



# **Safeguarding: Safer Recruitment Policy and Procedure**

## **September 2025**

Governor Responsibility	Safeguarding Committee
Policy Owner	Headteacher
Review Cycle	Annually
Policy Date	September 2025
Next Review Date	September 2026

## SEVEN STEPS TO SAFER RECRUITMENT

### 1. Safer Recruitment Training for all Recruiting Managers

- NSPCC Safer Recruitment e-learning Online Portal (to provide the interviewer with the context and knowledge to explore their safeguarding responsibility) or
- Face-to-Face Safer Recruitment Training should be delivered by Accredited Safer Recruitment Trainers

### 2. Job Descriptions and Advertisements

- Safeguarding commitment statement included in both the application form and job advertisement (to deter unsuitable personnel)

### 3. Scrutinising, Shortlisting, and Interviewing

- Application form (to be used as main tool for scrutinising)
- Internet search (to gather any public domain information)
- Gaps in employment history (to be noted for further exploration)
- Taking up references (to verify previous experience) and follow up with telephone call
- Concerns from a reference (to be noted for further exploration)
- Invitation to Interview (to prepare applicants for interview)
- Preparing for interview (Selection Process and Interview panel)
- Verify Identity
- Verify Professional Qualifications
- Interview (Scope of Interview, Outcome)

### 4. Offer letter and Contract of Employment (specific reference made to professional expectations to safeguard the Trust)

- Terms and Conditions of Employment
- Probation period
- Staff Handbook
- Staff Code of Conduct Procedure
- Standards and Policies
- Ofsted Framework (KCSIE)
- Safeguarding Declaration

### 5. Background Checks (in addition to pre-appointment checks, the following ensure the person is who they state they are and complies with our safeguarding requirements) References

- Identity check
- Right to Work
- Enhanced Disclosure and Barred List Check
- Overseas criminal records checks (if applicable)
- Country of Origin check (if applicable)
- Prohibition from Teaching check (if applicable)
- Prohibition from Management check (if applicable)
- Medical fitness

### 6. Recording and Monitoring New Starters (to evidence all background checks have been completed and suitably returned)

- SCR – updated for all new starters
- New Starter Induction Checklist (to be completed, signed off by the Executive Headteacher and filed on personnel file)
- Risk Assessment Form (to be completed, signed by the PA, copied to the Executive Headteacher, and filed on personnel file)
- Annual Staff Declaration (Safeguarding and Compliance Record)

### 7. Probationary Period including Induction

- The schools' attitude and expectations regarding safeguarding are clearly articulated inc. personal behaviours and reporting lines for any concerns
- Relevant Child Protection and Safeguarding Training should be completed during induction period
- Assess performance, conduct and final suitability for working with children before confirming permanent appointment.

## 1. Purpose

- 1.1 The Safer Recruitment Policy explicitly details the schools' position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.
- 1.2 Moon Hall School ensures compliance with all relevant legislation and recommendations and guidance including statutory guidance published by the Department for Education (DfE).

## 2. Definitions and Scope

- 2.1 This Safer Recruitment Policy sets out our safeguarding responsibilities as an organisation recruiting staff to work with students and provides consistent and best practice recruitment procedures.
- 2.2 This policy must be read by any member of staff who is actively involved in the recruitment and selection of staff or who has a lead role in the safeguarding/child protection of students in a school.
- 2.3 Safeguarding is an ongoing process and will continue throughout employment. Safer Recruitment is only the first step in the whole Safeguarding cycle and must be embraced as part of our wider commitment to Safeguarding and Child Protection.

## 3. Policy

- 3.1 At Moon Hall School we are committed to keeping our students safe by:
  - providing a safe environment for students to learn and
  - taking appropriate action to keep them safe (where a risk is identified)
- 3.2 Achieving this objective requires systems designed to:
  - prevent unsuitable people working with students
  - promote safe practice and challenge poor and unsafe practice
  - identify instances where there are grounds for concern and take appropriate action
  - contribute to effective partnerships to provide services to students who may require third party intervention
  - create a culture and environment where staff feel comfortable, if appropriate, to discuss matters outside of work, which may have implications for the safeguarding of students in the workplace.
- 3.3 Moon Hall continually implements strategies to ensure the best people are employed. The [Seven Steps to Safer Recruitment](#) have been adopted to deter and prevent unsuitable personnel from applying and/or being recruited. To achieve the aim, it requires recruiting staff to adhere to the [Seven Steps to Safer Recruitment](#).
- 3.4 The School Leadership Team must be clear about the expectations they place on staff, including where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of students in school.
- 3.5 Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.

- 3.6 When implementing the Safer Recruitment policy, the Recruiting Manager will be mindful of and act in accordance with the school's Preventing Extremism and Radicalisation Policy. By complying with safer recruitment best practice techniques as set out in this policy and by ensuring that there is an on-going culture of vigilance within our schools we aim to promote a culture of tolerance and respect and minimise the risk of students and/or members of staff being drawn into terrorism.

### *Equal Opportunities*

- 3.7 Our policy is to treat job applicants and employees in the same way regardless of their gender, marital status, age, race, sexual orientation, gender reassignment, religion, pregnancy/maternity or disability and the sole criteria for selection or promotion will be an applicant's suitability for the role.
- 3.8 In turn, we expect our staff to recognise and respect the different racial groups, religious cultures and languages represented by the children who attend our school, in order to help them to develop positive attitudes to diversity and to equip them to prevent them from being drawn into extremism or terrorism.
- 3.9 Our curriculum and activities will aim to use the richness this brings to the classroom and our organisation.

### *Levels of Responsibility*

- 3.10 It is the Senior Management Team's responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Job Description for the role.
- 3.11 Budget approval from the Executive Headteacher must be obtained prior to any recruitment activity including advertising, engaging with external agencies, interviewing or making verbal or written job offers. This is to ensure the new position and recruitment costs are within the approved budget.
- 3.12 The HR Manager will complete Safer Recruitment checks for all candidates, overseen by the Bursar. The HR Administrator will provide administrative support to assist with the recruitment process.
- 3.13 Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

### *Professional Standards*

- 3.14 Strict confidentiality must be always maintained by those who participate in the recruitment process. Confidential documents containing applicant details, application form, interview notes, employment offers etc. must be securely filed away.
- 3.15 Declaration of close personal or financial relationships with any applicant must be made to the Recruiting Manager. Anyone in this category will not be allowed to participate in the recruitment decision (this excludes ordinary working relationships).

### *Emerging Safeguarding Risks*

3.16 In line with KCSIE 2025, the school recognises that safeguarding responsibilities extend to addressing new and emerging risks. These include:

- Misinformation and disinformation, which may cause harm to children or undermine trust in safeguarding processes.
- Cybersecurity vulnerabilities, which could expose pupils or staff to harm through breaches of systems and data.
- Artificial Intelligence (AI) and other emerging technologies, which may present safeguarding challenges if used irresponsibly.

Recruitment, induction and training will take account of these risks, and all staff are expected to remain vigilant to new safeguarding threats as they arise.

## **4. Procedure**

### **(Step 1) Safer Recruitment Training**

- 5.1 It is best practice for members of the recruitment panel to have successfully completed safer recruitment training.
- 5.2 We believe training further strengthens and safeguards students in schools by helping to deter and prevent abuse; as such this is also a mandatory requirement for all Moon Hall staff who have a lead role in the safeguarding/child protection of students in the school.
- 5.3 The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) via; [NSPCC](#).
- 5.4 In addition, face-to-face Safer Recruitment Training is also available.

### **(Step 2a) Role Profiles**

- 5.5 Job Descriptions, including a Person Specification, should be reviewed for each new vacancy and must include the main duties and responsibilities specific to the needs of the role. It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:
- To comply with safeguarding policies, procedures and code of conduct
  - To demonstrate a personal commitment to safeguarding and student/colleague wellbeing
  - To ensure that any safeguarding concerns or incidents are reported appropriately in line with policy
  - To engage in safeguarding training when required.

### **(Step 2b) Advertisements**

- 5.6 When advertising a role, either internally or externally, it is important to outline the requirements in terms of the duties and responsibilities, the experience/background needed, and the personal qualities sought. The advertisement should then be written to reflect these in a way that makes the position attractive to applicants but also has

sufficient benchmarks to dissuade those who clearly do not have the required skills from applying.

- 5.7 Moon Hall actively encourages internal moves and promotion but also reserves the right to advertise externally in the quest to find the best person for the job. This decision should be made between the Senior Leadership Team and the Head.
- 5.8 Advertisements should always include the following abridged Commitment Statement which sets out Moon Halls commitment to safeguarding children:

*“Moon Hall School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment. Safer recruitment practice and pre-employment background checks will be undertaken before any appointment is confirmed.”*

### **(Step 3) Scrutinising, Shortlisting and Interviewing**

#### *The Application Form*

- 5.9 Applicants, both internal and external, must use the Moon Hall School Application Form to apply for a vacancy to comply with the Safer Recruitment Policy. This ensures a common set of core data from all applicants is received. It is not good practice to accept a CV drawn up by the applicant in place of an Application Form because this will only contain the information they wish to present and may omit relevant details (however, CV's can be accepted in addition to an Application Form.)
- 5.10 It is unacceptable for an applicant to be appointed in the absence of a fully completed signed Application Form. When an Application Form has been submitted electronically with only a typed name in the signature box, an applicant invited to attend an interview will be asked to sign the Application Form as part of the background compliance checks undertaken on the interview day or their first day of employment.
- 5.11 Application Forms include a self-declaration by the applicant that they are not barred, disqualified from teaching or subject to sanctions where applicable.
- 5.12 It is strongly advised that two people shortlist the applicants to avoid bias of opinion or prejudice in the process.

#### *Internet Search*

- 5.13 Applicants should be subject to a basic internet/media search to help identify the applicant's online identity and determine whether there may be any reputational risk to the school based on comments made by or about them online. Any information requiring further consideration should be discussed with the applicant and noted on the summary report from the interview documenting the considerations made. Information relating to the personal protected characteristics of the applicant (e.g. their race or sexual orientation) will not be considered in considering their application.  
**In line with KCSIE 2025 All applicants will be informed when shortlisted for interview, that they will be subjected to an online search as part of the recruitment process.**

- 5.14 Searches should cover all countries where the applicant has lived and/or worked to ensure a full picture of their past is captured.

### *Gaps in Employment History*

- 5.15 All Application Forms should be scrutinised to ensure they are fully and properly completed, and that the information provided is consistent and does not contain any discrepancies, including identifying any gaps in employment. Where there are gaps in employment, a note of this should be made and used in consideration of whether to short list the applicant. Together with obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression should be explored and verified. This can also include a midcareer move from a permanent role to supply teaching or temporary work.

### *Taking up References*

- 5.16 Applicants should give a minimum of two professional reference contacts from two separate employers on the Application Form. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must therefore include the most recent employer and the most recent employment working with children (if different). References should be sought on all short-listed school-based applicants, including internal ones and should be from a senior person within the organisation.
- 5.17 The School must request all written references directly from the referee. Moon Hall does not accept an open reference as part of the recruitment process e.g. "to whom it may concern". A minimum of two returned and satisfactory references are required on each personnel file before the start date of employment.
- 5.18 As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g. because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g. University tutor).
- 5.19 References should be requested using the standard employer reference request form and the reference request letter. If a reference is received electronically and has not been signed by hand by the referee, evidence must be sought and retained in the employee file to demonstrate that the reference was provided by the expected referee and email address.

### *Teaching staff:*

- 5.20 Prior to the interview, it is best practice for all permissible references to be requested for shortlisted applicants, considering whether the applicant has requested that their current employer should not be contacted at this stage.
- 5.21 Prior to the interview, at least one written reference must be requested for shortlisted applicants. Where possible, best endeavours must be made to ensure these are received and scrutinised before the interview.

- 5.22 All job offers are conditional upon receipt of a minimum of two satisfactory references and any appointment must not be confirmed until all required references, which must include either the current or most recent employer, have been received.

*Non-teaching school-based staff:*

- 5.23 Prior to the interview, at least one written reference must be requested for shortlisted applicants. This does not have to include the current or most recent employer at this stage, the Application Form asks if the referee can be contacted prior to interview for this reason.
- 5.24 Once the successful applicant has been offered the role, the second and third references (if applicable) must then be requested, including from the current or most recent employer if this was not obtained before the interview, to complete the reference process.
- 5.25 All job offers are conditional upon receipt of a minimum of two satisfactory references.

*Concerns from a Reference*

- 5.26 All references should be scrutinised by the interviewing panel upon receipt and special attention paid to questions regarding disciplinary issues, suitability to work with children, re-employment and whether the dates of employment, role and duties match the information supplied on the Application Form. Referees should be contacted for a follow-up conversation if any of these elements are unclear or give cause for concern. Notes of the conversation should be made and dated and retained on the applicant's personnel file. Any issues of significant concern should be escalated to the Executive Headteacher.
- 5.27 Where an individual has not listed relevant or logical referees the school may ask the applicant to provide more suitable referees and/or should consider contacting those referees who have not been listed. Any such contact should be discussed with the applicant in advance, documented, dated and included in their personnel file if they are subsequently appointed. Reasons for leaving former employers should also be sought.
- 5.28 In the event that suitable references cannot be obtained, the matter should be escalated to the Executive Headteacher for advice on how to proceed prior to any job offer being made.

*Invitation to Interview*

- 5.29 The Invite to Interview Letter should include the date, time and place of the interview, directions to the venue, names of those people on the interview panel, details of the selection process and a statement that the interview will include questions relating to safeguarding.
- 5.30 Applicants should be asked to bring three original documents, a copy of which must be kept on the personnel file and the person verifying the documents must sign and date the copies:
- two confirming their identity i.e. a current driving licence, passport and/or birth certificate (one of which must include their photograph)



- plus, one document confirming their current name and address such as a utility bill or financial statement (dated within the last three months). It is not permissible for applicants to offer photocopied documents for the purposes of identity checking

### *Preparing for the Interview (Selection Process and Interview Panel)*

#### *Selection Process:*

- 5.31 In order to help select the most appropriate applicants a number of different selection techniques may be deployed. In all cases, there should be an interview, and this can be complemented by a carousel format such as assessments, numeracy and/or literacy tests, a lesson observation and/or case study/presentation, student panel/staff panel, tour etc. For school based teaching roles, it is good practice to involve students in the recruitment and selection process in some way, so that applicants' interaction with them can be observed (although under no circumstances should an applicant be left unsupervised with students of any age during the recruitment process). If appropriate, the final decision may be reached via a second interview.
- 5.32 Where appropriate, select work-based assessments, exercises or personality profiling to further assess an applicant's suitability for the role.
- 5.33 It is important to prepare thoroughly prior to beginning the selection process, and the interview content is a key part of this. It is important to identify who should be involved in the selection process, assigning responsibility and setting aside sufficient time for the work needed at each stage.  
This ensures all elements of recruitment safeguards are not rushed or overlooked.

#### *Interview Panel:*

- 5.34 It is recommended, but not mandatory to have a minimum of two interviewers, and in some cases, i.e. for senior or specialist roles, a larger panel might be appropriate. A recruitment panel allows for at least one member to observe and assess the applicant, and the other to make notes. It also allows for the corroboration of events within an interview should an applicant attempt to bring a claim for an alleged breach of process or legislation within the recruitment process. A manager who interviews alone does not have such a defence.
- 5.35 The members of the interview panel should meet before the interview to:
- agree and understand the required standard for the role to which they are appointing
  - consider the issues to be explored with each applicant and who on the panel will ask about each of those
  - agree the assessment criteria in accordance with the Job Description and Person Specification
  - review the Interview Question Template to select the relevant questions for the post, ensuring Safeguarding questions are a focus
- 5.36 The Recruiting Manager should also consult others involved in the selection process, such as teachers involved in the lesson observation, tours or informal meetings to obtain their feedback, and collate and assess any associated paperwork. These should be incorporated into the summary or interview record documentation as required.

### *Verify Identity*

- 5.37 When verifying identity, those responsible are aiming to corroborate the person's full name, including forenames and last name, date of birth, and full permanent address. Where necessary applicants should also provide any official documentation regarding name changes.
- 5.38 Where an applicant claims to have changed his or her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he or she is required to provide documentary evidence of the change.
- 5.39 A copy of the documents used to verify the successful applicant's identity and address must be kept on their personnel file for record-keeping purposes and the person verifying the documents must sign and date the copies.

### *Verify Professional Qualifications*

- 5.40 Applicants must also be asked for evidence of their educational or professional qualifications that are necessary or relevant for the role (i.e. the original or certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body). If the applicant cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications must be obtained from the awarding body (for teaching positions) prior to the appointment being confirmed.
- 5.41 A copy of the qualifications must be kept on the personnel file and the person verifying the documents must sign and date the copies.

### *Interview (Scope of Interview, Outcome and Regrets)*

- 5.42 The interview should assess the merits of each applicant against the role requirements. It is important to ensure that the interview process adopted for internal applicants is exactly the same as that for external applicants for the same role. It is also very important to explore each applicant's suitability to work with children.
- 5.43 Each applicant must be given a fair and equal opportunity to demonstrate that they have the skills, experience and personal attributes that are being sought. The selection process should reflect the requirements of the role, the necessary competencies to be successful in the role, and the personal qualities appropriate to the environment.
- 5.44 All applicants should be tested in the same areas and should convincingly reach the level that was expected at the outset. An applicant should not be recruited based on being the 'best of the group', they should be the best person for the role. This may require commencing the search again if a suitable applicant is not sourced from the original search.
- 5.45 Having agreed the interview questions the panel will explore any issues with each applicant, based on the information provided in the Application Form and references received. An applicant's response to a question will determine whether and how that is followed up.

- 5.46 It is better to ask behavioural based questions which ask an applicant to relate how s/he has responded to or dealt with an actual situation in the past, or questions that test an applicant's attributes and understanding of key issues.
- 5.47 Interview notes should be taken by all panel members and collated at the end of the interview by the Recruiting Manager. Interview notes should be legible and cover all key topics discussed during the interview. At the very least the Recruiting Manager should prepare a legible or typed summary of the interview covering the points listed in section 6.43. Furthermore, the Recruiting Manager should make summary comments as the responsible person.
- 5.48 The HR Manager should ensure the interview notes are securely retained for a maximum of six months and then if the applicant is not successful, they may be shredded. It is important that interview notes are retained for this period as they will provide justification in the event of a potential complaint about the selection process.
- 5.49 Interview notes for the successful applicant should be retained securely on their personnel file for record-keeping purposes for the duration of their employment and any required statutory period thereafter.
- 5.50 Please note, for Head Teacher recruitment, all interview notes must be collated by the Recruiting Manager and passed to the HR Manager for secure and confidential filing.

#### *Scope of the Interview:*

- 5.51 In addition to assessing and evaluating the applicant's suitability for a particular role, it is imperative that safeguarding questions are asked at interview to ensure the filtering process of unsuitable applicants, but also to gain an insight in to the knowledge, experience and attitude of the applicant towards safeguarding, as this information can facilitate early training requirements upon commencement of role.
- 5.52 The interview panel should also therefore explore:
- the applicant's attitude towards children and young people
  - his or her ability to support the School's policy for safeguarding and promoting the welfare of children
  - gaps in the applicants' employment history
  - periods of time spent overseas
  - concerns or discrepancies arising from the information provided by the applicant and/or a referee
- 5.53 All applicants invited to interview are entitled to a meaningful interview irrespective of any change in circumstances (e.g. change of budget; identification of a preferred applicant; answers to early questions are poor) which might tempt the Recruiting Panel to abbreviate the process. This maintains a professional image of the school and will to some extent protect from potential claims of an unfair process.

#### *The Outcome:*

- 5.54 The recruitment decision should be based purely on the criteria required, so any outcome can be explained constructively to the unsuccessful applicants. Any feedback that can help them should be given honestly and, for internal applicants, learning and development areas may be identified. The HR Manager can assist with ensuring this feedback is constructive.

### *Regrets:*

- 5.55 It is essential that the successful applicant is either told after the regrets or in confidence until all the outcomes are known. It is the Recruiting Manager's responsibility to ensure that this process is controlled effectively.

## **(Step 4) Offer letter and Contract of Employment**

- 5.56 There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children.

### *Terms and Conditions of Employment*

- 5.57 The Template Offer Letter and Contract of Employment must be used to satisfy the conditions of employment relating to safeguarding.

### *Probation*

- 5.58 The initial period of employment enables an observed judgement of an applicant's suitability to work with children and capability for the role. Please go to [\(STEP 7\) PROBATIONARY PERIOD INCLUDING INDUCTION](#) for more information.

### *Rehabilitation of Offenders*

All applicants are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act. However, DBS filtering rules mean that some old/minor offences do not need to be disclosed as highlighted in KCSIE 2025.

### *Standards and Policies*

Teaching staff are expected to conduct themselves in line with the DfE professional standards in England.

### *Safeguarding Declaration*

All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

## **(Step 5) Background Checks**

- 5.59 An offer of employment must be conditional upon:
- the receipt of at least two satisfactory written references
  - verification of the applicant's identity (if that could not be verified at the interview)
  - Right to work
  - an Enhanced Disclosure and Barring Service (DBS) check, (paper copy) must be shown to the HR Manager by the applicant before starting work. An Enhanced DBS with Barred List check is required for people working in Regulated Activity and this is the default set up for Moon Halls online application service.
  - the receipt of overseas criminal records checks for all other countries in which the applicant has lived or worked for three months or more in the past ten years (if applicable) and for the country they completed their teacher training in (if not the UK)

- Prohibition from Teaching check (if applicable)
  - Prohibition from Management check (if applicable)
  - verification of the applicant's medical fitness
  - verification of appropriate qualifications/professional status (where required)
  - satisfactory completion of the probationary period
- 5.60 All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's personnel file. A summary of the checks must be recorded on the Single Central Record (SCR).
- 5.61 The above checks must be completed before an applicant takes up the post, this may result in delaying the commencement of employment.
- 5.62 Any exceptions to this must have been discussed and agreed with the Executive Headteacher who will confirm agreement that it is necessary for the individual to start work before all the vetting checks are complete and that the proposed measures that will be taken are appropriate to safeguard students' welfare.
- 5.63 Any exceptional permission to appoint without all recruitment vetting checks completed will be subject to the following conditions:
- all vetting checks must have been applied for
  - a Barred List check must have been completed and confirmation obtained that the individual is not on the Barred List
  - a Prohibition from Teaching Check must have been completed (if applicable)
  - a Prohibition from Management Check must have been completed (if applicable)
  - at least one written reference must have been received, and the Recruiting Manager must have spoken personally over the telephone (or face to face) with the remaining referee(s), asked and obtained answers to all of the questions on the reference request form, and a full written note must have been taken of these discussions and placed on the personnel file
  - verification of the individual's identity, right to work in the UK, qualifications and medical fitness must have been completed.
  - a written Risk Assessment must be carried out using the appropriate Risk Assessment Form and this must be suitably approved then placed on the personnel file.
  - steps must be taken to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips), are put in place pending completion of the vetting checks and documented on the Risk Assessment Form, which must be reviewed by the Head every two weeks, and updated notes produced as an audit trail
  - details of supervisory measures and restrictions on work must be discussed and agreed with the new employee prior to them starting.
  - whilst the DBS check is awaited, a note that there is a risk assessment in place should be recorded on the Single Central Record (SCR)
- 5.64 If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Recruiting Manager supported by HR Manager. Any disclosure information relating to a conviction should be notified to the Executive Headteacher for careful consideration of suitability to the post. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The Chair of Governors will be notified of any reporting to relevant authorities and/or regulators.

## References

5.65 Previously detailed in Sections 5.16 to 5.28 inclusive.

## Verifying Identity

5.66 Previously detailed in Sections 5.37 to 5.39 inclusive.

## Right to Work

5.67 When appointing new staff, the person's right to work in the UK must be verified. Advice can be sought on <https://www.gov.uk/check-job-applicant-right-to-work> Copies of documents should be verified (date and signature) and retained on the personnel file.

## Enhanced Disclosure and Barring (DBS) check including the Barred List

5.68 UK DfE regulations for schools set out a statutory duty to obtain an Enhanced DBS, which must include Barred List information for newly appointed staff in regulated activity i.e. all permanent, fixed-term contracts and temporary staff (including bank supply staff) employed by the school before they commence employment. Where the post holder will not undertake regulated activity, an Enhanced DBS must be carried out (again, before they commence employment), but the school is not permitted to carry out a Barred List Check on those not undertaking regulated activity.

5.69 The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012:

5.70 Regulated Activity includes:

- a) teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once.
- b) work for a limited range of establishments (known as "specified places" which includes schools and colleges) with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child, for reasons of age, illness, or disability, with eating or drinking or in connection with toileting, washing, bathing, or dressing.

5.71 Regularly is once a week, on three or more days in a 30-day period or overnight. It is likely that all school personnel will be carrying out regulated activity and so will require a Barred List check with

their enhanced DBS check. However, to assess whether a particular role involves regulated activity, please consult the Keeping Children Safe in Education (September 2021) guidance or refer to Judicium HR Advisory Service.

- 5.72 The relevant DBS check must be carried out as a matter of priority for all new employees at the job offer stage via the online system. If the offer is made more than three months before the employment will commence, it is best practice to wait until three months before the commencement date before applying for the DBS check.
- In addition, where an applicant is found to be on the Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the facts must be reported to the Police, the DBS and if the individual is a teacher in England, the DfE Children's Safeguarding Operations Unit (formerly the Teachers Misconduct Team) must be informed.
- 5.73 All steps taken in following up such issues must be clearly documented and retained on the recruitment file.
- 5.74 The school can undertake a free, online status check as an alternative to making a full new DBS check if the applicant has subscribed to the "Update Service" and gives written permission to the school to do so. By using this service, the school can check if any new information has come to light since the DBS certificate was originally issued. However, if the check does declare that something has changed the school will need to seek a new disclosure to use that information as evidence for a discussion with the applicant.
- 5.75 To carry out a status check of a DBS certificate, the school must:
- have the applicant's consent
  - confirm that they are legally entitled to carry out the status check
  - see the original paper certificate to check it is the same type and level as they are legally entitled to apply for
  - make sure that the right checks have been carried out and see what, if any, information was disclosed about the applicant
  - check the person's identity
  - check the name on the DBS certificate matches this identity
  - note the DBS certificate reference number, the person's name, and date of birth
- 5.76 If the successful applicant has not subscribed to the "Update Service" they should be instructed to log into the online portal to commence their DBS check. The HR Manager will provide the details. If the applicant did not provide appropriate identity documents on the interview day to meet the identity checking requirements for the DBS, then they will be required to bring their original (not copy) ID for checking to the HR Manager as part of the recruitment process. Copies of documents should be verified (date and signature), retained on the personnel file, and recorded on the SCR.
- 5.77 If the position being offered also requires a Prohibition from Management check (see 6.99) it is important to advise the successful applicant of the need to include the words "Management of Independent School" immediately after their job title within their application.

- 5.78 An Applicants' Guide can also be downloaded for further information via <https://www.securitywatchdog.org.uk/dbs-application-guide>
- 5.79 Schools are required to update DBS checks (including Barred List checks if applicable to the role) for all staff, as from time to time determined by the Trust Governors, or as soon as possible if concerns arise about an existing staff member's suitability to work with children. Additionally, staff are required to sign an annual self-declaration regarding their suitability to work with children.
- 5.80 Please note that it is only permissible to keep a photocopy of a DBS and/or criminal/Police records for up to six months and for reasons of a formal recruitment query. A record of the check and confirmation that it was satisfactory will be recorded on the SCR, together with details of the certificate number.

### *Overseas Checks*

- 5.81 Staff that have lived and/or worked outside of the UK must undergo the same background checks as all other applicants, plus additional criminal/Police record checks (overseas checks) to account for their time spent overseas. Copies of documents should be verified (date and signature), retained on the personnel file, and recorded on the SCR.
- 5.82 Criminal/Police record checks must be sought for:
- all other countries in which the applicant has lived and/or worked for a period of three months or more in the past ten years. Please note that checks are not required prior to the age of 16.
  - country where applicant completed teacher training (or relevant teaching qualifications) (if not within the UK).
- 5.83 If an overseas check is not in English, a reputable translation company should be used to translate the document. To ensure data protection, no member of the school staff or department must be asked to assist with translation, unless they are a member of the Interview Panel.
- 5.84 In the event that criminal/Police record checks are not available or forthcoming from a country, alternative documents to evidence their time spent in the country must be sought, such as certificates of good conduct (where available) or, if they worked in the country, full employment references. If no employment references are available, character references from professionals that knew the individual in the country can be sought. This should be recorded on an Overseas Criminal Checks Risk Assessment Form and filed on the applicant's personnel file.
- 5.85 Any disclosures on overseas checks will need to be discussed with the Executive Headteacher to allow an informed recruitment decision to be made.
- 5.86 UK Military Personnel:
- If an applicant has spent time overseas serving in the British Forces, criminal/Police record checks should still be requested for all countries where the individual has spent three months or more in the past ten years, as offences committed away from the base are not always recorded by the forces and documented in a DBS check.



## *Prohibition from Teaching Check*

- 5.87 Anyone who is appointed to carry out teaching within England requires an additional check to ensure they are not prohibited from teaching. This includes Teaching Assistants, Therapists, Sports Coaches and Peripatetic Teachers.
- 5.88 The School is registered for the Teacher Services Portal provided by the Teaching Regulation Agency and should be used to check successful applicants for any prohibitions by either entering their TRN number for an automatic search or alternatively manually checking all relevant lists for all known names:
- Prohibition lists are listed alphabetically by surname and can be found by clicking on the reference number adjacent to the name, this will then take you to more information about the sanctions that have been imposed.
- 5.89 The person who is responsible for conducting the check must evidence that the check has been completed, sign and date the evidence and file it in the employee file.
- 5.90 Please note that although this check is not applicable for teachers who gained their qualification in Wales there is a requirement for schools to undertake a registration check. To do this, they must send an email to [registration@ewc.wales](mailto:registration@ewc.wales) and ask the following questions:
- whether an individual is registered, and
  - whether there are any suspensions or barrings placed upon them.
- 5.91 For those teachers who have either trained or been working in Scotland, Northern Ireland, or Ireland it is possible to write and request for confirmation of whether any prohibitions are in place. To do this you should send an email to the relevant teaching council including details of all known names, date of birth, NI Number and where possible the TRN.

### **Scotland -**

The General Teaching Council for Scotland:  
Tel: 0131 314 6080  
Email address: [gtcs@gtcs.org.uk](mailto:gtcs@gtcs.org.uk)  
Website: [www.gtcs.org.uk](http://www.gtcs.org.uk)

### **Northern Ireland -**

The General Teaching Council for Northern Ireland  
Tel: 028 9033 3390  
Email Address: [registration@gtcni.org.uk](mailto:registration@gtcni.org.uk)  
Website: [www.gtcni.org.uk](http://www.gtcni.org.uk)

### **Ireland -**

Irish Teaching Council  
Tel: 00353 1 651 7900  
Email Address: [info@teachingcouncil.ie](mailto:info@teachingcouncil.ie)  
Website: [www.teachingcouncil.ie](http://www.teachingcouncil.ie)

## *EEA Sanctions Check*

- 5.92 Since 1 January 2021 the Teaching Regulation Agency no longer maintain a list of EEA teachers with sanctions, so this check (undertaken by schools via the [Teacher Services/Employer Access](#) route) will

no longer be available. Instead, teachers will be asked to provide a **letter of professional standing** from the organisation responsible for regulating teachers in the country in which they qualified. Teachers who qualified in the EEA will be required to present this when they apply for Qualified Teacher Status in England.

The school will continue to conduct safer recruitment checks on all applicants.

For applicants that have lived or worked outside of the UK, schools must make any further checks they think appropriate so that relevant events that occurred outside the UK can be considered, including obtaining an enhanced DBS certificate with barred list information (even if the teacher has never been to the UK).

Teachers may be able to provide proof of their past conduct as a teacher, issued by the professional regulating authority in the country in which they worked. Where available, such evidence can be considered alongside other information obtained through other pre-appointment checks to help assess their suitability.

Guidance can be downloaded for further information via the Home Office on criminal records checks for overseas applicants (<https://www.gov.uk/government/publications/criminalrecords-checks-foroverseas-applicants>).

### *Prohibition from Management Check*

- 5.92 The following staff with management responsibility: a Headteacher or Head of School, a member of the SLT, a proprietor or any person representing the proprietor in a governance role and teaching departmental headships who were recruited on or after 12<sup>th</sup> August 2015 must be checked to ensure that they are not subject to a direction under section 128 of the Education and Skills Act 2008 prohibiting that individual from taking part in the management of independent educational institutions in England and/or Wales respectively. All staff who are promoted internally to any of the aforementioned positions with management responsibility from 01 September 2018 must be checked regardless of their start date.
- 5.93 For all those appointed to a teaching position with management responsibility the prohibition check should be done using both routes, via the DBS with Barred List check and also by checking the appropriate list through the Teacher Services portal in the same way as the Prohibition from Teaching check.
- 5.94 For those individuals in regulated activity, but who are not teaching, this check should be undertaken by requesting it with the DBS and Barred List check.
- 5.95 For those individuals who are not carrying out regulated activity but who nonetheless have management responsibility a prohibition from management check cannot be requested with the DBS as there is no right to request the Barred List check (which is a requirement to be able to use this route). Therefore, the only route that can be used to undertake this check is via the Teacher Services portal in the same way as the prohibition from teaching check (see paragraph 6.95 above). Such a check can be made of any individual with management responsibility, irrespective of whether that individual is a teacher. For individuals who are based in or qualified in Wales a check should be made through the Teaching Regulation Agency and the EWC in accordance with paragraph 6.96.

### *Medical Fitness Check*

- 5.96 At offer stage, a Health Declaration Form is required from each member of staff, duly signed, that they know of no reasons, on the grounds of mental or physical health why they should not be able to discharge their duties with respect to the job description and contract of employment.
- 5.97 Copies of Health Declaration Forms should be verified (date and signature), filed in a separate file (not on the personnel file) and recorded on the SCR.

## **(Step 6) Recording and Monitoring New Starters**

### *The Single Central Record (SCR)*

- 5.98 Schools must keep a SCR to evidence they have conducted the range of checks required by law on their staff. All individuals who work in regular contact with children, including volunteers and those employed by third parties (including Teacher Trainees) must be included on the SCR, along with details of all members of the Governing Body. Board members are subject to appropriate checks which include an enhanced DBS check and Prohibition from Management check.
- 5.99 The SCR must contain the following fields:
- Full name of staff member
  - Position and Start date
  - Identity check
  - Qualifications
  - Enhanced DBS
  - Barred List/List 99
  - Right to Work in the UK
  - Overseas checks
  - References
  - Prohibition from Teaching
  - Letter of Professional Standing (where appropriate)
  - Prohibition from Management check (where appropriate)
  - Medical fitness declaration
  - Notes
- 5.100 Best practice for all documents copied, dated and signed is to state they are a "copy of the original" so that there is no doubt on record. It also helps if the signature has the name printed underneath for future reference.
- 5.101 The checker must input the following on to the SCR:
- the date the original documentation was seen
  - their initials (this is not a requirement)
  - the clearance level for Right to Work is "Yes"
  - for most DBS entries the clearance level is "Enhanced with Barred List"
  - where the Barred List check is obtained as part of the DBS check and not as a standalone, the clearance level should be the same as for the DBS.
  - where the Barred List check is obtained as a standalone check, the clearance level should be "List 99 cleared"

- if there is no requirement to see documentation “N/A” must be entered as no field should be left blank.

### *New Starter Checklist*

- 5.102 The New Starter Checklist must be completed as an evidence tool that all necessary checks and returns have been received. This document is signed off by the Executive Head and filed in the personnel file.
- 5.103 If any of the checks required are not fully compliant with the standard process this must be documented on a Risk Assessment Form whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the Executive Head to enable a full audit trail.

### *Staff Annual Declaration*

- 5.104 On an annual basis all staff will be required to complete the Staff Annual Declaration which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration with regard to DBS. The completed Declaration should be filed in the personnel file. Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter “N/A” against the relevant entry on the Declaration before signing and returning it.

### *Change of Employment*

- 5.105 Where an employee’s role changes, the Recruiting Manager must give due consideration to the relevant checks now appropriate for the new role (i.e. has the existing member moved to a position involving regulated activity?).
- 5.106 If a member of staff moves from a position involving regulated activity into non-regulated activity only, ongoing relevant checks should be monitored and recorded.
- 5.107 In both cases the SCR should be updated accordingly.
- 5.108 All paperwork and checks associated with a change of employment must be filed in the personnel file.

## **(Step 7) Probationary Period including Induction**

### *Induction*

- 5.109 An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:
- Provide training and information about the School policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children’s welfare, including child protection.
  - Support individuals in a way that is appropriate for the role to which they have been appointed;
    - Confirm the conduct that is expected of staff (Staff Code of Conduct)
    - Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities

- Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately.
- 5.110 The content and nature of the induction process will depend upon the role and previous experience of the new member of staff, but must include the information on the policies and procedures in relation to safeguarding and promoting the welfare of children e.g.:
- (Education) Safeguarding and Child Protection Policy and Procedure, which should also cover;
    - Safe practice and the standards of conduct and behaviour expected of staff and students in the School
    - How and with whom any concerns about those issues should be raised
  - (HR) Other relevant employment procedures which should include;
    - Disciplinary, performance improvement and whistleblowing procedures
    - Low-level concerns policy and reporting procedure
    - Equal Opportunities Policy and the wider Employment Handbook
- 5.111 An Induction Checklist provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of the school's commitment to safeguarding our students. This Induction Checklist should be completed for each member of staff and filed in the personnel file.
- 5.112 The induction programme should also include Child Protection Training appropriate to the new member of staff's role to ensure their full understanding of their safeguarding responsibilities. In addition, this will help ensure they best understand the school's commitment to safeguarding and promoting the welfare of children.

### *Probation*

- 5.113 The initial period of any new role is inevitably a time of adjustment during which the new starter becomes acquainted with a new environment, different working practices, routines and standards of performance. This will take time and to enable both parties to realistically assess suitability for the role, as such all new starters employment is subject to a probationary period (the length is role dependant).
- 5.114 Performance will be monitored and discussed throughout this period including a formal review meeting to discuss how both parties feel about the role, school/department/Trust and progress made in position and to ensure positive relationships with colleagues, students and parents have been made.
- 5.115 If the school is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation may be extended. In some instances, either party may decide to give notice to terminate employment (which is usually a shorter period during this time).
- 5.116 A new member of staff whose role involves the recruitment of staff must undertake Safer Recruitment Training during their Probation Period.
- 5.117 The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is

satisfied that the new starter fully understands and embraces the school's safeguarding philosophy and understands their own personal accountability.

- 5.118 The Probation Review Form should be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.

### *Notification Responsibilities*

- 5.119 If any information regarding an applicant comes to light through the recruitment and selection process, to suggest that they may have harmed or pose a risk of harm to a child or vulnerable adult the matter should be discussed with the Executive Headteacher immediately to ensure we meet our legal duty to refer a 'cause for concern' of this nature to the relevant third parties.
- 5.120 This obligation regarding the legal duty to refer a "cause for concern" extends beyond the recruitment and selection process and applies to any volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers.
- 5.121 We also follow the Teacher Misconduct: The Prohibition of Teachers (April 2018) where referral to the Teaching Regulation Agency is required.

### *Non-Employee Groups*

- 5.122 In order to safeguard the students in our care we require a similar rigorous approach to recruitment for all Non-Employee Groups. The School must obtain written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly, including any Barred List check required for the post. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the third-party organisation have confirmed the checks have been undertaken. The school will check the individual's identity against the details supplied by the agency before allowing work to commence. Under no circumstances should any Non-Employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. To this end guidance has been produced for third party contractors and non-employees (including supply, the self-employed and volunteers).

For supervised volunteers – there will no barred list check, but a risk assessment and supervision is required.

For unsupervised volunteers (regulated activity) – a full barred list check will be performed and enhanced DBS checks carried out.