Safer Recruitment Policy

October 2026

Review October 2027

Policy owner	Headteacher / Director
Operational lead	Operational Senior for Recruitment, Onboarding, Digital
Those with specific responsibility for the implementation, oversight and application of this policy	• Director: Brett Runchman • Headteacher: Jodie Evans • DSL: Alison Goode • Operational Senior for Recruitment, Onboarding, Digital Communications & ASDAN • Operational Senior for Administration • HR Administrator: Hannah Nunn
Applies to	Employees, workers, volunteers, trainees, proprietors/directors, senior leaders, operational seniors, management agencies/third-party staff where used, contractors and relevant visitors
Core statutory guidance	Keeping Children Safe in Education 2026 (KCSIE), Part 3
Data protection	UK GDPR and Data Protection Act 2018
Status	Reviewed and updated October 2026

Important: This policy is designed for an independent SEND/alternative provision environment where many successful applicants may come from non-teaching, care, youth work, hospitality, retail, sport, support or entry-level backgrounds. Safeguarding standards are not reduced because a role is low-paid, entry-level or non-teaching. Selection must assess transferable capability, values, boundaries and safeguarding judgement against the actual role requirements. This policy will be reviewed at least annually and whenever relevant law or statutory guidance changes.

1. Purpose and safeguarding commitment

Exceptional Ideas Ltd is committed to safeguarding and promoting the welfare of children and young people and to operating recruitment processes that deter, identify and reject people who are unsuitable to work with them. Safer recruitment is a continuous safeguarding process.

The school will recruit fairly, consistently and on merit against published role criteria. Recruitment arrangements will comply with the Equality Act 2010 and will not discriminate because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Because the school supports vulnerable learners with SEND and may support learners approaching or over the age of 18, the school will distinguish between child-safeguarding requirements and any adult-safeguarding requirements that apply to a particular learner or activity. KCSIE applies to children under 18. Where work with adults may constitute regulated activity with adults, the school will assess eligibility separately and obtain the lawful level of DBS check.

2. Scope

This policy applies to recruitment and pre-appointment vetting of:

- all employees and workers, including but not limited to student mentors, administrative staff, operational seniors, building premises support and leadership staff;
- volunteers and work-experience/placement personnel where applicable;
- teacher trainees and apprentices where applicable;
- proprietors, directors or members of the management body where statutory checks apply;
- agency and third-party personnel if the school uses them in future; and
- contractors and other adults whose work or access requires safeguarding checks or assurances.

Job title, salary level, previous sector experience or possession of teaching qualifications will not determine safeguarding standards. The checks required will be determined by the legal status of the role, the activities undertaken, frequency, setting, contact with children and any management responsibilities.

3. Legal and guidance framework

This policy has regard to the law and statutory guidance applicable in England, including, where relevant:

- Keeping Children Safe in Education 2026 (KCSIE), especially Part 3: Safer Recruitment;
- Education (Independent School Standards) Regulations 2014, as amended;
- Safeguarding Vulnerable Groups Act 2006, as amended, including the Crime and Policing Act 2026 changes to regulated activity;
- Police Act 1997 and Disclosure and Barring Service legislation and guidance;
- Rehabilitation of Offenders Act 1974 and the Exceptions Order, as amended, including DBS filtering rules;

- Equality Act 2010, including section 60 restrictions on pre-employment health/disability questions;
- Immigration, Asylum and Nationality Act 2006 and current Home Office right-to-work guidance;
- UK General Data Protection Regulation and Data Protection Act 2018;
- Children Act 1989 and Children Act 2004; and
- current ACAS recruitment and discrimination guidance.

The policy must be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-Level Concerns Policy, Allegations Against Staff procedures, Equality Policy, Data Protection Policy, Recruitment Privacy Notice and records-retention schedule.

4. Roles, accountability and training

The proprietor/Director and Headteacher retain overall accountability for lawful and effective safer recruitment. Day-to-day administration may be delegated, but accountability for decisions and statutory compliance is not.

- At least one person conducting every interview will have completed appropriate safer recruitment training.
- Panel members will declare actual or potential conflicts of interest. A conflicted panel member will be replaced or the mitigation formally recorded.
- Recruitment administrators may collect and verify information within their training and authority, but adverse safeguarding information, disputed checks, conditional starts and complex eligibility decisions will be escalated to the Headteacher/Director and, where appropriate, the DSL, HR or legal adviser.
- Access to sensitive recruitment information will follow least-privilege principles. Equality-monitoring and health information will be segregated from selection information.

5. Regulated activity and DBS eligibility

The school will determine DBS eligibility from the duties actually performed, not from the job title.

From 1 September 2026, the supervision exemption for relevant volunteer activity with children was removed. Teaching, training, instructing, caring for or supervising children is regulated activity when carried out frequently or when the statutory period condition is met, even if the person is supervised. The period condition includes activity on more than three days in a 30-day period or overnight in the circumstances defined by DBS guidance. Certain activities, including specified healthcare or personal care, may be regulated activity without a frequency requirement.

Where a person will engage in regulated activity with children, the school will obtain an Enhanced DBS check with children's barred list information, subject to the applicable statutory route. It is a criminal offence for a barred person to engage in regulated activity and for an organisation knowingly to permit a barred person to do so.

The school will never request barred-list information merely as a precaution. Barred-list information will only be requested where the role is legally eligible.

6. Workforce planning, job descriptions and person specifications

Before advertising, the Operational Senior for Recruitment will review the role and record its safeguarding profile. The job description and person specification will identify:

- the actual duties, working pattern, locations and level of contact with children;
- whether the role is regulated activity and the level of DBS check lawfully available;
- whether teaching prohibition, section 128, qualification, driving or other checks apply;
- essential safeguarding behaviours, professional boundaries and reporting responsibilities;
- genuinely essential qualifications or experience, avoiding unnecessary barriers to entry;
- physical or practical functions that are intrinsic to the role, expressed in a way that allows for reasonable adjustments; and
- the school's commitment to safeguarding and the requirement to complete pre-appointment checks.

The person specification should recognise relevant transferable experience. Applicants should not be rejected merely because they have not previously worked in a school where the essential competencies can be evidenced lawfully through other employment, volunteering, caring, sport, youth work, customer-facing work or life experience.

7. Advertising and candidate information

All advertisements will include the school's commitment to safeguarding and promoting the welfare of children and will make clear that safeguarding checks will be undertaken. The advertisement and/or associated job information will identify the safeguarding responsibilities of the post and, where applicable, state that the post is exempt from the Rehabilitation of Offenders Act 1974, subject to the applicable rules concerning protected convictions and cautions. Where the role involves regulated activity with children, candidate information will make clear that it is an offence for a barred person to seek, offer to do or engage in regulated activity with children. Advertisements will accurately state salary, hours, term-time arrangements, location, essential requirements and any genuine requirement to travel or drive.

Candidate information will explain the recruitment process, safeguarding expectations, DBS requirements, criminal-record self-declaration arrangements, online searches, right-to-work checks, reference requirements, privacy information and how to request reasonable adjustments. The candidate pack will include, or provide a clear link to, the school's Child Protection and Safeguarding Policy and its policy or statement on the recruitment of ex-offenders.

Advertisements and selection criteria must not imply that a protected characteristic is preferred unless a lawful occupational requirement or other statutory exception applies.

8. Application process and employment history

The school will use a structured application form for school appointments. A CV may supplement but will not replace the application form.

- Applicants must provide a complete chronology of education, employment, volunteering and other relevant activity since leaving school, including dates and explanations for gaps or periods when they were not in employment or education.
- Applicants must provide the names and contact details of referees in accordance with section 12.
- The application will require the information necessary for safer recruitment, including current and former names where relevant to lawful checks, current contact details, employment and education history, relevant qualifications and experience, referees and evidence against the person specification. It will include a declaration that the information supplied is accurate and complete.
- Safeguarding-relevant inconsistencies, unexplained gaps, repeated changes of employment or other matters requiring clarification will be explored fairly. A gap is not, by itself, evidence of unsuitability.
- Information about protected characteristics obtained for equality monitoring will be separated from selection material.

9. Criminal-record self-declaration

Where the post is eligible for the relevant exception to the Rehabilitation of Offenders Act, shortlisted candidates will be required to complete a confidential self-declaration of criminal-record and safeguarding information that the school is legally entitled to ask about.

The school will not ask candidates to disclose protected convictions or cautions and will not take protected information into account. Wording on forms will be kept aligned with current DBS filtering rules. Self-declaration information will be restricted to authorised staff and will not be used as a substitute for DBS or other statutory checks.

A disclosed conviction, caution or other matter will not automatically prevent appointment. The school will assess relevance, seriousness, age at the time, time elapsed, pattern, circumstances, evidence of change, role requirements and safeguarding risk. Decisions and rationale will be documented.

10. Shortlisting and online due diligence

Shortlisting will be undertaken against the published person specification using a consistent and objective scoring framework. At least two appropriately authorised individuals will undertake the shortlisting exercise, and the reasons for decisions will be appropriately recorded. Where practicable, those responsible for shortlisting will also participate in the interview and selection process.

Equality and diversity monitoring information will be kept separate from the selection process and will not be made available to those responsible for shortlisting. Where practicable,

information that is not relevant to assessing a candidate against the requirements of the role will also be excluded from the initial shortlisting process.

In accordance with *Keeping Children Safe in Education (KCSIE)*, the school will conduct online searches of all shortlisted candidates as appropriate to its responsibilities under safer recruitment due diligence. Online searches are a part of Exceptional Ideas Limited's standard recruitment exercise.
Online searches will be proportionate to the role and undertaken in accordance with applicable safeguarding and data protection requirements and the school's Privacy Notice. The purpose of any search will be to identify publicly available information that may be relevant to the candidate's suitability to work with children, or that may indicate a safeguarding concern. It will not be used to investigate a candidate's lawful private life or general reputation.
Any information identified through an online search will be considered objectively and in context. Information relating to protected characteristics or other matters that are not relevant to the candidate's suitability for the role will not be used to inform recruitment decisions. Where potentially relevant information is identified, the candidate will be given an appropriate opportunity to clarify or respond to the matter as part of the recruitment process.
Shortlisted candidates will be informed in advance that online searches are undertaken concerning them.
Searches will use a documented, consistent methodology and should, where practicable, be undertaken by someone not making the substantive selection decision.
Only relevant information will be passed to the panel. Protected-characteristic information and irrelevant private-life information will not be used.
Potentially adverse information will be verified as far as reasonably possible, and the candidate will be given a fair opportunity to explain relevant matters before a decision is made.
The school will maintain a DPIA or other documented data-protection assessment for the process where required. Any reasonable, significant and proportionate data concerning online searches will be retained by the company for a set retention period as set out in the Safer Recruitment Data Handling Map and in line with UK GDPR.

11. Interviews and assessment

Interviews will be structured and safeguarding led. Candidates for the same role will be asked the same core questions, with proportionate follow-up questions to clarify evidence.

For Student Mentor and similar roles, assessment should test practical judgement rather than assume formal teaching knowledge. It should normally cover:

- motivation for working with vulnerable children and young people;
- understanding of safeguarding, reporting, confidentiality and professional curiosity;
- response to a disclosure, including a concern involving a colleague or another student;
- response to any potentially adverse information found during online searches;
- professional boundaries and avoiding dependency;
- calm, consistent responses to dysregulation, distress, refusal and challenging language;
- communication with students, parents/carers, colleagues and external professionals;

- teamwork, reliability, organisation and accurate record keeping;
- ability to reflect, receive supervision and learn from feedback; and
- values and conduct consistent with respectful, non-discriminatory practice.

Interviewers must not ask about childcare arrangements, family plans, pregnancy, religion, sexual orientation or other protected matters unless a specific lawful exception applies. Health or disability questions before an offer will only be asked where permitted by section 60 of the Equality Act 2010, including to arrange recruitment adjustments or to establish whether an applicant can perform a function intrinsic to the work after reasonable adjustments.

12. References

References are an important safeguarding check and will be sought for all shortlisted candidates, including internal candidates, directly from the referee before interview wherever possible, in line with KCSIE. This allows relevant matters to be explored with the referee and candidate at interview. Where a reference cannot be obtained before interview, satisfactory references must be obtained, verified and any concerns resolved before an unconditional appointment is confirmed.

- A minimum of two references will be required, including the current or most recent employer. Where the applicant has worked with children, the school will seek an appropriate reference from that employment where reasonably possible and relevant.
- References will not be accepted solely because they are open testimonials supplied by the candidate.
- The school will verify that the reference originates from a legitimate source, normally using independently obtained organisational contact details where available.
- References will be compared with the application and discrepancies, gaps or vague safeguarding responses will be followed up.
- Reference requests will ask relevant safeguarding and suitability questions and, where lawful and appropriate, the reason for leaving employment involving children.
- References received or provided must be fair, accurate, relevant and not misleading. Protected-characteristic information, disability-related absence, parental leave or irrelevant personal information must not be used unlawfully.

13. Identity and previous names

Identity checking for DBS and other purposes will follow the current procedure applicable to that check. The school will not create a single rigid document rule that overrides current DBS, Home Office or digital identity routes.

For DBS purposes, applicants must provide the identity and address information required by the current DBS route, including all previous names and the required address history. The school will check that the claimed identity is consistent across the application and supporting evidence and will resolve material discrepancies.

The school will not insist on a birth certificate where identity can lawfully and appropriately be established through other acceptable evidence.

13.1 Transgender applicants and sensitive DBS applications

All applicants will be made aware, neutrally and confidentially, that DBS provides a sensitive applications route for transgender applicants. This allows previous names or gender information required for the DBS check to be supplied directly to the DBS Sensitive Applications Team without revealing that information to the employer or placing it on the DBS certificate where the DBS process permits.

The school will not require a transgender applicant to disclose a previous gender identity to the recruitment panel, will not seek documentary evidence of gender transition beyond what is lawfully required for the relevant identity-checking route, and will restrict access to any sensitive information that is legitimately received.

14. Right to work in the UK

A prescribed right-to-work check will be completed for every person to whom the requirement applies before employment commences. The school will not make assumptions about right to work from name, accent, race, ethnicity, nationality, appearance or length of residence.

The school will use the current lawful route applicable to the individual, which may include a Home Office online check/share code, an approved digital identity route where permitted, a manual document check, or the Employer Checking Service. The school will follow the current Home Office employer guidance and code of practice on avoiding discrimination.

Where permission is time-limited, the school will diarise and complete any required follow-up check. Evidence establishing the statutory excuse will be retained for the duration required by current Home Office guidance.

15. Qualifications, prohibition and section 128

The school will verify qualifications where they are required or material to the role. Only where explicitly specified will teacher-specific qualifications be a requirement of an advertised role within the company; this is inclusive of but not exhaustive of the role of Headteacher.

A prohibition from teaching check will be carried out where required for a person undertaking teaching work or otherwise within the scope of the applicable requirement.

A section 128 direction check will be carried out where applicable to a person who will take part in the management of an independent school. The need for the check will be determined by the actual responsibilities of the role, not merely its title.

16. Overseas checks

Where a candidate has lived or worked outside the UK, the school will consider what additional checks are appropriate so that relevant events outside the UK can be considered. The nature and extent of checks will depend on the country, duration, role, age at the time, availability and reliability of checks, and the candidate's circumstances.

Checks may include overseas criminal-record information/certificates of good conduct where available, professional or regulatory checks, additional references and documented risk

assessment. Inability to obtain an overseas certificate will not automatically determine the outcome; the school will document what was attempted and how residual risk was assessed.

17. Conditional offer and pre-appointment checklist

Offers will be conditional until all checks required for the role have been satisfactorily completed and recorded. The checklist will include, as applicable:

- identity;
- enhanced DBS and children's barred list information where legally eligible/required;
- right to work;
- references;
- qualifications required for the role;
- online searches
- prohibition from teaching;
- section 128 direction;
- overseas checks;
- criminal-record self-declaration reconciliation;
- resolution of employment-history or online-search concerns; and
- post-offer health/fitness process where applicable.

18. Starting before a DBS certificate is received

Starting before receipt of an enhanced DBS certificate is exceptional, time-constrained, and not routine. It will only be considered where lawful and consistent with KCSIE and the applicable DBS route.

Before any such start, all other mandatory checks that can be completed must be satisfactory. Where the person will undertake regulated activity and the lawful route permits a separate children's barred list check, that check must be completed before regulated activity begins. A written risk assessment must be approved by the Headteacher or authorised senior leader and reviewed until the DBS outcome is resolved.

The risk assessment will specify duties, supervision, access restrictions, lone-working restrictions, information-system access, transport/off-site restrictions and review arrangements. Supervision is a risk-control measure; since 1 September 2026 it does not remove otherwise qualifying volunteer activity from the definition of regulated activity.

19. Medical fitness and reasonable adjustments

The school will not ask general questions about health or disability before an offer except where section 60 of the Equality Act 2010 permits this, including to arrange reasonable adjustments to the recruitment process or to establish whether the applicant can carry out a function intrinsic to the role after reasonable adjustments.

Following a conditional offer, the school may seek proportionate health information or occupational-health advice where this is necessary and lawful to establish whether the individual can undertake functions intrinsic to the role, identify appropriate reasonable adjustments, or

address relevant health and safety requirements. Decisions will be based on functional capability and objective evidence, not diagnosis or assumptions. A conditional offer will not be withdrawn because of disability without proper consideration of reasonable adjustments and lawful, evidence-based reasons.

20. Volunteers, contractors, agency and third-party staff

The school currently prefers direct employment for student-facing roles. If volunteers, contractors, agency or third-party staff are used, the school will apply the checks and assurances required by KCSIE and the Independent School Standards.

For agency/third-party staff, the school will obtain written confirmation from the supplying organisation that the required checks have been completed and will verify the person's identity on arrival. The SCR will record the required assurance information. The school will not assume that supervision removes DBS/barred-list requirements for volunteers after the 1 September 2026 change.

Contractors without the required check will not be allowed unsupervised access to children where this would create an unacceptable safeguarding risk. Visitor controls will be proportionate to purpose, frequency and access. The school will not routinely copy identity documents unless there is a defined lawful and necessary reason to retain the copy.

21. Single Central Record (SCR)

The school will maintain an accurate Single Central Record (SCR) in the form and with the categories required for independent schools. For each applicable check, the SCR will record whether the check was carried out or the relevant certificate obtained and the date on which the check was completed or certificate obtained, together with any additional information required by current KCSIE and the Independent School Standards for the relevant category of person.

For relevant staff, the SCR will include, as applicable:

- identity check;
- enhanced DBS check and children's barred list information/check where applicable;
- prohibition from teaching check;
- further checks on people who have lived or worked outside the UK;
- professional qualifications where required;
- online searches
- right-to-work check; and
- section 128 check for applicable management roles.

The SCR will also include the categories of volunteers, agency/third-party staff, proprietors or management personnel required by the current regulatory framework. The SCR is an audit record; it must not contain unnecessary sensitive narrative.

22. Decision-making where information raises concern

No adverse item will be considered in isolation. The school will establish relevance, reliability and context, give the candidate a fair opportunity to respond where appropriate, and document the safeguarding rationale for the decision.

Where there is uncertainty about DBS eligibility, protected criminal-record information, immigration status, discrimination risk, a safeguarding allegation or a serious reference concern, the school will seek appropriate specialist advice rather than improvise a procedure.

23. Post-appointment safeguarding and referrals

Safer recruitment continues after appointment through induction, safeguarding training including Physical Intervention and Restraint Reduction Training, supervision, probation, professional boundaries, low-level concerns arrangements and appropriate management of allegations.

Where the statutory conditions are met, the school will make a referral to the Disclosure and Barring Service. Leaving employment, resignation, retirement, redundancy or redeployment does not remove a legal duty to refer where the conditions are met. Referrals to DBS are separate from referrals to the local authority designated officer, police or professional regulator.

24. Data protection principles for safer recruitment

Recruitment information will be processed lawfully, fairly and transparently; collected for specified purposes; limited to what is necessary; kept accurate; retained only as long as necessary; and protected by appropriate technical and organisational measures.

Criminal-offence data and special-category data require additional legal conditions and safeguards. The school's Recruitment Privacy Notice, Appropriate Policy Document where required, DPIA for higher-risk processing and records-retention schedule must align with this policy.

DBS certificate information will be handled in accordance with the DBS Code of Practice. The school will not retain a photocopy, scan, photograph or other representation of a DBS certificate. It may retain the limited audit information permitted by DBS guidance.

25. Safer Recruitment Data Handling Map

The following operational map is part of this policy and must be read with the Recruitment Privacy Notice, Appropriate Policy Document where required, Record of Processing Activities and corporate records-retention schedule. The Data Protection Lead will approve the specific Article 6 lawful basis and, where applicable, Article 9 condition and Article 10/Data Protection Act 2018 Schedule 1 condition used for each processing purpose. Statutory retention requirements take precedence over internal schedules.

Data / stage	Purpose	Typical lawful basis / condition	Access	Retention / disposal
Vacancy approval, JD, person specification, role-risk/DBS eligibility assessment	Design lawful recruitment and determine checks	Art. 6(1)(c) legal obligation and/or 6(1)(f) legitimate interests	Recruitment lead; Headteacher; authorised admin	Retain with recruitment record under policy schedule
Application form / CV / employment history	Assess merit, chronology and suitability	Art. 6(1)(b) steps before contract; 6(1)(f) recruitment administration	Shortlisting panel receives only necessary selection information; admin holds full file	Unsuccessful: normally 6 months after the recruitment decision, unless a documented reason justifies longer retention; successful: retain only material necessary for the employment record in accordance with the approved retention schedule.
Equality monitoring	Monitor equality and recruitment outcomes	Appropriate Art. 6 basis plus Art. 9 condition where special-category data is processed	Segregated; not available to interview/selection decision-makers	Aggregate/anonymise where possible; identifiable data only as long as necessary
Reasonable-adjustment information during recruitment	Make recruitment process accessible	Art. 6 basis plus Art. 9(2)(b) and/or other applicable condition	Need-to-know administrator/manager arranging adjustment	Keep only as necessary; do not place unnecessary medical detail in panel pack

Criminal-record self-declaration	Safeguarding suitability assessment for eligible roles	Art. 6(1)(c) and/or applicable basis; Art. 10 UK GDPR + DPA 2018 Schedule 1 condition	Restricted safeguarding/recruitment decision-makers	Unsuccessful: normally no longer than the recruitment-file retention period and only where necessary; successful: retain only information that is necessary, lawful and covered by the approved retention schedule. Do not retain protected information.
Online-search record	KCSIE due diligence on shortlisted candidates	Art. 6(1)(c) and/or 6(1)(f); special-category data only where a valid Art. 9 condition applies	Searcher; only relevant findings to panel/decision-maker	Retain only proportionate evidence needed to explain the recruitment decision, normally for the recruitment-file retention period (6 months for unsuccessful candidates and 6 years for successful candidates that take up post). Avoid retaining irrelevant screenshots or protected/private information.
References	Verify history, suitability and safeguarding information	Art. 6(1)(b)/(c)/(f) as applicable; Art. 9/10 conditions if sensitive/criminal data included	Recruitment lead/admin; panel only as necessary	Unsuccessful: normally 6 months after the recruitment decision; successful: retain relevant reference material in accordance with the approved personnel-record retention schedule.

Identity / DBS identity evidence	Verify identity and support DBS application	Art. 6(1)(c) legal obligation / safeguarding requirements	Authorised trained checker	Retain only what the applicable identity route and audit requirements require. Where a DBS digital verification service is used, retain the required DVS audit/application data for at least 2 years in accordance with current DBS guidance. Do not retain unnecessary identity copies.
DBS certificate	Safeguarding check	Art. 6(1)(c); Art. 10 + DPA 2018 condition	Authorised DBS/recruitment staff only	School policy: do not copy, scan or photograph the certificate. Record only permitted audit details. Any certificate information exceptionally retained must be securely stored and destroyed as soon as it is no longer necessary, normally within the period permitted by current DBS guidance.
DBS audit record	Evidence checks completed	Art. 6(1)(c)	Authorised HR/recruitment; SCR users as appropriate	Retain the permitted audit fields in accordance with the approved personnel/SCR retention schedule and current DBS/KCSIE requirements.
Right-to-work evidence	Establish statutory excuse / lawful employment	Art. 6(1)(c) legal obligation	Authorised RTW checker / HR	Keep prescribed evidence for duration of employment/engagement and 2 years afterwards, subject to current Home Office rules

Overseas checks	Assess relevant overseas safeguarding history	Art. 6(1)(c)/(f); Art. 10/DPA condition where criminal data	Restricted recruitment/safeguarding decision-makers	Retain only proportionate evidence and decision rationale in accordance with the approved pre-employment/personnel retention schedule.
Prohibition / section 128 / qualification checks	Verify legal/professional eligibility	Art. 6(1)(c) and/or legitimate interests	Authorised recruitment staff; SCR users	Record outcome/date and retain in accordance with the approved personnel/SCR retention schedule.
Post-offer health / OH information	Assess functional capability, adjustments, H&S	Art. 6 basis plus Art. 9(2)(b)/(h) as applicable	Strictly segregated; OH/authorised HR; managers receive functional advice only	Retain under the approved occupational-health/personnel retention schedule; minimise clinical detail and keep it segregated from ordinary recruitment decision records.
Interview notes / scores / decision record	Evidence fair, consistent selection	Art. 6(1)(b)/(f), plus legal obligation where applicable	Panel and authorised recruitment staff	Unsuccessful: normally 6 months; successful: retain necessary decision record under schedule
SCR	Statutory audit of pre-appointment checks	Art. 6(1)(c) legal obligation	Authorised senior/admin staff; inspectors/regulators as lawful	Maintain for the workforce categories and periods required by current KCSIE, the Independent School Standards and the school's approved retention schedule.

26. Access-control map

Information	Recruitment admin	Panel	Headteacher / Safer Recruitment Lead	DSL	Director / proprietor
Anonymised/selection application	Prepare	Yes	Yes	Only if panel/need-to-know	Oversight only
Full identity/contact details	Yes	After shortlist as needed	Yes	Need-to-know	Oversight only
Equality monitoring	Restricted admin	No	Normally no	No	Aggregate oversight
Health/adjustment information	Need-to-know	Adjustment only, not diagnosis	Functional need-to-know	Only safeguarding need	OH need-to-know
Criminal self-declaration / DBS content	Restricted	Only relevant verified issue	Yes	Safeguarding need-to-know	Only where legal need
References	Yes	Relevant content	Yes	Adverse safeguarding content	Only where legal need
RTW / ID evidence	Authorised checker	No	Oversight	No	Oversight only
Online search	Searcher/admin	Relevant verified findings only	Yes	Safeguarding findings	Oversight only
SCR	Prepare/update if authorised	No	Approve/oversight	Safeguarding oversight	Regulatory oversight

27. Minimum recruitment record

For each appointment, the recruitment file should allow an auditor to reconstruct the process without retaining unnecessary sensitive data. It should contain:

- approved job description/person specification and DBS/regulated-activity assessment;
- advert and candidate information;
- shortlisting criteria, scores and decision record;
-
- interview/assessment record and safeguarding assessment;
- reference requests, responses and verification notes;
- online-search completion record and any relevant resolved concern;
- pre-employment checklist and dates/outcomes of checks;
- conditional-offer and any conditional-start risk assessment;
- evidence that required SCR entries were completed; and
- documented rationale for any exceptional or adverse-information decision.

28. Quality assurance and audit

- The Headteacher will audit a sample of recruitment files and the SCR at least once annually.
- The Headteacher/Director will review any conditional start, adverse DBS/reference decision, disputed eligibility issue or significant process deviation.
- The policy will be reviewed at least annually and promptly after material changes to KCSIE, DBS, Home Office, Equality Act interpretation or Independent School Standards.
- Recruitment templates must be version-controlled so obsolete criminal-record, identity, right-to-work or health wording is withdrawn.

29. Candidate accessibility and fair recruitment for entry-level roles

The school's safeguarding threshold is high, but the recruitment process must remain accessible to capable applicants who may not have conventional school-sector experience or formal qualifications beyond those genuinely required.

- Use plain-English adverts and explain school terminology rather than assuming candidates know it.
- Assess behaviours and transferable evidence, not polish, accent, educational background or familiarity with interview conventions.
- Use structured questions and anchored scoring rather than subjective 'fit'.
- Permit reasonable adjustments and accessible formats.
- Do not use salary level, unemployment, benefit history, previous low-paid work or non-school employment as a proxy for reliability or suitability.
- Where literacy, numeracy, driving or physical capability is genuinely essential, assess the actual standard required for the role and consider reasonable adjustments.

- Do not lower safeguarding, boundary, honesty, reliability or conduct expectations because the role is entry-level.

30. Changes of role, DBS Update Service and rechecking

The school operates an annual programme of DBS Update Service status checks for relevant eligible staff as part of its ongoing safeguarding and safer employment arrangements. This is an organisational safeguarding measure and does not imply that annual DBS rechecking is a statutory requirement.

Where the DBS Update Service is used, a status check will only be undertaken where the school is legally entitled to carry out the corresponding level and type of DBS check, the original certificate remains appropriate for the relevant workforce and role, and the individual's consent has been obtained where required.

The school will also review DBS eligibility, Children's Barred List eligibility and any other relevant checks where an individual's role, duties, workforce, level of responsibility or contact with children materially changes. Eligibility will be assessed by reference to the duties actually undertaken and the legislation and statutory guidance in force at the time.

A change in role, duties or circumstances may require a new DBS check, a different level or type of check, or additional checks. Where an Update Service status check indicates that the existing certificate is no longer current, the school will take appropriate action, which may include obtaining a new DBS certificate.

The school will record the completion of annual Update Service status checks and any decisions or resulting actions arising from them in accordance with its safer recruitment, safeguarding, record-keeping and data protection procedures.

31. Review and legal advice

This policy reflects the position in England as at October 2026 and should be reviewed whenever relevant law or statutory guidance changes. Where a case raises uncertainty about employment law, immigration, DBS eligibility, protected criminal-record information, discrimination, data protection or safeguarding, the school will obtain appropriate HR, legal, DBS, Home Office or safeguarding advice before acting.

This policy is an operational compliance framework and is not a substitute for case-specific legal advice.

Appendix 1 - Safer Recruitment Pre-Appointment Checklist

Check	Date / outcome	Checked by
Role risk profile and DBS eligibility recorded		
Job description/person specification approved		
Safeguarding statement in advert		
Application complete and chronology/gaps reviewed		
Shortlisting scored against published criteria		
Online search completed for shortlisted candidate and any relevant findings resolved		
Self-declaration completed where legally applicable		
Structured interview and safeguarding assessment completed		
Identity verified		
Two satisfactory references obtained/verified (or documented lawful exception/escalation)		
Enhanced DBS completed at correct level		
Children's barred list information/check completed where legally eligible/required		
Right to work completed before work starts		
Qualifications checked where required		
Prohibition from teaching checked where applicable		
Section 128 checked where applicable		
Overseas checks/risk assessment completed where applicable		

Post-offer health/OH process completed where applicable		
Any adverse information reconciled and decision rationale recorded		
SCR updated and checked		
Conditional start risk assessment approved where exceptionally applicable		
Induction and safeguarding training arranged		
Candidate pack included/linked Child Protection and Safeguarding Policy and ex-offender recruitment statement		
Role-change / DBS rechecking requirements considered where appointment changes an existing worker's duties		

Appendix 2 - Core external sources current at October 2026

Body	Source	URL
DfE	Keeping Children Safe in Education 2026	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
DfE	Regulated activity: removal of the supervision exemption (1 September 2026)	https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children/regulated-activity-removal-of-the-supervision-exemption-comes-into-force-1-september-2026
DBS	Regulated activity with children	https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-children
DBS	Eligibility for Enhanced with Barred List DBS checks with children	https://www.gov.uk/government/publications/eligibility-for-enhanced-with-barred-list-dbs-checks-with-children/eligibility-for-enhanced-with-barred-list-dbs-checks-with-children
DBS	ID checking guidelines for Standard/Enhanced DBS applications	https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-standardenhanced-dbs-check-applications-from-22-april-2025
DBS	Transgender applications / sensitive applications route	https://www.gov.uk/guidance/transgender-applications
DBS	Handling of DBS certificate information	https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information
Home Office	Employers' right to work checklist / current guidance	https://www.gov.uk/government/publications/right-to-work-checklist
Home Office	Code of practice: avoiding unlawful discrimination while preventing illegal working	https://www.gov.uk/government/publications/right-to-work-checks-code-of-practice-on-avoiding-discrimination
ACAS	Recruitment: following discrimination law	https://www.acas.org.uk/recruitment/follow-discrimination-law
ACAS	Job references: what employers can say	https://www.acas.org.uk/providing-a-job-reference/what-employers-can-say-in-a-reference
DBS	Eligibility for Roles working with children (1 September 2026)	https://www.gov.uk/government/publications/eligibility-for-roles-working-with-children
Home Office	Employer's guide to right to work checks: 1 October 2026	https://www.gov.uk/government/publications/right-to-work-checks-employers-guide