Safer Recruitment Policy
September 2026

Date of adoption of this policy	1st September 2026
Date of last review of this policy	10th August 2026
Date for next review of this policy	10th August 2027
Policy owner (SLT)	Headteacher
Authorised by	Headteacher, DSL and Proprietor

In order to ensure the safety of the children within our school it is essential that appropriate recruitment and selection procedures are followed in accordance with The Education Regulations 2014, Equality Act 2010, Protection of Freedom Act 2012, Prevent Duty Guidance 2015, General Data Protection Regulations 2018 and Keeping Children Safe in Education 2026 and in compliance with the Independent Schools Inspectorate – The Regulatory Requirements. Reference should also be made to the school's Safeguarding and Child Protection policy.

All staff on the Senior Management Team and any staff responsible for recruitment are required to be trained in safer recruitment. When recruiting, there is always at least one member of the interview panel who has been trained in safer recruitment.

Aims
- To protect and safeguard the children of our school community
- To establish a robust and efficient system of vetting and checking
- To maintain comprehensive centralised records of evidence of safe recruitment

Objectives
- To ensure that when a post is advertised the advertisement makes clear the School's commitment to safeguarding and promoting the welfare of children.
- To ensure the job description refers to the responsibility for safeguarding and promoting the welfare of children
- To ensure the person specification includes specific reference to suitability to work with children
- To obtain and scrutinise comprehensive information from short listed applicants, check on previous employment history and experience and take up and satisfactorily resolve any discrepancies or anomalies
- To verify the identity and academic or vocational qualifications of short-listed applicants
- To conduct a face-to-face interview that explores the short-listed applicant's suitability to work with children as well as his or her suitability for the post
- To obtain independent professional and character references that answer specific questions to help assess the preferred applicant(s) suitability to work with children and follow up any concerns

• To verify that the preferred applicant has the capacity for the job (having regard to Section 60 of Equality Act 2010)
• To check a valid Enhanced DBS certificate for the applicant (for all members of staff in regulated activity), including a barred list check where appropriate.
• To check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State or subject to overseas teaching sanctions.
• To check that staff employed to work in early years provision, and employees who are directly concerned in the management of such provision are not disqualified
• To ensure that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils.
• To ensure that management of personal data during the recruitment process is compliant with General Data Protection Regulations 2018.

The definition of 'staff', for the purposes of this policy, includes any person working at the school whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer. It does include teachers, peripatetic teachers, part-time staff, gap students, administrative staff, caretakers and other ancillary staff in regulated activity.

Separate procedures apply for supply staff not employed directly by the school and volunteers– see below.

Single Central Register of Staff
The Headteacher is responsible for compiling and updating the Single Central Register of Staff. The checks included on the Single Central Register are listed at Appendix 1.

Procedures for recruiting staff
The procedures to be followed:

- Advertising (internally, externally or both)
- Drawing up a short list
- The interview process
- Offer of appointment
- Post appointment

Advertising
• Advertisement to include statement of School's commitment to safeguarding and promoting the welfare of children:

"The school is committed to safeguarding children and young people. All post holders are subject to a satisfactory Disclosure and Barring Service (DBS) check."

• Advertisement to indicate that applicants must request an application form
• On request, prospective applicants should be supplied with at least the following:
    - Job description (which includes a requirement for compliance with the school's child safeguarding policy) and person specification;
    - The school's safeguarding/child protection policy;

- The school's recruitment policy (this document);
- The selection procedure for the post;
- An application form.

- Prospective applicants must complete, in full, an application form. A curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

Drawing up a short list

• Application form scrutinised to ensure it does not contain any discrepancies and to identify gaps in employment – which should be noted in considering whether to short list an applicant
• All candidates to be assessed equally against criteria contained in the person specification.
• The Headteacher will carry out a check of candidate's social media profiles and flag up areas of concern.
• A short list of candidates will then be drawn up.
• References of the short-listed candidates (open references and testimonials not acceptable) to be taken up and a reference form sent for completion. If a reference cannot be taken up at this stage a further interview may be subsequently arranged. Referees should be asked as a minimum whether they are aware of any reason or have any concern that the applicant may not be suitable to work with children. If a reference is taken over the phone, detailed notes must be taken, dated and signed, and make clear who was spoken to. Open references ("to whom it may concern" are not acceptable). One of the referees should be the person's current employer (a senior person with appropriate authority) or the most recent employer when the applicant worked with children (if they don't currently work with children). Always follow up with a phone call to verify that reference originates from a legitimate source.
• Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Shortlisted candidates should physically sign a hard copy of the self-declaration at point of interview.
• Short listed candidates called for interview.

The interview process

• The interview would assess the merit of each candidate against the job requirements and explore their suitability to work with children
• Candidates for interview would be given all necessary information concerning time, place, etc. how the interview and trial lesson would be conducted and who would form part of the interview process. Any attendance requirements of the candidate will also be requested.
• Documentary evidence of identity, that would satisfy DBS requirements, and qualifications are requested
• Copies of all these will be kept on the successful candidate's personal record file. Documentary evidence of unsuccessful candidates will be shredded.
• In most instances the interviews will be conducted by two interviewers (at least one interviewer being a safer recruitment trained member of staff). An agreed set of questions will be drawn up relating to the requirements of the post and the issues to be explored with each candidate based on the information provided in the candidate's application form and references (if available). Also explored will be:

- The candidate's attitude towards children and young people
- His or her ability to support the school's agenda for safeguarding and promoting the welfare of children
- Gaps in the candidate's employment history (if applicable)
- Concerns or discrepancies arising from the information provided by the candidate or a referee
- The candidate will be asked if he/she wishes to declare anything in light of the requirement for a DBS disclosure

• In the case of a teaching post, an agreed trial lesson will form part of the interview process and will be observed by two members of staff: one member of the interview panel and a teacher. A teaching assistant would spend a trial morning/afternoon with a relevant teacher.
• The candidate will be informed of the timeframe for announcing the outcome of the recruitment process.
• Two written references will be obtained for the preferred applicant. All referees will be asked to confirm that the applicant is suitable to work with children and that the applicant is not involved in extremism.
• A final interview of the preferred applicant will take place (if required) to investigate any discrepancies between the application form, information provided at first interview and information provided in the references.
• Where candidates live outside the UK, the interviewer must ensure that the candidate is aware that all documents required for the submission of a DBS, in particular proof of UK address, are available well in advance of their commencement of employment at the school.

Pre-recruitment checks

In accordance with the recommendations set out in KCSIE, the School carries out a number of pre-employment checks in respect of all prospective staff. In fulfilling its obligations to carry out pre-employment checks the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability, pregnancy or age.

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with paragraph 299 of KCSIE this will include online searches on shortlisted candidates (online searches). The online searches the School carries out may include searches of internet search engines, websites and social media platforms. The candidate should be informed that online searches may be done as part of due diligence checks.

Online searches may be carried out at the shortlisting stage. The School will not carry out online searches as part of its initial sift of applications. The School will determine how it approaches online searches on a case by case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

In carrying out online searches the School is looking for any publicly available information about an applicant that:
• may be relevant to their suitability to carry out the role for which they have applied.

- may be relevant to their suitability to work at the School or in an education setting.
- is of a safeguarding nature; and/or
- may have an impact on the School's reputation.

Offer of appointment

Offer of appointment will be conditional on receipt of the following:

- Satisfactory DBS disclosure with Barred List check
- At least two satisfactory character and professional references (as appropriate). One of the references will be from the last employer. Headteacher to speak directly with both referees to certify veracity of references.
- Check that the member of staff is not subject to a Teaching Prohibition Order, if appropriate
- Check that the member of staff is not subject to a Prohibition from Management of Independent Schools (section 128 direction), if appropriate
- Verification of
    - Identity
    - Medical fitness
    - Right to work in UK
    - Previous employment history
    - Proof of qualifications
    - Disqualification Self Certification declaration (where appropriate)
- Where the applicant has lived or worked overseas (three months or more in the last five years), further checks will be made as appropriate. This includes criminal records checks and obtaining a letter (via the applicant) from the professional regulating authority in the country where the applicant has worked confirming that they have not imposed any sanctions or restrictions and or that they are aware of any reason why they may be unsuitable to teach (see Regulated Professions Database for EU and Switzerland). Where this information is not available the school should seek alternative methods of checking suitability and/ or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Each new appointment will be entered on the Single Central Register by the Head at the time of acceptance of the job offer. The Single Central Register details all the checks undertaken, when they were undertaken and who checked them. Before anyone starts working at the School, a member of the Senior Management Team, must sign a recruitment checklist to confirm there are sufficient checks and controls in place to allow them to work. Where a DBS disclosure has not been received before the commencement of employment, a Barred List check will be carried out prior to commencement of employment. A Barred List check will also be carried out where a 'portable' DBS is used. If the new member of staff has subscribed to the DBS 'updating service' a status check of the individual's DBS will be carried out. No member of staff or volunteer will be left unsupervised with children until they have a satisfactory DBS. A risk assessment will be carried out in these circumstances and reviewed on a regular basis.

Procedure should there be a disclosure on DBS form: The Head undertakes to discuss any matter revealed in a Disclosure with the person seeking a position at the school. Having a caution or conviction will not necessarily bar an applicant from working in the school. It will depend on the nature of the position and the circumstances, background and nature of the offence. The Headmistress should make a judgement based on the information revealed and a discussion with the candidate as to whether employing the candidate would in any way compromise his/her duty of safeguarding and protecting the children in her/his care.

Safer Recruitment Procedures during Covid-19 Pandemic: We will continue to follow our safer recruitment procedures as outlined above. However, when validating proof of identity documents and/or documents required for a DBS check, we will follow the guidance set out by the DBS. We will initially accept verification of scanned documents via online video link and staff will be asked to bring in original documentation when they first attend school. These will be checked by the Head.

Post appointment

The school conducts an Induction Inset and online training for all staff and volunteers to:

- Provide training and information about the school's policies and procedures
- Support individuals in a way that is appropriate for the role for which they have been engaged
- Confirm safe practice and standards of conduct and behaviour expected of staff and pupils within the school
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities
- Enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately
- Ensure new staff are aware of the policies and procedures that relate to safeguarding and promoting the welfare and safety of children and have been given a copy of, read and understood KCSIE Part One (including Annex A and B) and the School's Safeguarding & Child Protection policy .
- Are aware of the identity and role of the Designated Safeguarding Lead and deputies.
- Have undertaken the fire safety induction.
- Raise any relevant personnel procedures, e.g. disciplinary, whistleblowing.
- Ensure new staff receive the **Code of Conduct** and an appropriate **Staff Handbook** and know how to access all school policies.
- Ensure that an induction form is filled out and signed by all staff.

Procedure for supply agency staff

No person may begin work in the school unless the Head has received written notification from the supply agency that all appropriate checks have been carried out including: identity, references, relevant qualifications where appropriate, application form/background history, medical check, an enhanced DBS disclosure, further checks if person has lived outside UK, right to work in UK, prohibition order checks, Disqualification Self-Certification check and Barred List check. Agencies must provide DBS checks dated in the last three years for supply staff. Before a person begins work at the school (irrespective of any checks carried out by the employment business) the person's identity and DBS certificate will be checked by the Head.

Where a supply teacher will be at the school on a regular basis, safeguarding induction will be provided together with copies of safeguarding documentation and an induction form completed.

Procedure for recruiting Volunteers When a parent is involved in a school activity on a supervised (meaning supervised by a person in regulated activity such as a teacher or TA) and 'one off' basis, such as a school trip, vetting checks would not normally be required. If a volunteer becomes involved in a school activity on a regular basis (i.e. once a week or more, or three or more occasions in a 30-day period), the Head will be notified prior to the activity by the member of staff responsible. A copy of ID will be requested and held on file. An informal interview with the Head and/or member of staff involved will take place. The need for written references will be at the discretion of the Head. The volunteer will be briefed by the member of staff involved and provided (where appropriate) with safeguarding and procedural documentation. An assessment will be carried out to assess whether the volunteer will be supervised or unsupervised. The Head will obtain an enhanced DBS disclosure with barred list where it is considered that the role will be 'unsupervised'. No volunteer in regulated activity will be left unsupervised with children until they have an enhanced satisfactory DBS with barred list information. The Head will be responsible for keeping a list of all current volunteers who have been DBS checked and inform other members of staff accordingly. If a volunteer does personal care, even if supervised, this is considered as regulated activity and the school should obtain an enhanced DBS disclosure with barred list information.

Procedure to check visitors to the school
Visitors to the school must sign in the **Sign In Record Book**. They will be given a visitor lanyard. Visitors should not be left unsupervised whilst on the school premises. Visiting speakers sign in in the same way as visitors. The suitability of visiting speakers, whether invited by staff or pupils, must be approved by the Head, or Designated Safeguarding Lead (DSL) or Deputy DSLs and reasonable background checks made by the appropriate member of staff to decide whether to invite and/or permit a speaker to attend the School (see Policy for Safeguarding & Child Protection).

Contractors and employees of third parties (other than supply staff)
The school should ensure that any contractor, or any employee of the contractor, who is to work at the school, has been subject to the appropriate level of DBS check. The usual way to 'ensure' is to obtain written confirmation from the employer. Schools are not required to include employees of other organisations (other than supply staff) on their SCR. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not necessarily including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites. Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. The school is responsible for determining the appropriate level of supervision depending on the circumstances. If an individual working at a school is self-employed, the school should consider obtaining the DBS check, as self-employed people are not able to

make an application directly to the DBS on their own account. The school should always check the identity of contractors and their staff on arrival at the school. They should be issued with a 'visitor's badge to identify them as not part of the staff.

Ongoing compliance procedures

Anyone wearing a visitor lanyard should be supervised by a designated member of staff. Any visitor not wearing a lanyard on school premises should be challenged. Staff will check and/or request from the Head DBS clearance for volunteers before the activity starts. Until this confirmation is received, staff must work on the basis that this clearance has not been received. The Head will maintain and update a register of all current volunteers with DBS checks on the SCR. The Head will update the Single Central Register on a regular basis and review the Register termly. Whilst DBS applications are going through the Head will monitor the progress of the application online. Risk assessments will also be carried out and reviewed by the Head on a regular basis. The DSL will also review the Register and carry out spot checks as part of the annual Safeguarding Audit. The outcome of such audits will be reported to the Proprietor. Any deficiencies or weaknesses will be remedied without delay and reported as having been rectified to the Proprietor. The Head will maintain and update the 'Right to Work' register. When ongoing visa applications are taking place, the register will be reviewed every two weeks.

Appendix 1
Contents of Single Central Register

A list of all checks which must be recorded on the School's SCR are set out below together with additional details. Those categories marked with an asterisk * are entries for which the School must hold details but that are not required by the ISI to be entered on the SCR. The information recorded on the SCR confirms whether or not each check was carried out, the date on which the check was completed (or the certificate obtained) and the initials of the member of staff who carried out the check, where appropriate.

- **Identity including Name, Address and Date of Birth**

- **Position Description**

- **Employment Start Date**

The date entered on the SCR is the employment contract start date as well as the date work actually started with children present.

- **Qualifications required**

Where an individual claims to hold qualifications as part of an application for a position these are checked in advance of employment and the date of the check logged under this column. Not all appointments are subject to qualification requirements.

- **Enhanced DBS disclosure**

The School is required to undertake an enhanced DBS check on all staff in 'regulated' activity, even if the individual has never been in the UK. This covers nearly all appointments to the School workforce. The date of issue, together with the date and initials of the person who checked the DBS is recorded on the SCR. Whether a disclosure is noted on the DBS is also recorded.

There is no requirement to undertake an enhanced DBS check if, in the three months prior to beginning work at the School, the applicant has worked in another school in England in a post which brought them into regular contact with children or in any position at a school since 12 May 2006 OR in a college in England in a post which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18. The School will accept a DBS certificate (if it satisfies the above requirements) for short term, short notice staff but will carry out a separate Children's Barred List check. However, the School's general policy is to carry out a new DBS check when appointing all new permanent staff. When a DBS is accepted from another institution this will be logged on the SCR with further information detailed under the 'further information' column. Staff applying for a DBS are requested to subscribe to the DBS 'updating service'.

- **Children's Barred List**

Where the position applied for amounts to 'regulated activity' the School obtains confirmation that the applicant is not named on the Children's Barred List. Most positions at the School will amount to regulated activity and a Children's Barred List check will therefore be carried out in nearly all cases. This check is completed as part of the Enhanced DBS check. Where an individual commences work prior to the School receiving the DBS disclosure a separate check of the Children's Barred List will be carried out before work starts

- **Prohibition from Teaching Check**

For teaching staff this details the date that confirmation was obtained from the Teaching Regulations Agency (formerly National College of Teaching and Leadership (NCTL)) that the applicant is not subject to a prohibition order. These checks are carried out via the Teacher Services website. A check is carried out for all teaching staff regardless of whether the person has QTS.

- **Overseas Teaching Sanctions Checks**

Since 31.12.20 schools are no longer able to carry out EEA teaching sanction checks. For teaching positions where an applicant has taught overseas at any time in the past, a letter of professional standing from the professional regulating authority in the country in which the applicant has worked, will be sought. Where this information is not available, alternative methods of checking suitability and/or undertaking a risk assessment will be carried out.

- **Disqualification Self Certification**

This applies to employees who work in early years provision and in relevant later years provision and those involved in childcare under the age of 8 in before and after school settings. Staff must sign a self-declaration form confirming that they are not disqualified from working with children under the Childcare Act 2006.

- **Prohibition from Management of Independent Schools Directions (Section 128 directions)**

This applies to all staff appointed (internally and externally) to management positions (including headteachers, all staff on the senior leadership team (including non-teaching staff) and teaching positions with departmental headship) after 12th August 2015. Where staff have been recruited for such positions and subject to vetting checks before 12th August 2015, to commence in September 2015, there is no requirement to run checks again. The information is contained in the enhanced DBS disclosure certificate or obtained through the Teacher Services website.

- **Right to work in the UK**

In most cases this will be confirmed by provision of a GB or Irish passport or current visa/settled status demonstrating right to work in the UK.

- **Overseas criminal records or certificate of good conduct**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges (ie all those listed without an asterisk here). In addition, the School will make such further checks as it considers appropriate in order to verify a person's suitability to work with children due to them having lived or worked overseas prior to their being appointed to a position at the School (generally this applies if the applicant has lived overseas for 3 months or more in the last 5 years). The date of receipt of the overseas criminal records check / certificate of good conduct is logged in this column with additional information logged under the 'further information' column if necessary.

- **Two written references obtained**

Two satisfactory written references are required. Where appropriate, one reference will be from the current or most recent employer. References should be obtained before interview. The School will only accept references obtained directly from the referee and it will not rely on testimonials provided by the applicant or on open references or testimonials. A follow-up telephone conversation will be made with the referee.

- **Application Form**

Confirmation that any gaps have been explained and checked by interviewer. Date confirmed and initials of checker are entered on the SCR.

- **Medical fitness**

A declaration is required from all staff, duly signed, that they know of no reasons, on grounds of mental or physical health, why they should not be able to discharge with due care and skill the responsibilities required by the post in question.

- **Online searches**

The date online searches for the candidate were undertaken.

- **Latest Safeguarding Training level 1 undertaken (and date)***

Staff will receive child protection training (Level 1) that is updated regularly in accordance with the RBKC Safeguarding Children Board guidance. The date of the latest training is logged under this column on the SCR.

- **Further Information**

The 'Further Information' column will include additional relevant comments, eg changes in role, original DBS/CRB information, overseas checks information, notes of Risk Assessments put in place.

Administration of the SCR

The regulations do not specify the required format for the register but specify that all the required columns should have suitable entries as far as this is possible. Not applicable (N/A) should be entered on the SCR if a particular check was either not relevant to the appointment in question or was not a requirement at the time of the person's appointment. The SCR shows records for current staff, as well as volunteers & agency supply staff. Once staff have left employment, the records are moved to the bottom of the SCR and then removed from the SCR after one year for data protection purposes. The SCR is held electronically, and the Head is responsible for the completion, updating and logging of entries on the SCR. The Head reviews the SCR on a regular basis and signs off on each person registered on the SCR. Different tabs are identified for the following categories of workers:

- Teaching Personnel
- Teaching Assistants
- Other Personnel (including catering staff, administrative staff and cleaning staff)
- Non-Contracted Personnel (peripatetic teachers and clubs' staff, volunteers and work experience students)