



Safer Recruitment Policy

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Contents

1. Statement of intent
2. Legal framework
3. Definitions
4. Roles and responsibilities
5. Planning, advertising and shortlisting
6. Invitation to interview
7. Pre-interview checks
8. Requesting references
9. Checking references
10. Providing references
11. Content of references
12. Previous disciplinary action
13. Use of data and confidentiality
14. Online searches on shortlisted candidates
15. The interview
16. After the interview
17. Remote recruitment
18. Pre-appointment checks
19. Right to work checks
20. Identification checking process
21. After the pre-appointment checks
22. Single central record (SCR)
23. Safer recruitment training
24. Safeguarding
25. Monitoring and review
26. Induction and ongoing assurance
27. Recruitment completion checklist

Related school policies

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Managing Allegations and Low Level Concerns Procedures
- Whistleblowing Policy
- Data Protection and Records Management Policy
- Staff Equality and Recruitment Procedures

1. Statement of intent

1.1 Smoothstone Care and Education uses this policy to recruit safely and fairly at Jasmine Hall School. It applies to school staff, agency workers, contractors, volunteers, trainees and members of the proprietor body as relevant. Group procedures support implementation; children's homes must also follow their own applicable regulatory framework.

1.2 Pupil safety is central to selection, vetting, induction and ongoing employment. This policy supports the school's safeguarding culture across Croft House, Cedar House and Markeaton House.

2. Legal framework

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

2.2 Rehabilitation of Offenders Act 1974

2.3 Children Act 1989

2.4 Education Act 2002

2.5 Sexual Offences Act 2003

2.6 Children Act 2004

2.7 Safeguarding Vulnerable Groups Act 2006

2.8 Education and Skills Act 2008

2.9 The Education (Independent School Standards) Regulations 2014, as amended, particularly the suitability requirements in Part 4 and paragraph 21 on the single central register. The School Staffing (England) Regulations 2009 apply to maintained schools and are not presented as governing this independent school.

2.10 Equality Act 2010

2.11 The UK General Data Protection Regulation (UK GDPR)

2.12 Data Protection Act 2018

2.13 Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended; relevant Police Act 1997 and DBS provisions; Crime and Policing Act 2026 changes to regulated activity, as commenced.

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

2.15 Disclosure and Barring Service current identity checking and regulated activity guidance, including the route appropriate to the role.

2.16 DfE Independent School Standards guidance April 2026 and the Ofsted non-association independent schools inspection toolkit September 2026.

2.17 DfE Keeping children safe in education 2026, especially Parts three and four.

2.18 DfE 'Recruit teachers from overseas'

2.19 Disclosure & Barring Service 'Regulated activity with children in England and Wales'

2.20 Home Office Employer's guide to right to work checks, edition dated 1 October 2026; UK GDPR and Data Protection Act 2018 as amended, including relevant Data (Use and Access) Act 2025 provisions.

3. Definitions

3.1 "Regulated activity" includes:

3.2 Regulated activity is determined under the Safeguarding Vulnerable Groups Act 2006 as amended and current KCSIE guidance. It includes qualifying teaching, training, instruction, care, supervision, wellbeing advice and certain transport activities, subject to the relevant activity and frequency conditions.

3.3 Qualifying work in specified establishments, including schools, may be regulated activity where the relevant conditions and opportunity for contact apply. Staff document the assessment for the actual duties and frequency, including activity across settings.

3.4 Relevant personal care and healthcare can be regulated activity without a frequency threshold. Overnight activity is assessed against the statutory conditions. HR checks the current definition rather than relying on job title alone.

3.5 Activities outside regulated activity are assessed separately for the lawful level of DBS check. Examples and safeguards include:

3.6 Work that does not meet the statutory activity or frequency conditions; its suitability for an enhanced check is considered separately.

3.7 Occasional visitors are assessed by role and contact; professional identity and assurance of appropriate employer checks are obtained where applicable.

3.8 Supervision does not exempt a volunteer undertaking qualifying teaching, training, instruction or supervision from regulated activity under the September 2026 changes. Required barred-list information is obtained for such volunteers.

3.9 "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/homes manager to provide such direction and supervision.

3.10 A standard DBS check provides the conviction and caution information permitted by law, subject to current filtering rules. A standard check is not a substitute for an enhanced check where the role requires one.

3.11 An "enhanced DBS" 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.

3.12 An "enhanced DBS with barred list check" 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.

3.13 The children's barred list identifies people barred from regulated activity with children. A section 128 direction is a separate restriction on independent-school management. Its disclosure through a DBS application depends on the correct independent-school workforce

designation; an ordinary DBS check must not be assumed to complete the section 128 check.

3.14 A "section 128 check" 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.

3.15 "Safer recruitment" 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.

4. Roles and responsibilities

4.1 The directors are responsible for:

4.2 Agreeing and monitoring effective policies to ensure recruitment at the company is in accordance with the legislation outlined above.

4.3 Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.

4.4 Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the company.

4.5 Appointing an appropriate recruitment panel.

4.6 Ensuring that all recruitment panel members have undertaken unconscious bias training before the selection process begins.

4.7 Ensuring that at least one member of the recruitment panel has undergone safer recruitment training.

4.8 Ensuring that all members of the recruitment panel understand their role, i.e. advisory or decision making.

4.9 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.

4.10 Benchmarking the success of any advertising methods used, as well as the overall success of the recruitment process.

4.11 Ensuring a member of the board is on the recruitment panel for a new headteacher/homes manager.

4.12 Ensuring that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.

4.13 Monitoring the school's and children's homes SCR to ensure that the necessary vetting checks for employees are carried out.

4.14 Ensuring that equal opportunities are established and implemented throughout the recruitment process.

4.15 Ensuring that the salary of the successful candidate is determined.

4.16 Accommodating the needs of new employees and making reasonable adjustments when necessary.

- 4.17** Ensuring that the DPO reviews this policy and that any recruitment data that is kept is in accordance with the Records Management Policy.
- 4.18** Ensuring that they have the skills to carry out effective selection processes, including knowing when and how to request references.
- 4.19** Establishing a recruitment panel including at least one individual who has completed safer recruitment training within the past five years.
- 4.20** The recruitment panel is responsible for:
- 4.21** Creating the advert and ensuring it meets all the necessary requirements.
- 4.22** Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- 4.23** Appropriately delegating responsibility for recruitment to the headteacher/homes manager.
- 4.24** Ensuring that the interview addresses leadership ability, team working skills, integrity, understanding of the school's/children's homes ethos and vision, and why the candidate believes they would be a good fit for the company.
- 4.25** Ensuring that the interview addresses safeguarding practices.
- 4.26** Ensuring that the interview addresses the candidate's motivation, reasons for being interested in joining the company, and attitude to working with children.
- 4.27** Appointing an appointing officer who will be responsible for the entire management of the recruitment process.
- 4.28** Agreeing with the successful candidate when other members of the company will be informed about their appointment, including staff members and parents.
- 4.29** Ensuring that references have been received where requested.
- 4.30** Ensuring that all references for a shortlisted candidate are obtained prior to interview, properly scrutinised, and that information is not contradictory, unclear, or incomplete, with clarification requested when appropriate.
- 4.31** Capability information is requested where relevant to assessing suitability. Requirements specific to maintained-school employers are distinguished from the school's own recruitment practice.
- 4.32** Where possible, ensuring that the shortlisting panel and interviewing panel are comprised of the same people.
- 4.33** The appointing officer is responsible for:
- 4.34** Managing the entire recruitment process.
- 4.35** Sourcing suitable candidates.
- 4.36** Acting as a point of contact between candidates and the company.
- 4.37** Reviewing and scrutinising candidates' applications and identifying any gaps.
- 4.38** Preparing the recruitment panel to conduct interviews.
- 4.39** Organising interviews with shortlisted candidates.

4.40 Ensuring the recruitment process is carried out in line with the relevant school/children's homes policies.

4.41 Ensuring that the candidate chosen to fill a vacancy is suitable for the role.

4.42 The headteacher/homes manager is responsible for:

4.43 Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors and agency workers working within the schools/children's homes.

4.44 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.

4.45 Leading the interview when the candidate is at a lower level.

4.46 Ensuring that the successful candidate receives the appropriate training, e.g. safeguarding and induction.

4.47 Ensuring that all relevant staff members are familiarised with this policy.

4.48 During the recruitment process, and especially during the initial stages, the recruitment panel and the headteacher/homes manager will be watchful of candidates displaying the following characteristics:

4.49 No understanding or appreciation of children's needs

4.50 Expressing that they want the role to meet their needs at the expense of children

4.51 Using inappropriate language in relation to children

4.52 Expressing extreme views or views that do not support safeguarding practices

4.53 Displaying unclear boundaries with children

4.54 Providing vague answers when asked about their experience and being unable to explain gaps in their employment

4.55 The DPO is responsible for:

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

4.57 The DSL is responsible for:

4.58 Deciding when it is appropriate or necessary to disclose any safeguarding concerns or allegations as part of a reference, in line with KCSIE.

4.59 Discussing with the headteacher/homes manager the suitability of a candidate when a reference has disclosed safeguarding concerns or prior allegations.

5. Planning, advertising and shortlisting

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

5.2 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 headteacher/homes manager 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.

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

5.4 The homes manager/director and headteacher/homes manager will:

5.5 Decide on the recruitment timeframe.

5.6 Decide who will be involved in the process and what their roles will be, e.g. who forms the recruitment panel and who will lead interviewing.

5.7 Prepare 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.

5.8 Application information explains the checks applicable to the post. Childcare disqualification requirements are applied only where the role and provision fall within their scope; they are not imposed automatically on this 11–18 school.

Advertising

5.9 The company will consider the following information when advertising for a role within the schools/children's homes:

5.10 The skills, abilities, experience, attitude and behaviours required for the post

5.11 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

5.12 Advertisements will include:

5.13 A statement of the company's commitment to safeguarding and promoting the welfare of pupils whilst making clear that safeguarding checks will be undertaken.

5.14 The safeguarding responsibilities of the post as per the job description and person specification.

5.15 Information about exemption from the Rehabilitation of Offenders Act and the current filtering rules. Applicants are not required to disclose protected convictions or cautions.

5.16 Vacancies will be advertised through external media, such as the local newspaper, with due consideration to the company's Staff Equality, Equity, Diversity and Inclusion Policy, ensuring that the advertisement reaches a wide range of groups. 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. The contact number of the appointing officer and details of the application process will be clearly outlined.

5.17 Application forms will be accessible on the company's website.

5.18 The company may utilise social media for recruitment, and if doing so, will create a social media recruitment strategy to ensure that the advertisement is reaching the right people and is communicating the ethos of the effectively.

5.19 When an advert receives a response, the recruitment panel will ensure that candidates receive the application pack.

Application forms

5.20 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.

5.21 The company will also provide a copy of the Child Protection and Safeguarding Policy and information on employment of ex-offenders in the application pack.

5.22 Applicants will be required to provide the following:

5.23 Personal details, e.g. their current and former names, current address, and national insurance number

5.24 Details of their current or most recent employment, including the reason for leaving

5.25 Full employment history, including explanations for any gaps in their employment

5.26 Qualifications, the awarding body and the date of the award

5.27 Details of references

5.28 A statement of their personal qualities and an explanation of why they meet the person specification to be a suitable candidate for the role

5.29 A declaration form outlining whether they are barred from teaching

5.30 The company will only accept a CV alongside a completed application form; a CV on its own will not be accepted. When shortlisting candidates for an interview, all application forms will be considered. Shortlisting criteria will be agreed in advance by the recruitment panel.

5.31 Candidates who are shortlisted will meet all the essential aspects of the person specification requirements. The company will ensure that the shortlisting process is as systematic as possible, and that the recruitment panel reads through all applications. Each member of the panel will create their own shortlist which will then be collated and discussed. Candidates will be assessed against the same shortlisting criteria to ensure a fair process.

Shortlisting

5.32 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.

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

5.34 Relevant convictions or cautions that are not protected under the current filtering rules, with clear instructions on what must not be disclosed.

5.35 If they are known to the police and children's social care services.

5.36 Relevant disqualification information only where the statutory childcare regime applies to the role.

5.37 Any relevant overseas information.

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

5.39 When shortlisting candidates, the company will:

5.40 Ensure that at least two people carry out the shortlisting proceedings – ideally, these two people will also conduct the interview.

5.41 Assess whether there are any inconsistencies or gaps in the candidate's employment and consider the reasons given for them.

5.42 Explore any further potential concerns.

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

5.44 Interviews will be arranged for the shortlisted candidates.

6. Invitation to interview

6.1 Before interview invitations are sent, the recruitment panel will ensure that application packs are sent and include the following:

6.2 A copy of the advertisement

6.3 A comprehensive job description

6.4 A comprehensive person specification

6.5 Any equal rights material, e.g. an equal opportunities statement

6.6 A brief outline of the school/children's home, its values and aims

6.7 Any relevant company policies, e.g. the Child Protection and Safeguarding Policy

6.8 Once a shortlist has been confirmed, the candidates to be invited for interviews will be contacted by the recruitment coordinator 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, the areas that will be explored and what documents they should bring.

7. Pre-interview checks

7.1 Where possible the recruitment panel will complete the necessary checks at pre-interview stage.

7.2 Pre-interview checks include the following:

7.3 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

7.4 Verifying that the candidate has qualifications or experience relevant to the post

7.5 Checking references against application forms and noting down discrepancies or concerns, and following up these concerns with referees

7.6 Checking and, where necessary, following up candidates' self-declaration forms

8. Requesting references

8.1 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 an appointment. References will always be

requested directly from the referee and from a senior person with appropriate authority, rather than a colleague. The company's standard request form will always be used to obtain references.

8.2 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.

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

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

8.5 If a candidate has previously worked in a position involving work with children or vulnerable adults, verification so far as reasonably practicable of the reason why the employment or position ended will be obtained.

8.6 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 that they originate from a legitimate source.

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

9. Checking references

9.1 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.

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

9.3 Call the referee to discuss the reference further

9.4 Email the referee the reference for confirmation of its accuracy

9.5 The recruitment 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.

9.6 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 headteacher/homes manager will record this on the recruitment file as the reason for non-appointment.

9.7 References are factual, accurate and fair. Any doubt is referred to the Headteacher and HR, with safeguarding advice where necessary; information is not omitted simply to avoid an uncomfortable disclosure.

10. Providing references

10.1 References are supplied through the authorised process using an appropriate lawful basis. Consent is not treated as the only possible basis for necessary safeguarding information sharing.

10.2 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.

10.3 The headteacher/homes manager 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.

10.4 Staff members will make the headteacher/homes manager 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 company. The staff member will use their own paper or an email address unaffiliated with the company and ensure that the reference is not linked to the company in any way.

10.5 Relevant verified capability information is supplied where lawful and requested. Any specific statutory duty is applied only to the category of employer and role to which it relates.

10.6 If, as part of a settlement agreement, the company has agreed to provide a reference for a member of staff, the headteacher/homes manager 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/homes manager will decide if the reference is changed or withdrawn, with legal advice sought where necessary, and will notify the employee of any decision first.

10.7 The company 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.

10.8 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.

11. Content of references

11.1 Basic information will always be expected in references received, 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.

11.2 References contain factual, verifiable and relevant information. They confirm suitability to work with children and disclose substantiated safeguarding matters appropriately. Concerns are not concealed by a settlement agreement or by a blanket rule limiting references to positive information.

11.3 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.

12. Previous disciplinary action

12.1 The recruitment panel will ensure that any references requested by the company 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.

12.2 Information from DBS checks will not be included in references provided by the company. Information regarding criminal offences from other sources will not be included, unless the headteacher/homes manager deems it appropriate and HR advice has been sought.

12.3 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.

12.4 Allegations which were proven to be false, unfounded, 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, unfounded, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.

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

13. Use of data and confidentiality

13.1 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.

13.2 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.

13.3 Special-category and criminal-offence data are processed or shared only where the appropriate lawful basis and additional statutory conditions are met. HR and the DPO advise on necessity, minimisation and confidentiality.

13.4 Requests to access references are considered under applicable data protection law, including the confidential-reference exemption. There is no automatic right to receive every confidential reference or requirement to offer approval of its wording.

14. Online searches on shortlisted candidates

14.1 The company is committed to ensuring that safeguarding is a top priority; therefore, in line with KCSIE, the school will consider carrying out online searches on shortlisted candidates as part of their due diligence. Online searches solely aim to help identify any incidents or

issues that have happened, and are publicly available online, which the company may want to explore with the applicant at interview.

14.2 Online searches will be conducted on shortlisted candidates only, and only where the company considers this appropriate. The company 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. Shortlisted candidates will be informed that online searches may be carried out as part of due diligence checks.

14.3 Online searches will be carried out by an individual who is independent of the recruitment process to minimise the risk of bias or discrimination and to ensure that only relevant information is considered. The person responsible for carrying out online searches will have due regard to Part three of KCSIE.

14.4 The online search process may include searching for the candidate by name via search engines and social media, such as:

14.5 Google

14.6 Facebook

14.7 LinkedIn

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

14.9 Inappropriate behaviour, jokes or language.

14.10 Discriminatory comments.

14.11 Inappropriate images.

14.12 Drug or alcohol misuse.

14.13 Anything that suggests the candidate may not be suitable to work with children.

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

15. The interview

15.1 During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison by a designated note-taker on the interview panel. Any concerns raised through contact with referees will be discussed with the candidate at this stage. The recruitment 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 company will use a range of selection techniques to identify the most suitable person for the post.

15.2 Interview questions seek to:

15.3 Find out what attracted the candidate to the post being applied for and their motivation for working with children.

15.4 Exploring their skills and asking for examples of experience of working with children.

15.5 Looking at any gaps in employment or where the candidate has changed employment or location frequently and asking about the reasons for this.

15.6 Seek examples of the candidate's previous experience.

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

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

15.9 Failure to recognise the adult's responsibility to maintain professional boundaries and protect children, while respecting pupils' dignity and rights.

15.10 Lack of recognition or understanding of the vulnerability of children.

15.11 Inappropriate idealisation of children.

15.12 Inadequate understanding of appropriate boundaries between adults and children.

15.13 Indicators of negative safeguarding behaviours.

15.14 Attempts to push or overstep boundaries.

15.15 Consistent rule-breaking behaviour.

15.16 Candidates shortlisted for interview will be given the opportunity to complete a self-disclosure form before their interview, to give the interview panel time to consider the information provided. Candidates will also be asked to show proof of identification and qualifications at interview – this proof will be viewed and checked by the interview panel.

15.17 The candidate can discuss concerns and ask questions. Interviews are normally in person; remote interviews follow the safeguards in the Remote recruitment section. Additional assessment exercises may include:

15.18 Presentation – (depending on role applied for)

15.19 Written Exercise

15.20 Assessment Shift (if appropriate)

16. After the interview

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

16.2 Assess all candidates' performance using the same agreed criteria.

16.3 Ask the successful candidate to provide proof of identification and qualifications for the company's records, and to complete the DBS check as soon as possible.

16.4 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.

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

16.6 After choosing a successful candidate, the company will:

16.7 Make a conditional offer of employment to the candidate.

16.8 Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.

16.9 Complete the relevant pre-appointment checks.

16.10 Protected convictions and cautions are not requested or used adversely in appointment decisions. Lawfully disclosable information is assessed individually for relevance and risk; a conviction does not automatically preclude appointment unless a legal prohibition applies.

17. Remote recruitment

17.1 The company will follow all the requirements set out in this policy when recruiting remotely, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this. The ICT technician will research and select a suitable online platform through which online interviews may take place, taking into account ease of use, privacy measures and suitability for the purposes of online interviews. Online interviews will be conducted in line with the company's Data Protection Policy at all times.

17.2 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.

17.3 The company 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 company 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.

17.4 The company 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:

17.5 The candidate will participate in the interview with both the video camera and microphone features enabled at all required times

17.6 The candidate will participate in the interview in a suitable setting – a quiet area with a neutral background

17.7 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

17.8 Any proposal to record a remote interview is explained in advance, including purpose, lawful basis, access and retention. Recording is not automatic and accessibility and less intrusive alternatives are considered.

17.9 When recording an online interview, prior permission will be acquired from the candidate in writing via email and all members of the interview will be notified before the interview commences via email, and again once they have joined the interview before recording commences. If the candidate does not provide consent to recording the interview, the company will consider whether the online interview can still take place in line with company's safeguarding and records management responsibilities.

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

17.11 If a candidate refuses to interview remotely, the company will consider whether alternative arrangements for an in-person interview are possible, having due regard to the company's equality duties at all times. If this is not possible, then the company will sensitively inform the candidate that the remote interview process is a requirement of the application process and have a considerate and good-natured discussion with the candidate as to whether they can continue with the recruitment process at this time.

18. Pre-appointment checks

18.1 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.

18.2 When appointing new staff, the company will:

18.3 Verify the candidate's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.

18.4 Obtain an enhanced DBS check via the candidate and, for candidates engaging in regulated activity, barred list information.

18.5 If an exceptional start before receipt of the enhanced DBS certificate is contemplated, the Headteacher must first check that the route is lawful under the Independent School Standards and KCSIE, complete required barred-list and other checks, record a risk assessment and ensure appropriate supervision. School practice is normally to wait for completed checks.

18.6 After a conditional offer, assess mental and physical fitness for the role lawfully, taking account of reasonable adjustments. Pre-offer health questions are limited to those permitted by the Equality Act 2010.

18.7 Verify the person's right to work in the UK.

18.8 Obtain two written references, including a reference from the person's most recent employer(s), if any.

18.9 So far as reasonably practicable, verify the reason why the employment or position ended if the candidate has previously worked in a position involving work with children or vulnerable adults.

18.10 Make further checks as appropriate on any individual who has lived or worked outside the UK.

18.11 Verify professional qualifications, as appropriate.

18.12 A full employment history, together with a satisfactory explanation of any gaps in employment, in writing.

18.13 Check individuals taking up management positions are not subject to a section 128 direction.

18.14 For those in management, trustee or governor roles, conduct a section 128 check.

18.15 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.

18.16 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 company a chance to defend its decision if challenged.

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

18.18 The seriousness and relevance to the post which they have applied to

18.19 How long ago the offence occurred

18.20 The country where the offence occurred

18.21 Whether it was a one-off incident or a history of incidents

18.22 The circumstances around and at the time of the incident

18.23 Whether the individual accepted responsibility for what happened

18.24 Whether the offence has been decriminalised

18.25 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.

18.26 Relevant teacher prohibitions, directions and restrictions are checked through DfE's Check a teacher's record. Section 128 checks cover actual management responsibilities, including relevant leadership and proprietor roles.

18.27 Where a recent school employment exemption may be available, HR verifies the exact statutory conditions and records the evidence. It is not an automatic assurance of suitability or a blanket exemption from other checks. Jasmine Hall normally obtains an enhanced DBS check for new staff.

18.28 Required barred-list checks, identity, suitability and other applicable checks are completed regardless of any permitted DBS exemption.

18.29 An overseas history is assessed independently; recent employment in England does not automatically remove the need for appropriate overseas enquiries.

18.30 The Headteacher records the check route and supporting evidence before appointment.

Volunteers

18.31 A written assessment identifies each volunteer's duties, frequency, activity across settings and lawful vetting requirements. It does not substitute for checks required for regulated activity.

18.32 Volunteers in regulated activity require enhanced DBS checks with children's barred-list information, including qualifying supervised volunteers. Existing volunteers newly brought within regulated activity by the 2026 changes must have their barred-list status checked through the appropriate route before continuing that activity.

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

Candidates who have lived outside the UK

18.34 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.

18.35 Appropriate overseas enquiries are made for people who have lived or worked outside the UK, using current GOV.UK criminal-record and professional-conduct guidance. There is no blanket school vetting exemption for residence shorter than 12 months; any visa-specific residence threshold is distinguished from school safeguarding checks.

18.36 The company 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.

18.37 DBS identity verification and immigration right-to-work checks are separate processes. If standard DBS documents are unavailable, HR follows the current DBS alternative route where applicable. No person starts employment without a lawful right-to-work check and the required safeguarding checks.

18.38 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

18.39 In the case of any employee working at the company who is sourced from an agency or third-party organisation, the company will obtain written notification from the organisation confirming that they have carried out the same checks as the company would otherwise perform on any individual who will be working at the schools/children's homes, 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 generally be kept where appropriate.

18.40 The company 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 and student teachers

18.41 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.

18.42 For fee-funded trainees, the school obtains written confirmation from the initial teacher training provider of the required checks and suitability to work with children. School still verifies identity and manages supervision and safeguarding.

Existing staff

18.43 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.

18.44 Further checks are considered where a person moves into regulated activity, returns after a relevant break in service or raises suitability concerns. Allegations follow safeguarding procedures, including LADO liaison where required; the school gathers sufficient information for referral decisions.

18.45 A DBS referral duty arises where the school removes someone from regulated activity, or would have removed them had they not left, and the relevant conduct, harm-test or relevant-offence conditions are met. This applies to staff and volunteers.

18.46 The Headteacher and HR assess the statutory referral conditions promptly and record the decision.

18.47 Suspension, resignation or redeployment does not in itself prove the referral conditions, but must not be used to avoid a referral where they are met.

18.48 Where a teacher is dismissed or ceases to be used for serious misconduct, or would have been dismissed had they not left, the employer also considers referral to the Teaching Regulation Agency.

18.49 Required DBS referrals are made as soon as possible once the conditions are met, with supporting information. Resignation, settlement or an incomplete disciplinary process must not be used to evade the duty. Police and LADO referrals are considered separately.

Contractors

18.50 The company 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.

18.51 The company will set out its safeguarding requirements in the contract between the contractor's organisation and the school/children's home.

18.52 For self-employed contractors, the school obtains the appropriate check or verifies an existing certificate obtained through an eligible route. It checks the level, workforce and barred-list information required and verifies identity on arrival.

Adults who supervise children on work experience

18.53 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. More information related to checks on work experience providers is outlined in the school's Work Experience Policy.

Children staying with host families

18.54 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 circumstances, the LA will be consulted.

Governors

18.55 Checks for proprietor-body and governance appointments follow the Independent School Standards and KCSIE. Required suitability, identity, enhanced DBS and section 128 checks are completed; barred-list information is obtained only where the person undertakes regulated activity. Governance alone is not regulated activity.

18.56 Newly appointed governors will be subject to a suitability check, which includes:

18.57 An identity check.

18.58 The right to work is checked where the person is employed; it is not automatically an immigration requirement for every unpaid governance appointment.

18.59 An enhanced DBS check.

18.60 Appropriate additional suitability checks where the person has lived or worked overseas, without an arbitrary 12-month safeguarding threshold.

18.61 Governors will be subject to a section 128 direction check.

19. Right to work checks

19.1 Before employment begins, the company completes a lawful manual, Home Office online or eligible digital identity route, in line with the October 2026 employer guidance. A conditional offer may precede the check but work cannot begin without it.

19.2 When conducting a manual, document-based check, the company 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 20 of this policy.

19.3 The company verifies the person's entitlement to do the proposed work using the route applicable to their status, including any restrictions and follow-up requirements.

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

19.5 The candidate provides a document confirming receipt of an application to EUSS on or before 30 June 2021

19.6 The candidate provides a non-digital certificate of application confirming receipt of an application to the EUSS on or after 1 July 2021

19.7 The company has checked a digital certificate of application and has been directed to the Home Office's Employer Checking Service

19.8 The candidate provides an Application Registration Card stating the holder is permitted to undertake the work in question

19.9 The company 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

19.10 The company 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.

19.11 The company 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.

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

19.13 A certified digital verification route may be used only for eligible checks. It does not replace Home Office online checks where required or the employer's responsibility to confirm identity and retain evidence.

20. Identification checking process

20.1 Identity is verified under the current DBS and Home Office requirements for the relevant route. Original documents are examined where a manual route requires them; valid digital or online evidence is accepted where that route permits it. A video call alone is not assumed to establish a right-to-work statutory excuse.

20.2 Photographic identity is compared with the applicant. Current and former names are reconciled through appropriate evidence rather than automatically rejecting documents in a previous name.

20.3 The company 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 company will hold a discussion with the candidate about the reasons why. The company will always aim to check the name on the candidate's birth certificate in order to validate their identity.

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

20.5 Documents meet the date and validity conditions of the specific DBS or right-to-work route; a blanket three-month rule is not applied to every document.

20.6 Right-to-work evidence is retained for employment and two years afterwards. Other identity and recruitment records follow their own lawful retention schedule; this period is not automatically applied to copies of every document.

20.7 In line with the UK GDPR and Data Protection Act 2018, the company 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.

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

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

21. After the pre-appointment checks

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

21.2 Agree a start date with the candidate.

21.3 Complete the recruitment file with application, verified references, check records, necessary identity and qualification evidence, contract and induction information. DBS

certificate copies are retained only where justified and for no longer than the permitted period.

21.4 Add the required details of the checks carried out to the school's/children's homes SCR.

22. Single central record (SCR)

22.1 The company will maintain and regularly update the SCR.

22.2 All new employees will be added to the record, which will include:

22.3 All staff (including supply staff) who work at the school.

22.4 All others who work in regular contact with children in the school, including volunteers.

22.5 All members of the proprietor body.

22.6 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:

22.7 An identity check

22.8 A barred list check

22.9 An enhanced DBS check

22.10 A prohibition from teaching check

22.11 Appropriate overseas suitability and professional-conduct checks. HR does not rely on an obsolete blanket EEA sanctions search.

22.12 A check of professional qualifications

22.13 A section 128 check

22.14 A check to establish the person's right to work in the UK

22.15 For those in management, trustee or governor roles, a section 128 check

22.16 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.

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

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

23. Safer recruitment training

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

23.2 As a measure of good practice, the company will ensure that this training is renewed every five years.

23.3 Staff and governors involved in the recruitment process will have an awareness of information regarding the following:

23.4 The recruitment and selection process

23.5 Pre-appointment and vetting checks, regulated activity and recording of information

23.6 Other checks that may be necessary for, staff, volunteers and others

23.7 How to ensure the ongoing safeguarding of children and legal reporting duties on employers

24. Safeguarding

24.1 For references provided to the company, 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.

24.2 Safeguarding concerns about adults are handled through the school's allegations and low-level concerns procedures. Concerns about staff go to the Headteacher; concerns about the Headteacher go to the proprietor. LADO advice and police or social-care referrals are sought as required. Necessary information is shared lawfully and proportionately.

24.3 For all safeguarding allegations, excluding those found to be malicious or false unless the individual consents to their retention, 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, unfounded, unsubstantiated or malicious – this includes if it is a history of repeated concerns or allegations which have been found to be false, unfounded, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.

25. Monitoring and review

25.1 This policy is reviewed annually by the Directors and HR manager.

25.2 Any changes are communicated to staff and relevant stakeholders. The proprietor records approval of this policy.

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

25.4 The next scheduled review date for this policy is September 2027.

26. Induction and ongoing assurance

26.1 Before unsupervised deployment, staff receive safeguarding induction covering the Child Protection Policy, Staff Code of Conduct, whistleblowing, attendance safeguarding, online safety and the DSL team. All staff read Part one of KCSIE 2026 in full; the overview does not replace it.

26.2 The Headteacher reviews the SCR with HR regularly and the proprietor checks compliance at least termly as school practice. The SCR records required checks, dates and the checker or supporting evidence; pending or missing checks are escalated immediately.

26.3 The Headteacher documents any decision to use the DBS Update Service, checking identity, certificate level, workforce, barred-list content and lawful access. Required checks are refreshed when circumstances demand; routine rechecking is not a substitute for ongoing safeguarding supervision.

26.4 Visitors attending as family members or guests are not routinely asked for DBS certificates. Professional visitors provide identity and appropriate assurance of checks. Access, escorting and supervision are managed under the Safeguarding Policy.

27. Recruitment completion checklist

27.1 The appointing officer records the role and regulated-activity assessment, interview and reference scrutiny, identity, right to work, DBS and barred-list checks as applicable, teaching prohibition, management restrictions, qualifications, overseas checks and fitness with adjustments. All unresolved discrepancies are addressed before appointment.

27.2 Agency assurances identify the person and relevant checks; the school verifies identity on arrival and obtains the certificate copy where disclosure requires it. Educational providers delivering services on the school's behalf, including online, are subject to appropriate assurance and safeguarding arrangements.

27.3 No applicant is placed on an unsupervised assessment shift with pupils before the required checks and risk controls. Recruitment decisions and equality adjustments are recorded, with access limited to authorised people.

Source references

KCSIE 2026

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Independent School Standards guidance April 2026

<https://www.gov.uk/government/publications/regulating-independent-schools>

Home Office right to work guidance October 2026

<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

Ofsted non association independent schools inspection toolkit September 2026

<https://www.gov.uk/government/publications/independent-school-inspection-toolkit-operating-guide-and-information>