

Littledean Church of England Primary School and Pre-School

Safer Recruitment Policy

In accordance with statutory requirements and in keeping with our Christian Foundation, vision and ethos, Littledean C of E Primary School and Pre-School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. This is to be achieved through effective recruitment and retention of competent, motivated staff members who are suited to, and competent in their roles. Paying due regard to the Christian principles of dignity, respect and valuing all people, our school recognises the value of, and seeks to achieve a diverse workforce comprising different backgrounds, skills and abilities. As such, it is committed to a recruitment and selection process, which is systematic, efficient, effective and equal. In doing so, it upholds its obligations under law and national collective agreements not to discriminate against applicants on grounds of age, sex, sexual orientation, marital status, disability, colour, race, nationality, ethnic origin, religion or creed.

Introduction

The purpose of this policy is to ensure the practice of safe recruitment of staff appointed to work at Littledean C of E Primary School. It also sets out the minimum requirements to:

- attract the best possible applicants to vacancies;
- deter prospective applicants unsuitable for work with children;
- identify and reject applicants unsuitable for work with children.

Legal Framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- Rehabilitation of Offenders Act 1974
- Children Act 1974
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Amendment to the Exceptions Order 1975, 2013 and 2020

This policy has due regard to the guidance including, but not limited to, the following:

DfE (2024) 'Maintained schools governance guide'

DfE (2024) 'Academy trust governance guide'

DfE (2024) 'Staffing and employment advice for schools'

DfE (2022) 'ID checking guidelines for standard/enhanced DBS check applications from 1 July 2021'

DfE (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'

DfE (2024) 'Keeping children safe in education 2024'

DfE (2024) 'Recruit teachers from overseas'

Disclosure & Barring Service (2024) 'Regulated activity with children in England and Wales'

Home Office (2024) 'Employer's guide to right to work checks'

Definitions

Term	Definition
Regulated activity	<ul style="list-style-type: none">• Being responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.• Working for a limited range of establishments (known as specified places, which include schools and colleges), or in connection with the purpose of the establishment, with the opportunity for contact with children, but not including work undertaken by supervised volunteers.• Engaging in intimate or personal care or healthcare or any overnight activity, even if this only happens once. <p>Regulated activities do not include:</p> <ul style="list-style-type: none">• Paid work in specified places which is occasional and temporary and does not involve teaching or training.• Supervised activities which are paid in non-specified settings.• A supervised volunteer who regularly teaches or looks after children.
Teaching role	This refers to a role involving planning and preparing lessons and courses for pupils; delivering lessons to pupils; and assessing and reporting on the development, progress and attainment of the pupils. These activities are not teaching work for the purposes of KCSIE if the person carrying them out does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head Teacher to provide such direction and supervision.
Standard DBS	This provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.
Enhanced DBS	This provides the same information as the standard DBS, plus any additional information, e.g. interviews and allegations, held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.
Enhanced DBS with barred list check	This check is required for when people are working or seeking to work in regulated activity with children. This check allows for additional checks to be made as to whether the person appears on the children's barred list.
Children's	This is a list maintained by the DBS which covers individuals who are

barred list	unsuitable to work with children and vulnerable adults. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the candidate is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.
Section 128 check	This provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school (which includes academies and free schools). A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a governor of a maintained school.
Safer recruitment	This is the safeguarding and protection of pupils during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

Roles and Responsibilities

The governing board is responsible for:

- Agreeing and monitoring effective policies to ensure safer recruitment at the school is in accordance with the legal framework previously referenced in this document.
- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the school.
- Appointing an appropriate recruitment panel.
- Ensuring that at least one member of the recruitment panel has undergone safer recruitment training.
- Ensuring that all members of the recruitment panel understand their role. i.e. advisory or decision making.
- Monitoring the advertising of vacancies, assessing how they are being advertised and whether the adverts are maximising all of the opportunities to attract the appropriate candidates.
- Ensuring that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment as set out in KCSIE.
- Monitoring the school's SCR to ensure that the necessary vetting checks for employees are carried out.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.

The recruitment panel is responsible for:

- Creating the advert and ensuring it meets all the necessary requirements.
- Shortlisting the potential candidates with the aim of reducing the application filed and identifying those with potential to effectively undertake the role.
- Appropriately delegating responsibility for recruitment to the Head Teacher.
- Ensuring that the interview addresses safeguarding practices.
- Ensuring that the interview addresses the candidate's motivation, reasons for being interested in joining the school, and attitude towards working with children.
- Ensuring references have been received when requested.

- Ensuring that all references for shortlisted candidates are obtained prior to interview, properly scrutinised, and that information is not contradictory, unclear or incomplete, with clarification requested as appropriate.
- Asking previous employers of new staff members whether the individual has been subject to capability procedures in the last two years.
- Where possible, ensuring that the shortlisting panel and interviewing panel are comprised of the same people.

The appointing officer (School Business Manager) is responsible for:

- Managing the entire recruitment process.
- Acting as a point of contact between candidates and the school.
- Organising interviews with shortlisted candidates.
- Organising the staff files in accordance with agreed procedures.

The Head Teacher is responsible for:

- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the school.
- Ensuring that appropriate supervision of employees and volunteers is organised, and promoting the safety and wellbeing of pupils generally throughout the recruitment process.
- Ensuring that the successful candidate receives the appropriate induction and training.

During the recruitment process, and especially during the initial stages, the recruitment panel and the Head Teacher will be watchful of candidates displaying the following characteristics:

- No understanding or appreciation of children's needs.
- Expressing that they want the role to meet their needs at the expense of children.
- Using inappropriate language in relation to children.
- Expressing extreme views or views that do not support safeguarding practices.
- Displaying unclear boundaries with children.
- Providing vague answers when asked about their experience and being unable to explain gaps in their employment.

Planning, Advertising and Shortlisting

The job information and associated documents will be published online on the GCC job page and the school website. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.

The recruitment panel will comprise an appointing officer, who is responsible for the management of the entire recruitment process, and at least two other members of staff, with the Head Teacher usually being one of these. The recruitment panel will be an odd number so majority votes can be cast. At least one member of the recruitment panel will have successfully completed up-to-date safer recruitment training. The recruitment panel will create the advertisement.

Once a vacancy has been identified, the school will allow an appropriate amount of time for planning and structuring the recruitment process.

The governing board/recruitment panel/Head Teacher/appointing officer will:

- Decide on the recruitment timeframe.
- Decide who will be involved in the process and what their roles will be.
- Prepare documents/information that will be provided to candidates, ensuring that documentation contains a clear message about safeguarding, the checks that will be carried out and that references will be sought.
- Ensure that application packs, where relevant, state that candidates must be willing to sign a self-declaration form to obtain information about staff disqualification, in line with the Childcare Act 2006.

Advertising

The school will consider the following information when advertising for a role within the school:

- The skills, abilities, experience, attitude and behaviour required for the post.
- The safeguarding requirements, including to what extent the role will involve contact with children and whether the appointed staff member will be engaging in regulated activity.

Advertisements will include:

- A statement of the school's commitment to safeguarding and promoting the welfare of pupils whilst making it clear that safeguarding checks will be undertaken.
- The safeguarding responsibilities of the post as per the job description and person specification.
- Information surrounding whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Vacancies will be advertised through the GCC job site with a link to access an application form and a phone number to call to receive additional information.

Application Forms

Applicants will be required to provide the following:

- Personal details, e.g. their current and former names, current address and national security number.
- Details of their most recent employment, including the reason for leaving.
- Full employment history, including explanations for any gaps in their employment.
- Qualifications, the awarding body and the date of the award.
- Details of references.
- A statement of their personal qualities and explanation of why they meet the person specification to be a suitable candidate for the role.
- A declaration form outlining whether they are barred from teaching.

The school will not accept a CV in lieu of a completed application form.

Candidates who are shortlisted will meet all essential aspects of the person specification requirements. The school will ensure that the shortlisting process is as systematic as possible, and that the recruitment panel read all applications. Candidates will be assessed against the same shortlisting criteria to ensure a fair process.

Shortlisting

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or disclosure of any information making them unsuitable to work with children.

Only those candidates who have been shortlisted will be asked to disclose any relevant information including:

- If they have a criminal history.
- If they are included on the children's barred list.
- If they are prohibited from teaching.
- If they are prohibited from taking part in the management of an independent school.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.

Applicants will need to sign a declaration, which confirms that the information they have provided is true.

When shortlisting candidates, the school will:

- Ensure that at least two people carry out the shortlisting proceedings – ideally, these two people will also conduct the interview.
- Assess whether there are any inconsistencies or gaps in the candidate's employment and consider the reasons given for them.
- Explore all potential concerns.

Additionally, the school will consider carrying out an online search as part of its due diligence on shortlisted candidates. Online searches will be used to identify any incidents or issues that have happened and are publicly available online.

The school will inform shortlisted candidates that online searches may take place and that aspects of this search may be explored with the applicant at interview where relevant.

Requests for further information from candidates will be replied to promptly. All applications will be replied to with a letter/email notifying candidates whether they have been shortlisted or not.

Invitation to Interview

Once a shortlist has been confirmed, the candidates to be invited for interviews will be contacted by the appointing officer and suitable interview times will be decided. The recruitment panel will ensure that all shortlisted candidates receive information about the interview arrangements, how they will be conducted and what documents they should bring.

Pre-Interview Checks

The recruitment panel will complete the necessary per-interview checks, which could include the following:

- Requesting two references from each shortlisted candidate directly from the referees where possible, one reference will be obtained relating to the role in which the candidate worked with children.
- Verifying that the candidate has qualifications or experience relevant to the post.
- Checking references against application forms and noting down discrepancies or concerns, and following up these concerns with referees.
- Checking and, where necessary, following up candidates' self-declaration forms.

Requesting References

Once a candidate, including an internal candidate, has been shortlisted for a position, references will be requested and scrutinised by the recruitment panel. Any concerns will be resolved satisfactorily prior to confirming appointment. References will always be requested directly from the referee and from a senior person with appropriate authority, rather than a colleague. The school's standard request form will always be used to obtain references.

References will be requested in written form from the candidate's current employer – if they are unemployed, verification of their most recent period of employment and reasons for leaving will be obtained from their previous employer. Wherever possible, at least one reference will be from employment through which the candidate has worked with children.

If the candidate has never worked with children, the school will ensure that a reference from their current employer is received.

If the candidate is a school leaver or has not been in work for over two years, a character reference will be requested.

When a candidate is applying for a teaching role (including the role of Head Teacher). Information about the details of any capability procedures in the previous two years that they may have been subject to, and the reasons for these, will be requested from their current or former employer.

Open references, e.g. 'to whom it may concern' testimonials, and unverified information provided by the candidate as part of the application process, will not be relied upon. Electronic references will be checked to ensure they originate from a legitimate source.

Checking References

References will be checked upon receipt to ensure that all questions have been answered satisfactorily and that information is not contradictor or incomplete. The referee will be contacted to provide further clarification where appropriate, e.g. if some answers are vague or insufficient, or contradictory information has been provided. The reference will be compared for consistency with the information of the candidate's application form. Discrepancies between the reference and application form will be discussed with the candidate at interview.

Where a reference appears incomplete or other concerns arise, the school will carry out one of the following actions:

- Call the referee to discuss the reference further.
- Email the referee the reference for confirmation of its accuracy.

Before making a decision not to appoint a candidate based on an unsatisfactory reference, the recruitment panel will consider if HR advice is necessary. Once the decision is made, the Head Teacher will record this on the recruitment file as the reason for non-appointment.

All members of staff who provide a reference will be responsible themselves for checking the content to ensure that it only contains factual and verifiable statements. If there is any doubt about whether to include information, caution will be exercised and it will be omitted. Alternatively, advice will be sought from a senior figure, e.g. the Head Teacher or the Chair of Governors.

When obtaining and checking references, the school will:

- Not accept open references, e.g. to whom it may concern.
- Not rely on applicants to obtain their reference.
- Ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority.
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed.
- Secure a reference from the relevant employer from the last time the applicant worked with children, where applicable.
- Always verify any information with the person who provided the reference.
- Ensure electronic references originate from a legitimate source.
- Contact referees to clarify content where information is vague or insufficient.
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
- Establish the reason for the candidate leaving their current or most recent post.
- Ensure any concerns are resolved satisfactorily before appointment is confirmed.

Providing References

References will only be provided once written consent has been obtained from the person requesting a reference.

The member of staff providing a reference will follow this policy's procedures and the prospective employer's requests as much as is reasonably possible, e.g. if a pro-forma is provided, they will complete the form. If the reference is not requested in a specific format, the member of staff will decide the most appropriate method, e.g. a pro-forma or a letter-formatted reference.

The Head Teacher will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Staff members will make the Head Teacher aware when they have been asked to provide a personal reference, e.g. for a current or former colleague. The staff member will make it clear within the reference that it is a personal one and is not written for or on behalf of the school. The staff member will use their own paper or an email address unaffiliated with the school and ensure that the reference is not linked to the school in any way.

Details of any capability procedures in the previous two years for a teacher (including Head Teacher) or former teacher at the school, and the reasons for these, will be provided if requested.

If, as part of a settlement agreement, the school has agreed to provide a reference for a member of staff, the Head Teacher will ensure it is provided in line with the agreement and this policy. In circumstances where new evidence emerges that indicates information provided in the reference is incorrect, the Head Teacher will decide if the reference is changed or withdrawn, with legal advice sought where necessary, and will notify the employee of any decision first.

The school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

Content of references

Basic information will always be expected in references received and provided, e.g. skills, knowledge, duties undertaken, experience working with children, and personal characteristics, in addition to any information relating to safeguarding. Further relevant comments will be made as much as is reasonably possible in line with the employer's requests, provided they are verifiable and objective, e.g. through appraisals or attendance records.

References will contain only factual and verifiable information and will not include speculation, e.g. about a former employee's suitability for a job, or hearsay. The person providing the reference will ensure all comments have a factual basis and that an

impression is not given which is misleadingly positive or negative. Performance issues or concerns which have not been discussed or raised with the employee beforehand will not be mentioned.

All members of staff providing references will be made aware that information provided verbally to the prospective employer is subject to the same duties as written information and will avoid making verbal statements. Where it is necessary or appropriate, verbal information will be provided only in line with this policy's procedures, e.g. all statements must be verifiable and objective.

Previous Disciplinary Action

The recruitment panel will ensure that any references requested by the school include a section asking for any past disciplinary action or allegations to be disclosed. Any disclosures will be carefully considered when assessing the candidate's suitability for the role, in line with this policy.

Information from DBS checks will not be included in references provided by the school. Information regarding criminal offences from other sources will not be included, unless the Head Teacher deems it appropriate and HR advice has been sought.

When providing references, the disclosure of information about past disciplinary action or allegations not relating to safeguarding will be provided where it is deemed appropriate, e.g. it is relevant to the staff member or former staff member's suitability for the role. Information relating to disciplinary action will generally only be disclosed if penalties or sanctions remain in place for the employee.

Allegations which were proven to be unsubstantiated, unfounded, false or malicious, e.g. relating to misconduct, will not be included in a reference – this includes if it is a history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.

If an allegation exists which has yet to be investigated or an investigation is incomplete, the Head Teacher will seek HR advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

Use of Data and Confidentiality

Personal data relating to references will be handled in line with the Data Protection Policy. All references will be marked as private and confidential.

In accordance with the Data Protection Act (2018) and the UK GDPR any personal information will be processed fairly and lawfully, and will be kept safe and secure, e.g. in a locked filing cabinet. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

Online Searched on Short-Listed Candidates

In line with KCSIE, the school will consider carrying out online searches on shortlisted candidates as part of its due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, that they school may want to explore with the applicant at interview. The school will consider the potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will ensure staff conducting online searches are clear on the purpose of the search. Shortlisted candidates will be made aware that online searches may be conducted as part of due diligence checks.

When carrying out searches of shortlisted candidates' online presence, the school will look out for indicators of concern such as:

- Inappropriate behaviour, jokes or language.
- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the candidate might not be suitable to work with children.
- Anything that could harm the reputation of the school.

Any concerns will be addressed during the interview process. The school will ensure that candidates are given an opportunity to discuss concerns raised by the online search.

The Interview

During the interview candidates will be asked standard questions and their responses will be recorded for ease of comparison. The recruitment panel will ask open questions to assess the candidates experience and suitability for the post, and explore the candidate's motivation towards safeguarding and their suitability to work with children. The school will use a range of selection techniques to identify the most suitable person for the post.

Interview questions seek to:

- Find out what attracted the candidate to the post being applied for and their motivation for working with children.
- Exploring their skills and asking for examples of experience of working with children.
- Looking at any gaps in employment or where the candidate has changed employment or location frequently and asking about the reasons for this.
- Seek examples of the candidate's previous experience.

Interviews will also be used to explore the potential areas of concern to determine the applicant's suitability to work with children.

Areas that may raise concerns and lead to further enquiry include:

- Implication that adults and children are equal.
- Lack of recognition or understanding of the vulnerability of children.
- Inappropriate idealisation of children.
- Inadequate understanding of appropriate boundaries between adults and children.
- Indicators of negative safeguarding behaviours.

- Attempt to push or overstep boundaries.

After the Interview

After the interview is completed, the recruitment panel will:

- Assess all candidates' performance using the same agreed criteria.
- Ask the successful candidate to provide proof of identification and qualifications for the school's records and to complete the DBS check (if necessary) as soon as possible.
- Contact and provide feedback to the unsuccessful candidates – feedback will be verbal and based on evidence of their performance against the person specification for the role.

Interview notes and assessment material will be held securely for an appropriate amount of time after the interviews, in line with the Records Management Policy, in case any aspect of the recruitment process is challenged.

After choosing the successful candidate, the school will:

- Make a conditional offer of employment to the candidate.
- Complete the relevant pre-appointment checks.

Pre-Appointment Checks

All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks. These checks seek to identify whether there is anything that would make the candidate an unsuitable appointment for working with children or as a teacher.

When appointing new staff, the school will:

- Verify the candidate's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.
- Obtain an enhanced DBS check via the candidate and, for candidates engaging in regulated activity, barred list information.
- Obtain a separate children's barred list check if the individual will start work in regulated activity with children before the DBS certificate is available.
- Verify a candidate's mental and physical fitness to carry out their role.
- Verify the person's right to work in the UK.
- Make further checks as appropriate on any individual who has lived or worked outside the UK.
- Verify professional qualifications, as appropriate.
- Ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State
- Ensure that appropriate checks are carried out to ensure that individuals employed to work in Reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.
- For those in management, trustee or governor roles, conduct a section 128 check.

The recruitment panel will ensure any candidate employed to carry out teaching work is not subject to a prohibition order or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.

The recruitment panel will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented to enable the school a chance to defend its decision if challenged.

The school will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post which they have applied to
- How long ago the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances around and at the time of the incident
- Whether the individual accepted responsibility for what happened

All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks. These checks seek to identify whether there is anything that would make the candidate an unsuitable appointment for working with children or as a teacher.

When appointing new staff, the school will:

- Verify the candidate's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.
- Obtain an enhanced DBS check via the candidate and, for candidates engaging in regulated activity, barred list information.
- Obtain separate children's barred list check if the individual will start work in regulated activity before the DBS certificate is available.
- Verify a candidate's mental and physical fitness to carry out the role.
- Verify the person's right to work in the UK.
- Make further checks as appropriate on any individual who has lived or worked outside the UK.
- Verify professional qualifications, as appropriate.
- Ensure appropriate checks are carried out to ensure that individual employed to work in Reception classes, or in wrap around care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.
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The school will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post which they have applied to.
- How long ago the offence occurred.
- The country where the offence occurred.
- Whether it was a one-off incident or a history of incidents.
- The circumstances around and at the time of the incident.
- Whether the individual accepted responsibility for what happened.
- Whether the offence has been decriminalised.

The school will also consider the incident in the context of the Teachers' Standards and Teacher misconduct guidance, if the applicant is applying for a teaching post.

If the school has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for the school to allow the individual to carry out any form of regulated activity.

The school will use the Employer Secure Access sign-in portal via the Teaching Regulation Agency Teacher Services web page to check if a proposed governor is barred as a result of being subject to a section 128 direction.

Checks for all prohibitions, directions, sanctions and restrictions will be carried out by using the secure access portal on the Teacher Services' [web page](#).

In line with KCSIE, the school will not require candidates to have an enhanced DBS certificate or undergo checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the candidate has worked in England in a post:

- In a school which brought them into regular contact with children or young people; or
- In a school since 12 May 2006 which did not bring the person into regular contact with children or young people; or

This is because the candidate will have already undergone this process in their previous position.

Volunteers

All volunteers are expected to fill in an application form and provide references. We will use the GSCP flow diagram to aid decision making around what checks will be required.

Candidates who have lived outside the UK

For all candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with addition checks where necessary, including an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

The school will make any further checks that it deems appropriate so that any relevant events occurring outside the UK can be considered, e.g. obtaining proof of past teaching

conduct for any candidate for a teaching position from the professional regulating authority in the country in which they worked, where available.

If a candidate is unable to provide the correct documentation, they cannot submit a DBS check. This is because the right to work in the UK cannot be established.

Following the UK's exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside of the UK regardless of whether or not it was in an EEA country or the rest of the world.

Agency and Third-Party Staff

In the case of any employee working at the school who is sourced from an agency or third-party organisation, the school will obtain written notification from the organisation confirming that they have carried out the same checks as the school would otherwise perform on any individual who will be working at the school, or who will be providing education on the school's behalf, including through online delivery. Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will be kept where appropriate.

The school will obtain a copy of the enhanced DBS certificate before the person is due to commence work.

Trainee and Student Teachers

The school will ensure that enhanced DBS certificates and barred list checks are obtained on all salaried candidates for initial teacher training who are in regulated activity.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry the necessary checks. The school will obtain written confirmation from the organisation that the checks have been carried out.

Contractors

The school will ensure that any contractor, or any employee of a contractor, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

The school will set out its safeguarding requirements in the contract between the contractor's organisation and the school.

If a contractor is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. The school will always check the identity of contractors and their staff on arrival.

Governors

Governors will have an enhanced criminal records certificate from DBS. Governance is not a regulated activity and so governors will not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

Governors will be subject to a section 128 direction check.

Right to Work Checks

The school will obtain evidence that all candidates for a position have the right to work in the UK by either conducting a manual document-based check, or by using the government's [online portal](#). This will be done before a candidate is offered a position.

When conducting a manual, document-based check, the school will ensure that the documents received from candidates are acceptable in line with government guidance, and from the appropriate list: List A for candidates with a permanent right to work in the UK, or List B for candidates with a temporary right to work in the UK. Checks on documents will be conducted in line with [section 18](#) of this policy.

The school will obtain proof of candidates' immigration status in the UK.

The school will contact the Home Office in the event that a statutory excuse must be established in the following circumstances:

- The candidate provides a document confirming receipt of an application to EUSS on or before 30 June 2021
- The candidate provides a non-digital certificate of application confirming receipt of an application to the EUSS on or after 1 July 2021
- The school has checked a digital certificate of application and has been directed to the Home Office's Employer Checking Service
- The candidate provides an Application Registration Card stating the holder is permitted to undertake the work in question
- The school is satisfied it has not been provided with any acceptable documents because the candidate has an outstanding application with the Home Office made before their previous permission expired, or has an appeal or review pending against the Home Office's decision and cannot provide evidence of their right to work as a result
- The school considers that it has not been provided with any acceptable documents, but the person presents other information indicating they are a long-term resident of the UK, i.e. having arrived before 1988.

The school will not make assumptions about a person's right to work in the UK, or their immigration status, on the basis of their race, ethnicity, nationality, length of residence in the UK or background. All candidates, including British citizens, will have their right to work in the UK checked.

Where a candidate's right to work is time-limited, the school will conduct a follow-up check in advance of its expiry.

The school may use a certified digital identity service provider (IDSP) to conduct right to work checks on candidates.

Identification Checking Process

When checking the validity of identifying documents, the school will ensure that this is done in the presence of the holder, e.g. in person or via a live video link. In both cases, the school will be in physical possession of the original documents. The school will only accept valid, current and original documentation in its physical form. The school will not accept photocopies or documentation printed from the internet, e.g. internet bank statements.

The school will request documents with photographic identity, such as a passport, and compare this against the candidate's likeness. The school will not accept documents that are not in the candidate's current name as recorded on the application form.

The school will ensure that the candidate declares all previous name changes and provides documentary evidence to support the name change. If the candidate is unable to provide evidence to support the name change, the school will hold a discussion with the candidate about the reasons why.

The school will always aim to check the name on the candidate's birth certificate in order to validate their identity.

The school will compare the candidate's address history with any other information the candidate has provided, such as their CV.

The school will ensure that all letters and statements provided by the candidate are recent e.g. within a three-month period.

The school will keep a dated record of every document that has been checked for the duration of the candidate's employment and for a further two years after they have left the school. This will be either as a hard copy or in a scanned format which cannot be manually altered, e.g. JPEG or PDF document, and will be made available to the appropriate authorities if and when requested.

In line with the UK GDPR and Data Protection Act 2018, the school will only retain copies of DBS certificates where there is a valid reason for doing so, and only for as long as is needed to consider the information provided – this will not be for longer than six months.

When information is destroyed, the school may keep a record of the fact that vetting was carried out, the result of this vetting, and the recruitment decision taken.

The school may use a certified digital IDSP to secure DBS checks on candidates.

After the Pre-Appointment Checks

Once the pre-employment checks have been completed, the recruitment panel will:

- Agree a start date with the candidate.
- Destroy the completed self-declaration forms.

- Submit contractual paperwork, including the completed DBS check, copies of identification, references, proof of qualifications, pre-employment medical enquiry form, P45, application/equal opportunities and emergency contacts.
- Add the required details of the checks carried out to the school's SCR.

Single Central Record (SCR)

The school will maintain and regularly update the SCR. All new employees will be added to the record, which will include:

- All staff (including supply staff) who work at the school.
- All others who work in regular contact with children in the school.

The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- An identify check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- Further checks on people living or working outside the UK, including checks for European Economic Area (EEA) teacher sanctions and restrictions
- A check of professional qualifications
- A section 128 check
- A check to establish right to work in the UK
- For those in management, trustee or governor roles, a section 128 check

If checks are carried out on volunteers, this will be recorded in the SCR.

Safer Recruitment Training

At least one member of the recruitment panel will have completed formal safer recruitment training. As a measure of good practice, the school will ensure that this training is renewed every 2 years.

This policy should be read in conjunction with the following school policies:

- Child Protection and Safeguarding
- Disciplinary Policy and Procedure
- Teacher Appraisal Policy
- Teacher Capability Procedure
- Records Management Policy
- Data Protection Policy
- Equality Policy and Statement
- Staff Handbook

Date of Review: November 2024

Approved by Full Governing Board 25/3/2025

Date of Next Review: November 2025