

**St Monica's Catholic
Primary School**



**Safer Recruitment Policy
2026-2028**

Approved by:	Governing Body	Date: July 2026
Created by:	Headteacher	
Next review due by:	July 2028	

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Policy status

This is a school policy approved by the governing board. It must be read alongside the school's Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-Level Concerns Policy or procedure, Whistleblowing Policy, Data Protection Policy, Records Management Policy, Equality Policy, DBS/SCR procedures and relevant HR procedures.

Where legislation or statutory guidance changes before the next scheduled full review, the current legal requirement and the latest version of Keeping Children Safe in Education (KCSIE) take precedence. The policy will be amended without waiting for the full review date where a material change is required.

1. Statement of intent and scope

St Monica's Catholic Primary School is committed to safeguarding and promoting the welfare of children. Safer recruitment is a central part of that commitment. The school will use robust, fair and proportionate recruitment procedures to deter unsuitable applicants, identify concerns, and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities.

The school's Catholic ethos requires each applicant to be treated with dignity, fairness and respect. Safeguarding and equality are complementary duties: decisions will be evidence-based, relevant to the role and free from unlawful discrimination.

This policy applies to the recruitment, appointment and checking of:

- employees, including internal candidates and people moving to a different role;
- supply, agency and other third-party staff;
- contractors and self-employed people;
- salaried and fee-funded trainee or student teachers;
- volunteers, including existing volunteers whose duties change;
- governors and associate members, where checks are required; and
- any other person whose work is arranged or controlled by the school and who may have contact with children.

Safer recruitment is not a one-off checking exercise. It forms part of the school's wider safeguarding culture, induction, supervision, conduct expectations and procedures for managing concerns about adults.

2. Legal and guidance framework

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

- the Children Acts 1989 and 2004 and the Education Act 2002;
- the Safeguarding Vulnerable Groups Act 2006, as amended, including changes made by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026;
- the School Staffing (England) Regulations 2009, as amended;
- the School Governance (Constitution) (England) Regulations 2012, as amended;
- the Rehabilitation of Offenders Act 1974 and the Exceptions Order, as amended;
- the Education and Skills Act 2008, including section 128 directions;
- the Equality Act 2010, including section 60 and the Public Sector Equality Duty;
- the Immigration, Asylum and Nationality Act 2006 and current right to work legislation;
- the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025;
- the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018; and
- the Education (Health Standards) (England) Regulations 2003.

The school will use the current versions of the following guidance and services:

- Department for Education (DfE), Keeping Children Safe in Education 2026, from 1 September 2026;
- DfE, Staffing and employment guidance for schools;
- DfE, Check a teacher's record and guidance on recruiting teachers from overseas;
- DfE, Disqualification under the Childcare Act 2006;
- Disclosure and Barring Service (DBS) identity checking, eligibility, Update Service and barred list guidance; and
- Home Office, An employer's guide to right to work checks.

3. Safer recruitment principles

The following principles apply to every recruitment exercise:

- The welfare and safety of children are paramount.
- The safeguarding responsibilities and required checks for the role are identified before advertising.
- At least two people shortlist candidates and at least one person conducting an interview has completed appropriate safer recruitment training.
- All candidates are assessed against the same published criteria using a documented process.
- Employment history, gaps, references, self-declarations and any relevant online search findings are scrutinised and resolved before appointment.
- A CV is not accepted as a substitute for the school's application form.
- No person begins work until the required checks are satisfactory, except under the tightly controlled procedure in section 15.

- Only checks for which the role is legally eligible are requested.
- Information is processed lawfully, confidentially and only for a defined recruitment or safeguarding purpose.
- Reasonable adjustments are made for disabled applicants and recruitment decisions comply with the Equality Act 2010.

4. Roles and responsibilities

4.1 Governing board

- approve and monitor this policy and ensure safer recruitment arrangements are embedded and effective;
- ensure that at least one person conducting each interview has completed appropriate safer recruitment training;
- determine the delegation of appointment decisions and ensure the correct panel is used for headteacher appointments;
- ensure appropriate checks are completed for governors and that section 128 checks are undertaken;
- monitor the quality of the single central record (SCR) and sample recruitment records without accessing information beyond what is necessary; and
- ensure recruitment arrangements comply with safeguarding, employment, equality and data protection law.

4.2 Headteacher

- is accountable for the operational implementation of this policy, except where the governing board is the appointing body;
- appoints an appropriately constituted recruitment panel and ensures conflicts of interest are declared;
- ensures the correct pre-appointment checks are completed, scrutinised and recorded on the SCR;
- decides, with HR and DSL advice where appropriate, whether concerns are satisfactorily resolved;
- authorises any exceptional conditional start under section 15;
- ensures new staff and volunteers receive safeguarding induction and appropriate supervision; and
- ensures statutory referrals are made to the DBS, Teaching Regulation Agency (TRA), local authority designated officer (LADO), police or other body when the relevant threshold is met.

4.3 Recruitment panel

- agrees the timetable, role information, shortlisting criteria and selection methods in advance;
- assesses every applicant consistently against the person specification;
- scrutinises employment history, reasons for leaving, gaps, references and declarations;
- asks structured questions, including safeguarding questions relevant to the role;
- records scores, evidence and reasons for decisions; and
- maintains confidentiality and declares any personal or professional conflict.

4.4 Recruitment administrator or appointing officer

- coordinates communications, application records, references, interview arrangements and pre-appointment evidence;
- verifies that references come from legitimate and appropriately senior sources;
- keeps the recruitment file complete, secure and auditable; and
- updates the SCR only when evidence of a completed check has been seen.

4.5 DSL and data protection lead

The DSL advises on safeguarding information, transferable risk, allegations and low-level concerns. The data protection lead or DPO advises on lawful processing, privacy notices, online searches, retention and

access. Neither role replaces the recruitment panel's responsibility to make and evidence a fair appointment decision.

5. Planning the recruitment process

Before advertising, the school will:

- confirm the need for the role, the decision-maker and the recruitment timetable;
- prepare or review the job description and person specification;
- state the safeguarding responsibilities of the role and the extent of contact with children;
- determine whether the role is regulated activity and the correct level of DBS and barred list check;
- identify any requirement for a prohibition check, Section 128 check, childcare disqualification check, professional qualification check, overseas check or right to work follow-up;
- agree objective shortlisting and selection criteria;
- ensure panel members understand KCSIE Part three, equality duties and the need to avoid bias;
- identify reasonable adjustments or accessible recruitment arrangements; and
- prepare an application pack and a clear audit trail for the process.

The shortlisting panel and interview panel should be the same people where practicable. At least two people will shortlist. Panel membership will be proportionate to the seniority of the post and must comply with the school's scheme of delegation.

6. Advertising and applications

6.1 Advertisements and application packs

Advertisements will include or link to:

- the job description and person specification;
- the school's commitment to safeguarding and promoting the welfare of children;
- the safeguarding responsibilities of the post;
- confirmation that safeguarding checks will be undertaken;
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and subject to the Exceptions Order; and
- a statement that shortlisted candidates may be subject to an online search as part of due diligence.

The application pack will include or signpost the Child Protection and Safeguarding Policy and the school's policy or statement on the recruitment of ex-offenders. Advertising and selection methods will be designed to reach a suitably broad field and avoid unlawful discrimination.

6.2 Application forms

Applicants must complete the Archdiocese's application form. A CV may be submitted only as supplementary information and will not replace the application form. The form will request:

- current and former names, current address and appropriate contact details;
- current or most recent employment and the reason for leaving;
- a full chronological employment and education history, with an explanation for all gaps;
- relevant qualifications, awarding bodies and dates;
- details of suitable referees, including the current employer where applicable;
- information showing how the applicant meets the person specification; and
- a declaration that the information is true and complete and that the applicant understands the safeguarding checks that will be made.

Applicants for regulated activity will be told that it is a criminal offence to apply if they are barred from engaging in that activity. The school will not ask applicants at the initial application stage to disclose protected or filtered criminal record information that it is not legally entitled to consider.

7. Shortlisting, self-declaration and online searches

7.1 Shortlisting

At least two panel members will shortlist independently against the agreed essential and desirable criteria before reaching a panel decision. The panel will:

- consider every application consistently and record the evidence for its decisions;
- identify unexplained gaps, inconsistencies, frequent changes of employment or location, and unclear reasons for leaving;
- consider whether information requires clarification before or at interview;
- avoid taking account of protected characteristics or information irrelevant to the role; and
- invite only candidates who meet the essential criteria, unless a lawful and documented alternative approach has been agreed.

7.2 Self-declaration

Only shortlisted candidates will be asked to complete a confidential self-declaration of relevant criminal record and suitability information. The declaration may include:

- relevant criminal offences committed in any country, subject to the law on filtering and protected matters;
- whether the candidate is known to the police or children's social care in a way relevant to suitability;
- whether the candidate is disqualified from relevant childcare;
- any relevant overseas information; and
- any other information that may make the candidate unsuitable to work with children.

The candidate will sign a declaration that the information is true. Where an electronic signature is used, the school may require a signed hard copy or equivalent verification at interview. The purpose is to allow relevant information to be discussed before the DBS certificate is received. The form will be handled as confidential criminal offence data and retained only in accordance with the school's retention schedule.

7.3 Online searches

As part of shortlisting due diligence, the school will consider carrying out a search through an online search engine on each shortlisted candidate. The purpose is limited to identifying publicly available incidents or issues relevant to the candidate's suitability to work with children or to perform the role, so that they can be explored at interview.

- Shortlisted candidates will be informed that an online search may be carried out.
- Searches will use publicly available information only. Staff will not request passwords, follow a candidate or send a friend request to obtain access.
- Where practicable, a person who is not making the selection decision will conduct the search and report only relevant factual findings.
- The search will be proportionate. Protected characteristics, lawful private life and material unrelated to the role will not be recorded or used.
- The date, search terms and any relevant findings will be recorded. Screenshots will be retained only where necessary and lawful.
- The candidate will be given a fair opportunity to explain any relevant concern. No adverse decision will be based solely on an unverified online item.

8. References

8.1 Obtaining references

References will be sought for all shortlisted candidates, including internal candidates, and obtained before interview where possible. Concerns must be resolved satisfactorily before an appointment is confirmed.

- References will be requested directly from the referee. Open references or testimonials addressed "to whom it may concern" will not be relied upon.
- At least one reference will normally be from the candidate's current employer and completed by a senior person with appropriate authority.
- Where the referee is school- or college-based, the reference should be confirmed by the headteacher or principal as accurate in respect of disciplinary investigations.
- If the candidate is not currently employed, the school will verify the most recent relevant period of employment and reason for leaving.
- If the candidate is not currently working with children, the school will seek a reference from the last employer for whom the candidate worked with children. If the candidate has never worked with children, a reference from the current or most recent employer will be required.
- Electronic references will be checked to confirm that they originate from a legitimate source. The school will independently verify the referee's identity and authority where necessary.
- For a teacher, the school will request details of any capability procedures during the previous two years and the reasons for them, as required by the School Staffing (England) Regulations 2009.

8.2 Scrutinising references

The panel or authorised administrator will:

- check that all material questions have been answered and contact the referee where information is vague, incomplete or inconsistent;
- compare the reference with the application form, employment history and self-declaration;
- verify the candidate's reason for leaving the current or most recent post;
- discuss discrepancies and relevant concerns with the candidate at interview;
- seek DSL and HR advice where a reference contains safeguarding, disciplinary, conduct or capability information; and
- record how every material concern was resolved before the appointment decision.

Safeguarding information in references: References should confirm whether the referee is satisfied with the applicant's suitability to work with children and provide facts, not opinions, about substantiated safeguarding concerns or allegations that meet the harm threshold. Unfounded, false, unsubstantiated or malicious allegations must not be included. Low-level concerns should not be included unless they relate to matters that would normally be included in a reference, such as misconduct or poor performance.

9. Selection and interview

The school will use a range of proportionate selection methods to identify the candidate who best meets the person specification. The same core process and assessment criteria will apply to all candidates for the post.

Before the interview, the panel will agree structured questions, model indicators and scoring. Interviews will explore:

- motivation for applying and for working with children;

- relevant knowledge, skills, experience and professional judgement;
- understanding of safeguarding responsibilities, professional boundaries and how to respond to concerns;
- examples of working with children and with colleagues;
- employment gaps, frequent moves, reasons for leaving and any inconsistencies;
- concerns arising from references, the self-declaration or an online search; and
- the candidate's ability to support the school's mission, values and equality duties.

Potential warning signs that require further probing include a lack of understanding of children's vulnerability, inappropriate idealisation of children, unclear adult-child boundaries, attempts to minimise safeguarding responsibilities, unexplained inconsistencies, or answers suggesting that the adult's needs take priority over children's welfare. These are prompts for evidence-based enquiry, not automatic grounds for rejection.

Interview notes and selection evidence will be factual, relevant and sufficient to explain the decision. Panel members will score independently before moderation. Any conflict of interest or prior knowledge of a candidate will be declared and managed.

Candidates will be asked to present identity and qualification evidence at interview where practicable. Viewing documents at an interview does not replace the formal pre-appointment verification process.

10. Conditional offers and pre-appointment checks

The preferred candidate may be given a conditional offer only. The offer will state that employment is subject to satisfactory completion of all checks relevant to the role. No unconditional commitment will be made until the checks are complete and concerns are resolved.

For a new employee, the school will complete and record, as applicable:

- identity verification, including current and previous names and date of birth;
- an enhanced DBS check and, where the role is regulated activity, children's barred list information;
- a prohibition from teaching check and any current GTCE sanction or restriction for teaching work;
- a section 128 direction check for a maintained school governor and for any other role where legally required;
- right to work in the UK;
- further checks considered appropriate where the person has lived or worked outside the UK;
- professional qualifications, including QTS and completion of induction or probation where applicable;
- mental and physical fitness to carry out the specific duties, after conditional offer and with reasonable adjustments considered;
- childcare disqualification checks for relevant early years or later years childcare and those directly concerned in its management;
- satisfactory references, employment history and reasons for leaving;
- resolution of matters raised through the self-declaration, online search, interview or references; and
- any category-specific confirmation required for agency staff, contractors, trainees, volunteers or governors.

The school will assess criminal record or other suitability information individually and proportionately. Relevant factors include the nature and seriousness of the matter, its relevance to the role, the age and circumstances at the time, the time elapsed, pattern of behaviour, evidence of responsibility and rehabilitation, and the risk to children. HR, DSL or legal advice will be obtained where appropriate. The decision and rationale will be documented.

11. DBS and barred list checks

11.1 Correct level of check

Most school staff are in regulated activity and require an enhanced DBS check including children's barred list information. Barred list information must not be requested for a person who is not engaging in, or seeking to engage in, regulated activity. The school will use current DBS eligibility guidance to determine the correct level.

A person is generally in regulated activity with children where, as a result of paid work or volunteering, they work frequently, on more than three days in a 30-day period, or overnight in a role involving teaching, training, instructing, caring for or supervising children, specified-place work with opportunity for contact, or relevant personal care or healthcare. Some personal care, healthcare and overnight activities are regulated activity even if they occur only once. The legal definition and current KCSIE must always be checked for the specific role.

11.2 Certificates and the Update Service

- The school will obtain the appropriate DBS check through the candidate and verify the candidate's identity using current DBS procedures.
- The school will see the original DBS certificate where a certificate is issued and will not rely solely on an application reference number.
- The DBS Update Service may be used only with the individual's consent, after checking identity, the original certificate, the level of check and that it is for the same workforce. If the status has changed, a new certificate will be required.
- Applicants may join the Update Service when applying or within the period specified by DBS. The school will not treat Update Service membership as a substitute for the other pre-appointment checks.
- A separate barred list check may be obtained where the law and KCSIE permit an individual to begin regulated activity before the enhanced DBS certificate is available. Section 15 also applies.

11.3 Applicant moving from a recent school post

KCSIE provides a limited three-month exception in specified circumstances for a person moving from certain recent posts in schools or further education in England. The school's normal practice is to obtain an up-to-date enhanced DBS check. Where the headteacher decides to rely on the statutory exception, the reasons will be recorded, all other pre-appointment checks will be completed, and a separate children's barred list check will be obtained where the person will engage in regulated activity.

11.4 Retention of DBS information

The school does not need to retain a copy of a DBS certificate to maintain the SCR. Where a copy or criminal record information is retained for a valid reason, it will be stored securely, access will be restricted and it will normally be destroyed within six months. The school may retain a record that the check was completed, the outcome and the recruitment decision.

12. Specific categories of worker and volunteer

12.1 Volunteers

From 1 September 2026, the supervision exemption for volunteers is removed from regulated activity. Any volunteer in a school role involving teaching, training, instructing or supervising children frequently, on more than three days in a 30-day period, or overnight is in regulated activity. The school must obtain an enhanced DBS check including children's barred list information for that volunteer.

For an existing volunteer who takes regulated activity because of the September 2026 change, the school will check the person's children's barred list status. This will be done through an enhanced DBS check

with barred list information. A standalone barred list check may be used only in the circumstances permitted by KCSIE.

For a volunteer who is not in regulated activity, the school will complete and retain a written risk assessment considering:

- the nature, frequency and location of the work and the degree of contact with children;
- what is known about the volunteer and whether suitable referees are available;
- the level and consistency of supervision;
- whether an enhanced DBS check without barred list information is appropriate for a role that would be regulated activity but for its infrequency; and
- whether a basic DBS check is appropriate for another role with access to children.

A volunteer on whom no appropriate checks have been obtained will not be left unsupervised or allowed to undertake regulated activity.

12.2 Agency and third-party staff

Before an agency or third-party worker begins, the school will obtain written confirmation that the organisation has completed the same checks the school would otherwise be required to complete and has judged the person suitable. The school will verify that the person presenting for work is the person on whom the checks were made. Where the enhanced DBS certificate contains information, the school will obtain a copy in accordance with KCSIE. Agency and third-party supply staff will be recorded on the SCR even if they work for one day.

12.3 Contractors and self-employed people

- A contractor engaging in regulated activity requires an enhanced DBS check including barred list information.
- A contractor not in regulated activity but with opportunity for regular contact with children requires an enhanced DBS check without barred list information.
- Where there is no opportunity for regular contact, the school will decide whether a basic DBS check is appropriate.
- No contractor without the required checks will work unsupervised or undertake regulated activity. The school will determine and record the necessary supervision.
- The school will set out safeguarding requirements in the contract and verify each contractor's identity on arrival.
- For a self-employed person, the school will obtain or verify the level of check permitted under current DBS arrangements.

12.4 Trainee and student teachers

For salaried initial teacher training routes, the school will complete all necessary pre-appointment checks, including an enhanced DBS check with barred list information where the trainee is in regulated activity. For fee-funded trainees, the training provider is responsible for the checks. The school will obtain written confirmation from the provider that all required checks have been completed and that the trainee has been judged suitable to work with children. Fee-funded trainees do not have to be included on the SCR, but the school may record the confirmation as non-statutory information.

12.5 Governors and associate members

All maintained school governors must have an enhanced DBS check. Governance itself is not regulated activity, so a barred list check is not required unless the governor also undertakes regulated activity. The school will also complete a section 128 direction check for every proposed governor. There is no legal requirement for an associate member to have an enhanced DBS check unless the person also undertakes regulated activity, although other proportionate checks may be considered for any additional role.

12.6 People who have lived or worked outside the UK

The same mandatory checks apply to all candidates, regardless of nationality. In addition, the school will make further checks it considers appropriate so that relevant events outside the UK can be considered. This may include criminal record or good conduct evidence and, for teaching posts, information from the relevant professional regulating authority where available. The absence of an overseas checking service does not remove the requirement to assess risk and obtain the best available evidence.

12.7 Existing staff and volunteers

New checks will be completed where required, including when a person moves from a role that is not regulated activity to one that is, where there has been a break in service of 12 weeks or more, or where concerns arise about suitability to work with children. A concern will be managed under the school's safeguarding and employment procedures and must not be treated as a routine DBS recheck alone.

12.8 Work experience and homestay

Where the school arranges work experience, it will ensure that the placement provider has suitable safeguarding arrangements and will consider whether checks are required for an adult supervising a child, in accordance with KCSIE. Where the school arranges a child to stay with a host family, it will follow the specific homestay and private fostering requirements in KCSIE and seek local authority advice where required.

13. Right to work, identity and qualifications

13.1 Right to work

The school will establish a statutory excuse against illegal working by completing a prescribed right to work check before employment begins. Checks will be applied consistently to all candidates, including British and Irish citizens, without assumptions based on race, nationality, accent, name or length of residence.

- A check may be completed through the Home Office online service, a compliant manual document check, or an approved identity service provider where the candidate and document are eligible.
- Where the Employer Checking Service is required, employment will not begin until the school receives the appropriate verification or another lawful check is completed.
- For a time-limited right to work, the school will record the expiry date and complete a follow-up check before the permission expires.
- Evidence of the check will be retained securely for the duration of employment and for two years afterwards, in accordance with Home Office guidance.

13.2 Identity

Identity checks for DBS and employment purposes will follow the current route permitted by DBS and Home Office guidance. The school may use an approved digital identity process where available and appropriate. Otherwise, original documents will be inspected in accordance with the relevant checking procedure.

- The candidate's photograph, date of birth, current name and address will be compared across the application and evidence.
- All previous names must be declared and supported by documentary evidence where available. Unresolved identity discrepancies will be investigated before appointment.
- The school will check for signs of tampering and will not accept documents that do not meet current validity and date requirements.
- If sufficient identity evidence cannot be established, the person will not begin work until the issue is resolved through an authorised route.

13.3 Professional qualifications and teacher checks

Original or appropriately verified evidence of required qualifications will be checked. For teaching work, the school will use DfE's Check a teacher's record service to confirm QTS, induction or probation where applicable, prohibition orders and relevant current sanctions or restrictions. A qualification alone is not evidence of safeguarding suitability.

13.4 Health and reasonable adjustments

Before a conditional offer, health or disability questions will be asked only where permitted by section 60 of the Equality Act 2010, for example to establish whether an applicant needs an adjustment for the recruitment process or can perform an intrinsic function of the role with reasonable adjustment. After a conditional offer, the school may seek proportionate health information or occupational health advice to confirm fitness for the specific duties and identify reasonable adjustments. A disability will not of itself make a candidate unsuitable.

14. Single central record and recruitment records

14.1 Single central record

The school will maintain an accurate SCR of pre-appointment checks. It must cover all staff, salaried trainee teachers, and agency and third-party supply staff, even where they work for one day. For staff, the SCR will indicate whether the following checks were completed or certificates obtained, and the date:

- identity;
- standalone children's barred list check, where used;
- enhanced DBS check requested and certificate provided, including barred list information where required;
- prohibition from teaching;
- further checks for people who have lived or worked outside the UK;
- professional qualifications, where required; and
- right to work in the UK.

The school will record the date written confirmation was received for agency and third-party staff and whether details of an enhanced DBS certificate were provided. Where checks are completed for volunteers, governors or other categories, the school may record these as non-statutory information. The school will record governor section 128 checks as a matter of good practice. The name or initials of the person who completed each check will also be recorded.

The headteacher or delegated senior leader will review the SCR regularly. A nominated governor will undertake periodic monitoring without copying or retaining confidential certificate information. Details will be removed when the individual no longer works at the school, subject to any separate lawful retention requirement.

14.2 Recruitment file and data protection

- Recruitment information will be kept secure and accessible only to those who need it for recruitment, safeguarding, HR, audit or legal purposes.
- Applicants will receive a privacy notice explaining the data used, purposes, lawful bases, sharing and retention.
- Special category and criminal offence data will be processed only where an additional lawful condition is met and appropriate safeguards are in place.
- Interview notes, scoring, references, online search records and decision records will be retained in accordance with the Records Management Policy and any litigation hold.
- Information about unsuccessful applicants will not be retained indefinitely or placed on a talent pool without a lawful basis and clear notice.

- Recruitment records will not contain irrelevant opinion, discriminatory comments or unnecessary copies of identity documents.

15. Starting work before all checks are complete

Allowing a person to start before the enhanced DBS certificate is available is exceptional, not routine. It will occur only where legally permitted and where delay would materially affect the school. The headteacher must record a written risk assessment and authorisation before the start date.

The following minimum conditions apply:

- identity, right to work, qualifications, references, employment history, prohibition checks and all other available checks are satisfactory;
- a separate children's barred list check has been completed where the person will undertake regulated activity and KCSIE permits this route;
- there is no information suggesting the person is unsuitable;
- the role, contact with children and required supervision have been risk assessed;
- the person is appropriately supervised and is not given unsupervised access beyond what the risk assessment permits;
- the DBS application is in progress and actively followed up; and
- the risk assessment is reviewed at least weekly and immediately if new information arises.

A person who is known or reasonably believed to be barred must never be permitted to undertake regulated activity. A conditional start cannot be used to bypass a required check.

16. Induction, ongoing safeguarding and referral duties

16.1 Induction and supervision

Before or on the first day, new staff and volunteers will receive role-appropriate safeguarding induction, including:

- KCSIE Part one and the school's Child Protection and Safeguarding Policy;
- the Staff Code of Conduct, professional boundaries and acceptable use expectations;
- the identities and roles of the DSL and deputies;
- procedures for reporting concerns about children, adults, low-level concerns and whistleblowing;
- online safety, confidentiality, information sharing and data security; and
- any role-specific supervision, lone working, intimate care, first aid or site security arrangements.

Probation, appraisal, supervision and conduct management will continue to test suitability and reinforce safeguarding expectations. Managers must respond promptly to any new concern or information.

16.2 Referral duties

The school will make a referral to the DBS where it removes a person from regulated activity, or would have removed them had they not left, and believes the statutory referral criteria are met. This includes relevant conduct, the harm test or a relevant offence. Resignation, settlement or redeployment does not remove the duty.

The school will consider referral to the TRA where a teacher is dismissed, or would have been dismissed, for serious misconduct. Allegations and concerns will also be referred to the LADO, police or children's social care where the applicable threshold is met. The headteacher will ensure referrals are timely, complete and supported by relevant records.

17. Providing employment references

Only the headteacher or another expressly authorised senior person may provide an official school reference. A staff member giving a personal reference must make clear that it is personal, use private contact details and must not imply that it is provided on behalf of the school.

Official references will be:

- fair, accurate, factual, verifiable and not misleading by omission or presentation;
- limited to information that is relevant and lawfully disclosed;
- consistent with KCSIE requirements on safeguarding allegations and low-level concerns;
- clear whether the school is satisfied with the person's suitability to work with children;
- checked against the personnel and safeguarding records before being sent; and
- sent securely to a verified recipient.

Substantiated safeguarding concerns or allegations that meet the harm threshold will be described factually. Unfounded, false, unsubstantiated or malicious allegations will not be included. A low-level concern relating exclusively to safeguarding will not be included; however, related misconduct or poor performance may be included where it would normally form part of a reference. HR or legal advice will be sought where the position is unclear.

A settlement agreement must not prevent the school from meeting safeguarding, referral or reference duties. If material new evidence shows that a reference was inaccurate, the headteacher will seek advice and decide whether it must be corrected or withdrawn.

18. Remote recruitment

Remote recruitment will meet the same safeguarding, equality, confidentiality and evidence requirements as an in-person process. The school will use a secure platform, provide clear instructions and make reasonable adjustments.

- The panel will verify the candidate's identity at the start of the remote interview and complete formal document checks through an authorised route before employment begins.
- The same structured questions, scoring and decision process will be used for all candidates.
- Candidates will not be required to disclose passwords or unrelated private information.
- Interviews will not normally be recorded. Any exceptional recording must be necessary, lawful, transparent, secure and subject to an appropriate retention period.
- Where technology fails or disadvantages a candidate, the school will provide a fair alternative where reasonably practicable.

19. Safer recruitment training

At least one person conducting every interview will have completed appropriate safer recruitment training. The substance of the training must, as a minimum, cover Part three of the current KCSIE.

The school will:

- keep a record of formal safer recruitment training and the date completed;
- provide a briefing on current KCSIE and role-specific checks before each recruitment exercise;
- refresh formal training at least every three years as an internal standard, and sooner after a material change in law, guidance or role;
- ensure panel members understand structured selection, equality duties, data protection, online searches, references and recording decisions; and
- seek specialist HR, safeguarding, immigration or legal advice where the panel lacks expertise.

Training currency: KCSIE does not prescribe a fixed expiry period for safer recruitment training. A certificate alone is therefore not enough: panel members must also work from the current version of KCSIE and the latest checking guidance.

20. Monitoring and review

The governing board and headteacher will monitor compliance through SCR reviews, sampling of completed recruitment files, review of any conditional starts, and evaluation of any safeguarding or HR learning arising from recruitment.

An annual compliance check will be completed each September following publication or commencement of the latest KCSIE. The policy has a scheduled full review in July 2028, but it will be updated sooner where legislation, statutory guidance, school structure or identified practice requires a change.

Material breaches of this policy will be reported to the headteacher and chair of governors and managed under the relevant safeguarding, disciplinary, data protection or whistleblowing procedure.

Appendix 1: Pre-appointment check matrix

This matrix is a summary. The current KCSIE and DBS eligibility guidance must be checked for the precise duties of a particular role.

Category	Minimum approach	Recording / limits
Employee in regulated activity	Identity; enhanced DBS with barred list; right to work; references and history; overseas checks; qualifications; health after offer; prohibition/childcare disqualification where relevant.	Record mandatory staff checks on SCR.
Employee with regular contact but not regulated activity	Identity; enhanced DBS without barred list where eligible; right to work; references and history; other role-specific checks.	Do not request barred list information.
Agency or third-party supply staff	Written confirmation of all required checks and suitability; identity on arrival; obtain DBS certificate copy where KCSIE requires because information is disclosed.	Record confirmation date and DBS information status on SCR, even for one day.
Contractor in regulated activity	Enhanced DBS with barred list; identity; contractual safeguarding requirements.	No unchecked person may work unsupervised or in regulated activity.
Contractor with regular contact, not regulated activity	Enhanced DBS without barred list; identity; supervision as required.	Consider basic DBS if no opportunity for regular contact.
Volunteer in regulated activity from 1 Sept 2026	Enhanced DBS with barred list; identity; references/risk information as appropriate.	Includes frequent teaching, training, instructing or supervising even if supervised.
Volunteer not in regulated activity	Written risk assessment; enhanced without barred list or basic DBS only where appropriate and eligible; supervision.	No barred list check. Record risk assessment.
Salaried trainee teacher	School completes all employee checks including enhanced DBS with barred list where regulated activity.	Include on SCR.

Category	Minimum approach	Recording / limits
Fee-funded trainee teacher	Written provider confirmation of all required checks and suitability; identity on arrival.	Not mandatory on SCR; may record confirmation.
Maintained school governor	Enhanced DBS; section 128; identity.	No barred list unless also undertaking regulated activity. May record on SCR as non-statutory information.
Associate member	No automatic enhanced DBS requirement unless also in regulated activity; assess any other role separately.	Do not request an ineligible check.

Appendix 2: Recruitment file checklist

Stage	Evidence to retain
Planning	Approved vacancy and delegation; job description; person specification; regulated activity and check-level decision; timetable; panel and training record; conflict declarations.
Advertising	Advert; safeguarding statement; Rehabilitation of Offenders statement; application pack; privacy notice; reasonable adjustment information.
Applications	Completed application forms; no CV-only applications; full history and gaps; referee details; signed accuracy declaration.
Shortlisting	Pre-agreed criteria; independent scores from at least two people; moderation record; reasons for shortlist/non-shortlist.
Due diligence	Shortlisted self-declaration; online search decision and record; relevant concerns identified for interview.
References	Direct requests; current/last child employer where relevant; verification of source; comparison with application; capability information for teachers; discrepancies resolved.
Interview	Structured questions; safeguarding questions; notes and scores; identity/qualification documents viewed; candidate explanations; panel decision and rationale.
Conditional offer	Written conditional offer listing all checks; no unconditional start date until authorised.
Checks	Identity; DBS/barred list; prohibition; section 128 where relevant; right to work; overseas; qualifications; health; childcare disqualification; category-specific evidence.
Decision	All concerns resolved; risk assessment where needed; headteacher approval; offer confirmed or withdrawn with rationale.
Records	SCR updated from evidence; personnel file created; DBS copy destroyed within permitted period; unsuccessful records retained/destroyed under schedule.
Induction	KCSIE Part one; safeguarding policy; code of conduct; DSL; low-level concerns; whistleblowing; online safety; supervision and role-specific training.