



Smoothstone Care and Education

Safer Recruitment Policy

Policy reviewed and updated	September 2026
Next scheduled review	September 2027
Policy owner	Smoothstone Directors / HR
Applies to	Smoothstone schools and registered children's homes
Core guidance	Keeping Children Safe in Education 2026 and applicable children's homes regulations

Safeguarding begins before appointment.

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1. Statement of intent and scope

Smoothstone Care and Education is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is a core safeguarding process and is designed to deter, identify and reject people who may be unsuitable to work with children, while ensuring recruitment is fair, lawful and inclusive.

This policy applies to recruitment and appointment activity across Smoothstone's independent schools and registered children's homes. Where the legal requirements differ between education and residential children's care, this policy states the relevant requirement. The stricter requirement will be followed where a role spans more than one setting or regulatory regime.

This policy applies to employees, workers, volunteers, agency and third-party staff, contractors, self-employed workers, trainee teachers, students on placement and, where relevant, members of the proprietor body.

2. Legal and regulatory framework

This policy has regard to current legislation and statutory guidance, including:

- Keeping Children Safe in Education 2026 (KCSIE), particularly Part three: Safer recruitment and Part four: safeguarding concerns or allegations about staff.
- The Education (Independent School Standards) Regulations 2014, as amended, including Part 4 of the Schedule on suitability of staff, supply staff and proprietors.
- The Children's Homes (England) Regulations 2015, particularly regulations 32 and 33 and Schedule 2, together with the Guide to the Children's Homes Regulations, including the quality standards.
- Safeguarding Vulnerable Groups Act 2006, as amended, including the 2026 changes to regulated activity.
- Teachers' Disciplinary (England) Regulations 2012 and relevant provisions of the Education Act 2002.
- The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014.
- Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, as amended.
- Equality Act 2010, including the restrictions on pre-employment health questions and the Public Sector Equality Duty where applicable.
- Immigration, Asylum and Nationality Act 2006 and current Home Office right-to-work guidance.
- UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.
- Current Disclosure and Barring Service (DBS) eligibility, identity checking and Code of Practice guidance.

The School Staffing (England) Regulations 2009 are not the statutory basis for recruitment in Smoothstone's independent schools and are therefore not relied upon by this policy.

3. Core safer recruitment principles

- Safeguarding considerations are built into every stage of recruitment, from job design to induction and ongoing employment.
- All appointment decisions are based on evidence, role requirements and recorded decision-making.
- Applicants are treated fairly and consistently, with reasonable adjustments made where required.
- A CV will not be accepted on its own for roles covered by this policy; a completed application form and full employment history are required.
- Offers of appointment are conditional on satisfactory completion of all checks required for the particular role and setting.
- The level of DBS check requested will be no higher than the law allows and will reflect the duties of the role.
- Barred-list information will only be requested where the person will engage in regulated activity.
- Safeguarding does not end at appointment. Smoothstone maintains ongoing vigilance and acts on concerns about suitability.

4. Roles and responsibilities

4.1 Directors / proprietor body

- Ensure effective safer recruitment policies and systems are in place across Smoothstone.
- Ensure independent-school proprietor suitability requirements are met and recorded.
- Provide strategic oversight and challenge in relation to recruitment, safeguarding and the single central record.
- Ensure sufficient trained personnel are available to conduct safe and fair recruitment.

4.2 Headteacher / Registered Manager

- Ensure the correct checks are identified and completed for appointments within their setting.
- Ensure nobody is permitted to work in a role contrary to a statutory prohibition, barred-list restriction or other relevant restriction.
- Ensure any exceptional decision to permit a person to begin work before all normally required evidence is complete is lawful, risk assessed, documented and appropriately supervised.
- Ensure safeguarding concerns arising during recruitment are escalated to the appropriate safeguarding lead, HR and external authority where required.
- Ensure recruitment records are available for inspection.

4.3 HR / appointing officer

- Coordinate the recruitment process, issue compliant recruitment documentation and maintain the audit trail.
- Scrutinise applications for gaps, inconsistencies and unexplained changes.
- Obtain and verify references directly from referees.
- Coordinate identity, DBS, right-to-work, qualification and other relevant checks.
- Ensure required information is entered on the school single central record or children's-home recruitment record before the person begins unsupervised duties.
- Process recruitment information in accordance with data-protection requirements.

4.4 Recruitment panel

- Apply agreed shortlisting and interview criteria consistently.
- Include at least one person who has completed appropriate safer recruitment training.
- Explore safeguarding suitability, motivation to work with children, professional boundaries, employment history and any discrepancies identified during due diligence.
- Record the evidence considered and the reasons for appointment or non-appointment.

4.5 Designated Safeguarding Lead / safeguarding lead

- Advise where recruitment information raises safeguarding concerns.
- Ensure concerns about adults are considered in line with KCSIE, local authority procedures and the organisation's safeguarding policy.
- Support decisions about what safeguarding information should lawfully be included when Smoothstone provides a reference.

5. Regulated activity and DBS eligibility

The definition of regulated activity relating to children is set by law and must be applied to the actual duties and frequency of the role. From 1 September 2026, the previous 'supervision exemption' for volunteers was removed. Supervision therefore does not, by itself, prevent volunteering activity from being regulated activity.

In summary, regulated activity can include paid or unpaid teaching, training, instructing, caring for or supervising children; providing advice or guidance on their physical, emotional or educational wellbeing; driving a vehicle solely for children; certain work in specified establishments such as schools; and relevant personal care or health care. Frequency conditions apply to some activities, while relevant personal care and health care are regulated activity regardless of frequency.

Most staff in Smoothstone schools and children's homes will engage in regulated activity. Where a role is not regulated activity but is eligible for another level of DBS check, the appropriate lawful level will be used. Smoothstone will use current DBS eligibility guidance rather than relying on outdated job-title assumptions.

6. Planning, advertising and application forms

Before advertising, the recruiting manager and HR will confirm the duties, safeguarding responsibilities, regulated-activity status, required qualifications and pre-appointment checks for the role.

Advertisements and recruitment information will include:

- Smoothstone's commitment to safeguarding and promoting the welfare of children and young people.
- The safeguarding responsibilities of the role and whether the role is expected to involve regulated activity.
- A statement that appropriate safeguarding and vetting checks will be undertaken.
- Where applicable, that the post is exempt from the Rehabilitation of Offenders Act 1974 and subject to the Exceptions Order.
- A statement that shortlisted candidates may be subject to an online search as part of safeguarding due diligence.

Applicants will be required to provide:

- current and former names and contact details;
- a full chronological employment and education history, with written explanations for gaps;
- current or most recent employment and reasons for leaving;
- relevant qualifications and professional registrations;
- details of suitable referees; and
- a supporting statement addressing the person specification.

Application materials will explain that it is an offence for a person who is barred from regulated activity with children to seek to engage in regulated activity from which they are barred.

7. Shortlisting, self-declaration and online searches

At least two people will normally shortlist, using criteria agreed in advance. The panel will scrutinise applications for unexplained gaps, inconsistencies, repeated moves, changes of name and information that requires clarification.

Only shortlisted candidates will be asked to complete a safeguarding self-declaration. The declaration will seek only information that Smoothstone is legally entitled to request and which is relevant to the role. This may include relevant criminal-history information, barred status for regulated-activity roles, relevant overseas information and any prohibition or disqualification that lawfully prevents the individual from carrying out the proposed role.

Shortlisted candidates will be informed that online searches may be carried out as part of due diligence. In line with KCSIE 2026, Smoothstone will consider an online search for each shortlisted candidate and will normally carry one out unless the decision not to do so is recorded. Searches will be proportionate, limited to publicly available information and focused on matters that may be relevant to suitability to work with children or the role. Any concern relied upon will be put to the candidate so that they have an opportunity to respond.

8. References and employment history

References are an important safeguarding check. Smoothstone will normally obtain two written references for external appointments. For children's-home appointments, two written references are required by Schedule 2 of the Children's Homes (England) Regulations 2015.

- References will be sought directly from the referee, not supplied by the applicant.
- References should be obtained before interview where possible so that concerns can be explored at interview.

- At least one reference will be from the current employer; where the applicant is not currently employed, the most recent relevant period of employment will be verified.
- Where the applicant currently works in a school or college, the reference should be completed by a senior person with appropriate authority and, where relevant, confirmed by the headteacher/principal in respect of disciplinary investigations.
- Where the applicant has previously worked with children but is not currently doing so, Smoothstone will seek a reference from the relevant employer from the last time the applicant worked with children.
- Open references or testimonials addressed 'to whom it may concern' will not be relied upon.
- Electronic references will be verified as originating from a legitimate source.
- References will be compared with the application form and discrepancies will be followed up with the referee and candidate.
- For applicants who have previously worked in a position involving children or vulnerable adults, Smoothstone will verify, so far as reasonably practicable, the reason why that employment or position ended.

Safeguarding information in references will be handled in line with section 22 of this policy.

9. Selection and interview

The interview process will be structured and will use a range of appropriate selection techniques. Questions will be agreed in advance while allowing the panel to probe individual issues arising from applications, references, self-declarations or online searches.

The panel will explore:

- motivation for working with children and understanding of children's vulnerability;
- relevant skills, experience and examples of practice;
- professional boundaries and safeguarding judgement;
- any gaps or frequent changes in employment or location;
- any discrepancy or concern identified during shortlisting, references or due diligence; and
- the candidate's understanding of the setting's values, safeguarding expectations and role responsibilities.

Where appropriate and safe, pupils or young people may be meaningfully involved in the selection process, for example through a supervised activity or structured feedback. Candidates will never have unsupervised access to children as part of recruitment.

Interviews may be in person or remote. A remote interview does not reduce any requirement to verify identity, qualifications, DBS information or right to work through an approved process.

10. Conditional offers and pre-appointment checks

All offers are conditional until the checks required for the role and setting have been satisfactorily completed. The exact checks depend on the person's duties and regulatory context.

For school appointments, the required checks will include, as applicable:

- identity;
- an enhanced DBS check at the correct level and children's barred-list information where the role is regulated activity;
- a separate children's barred-list check where lawfully permitted and needed before the DBS certificate is available;
- mental and physical fitness to carry out the specific work responsibilities, assessed after conditional offer and in accordance with section 60 of the Equality Act 2010;
- right to work in the UK;
- further checks for people who have lived or worked outside the UK;
- professional qualifications where required;
- teacher prohibition and historic GTCE restrictions for anyone appointed to carry out teaching work;
- section 128 direction checks for management positions in an independent school;
- satisfactory references and employment-history checks; and

- childcare disqualification checks only where the role is within the scope of the Childcare Disqualification Regulations 2018.

For children's-home appointments, the checks in section 18 and Schedule 2 requirements will also apply.

11. Identity, DBS and barred-list checks

Identity will be verified using current DBS identity-checking guidance and, where applicable, certified digital identity services. All names, previous names, date of birth and address history required for the DBS process will be checked carefully.

Where a DBS certificate is required, Smoothstone will obtain the appropriate certificate through the applicant. The original DBS certificate will be checked against the applicant's identity before the person takes up post or, only where KCSIE permits, as soon as practicable afterwards.

Children's barred-list information will only be requested where the role is regulated activity. It is a criminal offence knowingly to permit a barred person to engage in regulated activity from which they are barred.

Where the DBS Update Service is used, Smoothstone will obtain the individual's consent, inspect and verify the original certificate, confirm that it is at the correct level and workforce, and complete a status check. If the service indicates new information or the certificate is not suitable for the role, a new DBS application will be required.

If a DBS certificate contains information, the appointment decision will be made fairly and individually. Smoothstone will consider relevance, seriousness, age of the information, pattern, circumstances, subsequent conduct and the requirements of the role. Decisions and rationale will be recorded.

12. Teacher prohibition and section 128 checks

Before appointing any person to carry out 'teaching work' as defined in the Teachers' Disciplinary (England) Regulations 2012 in a Smoothstone school or children's home, Smoothstone must check that the person is not subject to a teacher prohibition order, interim prohibition order or relevant historic GTCE sanction or restriction. The current DfE 'Check a teacher's record' service will be used where applicable.

For independent schools, any person taking up a management position must be checked to ensure that they are not subject to a section 128 direction. Management includes, but is not limited to, headteacher, principal, deputy/assistant headteacher, proprietor-body member, governor and other roles that in practice involve management of the school. The check and date must be recorded on the single central record.

A person subject to a section 128 direction must not be permitted to take part in management to the extent prohibited by the direction.

13. Applicants who have lived or worked outside the UK

Applicants who have lived or worked outside the UK will undergo the same checks as other applicants. Smoothstone will also make such further checks as it considers appropriate so that relevant events outside the UK can be considered.

Additional checks may include an overseas criminal-record check and, for teaching positions, information from the relevant professional regulating authority. Where information is unavailable, Smoothstone will use alternative methods and a documented risk assessment to determine whether there is sufficient information to make a safe appointment.

Smoothstone will not use a fixed '12 months in the last 10 years' threshold as a substitute for judgement. The nature, duration, location and relevance of overseas residence or work will be considered in line with current KCSIE and Home Office guidance.

14. Right to work checks

Smoothstone will verify every employee's right to work in the UK before employment begins, regardless of nationality, ethnicity or background. Checks will be completed through a lawful Home Office route, which

may include a manual check, the Home Office online service, the Employer Checking Service or an approved digital identity route where permitted.

Where the right to work is time-limited, follow-up checks will be completed before the relevant permission expires. Records will be retained for the duration required by Home Office guidance.

15. Volunteers

Volunteer roles will be risk assessed and the appropriate checks determined from the duties and frequency of the role.

From 1 September 2026 the supervision exemption from regulated activity was removed. This means that supervision does not remove the need for barred-list information where a volunteer's duties and frequency meet the legal definition of regulated activity.

- Volunteers in regulated activity must have an enhanced DBS check with children's barred-list information.
- Where a volunteer will begin regulated activity before the enhanced DBS certificate is available and the law permits it, a standalone barred-list check may be completed, all other relevant checks must be satisfactory, and the person must be appropriately supervised pending the certificate.
- Where volunteering is not regulated activity, Smoothstone will consider whether an enhanced check without barred-list information or another lawful level of check is appropriate.
- The risk assessment and checks undertaken will be recorded.

16. Agency staff, contractors and self-employed workers

16.1 Agency and third-party staff

Before agency or third-party staff work in a Smoothstone school, written confirmation will be obtained that the agency has completed the same relevant checks the school would otherwise have undertaken and has obtained the appropriate certificates. The school will record the date the written confirmation was received and will verify the identity of the person who presents for work.

If an agency DBS certificate contains disclosed information, the school will obtain a copy before the individual begins work, as required by KCSIE and the Independent School Standards.

16.2 Contractors and self-employed workers

Contracts will specify safeguarding requirements. Contractors and self-employed people will be checked at the lawful level appropriate to their work and access to children. No person for whom required checks have not been completed will be permitted to work unsupervised or to engage in regulated activity. Identity will always be checked on arrival.

Where a self-employed person cannot apply for the necessary level of DBS check directly, Smoothstone will arrange or facilitate the appropriate check where legally permitted.

17. Trainee and student teachers

For salaried trainee teachers, the school will ensure the same required pre-appointment checks are completed as for other staff. For fee-funded trainees, the training provider is responsible for the relevant checks; the school will obtain written confirmation that the checks have been completed and will verify the identity of the trainee on arrival. Any additional check required by the person's duties will be completed.

18. Children's homes: additional recruitment requirements

Registered children's homes must comply with regulations 32 and 33 and Schedule 2 of the Children's Homes (England) Regulations 2015. The Registered Manager must be able to demonstrate that every person working at the home is fit to do so and that recruitment records support that conclusion.

For each person appointed to work at a children's home, Smoothstone will obtain and record:

- proof of identity, including a recent photograph;

- a relevant DBS certificate;
- two written references, including one from the most recent employer where there is one;
- so far as reasonably practicable, verification of the reason why previous employment or a position ended;
- documentary evidence of relevant qualifications;
- a full employment history with a satisfactory written explanation for any gaps; and
- any other information needed to satisfy the Registered Manager that the person is of integrity and good character, has the skills and experience required and is physically and mentally fit for the work.

Agency staff used in a children's home will have their identity checked and the home will obtain written assurance and sufficient evidence from the agency to satisfy itself that the individual is suitable. At short notice, the individual will not be left in sole charge until the Registered Manager is satisfied that the required suitability information has been obtained and checked.

Prospective staff attending a shadow shift or interview in a children's home will be supervised at all times, will not count in staffing numbers and will not have access to children's detailed personal information.

19. Starting work before all checks are complete

The normal position is that all required checks are completed satisfactorily before the person begins work.

19.1 School appointments

Only where KCSIE and the Independent School Standards permit, and there is a documented operational reason, may a person begin regulated activity before the enhanced DBS certificate is available. In such a case:

- all other relevant pre-appointment checks must be complete;
- a separate children's barred-list check must have been completed where permitted and required;
- a written risk assessment must be approved by the Headteacher or Director;
- appropriate supervision must be in place and reviewed;
- the DBS application must be actively progressed; and
- the original certificate must be checked as soon as practicable.

19.2 Children's homes

In exceptional circumstances permitted by the Children's Homes Regulations and Ofsted guidance, a permanent employee may begin work while outstanding Schedule 2 enquiries continue only where the minimum legal conditions are met, the Registered Manager has recorded a clear risk-based decision and safeguards are in place. Smoothstone's default expectation is that the full Schedule 2 information is obtained before normal duties begin.

20. Single central record and recruitment records

20.1 Independent schools - single central record

Each Smoothstone school will maintain an accurate and current single central record (SCR). It will cover all staff, including salaried trainee teachers and agency or third-party supply staff, even where they work for only one day, and all members of the proprietor body.

For staff, the SCR 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, as applicable:

- identity;
- standalone children's barred-list check, where undertaken;
- enhanced DBS check and, where required, children's barred-list information;
- teacher prohibition check;
- further checks for people who have lived or worked outside the UK;
- professional qualifications, where required;
- right to work in the UK; and
- section 128 checks for those in management positions.

For agency and third-party supply staff, the SCR will include whether written confirmation of the required checks has been received, the date of that confirmation and whether details of any enhanced DBS certificate were supplied. For independent schools, the date on which any required certificate was obtained will also be recorded where applicable.

Smoothstone may record additional useful information, such as volunteer checks, the person completing each check, and safer recruitment/safeguarding training dates. Details will be removed from the SCR when the individual no longer works at the school, while underlying recruitment records will be retained in accordance with the records-management schedule.

20.2 Children's homes - recruitment records

Each children's home will maintain an accessible record, checklist or electronic system showing how Schedule 2 requirements have been met for each employee and relevant agency worker. The Registered Manager must be able to provide full recruitment records or evidence supporting the suitability decision to Ofsted when requested.

21. Existing staff and ongoing safeguarding vigilance

Smoothstone maintains ongoing vigilance after appointment. New checks will be carried out where legally required or where necessary to reassess suitability, including where a person moves from work that was not regulated activity into regulated activity, where KCSIE requires checks following a break in service, or where concerns arise about suitability.

Induction will include safeguarding, staff conduct, whistleblowing, low-level concerns, professional boundaries and relevant setting procedures. Probation, supervision, appraisal and management oversight are part of safer employment practice.

22. Safeguarding concerns, references and referral duties

22.1 References provided by Smoothstone

References will be factual, fair, accurate and not misleading. Safeguarding information will be included in accordance with KCSIE 2026.

- Substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same person that together meet the harm threshold, will be included where relevant.
- Low-level concerns will not normally be included unless they relate to matters that would ordinarily be included in a reference, such as misconduct or poor performance.
- Allegations or concerns found to be false, unfounded, unsubstantiated or malicious will not be included as safeguarding allegations.
- Where an investigation is incomplete or the position is legally complex, HR and safeguarding advice will be obtained before a reference is issued.

22.2 DBS referrals

Smoothstone will make a referral to the DBS when the legal referral conditions are met, including where an individual is removed from regulated activity, or would have been removed had they not left, and the relevant conduct, harm-test or relevant-offence criteria apply. This duty applies to paid staff and volunteers engaged in regulated activity.

22.3 Teaching Regulation Agency referrals

Where concerns relate to serious teacher misconduct, Smoothstone will consider whether referral to the Teaching Regulation Agency is required or appropriate in addition to any DBS, LADO, police or children's social care action.

22.4 LADO and safeguarding procedures

Any safeguarding concern or allegation about a person working with children will be managed under the organisation's safeguarding and allegations procedures and KCSIE Part four. Recruitment or disciplinary

action will not replace required referral to the Local Authority Designated Officer (LADO), police, children's social care, DBS or other relevant body.

23. Data protection and retention

Recruitment data will be processed lawfully, fairly, transparently and securely in accordance with Smoothstone's privacy information and data-protection policies. Consent will not be treated as the default lawful basis where another lawful basis is more appropriate.

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be retained on the personnel file in accordance with legal requirements and the records-retention schedule.

Smoothstone does not need to keep a copy of a DBS certificate in order to maintain the school SCR. Where a copy is retained, there must be a valid reason and it will not normally be retained for longer than six months. A record may be kept that the check was completed, the outcome and the recruitment decision.

Confidential references and safeguarding information will be access-controlled and retained or disclosed only in accordance with data-protection law, safeguarding duties and applicable exemptions.

24. Safer recruitment training

At least one member of every recruitment panel will have completed appropriate safer recruitment training. Smoothstone will refresh training at intervals determined by role, changes in law or guidance and organisational need; as a minimum good-practice expectation, key recruiters will normally refresh formal safer recruitment training within five years.

HR and leaders responsible for recruitment will receive updates when statutory or DBS requirements change. Particular attention in 2026 is given to the removal of the supervision exemption from regulated activity and the revised DBS eligibility framework.

25. Monitoring and review

Directors and HR will review the implementation of this policy through recruitment-file sampling, SCR quality assurance, audit of children's-home recruitment records, safeguarding reviews and feedback from inspections.

This policy will be reviewed at least annually and sooner if KCSIE, the Independent School Standards, children's homes regulations, DBS eligibility rules, right-to-work requirements or other relevant law or statutory guidance changes.

Appendix 1: Minimum safer recruitment checklist

Stage	Required action	School record	Children's-home record
Planning	Confirm role duties, regulated activity, checks and safeguarding content in advert	Recruitment file	Recruitment file
Application	Full application form; employment history and gaps; no CV-only applications	Recruitment file	Recruitment file
Shortlisting	Two-person shortlist; self-declaration; consider/complete online search; record issues	Recruitment file	Recruitment file
References	Obtain directly; current/most relevant employer; verify discrepancies	Recruitment file	Schedule 2 - two written references

Stage	Required action	School record	Children's-home record
Interview	Structured safeguarding questions; explore gaps and concerns; record decisions	Recruitment file	Recruitment file
Identity	Verify identity and previous names using current approved process	SCR + personnel file	Schedule 2 record
DBS	Correct lawful level; barred list only for regulated activity; original certificate checked	SCR	Schedule 2 record
Teaching prohibition	Check anyone appointed to teaching work	SCR	Where teaching work is carried out
Section 128	Check independent-school management roles	SCR	Not applicable unless role also manages school
Overseas	Further checks/risk assessment where person lived/worked overseas	SCR + recruitment file	Recruitment record
Qualifications	Verify where required/relevant	SCR where required	Schedule 2 record
Right to work	Complete lawful check before employment begins	SCR + personnel file	Personnel/recruitment record
Start date	Only after checks, unless lawful documented exception applies	SCR/recruitment file	Registered Manager decision

Appendix 2: Key source documents

- Department for Education - Keeping Children Safe in Education 2026.
- Department for Education - Independent School Standards guidance, April 2026.
- Ofsted - Children's homes: recruiting staff.
- Department for Education - Guide to the Children's Homes Regulations, including the quality standards.
- Disclosure and Barring Service - DBS eligibility guidance and ID checking guidelines current from September 2026.
- Home Office - current employer's guide to right to work checks.