Safer Recruitment Policy

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Statement of intent

Collective Vision Trust has implemented this policy to assist with recruitment and employee selection. It outlines the school's recruitment procedure and how the school ensures safer recruitment is considered at all levels of the recruitment process. This policy will apply to all schools within Collective Vision Trust.

The safety and protection of the school's pupils is always at the forefront of the school's concerns, which is why this policy aims to embed a robust safeguarding culture into the recruitment practices of the school.

The policy uses the term 'headteacher' this is the person legally registered as the headteacher. In some schools this will be the 'Executive Headteacher'. In these schools if a responsibility is delegated to a 'Head of School' this policy will indicate this.

1. 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 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026)
- 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
- Amendments to the Exceptions Order 1975, 2013 and 2020

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

- DfE 'Academy trust governance guide'
- DfE 'Staffing and employment advice for schools'
- Disclosure and Barring Service 'ID checking guidelines for standard/enhanced DBS check applications from 1 July 2021'
- Home Office 'Right to work checks: employing EU, EEA and Swiss citizens'
- DfE 'Keeping children safe in education'
- DfE 'Recruit teachers from overseas'
- Disclosure & Barring Service 'Regulated activity with children in England'
- Home Office 'Employer's guide to right to work checks'

This policy operates in conjunction with all other Trust and School Policies.

2. Definitions

Regulated activity includes:

- As a result of their work or volunteering, being responsible, on a frequent basis in a school or college, for teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.

- Working on a regular basis for a limited range of establishments (known as 'specified places', which include schools and colleges), or in connection with the purposes of the establishment, with the opportunity for contact with children.

- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Regulated activities do not include:

- Paid work in specified places which is occasional and temporary and does not involve teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children.

Teaching role – 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 pupils. These activities are not teaching work for the purposes of KCSIE if the person carrying out the activity 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 headteacher 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 or not 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 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 along with a check of the Police National Computer records plus additional information held by the police as above. The position being applied for, or activities being undertaken, must be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check can also include information as to whether an individual is subject to a section 128 direction.

Children's barred list – is maintained by the DBS and contains individuals who are barred from engaging in regulated activity with children. 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.

3. Roles and responsibilities

The Board of Directors is responsible for:

- Agreeing and monitoring effective policies to ensure recruitment at the school is in accordance with the legislation outlined above.
- Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.
- Ensuring appropriate checks have been carried out on staff, volunteers, contractors, and agency workers working within the school.
- Ensuring that those involved with the recruitment and employment of staff have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of Part 3 of KCSIE.
- Ensuring that at least one member of the interview panel and those leading the recruitment process have undergone safer recruitment training in the past 3 years.
- Ensuring that all involved in the recruitment process are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- If regulations in KCSIE change regarding aspects to do with safer recruitment. The Board may decide that staff training be renewed before the three yearly review.
- Monitoring takes place of 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.
- Ensuring that the salary of the successful candidate is determined.
- Accommodating the needs of new employees and making reasonable adjustments when necessary.
- Ensuring that the CEO reviews this policy and that any recruitment data that is kept is in accordance with the Records Management Policy.
- Ensuring that they have the skills to carry out effective selection processes, including knowing when and how to request references.

The Headteacher/ CEO (in the case of Trust or Headteacher Appointments)/ Chair of Directors (in the case of CEO appointment) is responsible for:

- Deciding if a post can be filled internally or if an external advertisement is needed. A discussion with CEO will happen for all appointments and changes, internally and externally.
- Creating the advert and ensuring it meets all the necessary requirements.
- Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- Setting appropriate recruitment procedures, as per the scheme of delegation.
- Reviewing candidates' applications
- Ensuring that the interview addresses safeguarding practices as well as other essential skills appropriate to the role.

- Ensuring that the interview addresses the candidate's motivation, reasons for being interested in joining the school, and attitude to working with children.
- Ensuring that references have been received where requested.
- Ensuring that all references for a shortlisted candidate are properly scrutinised and that information is not contradictory, unclear, or incomplete, with clarification requested when appropriate.
- Asking previous employers of new staff members whether the individual has been subject to capability procedures in the previous two years.
- Ensuring the recruitment process is carried out in line with the relevant school policies.
- Ensuring that the candidate chosen to fill a vacancy is suitable for the role.
- Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors, and agency workers working within the school.
- Ensuring that appropriate supervision of employees and volunteers is organised, and for promoting the safety and wellbeing of pupils generally and throughout the recruitment process.

The appropriate HR or Senior Manager is responsible for:

- Managing the administration of the recruitment process.
- Acting as a point of contact between candidates and the school.
- Reviewing and scrutinising candidates' applications and identifying any gaps.
- Preparing the interview panel to conduct interviews.
- Organising interviews with shortlisted candidates.
- Ensuring the recruitment process is carried out in line with the relevant school policies.
- Ensuring that the candidate chosen to fill a vacancy is suitable for the role.

During the recruitment process, and especially during the initial stages, all involved 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

The DPO is responsible for:

- Ensuring that all references are handled in line with the Data Protection Policy and relevant legislation.

The DSL is responsible for:

- Deciding when it is appropriate or necessary to disclose any safeguarding concerns or allegations as part of a reference.
- Discussing with the headteacher the suitability of a candidate when a reference has disclosed safeguarding concerns or prior allegations.

Access Screening:

- The Trust uses Access Screening as part of its recruitment and vetting process
- All candidates will view and agree the appropriate privacy notice.

4. Planning, advertising and shortlisting

The job information and associated documents for externally advertised vacancies will be published online. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.

The headteacher, after discussion with CEO, will:

- Decide on the recruitment timeframe.
- Decide who will be involved in the process and what their roles will be, e.g. who forms the interview panel.
- Check the training records of panel members to ensure that the relevant safer training is up to date.
- Oversee the preparation of the documents that will be provided to candidates, including the job description, person specification and application form – ensuring that these documents contain 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 the staff disqualification 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 behaviours required for the post
- The safeguarding requirements, including to what extent the role will involve contact with children and young people 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 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 most appropriate means available in order to reach as wide a range of external candidates as possible. Advertisements will contain a statement of commitment to ensuring equal rights. Advertisements will include, or link to, a job description, person specification and detail the closing date. A contact number and details of the application process will be clearly outlined.

Application forms will be accessible on the school's website.

Application forms

Application forms will be accessible on the school's website.

Where the role involves engaging in a regulated activity, applicants will be reminded in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to children.

The school will also provide a link to the Child Protection and Safeguarding Policy in the application pack.

Applicants will be required to provide the following:

- Personal details, including their current and former names, current address and national insurance number
- Details of their current or 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 an explanation of why they meet the person specification to be a suitable candidate for the role

The school will never accept a CV alone, only completed application forms. When shortlisting candidates for an interview, all application forms will be considered. Candidates who are shortlisted will meet all the essential aspects of the person specification requirements. The school will ensure that the shortlisting process is as systematic as possible, and that those completing the shortlist reads through 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
- Whether they are included on the barred list.
- Whether they are prohibited from teaching.
- If they are prohibited from taking part in the management of an independent school.
- Information of any criminal offences committed in any country in line with the laws as applicable in England and Wales, nit 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 (these two people will ideally 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 any further potential concerns.

Requests for further information from candidates will be replied to promptly.

Interviews will be arranged for the shortlisted candidates.

5. Invitation to interview

Once a shortlist has been confirmed, the candidates to be invited for interviews will be contacted by the appropriate HR or Senior Manager and suitable interview times will be decided. All shortlisted candidates should receive the same information about the interview and what documents they should bring.

They should also be informed that the school will check candidates' public social media or other online activity prior to interview.

This process will involve a search of the public information on common social networking platforms. Shortlisted candidates should be asked to provide platforms and handles that they use to help with the process.

Any concerns will be addressed during the interview process.

6. Pre-interview checks

Pre-interview checks will be completed and will 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
- Checking common social media platforms (e.g. Facebook, twitter, Instagram, LinkedIn etc)

7. Requesting references

Once a candidate has been shortlisted for a position, references will be requested and scrutinised by the interview panel before interview, where possible. Any concerns will be resolved satisfactorily prior to confirming an appointment. References will always be requested directly from the referee and from a senior person with appropriate authority, rather than a colleague.

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 worked with children.

If the applicant has never worked with children, 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. In these cases, the CEO will need to decide whether this is an acceptable reference.

When a candidate is applying for a teaching role (including the role of headteacher), 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.

Concerns raised following a candidate's reference(s) will be explored further with the referee where appropriate and discussed with the candidate at interview.

The school will ensure that references have been completed by a senior person with appropriate authority. If the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations.

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.

8. Checking references

References will be checked upon receipt to ensure that all questions have been answered satisfactorily and that information is not contradictory 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 on the candidate's application form. Discrepancies between the reference and the 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 a copy of the reference for confirmation of its accuracy

The interview panel will ensure that any past disciplinary action or allegations disclosed as part of a reference are considered carefully when assessing the candidate's suitability for the role. If this involves safeguarding or potential safeguarding concerns, the DSL will be consulted to help assess the candidate's suitability. The interview panel will ensure that the information provided in the reference does not contain any information about concerns / allegations which are unsubstantiated, unfounded, false or malicious.

Before deciding not to appoint a candidate based on an unsatisfactory reference, the interview panel will consider if HR advice is necessary. Once the decision is made, the headteacher 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 headteacher and CEO.

9. Providing references

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 headteacher or CEO.

References will only be provided once 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.

If there are exceptional circumstances, eg a reference cannot be provided or if certain questions asked by a prospective employer cannot be answered, the HT will make the CEO aware of the fact. The CEO and headteacher will decide what action is taken, HR advice sought when appropriate.

Staff members will make the headteacher 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 headteacher) 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 headteacher 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 headteacher 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.

10. 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.

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.

11. Previous disciplinary action

The interview 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 headteacher 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 false, unsubstantiated 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 headteacher will seek HR advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

Any reference that is anything other than straightforward or has information that could be viewed negatively, **must** be discussed with the CEO prior to sending.

12. Use of data and confidentiality

Personal data relating to references will be handled in line with the Data Protection Policy. All references will be properly addressed and marked 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 locked, non-portable containers or, for electronic information, password protected. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

Information relating to an individual's health and sensitive personal data, e.g. information relating to the individual's ethnicity, religion or trade union membership, will not be disclosed as part of a reference unless 'express consent' has been received from the individual for this purpose.

The person requesting a reference will be offered the opportunity to see it before it is sent, unless the headteacher decides this is not appropriate; however, the school is aware that ultimately, they cannot prevent the person receiving a copy in line with the Data Protection Act. If the person raises comments about the reference before it is sent, the member of staff responsible for the reference will consider the comments and, if they decide to leave it unchanged, record the reason(s) behind their non-agreement.

13. Online searches on shortlisted candidates

The school is committed to ensuring that safeguarding is a top priority; therefore, the school will check candidates' social media or other online activity prior to interview, as outlined in section 5 and 6.

Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, which the school may want to explore with the applicant at interview.

Online searches will be conducted on shortlisted candidates only. The school will consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will be clear on the reasons that online searches are being conducted. Online searches will only examine data that is publicly available.

Online searches will be carried out by Access Screening.

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 may 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 any concerns raised by the online search.

14. The interview

During the interview process, amongst other activities, there will be a formal interview where candidates will be asked standard questions and their responses noted. In addition, there will also be personal questions based on information from the application form. Any concerns raised through contact with referees, social media searches or gaps in employment history will be discussed with the candidate at this stage. The interview panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children. The will look at any gaps in employment or where the candidate has changed employment or location frequently and ask about the reasons for this.

Interviews will also be used to explore the potential areas of concern to determine the applicant's suitability to work with children. The candidate can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.

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.
- Attempts to push or overstep boundaries.
- Consistent rule-breaking behaviour.

Candidates shortlisted for interview will be asked to provided documents to prove identity and qualifications. This proof will be available to the interview panel.

15. After the interview

After the interview has been completed, the interview panel will:

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

All information considered in decision making will be clearly recorded along with decisions made. Interview notes and assessment materials 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 a successful candidate, the school will:

- Make a conditional offer of employment to the candidate.
- Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
- Complete the relevant pre-appointment checks.

Any offer of employment is made subject to the successful pre-appointment checks. Once these have been completed, the successful candidate should be informed and a contract issued.

Any spent or filtered convictions declared on the candidate's self-declaration form, or declared at interview, will not affect the offer of employment if already made; however, the school will undertake the relevant assessments to determine whether the candidate is suitable to work in the school.

16. Remote recruitment

The usual recruitment process will be face to face. However, if it is decided that a remote interview needs to take place the school will follow all the requirements set out in this policy, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this.

Staff members conducting an online interview will ensure they understand how to operate the various relevant functionalities of the online interview platform, e.g. how to share their screen, prior to the interview commencing. Staff members conducting an online interview will ensure privacy settings are adjusted appropriately on the provider's site or application.

The school will be aware of, and have due regard for, the potential risks associated with online communication, e.g. ease of anonymity, and will ensure it takes suitable precautions, e.g. encrypting data where possible. The school will ensure that any tasks set for candidates during the interview are compatible with the online nature of the interview, e.g. they do not require the exchange of physical paper resources.

The school will communicate its expectations to candidates regarding the use of the online platform in good time prior to the interview. These expectations will include, but will not be limited to, the following:

- The candidate will participate in the interview with both the video camera and microphone features enabled at all required times
- The candidate will participate in the interview in a suitable setting – a quiet area with a neutral background
- The candidate will keep personal information, which is not relevant to the recruitment process private, e.g. their email password, and will not ask the staff members conducting the interview to share any such private information
- Where necessary, the candidate will be aware that the school will record the online interview, and that they will be required to consent to this in order for the interview process to continue

The school will not discriminate against candidates who are recruited remotely; they will be considered fairly alongside any candidates who are not recruited remotely.

17. 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 (including volunteers).
- 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 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.

Barred list information will not be requested for anyone who is not engaging in or seeking to engage in regulated activity.

The interview 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 interview panel will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their conviction(s), 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

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.

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

There is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the candidate has worked:

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

Volunteers

For all volunteers, the school will undertake a written risk assessment and use professional judgement and experience when deciding what checks, if any, will be required.

All volunteers engaging in regulated activity will be required to provide the school with an enhanced DBS check with a barred list check. Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check (including barred list information); however, the school may decide to conduct a repeat DBS check.

Where an existing volunteer will be in regulated activity from 1 September 2026 because of the changes brought in by the Crime and Policing Act 2026, the school will obtain an enhanced DBS check with children's barred list information. The school may obtain a standalone barred list check where either:

- the school wishes to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate
- the school has recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued.

The school will only request barred list information for volunteers in regulated activity.

Candidates who have lived outside the UK

For candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with additional 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.

Where this information is not available the school will seek alternative methods of checking suitability, and/or undertake a risk assessment supports informed decision making on whether to proceed with the appointment.

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 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. In respect of the enhanced DBS check, the school will ensure that written notification confirms the certificate has been obtained by either the organization or another such organisation.

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 generally be kept where appropriate.

The school will obtain a copy of the enhanced DBS certificate from the agency or third-party organisation where it has been obtained before the person is due to commence work and has disclosed any matter or information.

Trainee/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 out the necessary checks. The school will obtain written confirmation from the agency that the checks have been carried out.

Existing staff

If a member of staff moves from a post that was not regulated activity to one that is, the relevant checks will be carried out. A new check will also be carried out where there has been a break in service of 12 weeks or more or there are concerns about an individual's suitability to work with children. This includes staff whose role becomes regulated activity as a result of changes to the definition of regulated activity.

The interview panel will carry out further checks where there is a concern about a member of staff's suitability to work with children. An investigation will be carried out to gather enough evidence to establish if an allegation has a foundation. The employer of the school will ensure they have sufficient information to meet the relevant referral duty criteria, as outlined in the DBS's barring referral guidance.

The school will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The harm test is satisfied in respect of that harm.
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
- The individual is deployed to another area of work not in regulated activity, or where they have been suspended, dismissed or when they have resigned.

Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity. Referrals to the DBS will be made as soon as possible after the resignation, removal or redeployment of the staff member.

Contractors

The school will ensure that any contractor, or any employee of the 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, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school. The school will always check the identity of contractors and their staff on arrival.

Visitors

The school will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The headteacher will use their professional judgement about the need to escort or supervise such visitors.

Where a visitor attends the school in a professional capacity, the school will check their ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that appropriate checks have been carried out – the school will not ask to see the certificate in these circumstances).

Adults who supervise children on work experience

If the school is organising work experience placements, it will ensure that the placement provider has policies and procedures in place to protect children from harm.

Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school will consider the specific circumstances of the work experience, the nature of the supervision and the frequency of the activity being supervised. This will be done to determine what, if any, checks are necessary.

Such consideration would include if the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight. If so, this is a regulated activity and the school must not allow someone on the barred list to take part in regulated activity.

The school may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Other individuals in the workplace who are not involved in teaching, training, instructing or caring for or supervising the child on a work experience placement or activity are not in regulated activity.

Children staying with host families

The school may make arrangements for a child to have learning experiences where, for short periods, the child may be provided with care and accommodation by a host family to whom they are not related. In these cases the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the school has the power to terminate the homestay the school is the regulated activity provider and should obtain a DBS enhanced certificate with children's barred list information.

In some circumstances, the arrangement where children stay with UK families could amount to "private fostering" under the Children Act 1989. Where such arrangements come to the attention of the school, and the school is not directly involved in making them, the LA will be consulted to ensure that the arrangement is suitable and safe for the child.

Directors and LGC Members

The Trust Board will request an enhanced DBS certificate without a barred list check on an individual as part of the appointment process for Directors and Members of Local Governing Committees. An enhanced DBS certificate (which will include a barred list check) will only be requested if the governor will be engaging in regulated activity; this also applies to volunteer governors.

Trustees and members will be subject to a section 128 check.

Newly appointed chairs of trustees will be subject to a suitability check, which includes:

- An identity check.
- Confirmation of the right to work in the UK.
- An enhanced DBS check.
- Where required, additional information if the individual has lived outside the UK for a period of 12 months or longer.

18. 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 19 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.

19. 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.

The school will request documents with photographic identity, such as a passport or driving license, 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, before validating 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.

20. 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.

21. 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 or college, including volunteers.

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/certificate obtained:

- An identity 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 the person's right to work in the UK
- For those in management, trustee or governor roles, a section 128 check

For supply staff, the school will include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

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

Each academy will keep their own separate SCR; however, it will ensure that all those from the Trust who need to see the central SCR can easily do so. Any staff who work are employed solely in a Trust role, e.g. CEO, will be on all academies SCR.

The details of individuals will be removed from the SCR once their employment with the school ends.

22. Safer recruitment training

Those involved with the recruitment and employment of staff to work with children have received safer recruitment training, the substance of which will at minimum cover the content of part three of KCSIE

If safer recruitment requirements in KCSIE changes the Trust may require staff to renew their training early.

At least one member of the interview panel will have completed safer recruitment training.

As a measure of good practice, the school will ensure that this training is renewed every three years.

Those involved in the recruitment process will have an awareness of information regarding the following:

- The recruitment and selection process
- Pre-appointment and vetting checks, regulated activity and recording of information
- Other checks that may be necessary for, staff, volunteers and others
- How to ensure the ongoing safeguarding of children and legal reporting duties on employers

23. Safeguarding

For references provided to the school, the candidate's suitability will always be assessed with particular regard paid to their suitability to work with children. The DSL will be consulted where appropriate.

The DSL will recognise the school's duty to disclose safeguarding concerns overrides any other duties to an employee, and ensure the school complies with its safeguarding obligations. The DSL will ensure records are kept of all allegations against staff in line with the most up-to-date version of KCSIE.

For all safeguarding allegations, excluding those proven to be malicious, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused member of staff. Accurate information based on these records will be given in response to future requests for a reference, where appropriate. Safeguarding information will not be given in circumstances where the allegation was found to be false, unsubstantiated or malicious – 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.

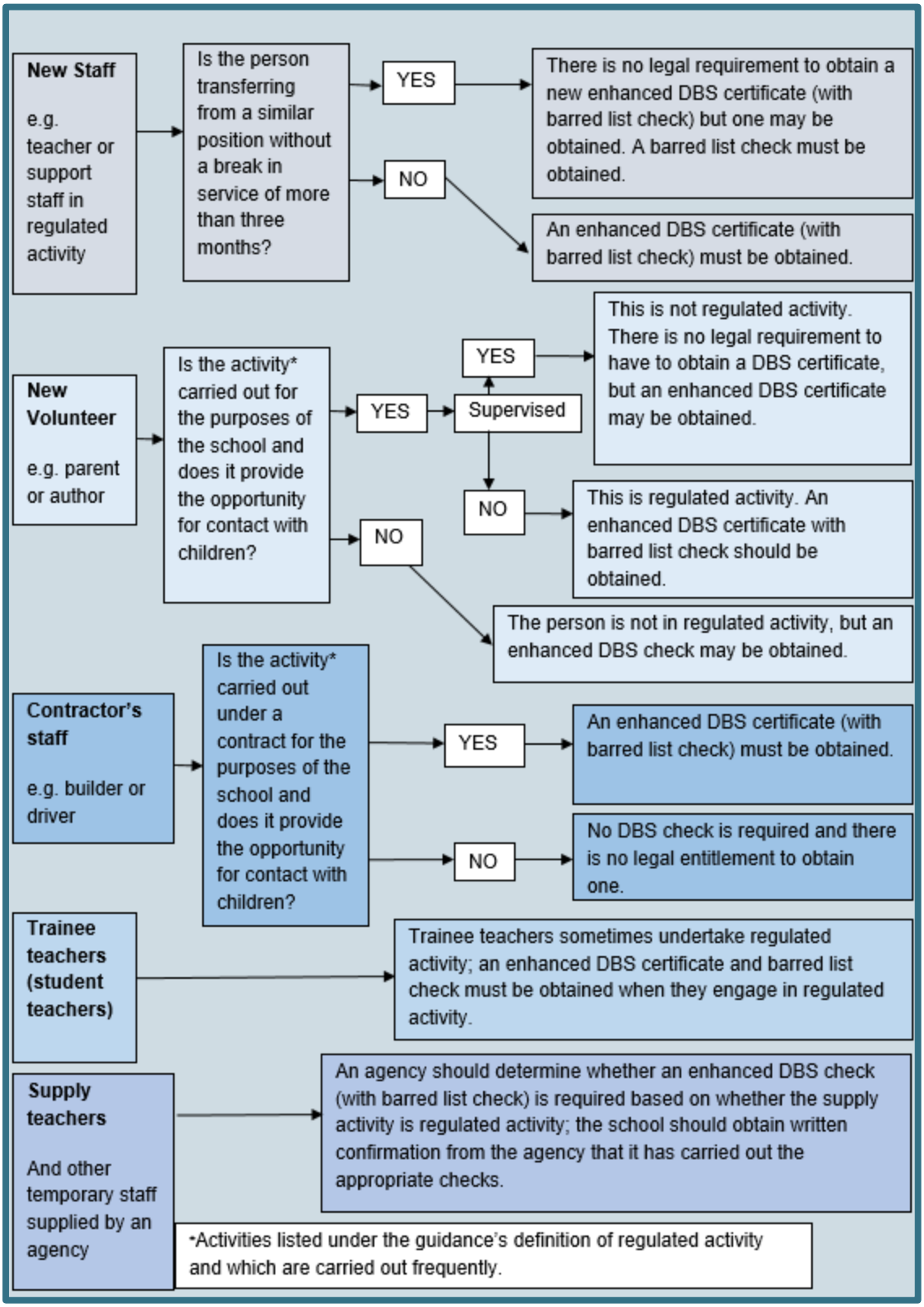
24. Monitoring and review

This policy is reviewed annually by the Trust Board

Any changes made to this policy will be communicated to all members of staff and relevant stakeholders.

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

Appendix 1: Flowchart of Disclosure and Barring Service Criminal Record Checks and Barred List Checks



Appendix 2: Employment of Staff & Issuing of contracts

Protocol

The below protocol applies to all employment within the trust including

1) New Employment to CVT
2) Change of hours, (temporary or permanent)
3) Change of role (promotion etc)
4) Additional role (taking on more responsibility)

General Outline.

1. Headteacher approach CEO to discuss possible appointments
2. CEO give go ahead to advertise etc
3. Headteachers & schools advertise as they see fit
4. All relevant staff have completed the safer recruitment module through SSS, National College or relevant Shropshire provider. (including office staff)
5. Headteacher & school staff do screening checks, ask for references and invite to interview - as they see fit.
    a) Must be at least 2 staff to do screening checks and reference checks.
    b) When checking references use checklist from Aby to ensure all checks are thorough and correct.
    c) Any discrepancies from application to reference, raise with headteacher/CEO
6. Heads/SLT school staff do interview process – headteacher makes decision on who to appoint (CEO involved if it is SLT – in line with Scheme of Delegation)
7. Following the appointment Headteacher informs CEO of decision, talk about specific details on the contract.
8. School admin staff take all relevant details for DBS, etc
    a) No-one should start employment unless DBS is cleared.
9. Headteacher does all relevant checks with admin staff.
10. Headteacher or admin staff then sends all details to central trust team
11. Central trust team processes all information, clarifies any issues and produces contract
12. Contract goes to headteacher who must sign with DocuSign – (individual email)
13. Contract then comes to CEO who must sign with DocuSign – (individual email)
14. Central trust team uploads all documents to system sends contract out to all relevant parties.
15. Person employed needs to sign contract, schools staff/trust staff ensure with access check that person has signed contract.
16. No person should start employment until everyone has signed the contract.
17. Relevant school staff upload details to single central record.

NB

- When referring to Headteacher – this is the “Named” headteacher of the school

Appendix 3: Safer Recruitment Reference Checklist

Action	Advice	Date Completed
Obtain references at shortlisting stage	• To allow any concerns raised to be explored at interview • Allow adequate time between shortlisting and interview in order for references not only to be received but also scrutinised • Only in exceptional circumstances should references be taken up after the offer of a job has been made. In such instances the selection panel must ensure that references are obtained, scrutinised and any concerns resolved before the appointment is confirmed	
Enclose a copy of the Job Description and Person Specification with the reference request		
Use a Reference Proforma for consistency	• Ask about the referee's relationship with the candidate e.g. how long has the referee known the candidate and in what capacity • Whether the referee is satisfied that the person has the capability and is suitable to undertake the post • How the candidate has demonstrated that they can meet the requirements of the person specification • To confirm details of the applicant's dates of employment, current post, salary and reason for leaving • (see below for specific safeguarding questions to ask)	
Minimum of 2 references		
References obtained directly from the referee (not from the applicant), freshly dated and addressed to the person seeking the reference		
Do not accept open ('to whom it may concern') references		
One reference is from the current employer or most recent employer		
A third reference is obtained if the candidate is not currently working with children but has done so in the past		
If from an education setting, the reference has come from the Headteacher or at least been verified by them as accurate in regard to any disciplinary / safeguarding matters		
Evidence that electronic references have come from a legitimate source	• Is the company/ organisation legitimate, i.e. does it exist? (have a look • online) • Reference is received from the employers email address rather than personal email -retain covering email on file • Telephone the employer on receipt of reference to ensure it is legitimate/ to verify the information contained	
The reference asks questions about the candidates suitability to work with children and the referee has answered these questions		
The reference asks a question about any substantiated concerns or allegations involving the safety or welfare of children/ young people and the outcome of these		

The reference asks a question about any live formal disciplinary sanctions (regarding any matter) and any expired disciplinary sanctions that specifically involved the safety/welfare of children/ young people		
Contact referees to clarify content where information is vague or insufficient information is provided	• Ask the referee to confirm the details of your conversation in writing • Keep your own notes/ record of the conversation	
Compare the information on the application form with that in the reference and take up any discrepancies with the referee and then with the candidate at interview	Information in references needs to be compared with the application form to ensure there is consistency – looks at job titles, dates of employment, salary details	
If it has proved impossible to obtain reference(s), the recruitment decision should be based on all relevant evidence gathered throughout the recruitment process together with the employers' own judgement as to the suitability of the applicant and their fitness to carry out the role.	Reasons for the recruitment decision and details of the efforts made to obtain reference(s) should be recorded in a pre-employment risk assessment form, along with the reasons why the information could not be obtained.	
What about character references?	• Should never be a 'first resort' • Should not be a substitute for an employer's reference, but can have a place if someone has no employment history/ is a school leaver • Ideally should be from a person of standing within the community • CEO must approve accepting a character reference	