

# Safer Recruitment Guidance for Schools

September 2025

<b>1</b>	<b>Summary</b>	Safer Recruitment Policy	
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# Introduction

Section 175 of the Education Act 2002 places a duty on the governing bodies of maintained schools and further education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Section 157 of the same Act places a similar duty on the proprietors of independent schools, including academies and free schools, to ensure that they safeguard and promote the welfare of pupils.

It is essential that all schools and colleges create a culture of vigilance where safeguarding is embedded in every aspect of practice. A key part of this culture is the implementation of robust safer recruitment procedures. These procedures must deter, identify, and prevent individuals who are unsuitable to work with children from gaining access to the education workforce.

Safer recruitment applies to all individuals who work in or with the school, including:

- Directly employed staff
- Volunteers
- Contractors
- Agency and third-party staff
- Self-employed individuals
- Alternate Provision (AP) providers

Schools must ensure that safeguarding and safer recruitment expectations are clearly outlined in all contracts with external providers. This includes the requirement for Letters of Assurance where applicable (see p.23).

When selecting a safer recruitment training provider, schools must confirm the accreditation and re-accreditation period. Kirklees Council requires re-accreditation every three years. Other providers may differ.

All recruitment must comply with relevant legislation, including:

- Children Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Equality Act 2010
- Police Act 1997 and associated regulations
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Sexual Offences Act 2003
- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023

Any future amendments to these laws and guidance will also apply.

The School Staffing (England) Regulations 2009 (as amended in 2012, 2013, and 2014) set out the legal requirements for the appointment, discipline, suspension, and dismissal of staff. They also cover the use of supply staff, the single central record (SCR), and the provision of information in references regarding teacher capability

## Terms used within this Policy

- **Headteacher** – This term includes Principals and Chief Executive Officers (CEOs).
- **Governor** – This term includes Trustees and Directors.
- **School** – This term refers to all types of educational establishments, including Academies, Multi-Academy Trusts (MATs), Free Schools, and Independent Schools.

## Purpose of the Policy

In line with the legislation outlined above, all schools that employ staff or engage volunteers, contractors, self-employed individuals, agency workers, or third-party staff must adopt a consistent and rigorous approach to recruitment and selection. The aim is to ensure that those recruited are suitable to work with children.

The purpose of safer recruitment is to:

- **Deter**  
From the outset of the recruitment process, it is important to send a clear message that the school has a robust recruitment procedure and does not tolerate any form of abuse. Wording in advertisements and recruitment materials should reflect this and act as a deterrent to unsuitable applicants.
- **Identify and Reject**  
While it may not always be possible to deter all unsuitable individuals, careful planning of the interview and selection process can help identify those who are not suitable. This includes asking appropriate questions, setting relevant tasks, and gathering the right information.
- **Prevent and Reject**  
Even with a thorough recruitment process, there is no guarantee that an inappropriate appointment will not occur. However, it is never too late to act. A strong induction process, clear policies and procedures, regular safeguarding training, and a culture of vigilance can help prevent abuse and identify concerns early.

This policy ensures that every stage of the recruitment process includes measures to deter, identify, prevent, and reject individuals who are unsuitable to work with children.

The policy also ensures compliance with all relevant legislation, statutory guidance, and best practice in safer recruitment and safeguarding in education.

The school will record all relevant recruitment checks in the Single Central Record (SCR). Where appropriate, copies of these checks will be retained in individual personnel files, in line with legal and best practice requirements.

## Recruitment Panels

The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 require that the governing bodies of maintained schools and the management committees of pupil referral units (PRUs) ensure that at least one person involved in interviewing has completed safer recruitment training.

Governing bodies and management committees may choose an appropriate training provider and are encouraged to seek advice from their local safeguarding partners when doing so.

Panel members will be appointed or selected in line with the requirements set out in:

- The School Staffing Regulations
- Further Education Providers' guidance
- Independent School Standards
- Any other relevant regulations
- Or as otherwise determined by the Governing Body or Management Committee

The recruitment and selection process, particularly interviews, will be conducted by a panel of **two or more people**. Wherever possible, appointment panels will consist of an **odd number of at least three members**.

All panel members should ideally be involved in every stage of the recruitment process. However, it is essential that **at least one panel member trained in safer recruitment is involved throughout**.

# Recruitment and selection process

This section focuses on ensuring potential applicants are given the right messages about the school and college's commitment to recruiting suitable people.

It is vital that governing bodies and proprietors create a culture that safeguards and promotes the welfare of children in their school or college. As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges.

Governing bodies and proprietors should ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of this part (Part three) of this guidance.

## 1. Policy Framework and Principles

To support the school's commitment to safer recruitment, the following principles will apply:

- The school's safeguarding statement of intent will be included in all relevant publicity and recruitment materials, including websites, advertisements, candidate information packs, and person specifications.
- All recruitment processes will comply with the Equality Act 2010 and the Public Sector Equality Duty 2011.
- A safer recruitment-trained individual will review all applications as part of the shortlisting process.
- All interview panels will include at least one member who has completed safer recruitment training. This will typically include senior staff such as Headteachers, Deputy Heads, or Governors. Kirklees Council requires re-accreditation of safer recruitment training every three years, unless national policy changes require earlier renewal.
- Where a positive DBS check is returned, a risk assessment will be completed, and the final decision on appointment will be made by the Headteacher (see Appendix 2 for the risk assessment template).
- Safeguarding requirements will be included as conditions in all contracts, grants, and service-level agreements. Inspection and compliance mechanisms will be built into these arrangements.
- No prospective employee will begin work until all relevant pre-employment checks have been completed, received, and verified.
- The Single Central Record (SCR) will be monitored and reviewed by the Headteacher, Designated Safeguarding Lead (DSL), or Business Manager. The Safeguarding Link Governor will be updated on a termly basis regarding the SCR.

## 2. The Applicant/Employee's Duty to Disclose Information

A central feature of safer recruitment and ongoing employment is the requirement for all applicants and existing employees to disclose any convictions or cautions as part of the recruitment process.

Failure to disclose relevant information will be treated as a potentially serious breach of trust and confidence. This may result in disciplinary action, which could include dismissal for existing staff or withdrawal of an offer for applicants. (For further details, refer to Appendix 4.)

### 3. Roles and Responsibilities

The Headteacher is responsible for ensuring the school has the following safer recruitment processes in place:

- Considering positive disclosure information received from the Disclosure and Barring Service (DBS) and determining whether the appointment should proceed, with decisions recorded appropriately (see Appendix 2).
- Ensuring that relevant partner agencies and organisations are aware of their safeguarding responsibilities through appropriate communication and training.
- Making the protection of children and young people a condition of awards, grants, and service-level agreements when commissioning or contracting services. Inspection mechanisms must be built into contracts to audit compliance.
- Delegating responsibilities to suitably trained and experienced staff where appropriate, while retaining overall accountability for decisions and advice given.
- Monitoring training delivered to organisations on safer recruitment, particularly when legislation or guidance is updated, in conjunction with the Designated Safeguarding Lead (DSL) and Safeguarding Governor.
- Progressing all DBS checks for new starters in conjunction with the school's DBS provider.
- Undertaking DBS checks for non-employed groups at school level, such as volunteers and governors.
- Monitoring safer recruitment systems and procedures and reporting any concerns to the Headteacher and DSL.
- Managing the Single Central Record (SCR) in conjunction with the DSL and Safeguarding Governor.
- Overseeing the induction of new staff and ensuring relevant safeguarding training is completed before employment begins.
- Managing employee and recruitment documentation on appropriate systems to ensure accessibility for audit purposes.
- Ensuring all DBS checks for new starters are completed in collaboration with Business Managers.
- Referring any positive DBS checks to the Headteacher for a final appointment decision.
- Including the school's safeguarding statement of intent in all recruitment materials, including websites, advertisements, candidate information packs, and person specifications.
- Undertaking termly checks of the school's SCR.
- Providing ongoing support and training to School Leaders and Business Managers.
- Reviewing the annual report detailing DBS checks from each individual school.
- Escalating any known safeguarding risks to the relevant Headteacher.
- Reviewing the Safer Recruitment Policy annually to ensure alignment with current legislation and guidance.
- Ensuring adherence to Safer Recruitment standards across the school.
- Ensuring the policy is communicated effectively and made accessible to all staff.
- Ensuring all staff complete relevant training in accordance with the school's training requirements.

## 4. Single Central Record (SCR)

The school will maintain a Single Central Record (SCR) of safeguarding checks in line with the requirements of *Keeping Children Safe in Education 2025*. The SCR will be held on the school's management system and will include all individuals working within the organisation on a paid or voluntary basis. This includes:

- Teacher trainees on salaried routes
- Agency and third-party supply staff
- Governors

The SCR must clearly indicate whether the following checks have been completed, or certificates obtained, along with the date of completion or receipt:

- All required checks for staff employed directly or via an agency, and any individuals identified as working in regular contact with children
- Identity verification: confirmation that relevant identification has been checked and dated
- Children's Barred List check (formerly List 99), where the individual is engaged in regulated activity
- Enhanced DBS disclosure: date and certificate number
- Prohibition from teaching check
- Online checks (see Appendix 5 for guidance)
- Additional checks for individuals who have lived or worked outside the UK
- Qualification verification, where qualifications are a requirement of the role (e.g. Qualified Teacher Status)
- Evidence of permission to work in the UK
- Section 128 check (for management roles including Governors and Trustees)
- Written confirmation from any agency or third-party organisation that all required checks have been completed. This includes confirmation that an enhanced DBS certificate has been obtained by the employment business or other relevant organisation.

New organisations working within the school will receive training on how to develop and maintain the SCR.

The SCR will be monitored termly by the school's senior leadership team and the Safeguarding Governor. Feedback and guidance will be provided following each review to ensure compliance and continuous improvement.

## 5. Job Descriptions and Person Specifications

When a vacancy arises due to an employee leaving or moving to a different role, it must not be assumed that a direct replacement is required. A review of the existing job description should be undertaken to determine whether the role still meets the current needs of the school. The requirements for any replacement or new role will be analysed before drafting the Job Description and Person Specification.

Where a post requires a DBS Disclosure, this must be clearly stated in both the job description and person specification. Given the nature of work in schools and the regular contact with children, it is expected that all posts will require an enhanced DBS Disclosure and, in most cases, a check of the Children's Barred List.

If the post is subject to the Disqualification under the Childcare Act 2006, this must also be reflected in the person specification.

- All job adverts include a safeguarding statement.
- Job descriptions and person specifications reflect safeguarding responsibilities.
- Inclusive language is used throughout, avoiding outdated terms (e.g., "disorder" or "spectrum").

## Job Descriptions

All job descriptions must follow the school's approved template and include:

- Post title and grade
- Main duties and responsibilities, including safeguarding responsibilities
- Scope of the role within the organisation
- General statements applicable to all roles, such as equal opportunities and health and safety requirements
- The extent of contact with children and young people, and the general responsibility for safeguarding in line with the school's commitment to child welfare

## Person Specifications

All person specifications must follow the school's approved template and include:

- Required qualifications
- Professional registrations (if applicable)
- Requirement for an Enhanced DBS Disclosure and whether the post is subject to the Childcare Act 2006
- Whether the post involves regulated activity and requires a Children's Barred List check
- Required knowledge, skills, and competencies
- Specific training requirements
- Commitment to health and safety and safeguarding
- Awareness of and commitment to equal opportunities

The person specification must clearly indicate whether each criterion is:

- Essential – criteria without which the job cannot be performed
- Desirable – criteria that are not essential but may support the selection process if multiple candidates meet the essential criteria

Person specifications will also include the following statement:

Applicants invited to interview should note that the interview (and any additional tasks, if applicable) will focus on the requirements of the role and explore issues related to safeguarding and promoting the welfare of children, including:

- Motivation to work with children and young people
- Ability to form and maintain appropriate relationships and personal boundaries
- Emotional resilience when working with challenging behaviours
- Attitudes towards the use of authority and maintaining discipline

## 6. Advertising the Role

The job advertisement provides potential applicants with their first impression of the school. It is essential that the advert communicates the school's commitment to safeguarding and protecting the welfare of children and young people.

All advertisements will include the following safeguarding statement:

*“Our school is committed to safeguarding and promoting the welfare of children and young people. Therefore, we expect all workers, volunteers, and employees to share this commitment. All appointments are subject to satisfactory pre-employment checks, including a satisfactory Enhanced criminal records with Barred List check through the Disclosure and Barring Service (DBS). It is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity). CVs will not be accepted.”*

**6.2** All prospective applicants will receive a recruitment pack containing the following materials:

- Application form
- Job description
- Person specification
- Interview arrangements and/or selection procedure
- General information about the school and local area (where relevant)
- Any other relevant documentation or details

## **7. Application Process**

The school's standard application form must be used for all recruitment. CVs will not be accepted. The application form ensures that consistent and detailed information is collected from all applicants, which is critical to the safer recruitment process.

For all external recruitment, the application form will include, as a minimum:

- Personal details: full name, any former names, date of birth, current address, National Insurance number, and (for teachers) Teacher Reference Number
- Qualifications
- Present (or most recent) employment and reason for leaving
- Full history since leaving school, including education, employment, voluntary work, and explanations for any gaps
- Details of appropriate referees (see Section 9 – References)
- A personal statement addressing the criteria outlined in the person specification
- A declaration that the post is exempt from Section 4(2) of the Rehabilitation of Offenders Act 1974, under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, and a signed self-disclosure of any unspent and relevant spent criminal offences (see Appendix 2)
- A signed declaration confirming that all information provided is true

For internally advertised posts, applicants must provide updated details to reflect any changes since their original application, along with new signed declarations. If a fully completed application form is not held on file, a new full application form must be completed and signed.

Volunteers will be required to complete an application form that includes:

- Personal details
- Previous employment, voluntary work, and other relevant activities
- General information about their motivation for applying for voluntary work
- A signed declaration regarding any criminal record
- Where applicable, a declaration to meet the childcare disqualification requirements under the Childcare Act 2006
- A signed declaration confirming the accuracy of the information provided

## 8. Longlisting and Shortlisting

Recruitment for some positions may involve a two-stage process: longlisting followed by shortlisting. Whether both stages are used or only shortlisting, the same principles will apply. Longlisting and shortlisting must be conducted by at least two people (ideally three), including one or more members of the interview panel. Notes must be recorded on each application form, identifying any queries or gaps in employment history.

The criteria used for longlisting and shortlisting will be based on the person specification and job description for the post. This ensures that the process includes criteria specific to working with children, as well as other essential requirements for the role.

Panel members conducting the process will:

- Ensure consistency by assessing each application against the criteria, including safeguarding-related criteria
- Use a structured approach (e.g. a scoring grid) to support fair and transparent decision-making
- Take time to scrutinise applications thoroughly and identify any concerns
- Check that each application is fully completed; incomplete applications may be returned or excluded from the process
- Highlight any gaps in employment or education for further exploration at interview
- Look for clear evidence that the applicant meets the criteria set out in the person specification and job description
- Apply the criteria equally to all applicants
- Normally shortlist only those who meet all essential criteria. However, if clarity is lacking, the panel may choose to shortlist and explore the issues further during the interview

Authority to recruit within each school setting is delegated by the Headteacher. This authority **cannot be further delegated**, and each appointment must be agreed by the Headteacher.

## 9. References

References are a vital part of the recruitment process and help gather comprehensive information about potential new recruits. Testimonials provided by applicants or open references (e.g. “to whom it may concern”) will not be accepted. The following standards must be applied:

- References must be requested prior to interview. Any exceptions must be discussed and agreed with the recruiting chairperson.
- A comparison must be made between the reference and the application form. Any discrepancies or inconsistencies must be raised with the candidate.
- One referee must be the current employer and must be someone with appropriate seniority and authority (not a colleague).
- If the candidate is currently unemployed, verification of their most recent employment and reason for leaving must be obtained from their last employer.
- If the employer is/was a school, the referee must be the Headteacher or a member of the Senior Leadership Team (SLT).
- If the applicant has previously worked with children but is not currently doing so, a referee must be the most recent employer in a role involving work with children.
- Where references are provided electronically, the source must be verified (e.g. by phone). A note of this verification must be kept on the candidate’s personal file if appointed.
- References must be requested directly from the referee. Open or agreed references must not be relied upon.

Reference requests must be issued using the school’s Reference Pro-Forma, which ensures consistency and that all relevant questions are asked. The standard Reference Pro-Forma will request information on:

- Capacity in which the applicant was employed, dates of employment, quality of work, relationships with colleagues, parents, and pupils, strengths, areas for development, honesty, punctuality, and reliability
- Any current disciplinary or capability warnings, or warnings that were current at the time of leaving
- Any disciplinary or capability action that is pending or unresolved
- For teaching roles, any capability proceedings within the last two years
- Details of all substantiated LADO outcomes
- Details of any expired warnings relating to the safety and welfare of children or behaviour towards children
- Reason(s) for leaving, if no longer employed
- Whether the referee would re-employ the applicant and whether they recommend the applicant for the post

On receipt, references must be carefully scrutinised to ensure that all specific questions have been answered satisfactorily. Where responses are vague, incomplete, or raise concerns, the referee should be contacted directly for clarification. All references should be obtained directly from the referee using their official work contact details; open testimonials or references provided by the candidate are not acceptable.

References must be compared against the candidate’s application form to identify any discrepancies, anomalies, or omissions. Any inconsistencies should be discussed with the candidate during the interview or prior to appointment confirmation.

## 10. Assessment Process

The interview process must allow sufficient time for any discrepancies in a candidate's application or references to be scrutinised and clarified. All candidates must undergo the following checks and assessments:

- **Verification of Qualifications:** Original qualification certificates must be presented and photocopied. Copies for successful candidates should be retained in their personal file and recorded on the Single Central Record. For unsuccessful candidates, copies must be securely destroyed.
- **Employment History and Gaps:** Any gaps in employment or frequent changes in employment or location must be explored during the interview. Valid reasons may include travel, family responsibilities, bereavement, or illness. These explanations must be documented and signed by the candidate.
- **Attendance Record:** Candidates must disclose their attendance history, which should be discussed and considered as part of the overall assessment.
- **Criminal Record Disclosure:** Any criminal history must be disclosed and discussed, with appropriate safeguarding considerations applied.
- **Reference Issues:** Any concerns or inconsistencies arising from references must be addressed during the interview.
- **Safeguarding Attitudes and Knowledge:** The candidate's understanding of safeguarding and their attitude towards working with children must be actively explored through targeted questioning.

All interviews must be conducted face-to-face, which may include secure video communication where appropriate.

### Interview Panel Preparation

Prior to interviews, the Panel will convene to prepare:

- A consistent set of core questions for all shortlisted candidates.
- Follow-up questions tailored to individual responses.
- Agreement on desired responses and indicators of concern.
- Allocation of questioning responsibilities and note-taking duties.

A structured interview grid will be used to record questions, responses, and scores, enabling fair comparison and identification of the strongest candidate.

Safeguarding-related questions will be included for all roles, with depth and focus adjusted according to the nature and level of the post. These questions will assess motives, attitudes, awareness, and understanding of child welfare.

### Additional Assessment Methods

Depending on the role, supplementary assessment tools may be used, including:

- Presentations
- Role plays
- Group exercises
- Observations (e.g., teaching or pupil interaction)
- Written tests
- Data analysis or in-tray exercises
- Pre-interview tasks submitted in advance

These methods provide a broader understanding of the candidate's suitability and competencies.

## 11. Safer Recruitment Training

In accordance with statutory guidance and best practice, every interview panel must include at least one senior member of staff and/or a Governor who has successfully completed accredited safer recruitment training.

This training is essential for:

- Headteachers and other senior leaders involved in recruitment.
- Nominated Governors with oversight of staffing and safeguarding.
- Designated staff members responsible for recruitment processes.

The training ensures that panel members are equipped to:

- Recognise and respond to potential safeguarding concerns.
- Conduct interviews that explore candidates' suitability to work with children.
- Understand the legal and procedural requirements of safer recruitment.
- Apply consistent and fair assessment criteria.

Training should be refreshed periodically to ensure continued compliance with current legislation and guidance, such as *Keeping Children Safe in Education 2025*.

## 12. Pre-Employment Checks

No candidate will be offered a post unconditionally. All offers of employment are subject to the satisfactory completion of all required pre-employment checks. These checks must be clearly communicated to candidates during the interview process. A conditional offer may be made, but it must not be confirmed until all checks have been completed, verified, and recorded on the **New Starter Checklist**, which is placed at the front of the personnel file.

The following checks must be completed:

- **Identity Verification**  
Confirm the candidate's identity using original documentation.
- **Enhanced DBS Certificate**  
Obtain an enhanced DBS certificate including barred list information for those engaging in regulated activity.
- **Separate Barred List Check**  
If a candidate is due to start regulated activity before the DBS certificate is available, a separate barred list check must be completed.
- **Fitness to Work**  
Verify the candidate's physical and mental fitness to carry out the role. Relevant questions may be asked to assess capacity for the specific duties.
- **Right to Work in the UK**  
Confirm and retain evidence of the candidate's right to work in the UK for the duration of employment and for two years thereafter. If there is uncertainty, follow guidance on the GOV.UK website.
- **Overseas Checks**  
Where a candidate has lived or worked outside the UK, conduct any additional checks deemed appropriate.
- **Professional Qualifications**  
Verify all relevant qualifications. Use the Teacher Services system to confirm QTS status and completion of induction or probation.

Additional statutory checks include:

- **Prohibition from Teaching**  
Ensure candidates for teaching roles are not subject to a prohibition order issued by the Secretary of State or any legacy GTCE sanctions.
- **Section 128 Direction**  
For independent schools, academies, and free schools, confirm that candidates for management positions are not subject to a Section 128 direction. Management roles may include headteachers, deputy/assistant heads, business managers, and governors. The nature of the role, not the job title, determines whether this check is required.

## Commencement of Employment

No individual may commence employment until:

- The DBS certificate has been received and reviewed.
- The barred list check has been completed (for regulated activity).
- The individual has been checked against the **Teaching Regulation Agency (TRA)** prohibited list and Section 128 list, where applicable.

Where the DBS Update Service is used, a thorough check must be completed, and the physical certificate must be viewed as soon as practicable.

## Disclosure and Barring Service (DBS) clearance

All staff employed in roles that involve access to children, young people, or sensitive information about them must obtain the appropriate level of **Disclosure and Barring Service (DBS)** clearance prior to commencing employment.

### Required Checks

- All staff must undergo an **Enhanced DBS check**.
- Where the role involves **regulated activity**, the check must include the **Children's Barred List**.
- For roles not involving regulated activity, an Enhanced DBS check **without** the barred list may be sufficient.

### Definition of Regulated Activity

Regulated activity includes:

- Teaching, training, instructing, caring for, or supervising children (unsupervised).
- Providing advice or guidance on physical, emotional, or educational well-being.
- Driving a vehicle solely for children.

It also includes work in **specified places** (e.g. schools) where there is the opportunity for contact with children, excluding supervised volunteer roles.

### Frequency of Activity

To qualify as regulated activity, the work must be carried out:

- On more than three occasions in any 30-day period.
- At any time between 2am and 6am, if it involves face-to-face contact with children.

### Activities Always Considered Regulated

Regardless of frequency or supervision, the following are always regulated:

- **Personal care:** Assisting with eating, drinking, toileting, washing, bathing, or dressing due to illness, disability, or age.
- **Health care:** Provided by or under the supervision of a regulated health care professional.

## DBS Certificate and Disclosure

Once checks are complete, the DBS certificate is sent to the applicant. The school will receive notification from the DBS provider indicating whether the certificate is clear or contains information.

If the certificate contains information:

- The school must **view the original certificate**.
- A **risk assessment** must be completed (see Appendix 2).
- A **Senior Leader** must meet with the applicant to verify the information.
- The **Headteacher** must approve any decision to proceed with employment.
- The completed risk assessment must be retained on the personal file.

## Positive Disclosure

A “positive disclosure” includes:

- Convictions, cautions, reprimands.
- “Soft information” deemed relevant by the police.

The risk assessment must consider:

- Relevance to the role.
- Nature and seriousness of the offence(s).
- Time elapsed since the offence(s).
- Number and pattern of offences.
- Applicant’s age at the time.
- Any explanation provided.
- Whether the offence(s) were disclosed during application.

## Declaration

All applicants must sign the declaration included in the application form at the shortlisting or interview stage.

## 13. Verification of Identity

It is essential that the school verifies the identity of all individuals employed, ensuring that accurate records are maintained and that all staff are legally entitled to work in the UK.

- **Identity and Right to Work Documentation**  
All candidates must present original documentation to confirm their identity and right to work in the UK. Copies of these documents must be:
  - Verified and signed by the appropriate staff member.
  - Placed on the individual’s personnel file.
  - Logged on the Single Central Record.

Timing of Verification - Identity documents should ideally be seen at the interview stage. If this is not possible, they must be verified and copied prior to the individual commencing employment.

Acceptable Documents - Acceptable forms of identification include:

- Passport or national identity card.
- Birth certificate (with supporting documentation).
- Biometric residence permit or visa documentation (if applicable).
- Proof of address (e.g., utility bill, bank statement).

Failure to provide satisfactory evidence of identity and right to work will result in the withdrawal of any conditional offer of employment.

## 14. Prohibition from Teaching

To ensure compliance with statutory safeguarding requirements, schools must verify that any individual appointed to a teaching role is not subject to a prohibition order. This check has been mandatory since April 2014, and while retrospective checks are not required for staff employed before this date, all new appointments must be verified prior to commencing employment.

### 1. Applicability

- All candidates with Qualified Teacher Status (QTS) must be checked, even if the role is not a teaching post.
- Checks must be completed before the individual starts work.
- This requirement also applies to non-teaching staff who lead or supervise classes, such as Higher-Level Teaching Assistants (HLTAs) and Cover Supervisors.

### 2. Procedure

- Schools must register with the Teacher Regulation Agency (TRA) via the Teacher Services system. This is a free service. Guidance is available at: <https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>
- The following checks must be undertaken:
  - Qualified Teacher Status (QTS)
  - Induction completion
  - Mandatory qualifications for teaching pupils with hearing or visual impairments
  - Active teaching restrictions
  - Prohibition orders for misconduct or criminal convictions
  - Section 128 direction for management roles in independent schools, academies, and free schools
  - Suspensions or conditional orders from the former General Teaching Council for England (GTCE)
  - Induction or probation failure
- The individual's teaching record must be printed, placed in their personnel file, and the date of the check recorded on the Single Central Record.

### 3. Claiming the Teacher

- The checker must also 'claim' the teacher on the Teacher Services website to ensure ongoing access to their record and any future updates.

### 4. Section 128 Checks

- For roles involving school leadership or management, a Section 128 direction check must be completed. This applies to:
  - Headteachers, deputy/assistant headteachers
  - Business Managers
  - Governors
  - Central team members in leadership roles

The nature of the role, not the job title, determines whether a Section 128 check is required.

## 15. Barred List Check

The **Barred List Check** is distinct from the **Prohibition Order Check** and is operated by the Disclosure and Barring Service (DBS). It identifies individuals who are barred from working with children and is a critical safeguarding measure for roles involving **regulated activity**.

### 1. Requirement for Regulated Activity

- The Barred List must be checked for all individuals engaging in **regulated activity**.
- This check is typically completed as part of the **Enhanced DBS application process**.
- **It is unlawful** to request a Barred List check for individuals not engaged in regulated activity.

### 2. Legal Compliance

If a school knows or has reason to believe that an individual is barred, it is a criminal offence to allow that person to carry out any form of regulated activity.

### 3. Timing of the Check

Candidates must **not commence regulated activity** until the Barred List check has been completed and confirmed.

### 4. Stand-Alone Barred List Checks

In limited circumstances, a stand-alone Barred List check may be required:

- When an existing staff member moves from a non-regulated role to one involving regulated activity, and a new Enhanced DBS certificate is not required.
- When a new employee in regulated activity is permitted to start before the Enhanced DBS certificate is received.
- When a recruit transfers from a similar role in another maintained school with a break in service of **three months or less**, and a new Enhanced DBS certificate is not required.

## 16. Disqualification under the Childcare Act 2006 (DfE 2018)

Under the Childcare Act 2006, individuals may be disqualified from providing or managing relevant childcare. Schools must not employ a disqualified person in connection with relevant childcare provision. It is a criminal offence to do so unless the employer can demonstrate that they did not know, and had no reasonable grounds to believe, that the individual was disqualified.

### 1. Scope of the Regulations

These regulations apply to individuals who:

- Provide or manage **early years provision** (care for children up to and including reception age), including nursery and reception classes, and supervised activities such as breakfast clubs, lunchtime supervision, and after-school care.
- Provide or manage **later years provision** (for children under 8) outside of school hours, such as before and after school clubs.

Education or supervised activities for children above reception age during school hours are **not** included.

### 2. Responsibilities of the School

- **Headteachers** must be familiar with the statutory guidance and assess which roles fall within scope.
- Schools must exercise professional judgement, document risk assessments, and seek advice where necessary.
- If a role is within scope, applicants must be informed of the regulations and asked to complete a **disqualification declaration form** (see Appendix 3).
- If a declaration is made, it must be discussed with the candidate. Any offer of employment must be **conditional** pending the outcome of a waiver application.
- If a waiver is not granted, the conditional offer must be withdrawn.

### 3. Record Keeping

- Schools must maintain a record of staff employed in or managing relevant childcare.
- The **date of disqualification checks** must be recorded, either on the Single Central Record or in a separate register.
- Completed declaration forms must be retained in the personnel file.
- All personal information must be handled in accordance with the **Data Protection Act 2018** and **GDPR**.

### 4. Ongoing Monitoring

- Staff and volunteers in relevant roles must be reminded annually of their obligation to disclose any changes in circumstances that may affect their suitability.
- Any disclosures must be reported to the Headteacher immediately for appropriate action.

### 5. Wider Safeguarding Expectations

All staff, regardless of role, are expected to:

- Disclose any criminal charges, cautions, or convictions acquired during employment.
- Report any personal relationships or associations (online or offline) that may have safeguarding implications.

These disclosures allow the school to conduct appropriate risk assessments and uphold its safeguarding responsibilities.

## 17. Medical Clearance

Following a conditional offer of employment, all prospective employees must complete a Health Declaration Form. This is a key step in confirming the individual's mental and physical fitness to perform the duties associated with the role.

- The form must be completed after the offer is made, not during the application or interview stage.
- Responses will be reviewed, and where necessary, the school's Occupational Health provider may be consulted to undertake further assessment.
- The purpose of this process is to ensure that the candidate is medically fit to carry out the responsibilities of the post safely and effectively.
- Any concerns or recommendations arising from Occupational Health must be considered before confirming the appointment.

All medical information must be handled in accordance with the Data Protection Act 2018 and GDPR, ensuring confidentiality and appropriate use.

## 18. Verification of Qualifications and Professional Registrations

Where a post requires professional registration with a regulatory body—such as the General Teaching Council, Teacher Regulation Agency, or other relevant authority—this must be verified prior to appointment.

### Essential Qualifications and Registrations

If the person specification identifies professional registration as an essential requirement, the candidate must provide evidence of current registration. This includes, but is not limited to:

- Qualified Teacher Status (QTS)
- Registration with a professional teaching or childcare body
- Mandatory qualifications for specialist roles (e.g., SEN, visual/hearing impairment)

### Verification Process

- Original certificates and registration documents should be reviewed and verified.
- Copies must be placed on the individual's personnel file.
- The verification must be recorded on the Single Central Record.
- Where applicable, online systems such as the Teacher Services system should be used to confirm registration status.

### Timing

- Verification should ideally be completed at the interview stage. If not, it must be completed prior to the individual commencing employment.

Failure to provide satisfactory evidence of required professional registration will result in the withdrawal of any conditional offer of employment.

## 19. Right to Work in the UK

It is a legal requirement that all employers in the UK verify a candidate's right to work before employment begins. Failure to comply can result in significant penalties.

### Verification Process

#### Step 1 – Request Original Documentation

Candidates must provide original, acceptable documents or combinations of documents that prove their right to work in the UK. Photocopies or scanned versions are not acceptable for verification purposes.

#### Step 2 – Check Authenticity and Relevance

The school must take all reasonable steps to:

- Confirm the document is genuine.
- Ensure the photograph and personal details match the candidate.
- Verify that the document permits the individual to carry out the work offered.

#### Step 3 – Record Keeping

- Record the **date** the check was completed.
- Note the **name of the person** who verified the documents.
- Retain a copy of the verified documents on the candidate's **personnel file**.
- Log the check on the **Single Central Record**.

## 20. Overseas checks

Where a potential employee has **lived or worked outside the UK for six months or more within the last five years**, a UK DBS Disclosure alone will not provide a complete picture of their criminal record history. In such cases, additional checks must be undertaken to ensure a thorough assessment of the individual's suitability for employment.

### Additional Checks Required

In addition to standard pre-employment checks, the school will conduct further checks as appropriate, which may include:

- **Criminal Records Check for Overseas Applicants**  
Where available, a criminal records certificate from the relevant country must be obtained.
- **Letter of Professional Standing**  
For teaching positions, a letter of professional standing should be requested from the professional regulatory authority in the country where the applicant previously worked.
- 

*Note: As of January 2021, the Teacher Regulation Agency (TRA) no longer conducts checks for teachers who have lived or worked abroad.*

### Recording and Compliance

- The school's **Single Central Record (SCR)** must include confirmation of whether an overseas criminal records certificate was required and, if so, the **date it was seen and verified**.
- All documentation must be retained in the individual's **personnel file**.
- Where overseas checks are not available, the school must assess the risk and document the rationale for proceeding with the appointment.

## 21. Withdrawal of Conditional Offer

All offers of employment made by the school are **conditional** and subject to the satisfactory completion of all required pre-employment checks. These include, but are not limited to, identity verification, DBS clearance, reference checks, right to work in the UK, medical clearance, and qualification verification.

- A conditional offer—whether verbal or written—**does not constitute a guarantee of employment**.
- If any of the pre-employment checks prove to be **unsatisfactory**, the school reserves the right to **withdraw the offer** where it is deemed appropriate.
- **Advice must be sought from the Headteacher / HR provider and / or legal provider** prior to withdrawing any offer of employment to ensure consistency, fairness, and legal compliance.

All decisions to withdraw an offer must be documented and handled sensitively, with clear communication to the candidate.

## 22. Other Contact with our School

### Temporary / Short-Term Teachers Employed Directly by the School

- These teachers must be recruited with **the same safeguarding checks** as permanent staff:
  - **Enhanced DBS check**
  - **Prohibition from teaching check**
  - **Childcare Disqualification declaration** (if applicable)
  - **Identity verification**
- **Re-checking requirements:**
  - If not continuously employed, **DBS and prohibition checks must be repeated every 12 months**.
  - If there's a **gap of 3 months or more**, a **new DBS check is required** before they return to work.
- **Disqualification under the Childcare Act declarations** should be completed **annually** if relevant.
- **Responsibility for re-checks:**
  - If the teacher is **based at one school**, the school should **organise and fund** the re-check and encourage registration with the **DBS Update Service**.
  - If the teacher is **mobile and works only occasionally**, they should **arrange their own re-check** via a Local Authority or Umbrella Body and fund it themselves.

### Teacher or Teaching Assistant Training Students

- **Salaried trainees (e.g. School Direct)** are treated as employees and must undergo **full pre-employment checks**.
- **Non-salaried trainees** (e.g. university placements) are not employed by the school. The **supplying institution** (e.g. university or college) must provide **written confirmation** that all required checks have been completed:
  - Enhanced DBS check
  - Prohibition check
  - Childcare Disqualification declaration (if applicable)
  - Identity verification
- Schools must **verify the trainee's identity** on arrival but **should not request DBS certificate details**.
- These checks are part of the **Initial Teacher Training (ITT) criteria**, which now include stricter quality assurance and safeguarding standards

### Peripatetic Tutors & Agency Staff

This includes:

- **Agency supply teachers**
- **Music tutors**
- **Sports coaches**
- **Social workers**
- **Staff from other educational institutions**

## Key Requirements

- Schools must **obtain written confirmation** from the agency or employer that **all required pre-employment checks** have been completed:
  - **Enhanced DBS check**
  - **Barred list check** (if in regulated activity)
  - **Prohibition from teaching check**
  - **Childcare Disqualification declaration** (if applicable)
  - **Identity verification**
  - **Right to work in the UK**
  - **References and employment history**
- **Face-to-face interviews** and **safeguarding inductions** are expected for agency staff.
- If the school **does not receive confirmation**, the individual:
  - **Must not work unsupervised**
  - **Cannot engage in regulated activity**
  - **Must not start work until barred list clearance is confirmed**
- Schools must **verify the identity** of all external staff on arrival (e.g. passport, driving licence, or company ID).
- These requirements should be **written into contracts** with external providers.

## Volunteers

### General Principles

- Volunteers often have **unsupervised access to children**, so they must be treated with the same safeguarding rigor as staff.

### Checks Required

- **Identity check**
- **Two references**
- **Enhanced DBS check with barred list check** if the volunteer is in **regulated activity**:
  - Regular unsupervised teaching or care
  - Overnight stays (e.g. residential trips)
  - Personal care, even if one-off
- If the volunteer is **supervised**, and not in regulated activity:
  - A **risk assessment** should be completed
  - An **enhanced DBS check without barred list** may be obtained at the school's discretion
- **Disqualification from Childcare declaration** should be completed if relevant.
- If a volunteer becomes a **paid employee**, full **pre-employment checks** must be conducted, including a **new enhanced DBS check**.
- 

### Supervision Rules

- Volunteers **must not be left unsupervised** unless all checks are complete.
- For **one-off events** (e.g. school trips), volunteers do **not require a DBS check** but must be **supervised at all times**.

## Risk Assessing Volunteers

Schools must complete a written risk assessment for all volunteers not in regulated activity. This assessment helps determine whether an enhanced DBS check (without barred list) is necessary.

### Risk Assessment Should Consider:

- What is already known about the volunteer (e.g. previous involvement, reputation)
- Nature of the activity (e.g. classroom support vs. admin help)
- Needs and vulnerabilities of pupils
- Level and consistency of supervision
- Feedback from staff, other volunteers, and referees

If the volunteer is supervised while doing work that would otherwise be regulated activity, the nature of supervision must be documented in the risk assessment.

## Contractors

DBS Requirements:

- Regulated activity: Enhanced DBS with barred list check
- Regular contact but not regulated activity: Enhanced DBS without barred list check
- Occasional or no contact: No DBS required, but must be supervised

Additional Safeguarding Measures:

- Identity verification on arrival (e.g. company ID, passport)
- Signing-in procedures
- Letter of Assurance from the contractor confirming all checks have been completed
- Induction covering safeguarding and code of conduct

If the contractor is self-employed, the school may need to arrange the DBS check, as individuals cannot apply for enhanced checks themselves.

## Governors

All governors must undergo:

- Enhanced DBS check
- Identity verification
- Additional checks if they have lived or worked outside the UK
- Section 128 check (prohibition from school management)

Section 128 Direction:

This check ensures the individual is not barred from managing or governing schools. It applies to:

- Governors of maintained schools
- Trustees of academies and free schools

The Chair of Governors and Headteacher are responsible for ensuring these checks are completed and recorded in the Single Central Record (SCR)

## 23. Existing Staff

### When to Re-check Existing Staff

- If there are **concerns about a staff member's suitability to work with children**, schools must treat the situation **as if recruiting a new employee**.
- If a staff member has had a **break in service of more than 12 weeks**, all **pre-employment checks must be repeated**.
- If an employee **moves into regulated activity** from a non-regulated role, the school must conduct **all relevant checks for regulated activity**, including:
  - Enhanced DBS check
  - Barred list check
  - Prohibition from teaching check (if applicable)
  - Childcare Disqualification declaration (if applicable)

### Section 10: Duty to Refer to the Disclosure and Barring Service (DBS)

Schools have a **legal duty to refer** an individual to the DBS if both of the following apply:

#### Referral Conditions

1. The school **removes the person from regulated activity** (or would have done so if they hadn't left), due to safeguarding concerns.
2. The school believes the person has:
  - **Engaged in relevant conduct** (e.g. harmed or risked harm to a child or vulnerable adult)
  - **Satisfied the harm test** (even if no actual harm occurred)
  - **Been cautioned or convicted** of a relevant offence

## Examples of Relevant Conduct

- Physical, emotional, sexual, or psychological harm
- Possession of sexual or violent material
- Attempting or inciting harm

## Timing

- Referrals should be made **as soon as possible**, including in cases of:
  - Suspension
  - Redeployment to non-regulated activity
  - Dismissal
  - Resignation

Failing to make a referral **without reasonable justification** is a criminal offence and may result in a **fine of up to £5,000**.

## Section 11: Duty to Consider Referral to the Teaching Regulation Agency (TRA)

Schools must **consider referring** a teacher to the TRA if they are:

- **Dismissed or removed** due to **serious misconduct**
- Would have been dismissed if they hadn't resigned

## TRA Referral Process

- The TRA investigates cases of **serious teacher misconduct**, such as:
  - Criminal behaviour
  - Sexual misconduct
  - Violent behaviour
  - Failure to safeguard pupils
- If the TRA finds a case to answer, they may issue a **prohibition order**, preventing the individual from teaching in England.

Referrals can be made via the **Teacher Services website**, and outcomes must be recorded in the **Single Central Record (SCR)**.

## 24. Visitors

- Schools **must not request DBS checks or barred list checks** for general visitors (e.g. parents, guests).
- Visitors **must not be left unsupervised** with pupils under any circumstances.
- Head Teachers and Office Managers are responsible for ensuring that **all visitors are escorted and supervised** at all times.
- Professional visitors (e.g. social workers, therapists) must show ID and schools must be assured that their employer has conducted appropriate checks.

## 25. Alternative Provision

Where the school places a pupil with an alternative provision (AP) provider, the school **remains responsible** for the safeguarding and welfare of that pupil throughout the placement.

### Key Responsibilities:

- The school must be **satisfied that the AP provider meets the pupil's educational and safeguarding needs**.
- Before any placement begins, the **Head Teacher must obtain written confirmation** from the AP provider that **appropriate safeguarding checks** have been carried out on all individuals working at the establishment. These checks should be equivalent to those the school would perform for its own staff, including:
  - Enhanced DBS checks
  - Barred list checks (where applicable)
  - Identity verification and right to work

### Best Practice Includes:

- **Visiting the AP provider** to assess safeguarding arrangements and physical environment.
- Reviewing the provider's **Child Protection Policy**, health and safety procedures, and risk assessments.
- Ensuring the provider is **registered** if legally required (e.g. full-time education for 5+ pupils, or any pupil with an EHCP or looked-after status).
- Establishing a **contact and attendance plan**, including:
  - Daily attendance monitoring
  - Clear procedures for non-attendance
  - Regular contact with the pupil and provider
  - Scheduled reviews of progress and wellbeing

### Documentation:

- Written confirmation of safeguarding checks must be **retained securely** and be accessible to relevant staff.
- The school should maintain a **record of the pupil's placement**, including:
  - Objectives and expected outcomes
  - Monitoring and review dates
  - Pupil feedback and progress

## 26. Adults who supervise children on work experience

When our school organises work experience placements, we remain responsible for ensuring that the placement is **safe and appropriate** for the pupil.

### Safeguarding Responsibilities:

- The **Head Teacher** must ensure that the **placement provider has policies and procedures in place to protect children from harm**.
- The school should **discuss the nature of the supervision and frequency of contact** with the placement provider to determine whether any safeguarding checks are required.
- 

### DBS and Barred List Checks:

- If the adult supervising the pupil is:
  - **unsupervised**, and
  - **providing teaching, training, instruction or supervision frequently** (i.e. more than three days in a 30-day period or overnight), then the activity is likely to be considered **regulated activity**.
- In such cases, the school **may ask the employer** to confirm that the individual is **not on the DBS Children's Barred List**.
- Schools **cannot request a DBS check with barred list information themselves** for individuals supervising children under 16 in external placements.

### Written Confirmation:

- The Head Teacher should obtain **written confirmation** from the employer that:
  - Appropriate safeguarding checks have been carried out.
  - The individual supervising the pupil is **not a barred person**.
  - The employer understands their **legal duty** not to allow barred individuals to work with children.
- 

### Risk Assessment and Supervision:

- If a DBS check is not required, a **risk assessment** must be completed.
- The school should ensure that the pupil will be **appropriately supervised** at all times.
- The employer must be made aware of any **additional needs or vulnerabilities** the pupil may have.

## 27. Induction

All new staff and regular volunteers will receive **comprehensive induction training** to ensure they understand their safeguarding responsibilities and the school's policies and procedures.

### Induction Will Include (as a minimum):

- The **School's Child Protection Policy and procedures**
- The **Staff Code of Conduct / Safer Working Practices**
- The **Pupil Behaviour Policy**
- The **Whistleblowing Policy**
- The role and contact details of the **Designated Safeguarding Lead (DSL)**
- The **Medical Needs Policy**
- **Social Media / Acceptable Use / Online Safety Policies**
- **Evacuation and Lockdown Procedures**
- The **Health and Safety Policy**
- The **Attendance Policy**
- The **Anti-Bullying Policy**

### Statutory Guidance:

- All individuals will be provided with a copy of:
  - **Part 1 of Keeping Children Safe in Education (KCSIE) 2025**
  - **Annex A**, if they will be in direct contact with children.

### Confirmation and Support:

- Individuals will be asked to **confirm in writing** that they have read and understood these documents.
- If they are unsure of anything, they should **seek advice from the designated safeguarding staff**.

### Ongoing Training:

- Staff will be required to undertake **regular safeguarding training**, including updates when statutory guidance changes or when local safeguarding concerns arise.

## 28. A Safe Culture and On-Going Vigilance

It is never sufficient to assume that a safer recruitment process and robust induction arrangements alone will ensure pupil safety. A **strong safeguarding culture**, supported by **ongoing vigilance**, is essential to protect children and young people within the educational environment.

### Our Commitment to a Safer Culture:

The school will continue to strive to create and maintain a safer culture by:

- **Implementing clear policies and procedures**, and ensuring all staff and volunteers are aware of and understand them.
- **Setting and modelling acceptable standards of behaviour** for all adults working with or around children.
- **Establishing clear procedures for reporting concerns**, and ensuring everyone knows how to raise concerns and understands their responsibility to do so.
- **Taking concerns seriously**, and providing support to individuals who raise them.
- **Responding appropriately and proportionately** to concerns raised.
- **Providing robust induction arrangements** for all new staff and volunteers.
- **Ensuring regular safeguarding and child protection training** is undertaken by all staff.
- **Keeping safeguarding on the agenda**, through regular discussion at staff meetings, briefings, and training sessions.
- **Learning from experience**, including internal reviews and external case studies.
- **Maintaining a mindset of continuous improvement**, never assuming that enough has been done.

## 29. Letters of Assurance

An appropriate 'letter of assurance' would be on headed paper, personally addressed, dated, signed, and provided by the relevant authorised person on behalf of the individual concerned, for example by the agency on behalf of an agency worker.

The letter should include a statement of assurance that all the checks you specified in your contract for services have been undertaken, the date on which they were completed, and that they are satisfactory.

## 30. Online Searches

From September 2022 'online search' will be conducted on all shortlisted candidates, for more information see [Appendix 5](#).

## 31. Monitoring and Review

The school's policy on safer recruitment will be **reviewed annually**, or sooner if required, in response to:

- **Changes in statutory guidance**, including updates from the Department for Education (DfE)
- **Local safeguarding concerns or recommendations**
- **Lessons learned from safeguarding incidents or audits**

This ensures that our recruitment practices remain **current, compliant, and effective** in promoting the safety and wellbeing of all pupils.

# Appendix 1 – Letters of Assurance and School Contract Parameters

Our school must set out their safeguarding and safer recruitment requirements in any contract clearly between the organization(s) and school, as part of our school’s commitment to providing a safer environment. Our school expects our providers to have in place are the necessary safer recruitment processes and checks that we would otherwise perform as an employer. Our school will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). All providers will provide a Letter of Assurance (LOA) confirming safer recruitment and checks are in place, this LOA will be held with the school SCR.

**TABLE 1**

Kirklees Council recommend the following information is requested and confirmed in writing by the following parties:

- Agency worker (all staff groups)
- Contractors
- Third Party Organisations (e.g., Kirklees Council/ NHS/ Locala/ KNH etc.).

Item	Checklist
Written confirmation all Pre employment checks (role dependent) have been satisfactorily conducted	
At least one recruiter on the recruitment panel to be Safer Recruitment trained (refreshed every 3 years)	
Applications forms with complete employment history	
2 x verified references inc. questions on behaviours towards children, any ongoing or spent formal disciplinary issues, or substantiated LADO allegations and capability	
DBS (+Barred list) where appropriate	
Prohibition from Teaching	
S128 checks (role dependent)	
Qualifications (role dependant)	
Right to Work in the UK	
Appropriate checks for overseas employees	
Online checks as per Appendix 5 (role dependant)	
Disclosure under Childcare Disqualification Regulations 2018 and Childcare Act 2006	
Medical clearance (role dependant)	
Any disclosed information/Risk assessments shared with School / Academy	
Safeguarding awareness training	

## Use of school or college premises for non-school/college activities

Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement

## Appendix 2 – Positive Disclosure Risk Assessment

Item	Comment	
Name of applicant or employee		
Job role		
DBS number		
School		
Question	Applicable <i>delete as appropriate</i>	Comment
Did the applicant or employee disclose the issue(s) to you prior to the DBS disclosure?	Yes / No If 'No' state reason	
Does the applicant agree that the information detailed on the DBS is correct?	Yes / No If 'No', what do they think is correct and why?	
Were any offences or information related to behaviours in relation to children or adults at risk? <i>(Persons whose own children are subject to *CSC plans or any unsuitable behaviour in relation to vulnerable groups)</i>	Yes / No If yes give details	
Were any offences or information work related or in the context of a work setting? <i>(Persons who work paid or unpaid with vulnerable groups)</i>	Yes / No If yes give specify	
Are there any mitigating circumstances?	Yes / No If yes give details	
What is the applicant's attitude to the offence(s) now?	e.g., remorse, regret, denial	
Do the matters disclosed form any pattern which could increase the risk of re-offending? Can the person demonstrate what positive actions that are taking not to re-offend?	Yes / No If yes specify	
Is there any other information relevant to this Risk Assessment regarding the applicant, the work itself or the location/environment where the activities will take place?	Yes / No If yes specify	
<b>Level of Risk:</b> Please complete the level of risk posed by appointing / employing the applicant in this job. Give reasons. (High, medium, or Low risk) <i>What to consider when assessing risk – Nature, seriousness and relevance / How long ago it occurred / Was it a one off or part of a history / Circumstances of it being committed / Decriminalisation / Remorse / Has the candidate learned lessons or amended their circumstances or behaviours</i>		
Risk level:		
Reasons:		
Can protective measures be put in place to render the risk low? Yes / No		
Outline of the protective measures, e.g., curtailment of access to children/information: additional supervision; temporary changes of work location; temporary diversion of low-risk tasks or training.		
<b>Outcome of Risk Assessment – delete one of the following statements as appropriate</b>		
<b>I am satisfied</b> that based on the above, the criminal background of this person should not prevent them taking up the position.		
<b>I am not satisfied</b> that based on the above, the criminal background of this person should not prevent them taking up the position.		

\*CSC – Childrens Social Care

# Appendix 3 – Policy Statement on the Recruitment of Ex-offenders

It is a legal requirement that all registered bodies and prospective employers must treat DBS applicants who have a criminal record fairly and not discriminate because of a conviction or other information revealed. Registered Bodies and employers who are Regulated Activity Providers (including schools) are obliged to have a written policy on the recruitment of ex-offenders, which is available to DBS applicants at the outset of the recruitment process.

## Policy Statement

1. As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, The Trust complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. We undertake not to discriminate unfairly against any subject of a DBS check based on a conviction or other information revealed.
2. The Trust is committed to the fair treatment of its staff, potential staff, or users of its services, regardless of gender, pregnancy and maternity, ethnicity, culture, age, disability, sexual orientation, gender identity, religion or belief, marital and civil partnership status, education, learning styles, caring responsibilities, or offending background.
3. A summary of this policy on the recruitment of ex-offenders is available to all DBS applicants on request.
4. We actively promote equality of opportunity for all with the right mix of talent, skills, and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, knowledge, and experience.
5. As a Regulated Activity Provider (RAP) most paid employees of the Trust are in regulated activity with children and therefore subject to checks of the DBS children's barred list in addition to enhanced DBS certificate.
6. In relation to volunteers and contractors, we only request a DBS check after a risk assessment had indicated that one is both proportionate and relevant to the position concerned.
7. For those positions where a DBS check is required, all application forms, job adverts and recruitment briefs will contain a statement that a DBS check will be requested in the event of the individual being offered the position.
8. We expect all applicants to provide details of any criminal record history that is not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) order 1975 (as amended in 2013) at an early stage in the application process.  

Applicants should disclose details of any unspent convictions, cautions, reprimands, bind-overs, and final warnings you may have in addition to any criminal proceedings pending against you. You should not disclose any criminal history that would be protected or filtered.
9. We guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
10. We ensure that everyone within the Academy who participates in the recruitment process has been suitably briefed to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance on the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974 and its amendments and know how to access advice and support.
11. At interview, or on a separate occasion, we ensure that an open and measured discussion takes place about any relevant offences or other matter that may be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
12. We undertake to discuss any matter revealed in a DBS check with the person seeking the position before considering withdrawing a conditional offer of employment. This discussion and any subsequent risk assessment may be undertaken by our HR team or another trained member of our Senior Leadership Team.

## Appendix 4 – Declaration of Unspent and Relevant Spent Criminal Convictions

The purpose of requiring a self-disclosure as part of the application is to give candidates an opportunity to share relevant information about any convictions or cautions at an early stage. Disclosed information will not be used as a criterion for short-listing. Fair and objective assessment criteria will be applied. Information on self-disclosures will only be used in relation to short-listed candidates and will not automatically rule someone out. A full DBS check will still be conducted on making a conditional offer and the two sets of information compared. Note that applicants will only be asked about 'unspent and relevant spent' convictions, cautions, reprimands, and warnings and these will be the only ones appearing on Disclosure certificates. Other minor, older offences will be filtered out after the relevant time period. Those offences to be declared include:

- **Cautions** relating to an offence from a list (see below\*) agreed by Parliament
- **Cautions** given less than 6 years ago (where the individual was over 18 years old at the time of the caution)
- **Cautions** given less than 2 years ago (where the individual was under 18 years old at the time of the caution)
- **Convictions** relating to an offence from a prescribed list (see below)
- **Convictions** that resulted in a custodial sentence (regardless of whether served) Convictions given less than 11 years ago (where the individual was over 18 years old at the time of the conviction)
- Convictions given less than 5.5 years ago (where the individual was under 18 years old at the time of the conviction)
- Irrespective of the above list, **if individuals have more than one conviction then ALL convictions must be declared.**

\* The list referred to above includes a range of offences which are serious, and which relate to sexual offending, violent offending and/or safeguarding. It is never appropriate to withhold details of offences on this list. A list of offences which must always be declared has been derived from the legislation and can be accessed using the following link: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/756791/List\\_of\\_offences\\_that\\_will\\_never\\_be\\_filtered\\_PDF\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756791/List_of_offences_that_will_never_be_filtered_PDF_.pdf)

# Appendix 5 – Online Checks Framework

## Rational for the introduction of online searches within Safer Recruitment

Under the September 2022 amendments to KCSIE, Schools are required to consider conducting an ‘online search’ as part of your due diligence, this is help identify incidents or issues that have happened and are publicly available online.

The **KCSIE 2025 guidance** continues to recommend that schools "**should consider**" conducting online searches on shortlisted candidates. This is not a legal requirement but is considered best practice. Schools must be able to justify their decision if they choose not to conduct these checks.

Key clarifications include:

- Online searches are **not mandatory**.
- Ofsted **does not require** evidence of online searches on the Single Central Record (SCR).
- Searches must be **fair, consistent, and relevant to safeguarding**.

## Avoiding Discrimination

The DfE revised the terminology from “social media checks” to “online searches” to reduce the risk of bias and discrimination. Searches must:

- Be conducted **only on shortlisted candidates**.
- Avoid accessing **private or password-protected content**.
- Be **consistent across candidates** to avoid unfair treatment.

## GDPR Compliance (2025 Update)

Under the **UK GDPR and Data Protection Act 2018**, schools do **not need consent** to conduct online searches if it's part of their safeguarding duty. However:

- Candidates must be **informed in advance**.
- Searches must be **recorded and justified**.
- Data must be handled in line with the school’s **data protection policies**.

The **Data Use and Access Act 2025** further supports lawful processing for safeguarding purposes, reinforcing schools' responsibilities to manage personal data securely.

## Recommended Actions for Schools

1. **Update recruitment materials** to inform candidates of online searches.
2. **Add online searches to recruitment checklists**.
3. **Use a standardised pro forma** to record search outcomes.
4. **Train designated staff** to conduct searches fairly and consistently.
5. **Consult LADO or police** if serious concerns arise.
6. **Ensure supply agencies** are aligned with your vetting standards.

# Appendix 5 –

## Example - Online Search Checklists for Safer Recruitment

### Example A

Candidate Name: \_\_\_\_\_

Role Applied For: \_\_\_\_\_

Date of Search: \_\_\_\_\_

Search Conducted By: \_\_\_\_\_

### Pre-Search Preparation

- Candidate has been **shortlisted**.
- Candidate has been **informed** that an online search will be conducted.
- Searcher is trained in **fair and consistent search practices**.
- Search will be conducted using **publicly available information only**.

### Search Process

- Search includes general online presence (e.g., news articles, blogs, forums).
- Search excludes private or password-protected content.
- Search avoids social media unless relevant to safeguarding concerns.
- Search terms used:
  - Full name
  - Known aliases
  - Location
  - Previous employers (if relevant)

### Recording Findings

- No concerning information found.
- Concerning information found (details below):
  - Nature of concern: \_\_\_\_\_
  - Source/URL: \_\_\_\_\_
  - Date of publication: \_\_\_\_\_
  - Relevance to safeguarding: \_\_\_\_\_

### Post-Search Actions

- Information reviewed in line with **Ministry of Justice filtering rules**.
- If serious concerns arise, advice sought from:
  - LADO
  - Police
  - HR / Legal Team
- Decision made regarding candidate's suitability:
  - Proceed to interview
  - Withdraw from process
  - Further investigation required

### Documentation

- Checklist saved in recruitment file.
- Candidate informed of outcome if relevant.
- Data handled in accordance with **GDPR and school data protection policy**.

### Example B

Name of the shortlisted candidate	Record of where you searched, and what searches were used <i>(please note these terms are not exhaustive)</i>
Paul Smith	E.g., Google search for 'Paul Smith' 'Paul Smith Botswana' (or the country they worked in) 'Paul Smith convicted' 'Paul Smith Teacher' (or their previous role) Also, do searches under other or previous names disclosed by the candidate & record your search
<b>What (if anything) was found</b> - Record date of search and what was found or record date of search & 'Nothing found'	
Name of the shortlisted candidate	Record of where you searched, and what searches were used <i>(please note these terms are not exhaustive)</i>
Jane Smith	E.g., Google search for 'Jane Smith' 'Jane Smith Botswana' (or the country they worked in) 'Jane Smith convicted' 'Jane Smith Teacher' (or their previous role) Also, do searches under other or previous names disclosed by the candidate & record your search
<b>What (if anything) was found</b> - Record date of search and what was found or record date of search & 'Nothing found'	

