Appendix 1: Safer Recruitment and DBS checks – policy and procedures

Safer Recruitment Policy

Recruitment and selection process

The recruitment steps outlined below are based on **Part 3 of Keeping Children Safe in Education 2026**.

The Trust will ensure that all staff involved in recruitment receive appropriate safeguarding and safer recruitment training proportionate to their role. At least one person involved in every appointment process will have completed appropriate safer recruitment training in accordance with Keeping Children Safe in Education 2026.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, including the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Where the role is exempt, certain spent convictions and cautions are 'protected', and do not need to be disclosed. . Where such information is disclosed, we will ensure that it is dealt with in accordance with the relevant legislation and guidance.

Application form

Our application form will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children, where the role involves this type of regulated activity.
- Require applicants to provide information about their full employment history, including explanations for any gaps in employment.
- Include a copy of our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.
- Consider the information provided in the application form against the requirements of the role.

Once we have shortlisted candidates, we will ask shortlisted candidates to complete a self-declaration of their criminal record and any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage.

The information we will ask for includes:

- Whether they have a criminal history.
- Whether they are included on the barred list and whether they are prohibited from teaching.
- Information about any criminal offences committed in any country in line with the law applicable in England and Wales.
- Any relevant overseas information.
- Whether they have been subject to any relevant concerns or findings by the police or children's social care.
- Any information relating to childcare disqualification, where applicable.

Candidates will be required to sign a declaration confirming that the information they have provided is true.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

Where possible, we will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Obtain references directly from the referee and not solely from open testimonials or references supplied by the applicant.
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure that references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.

- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Consider the information provided by the candidate in their application, self-declaration and references.
- Ensure that at least one person involved in the interview and selection process has received appropriate safer recruitment training.
- Record all information considered and decisions made.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment.
- Where the individual is registered with the DBS update service, we will carry out the appropriate status check and obtain the original DBS certificate where required.
- Obtain a separate barred list check where an individual will begin work in regulated activity before the DBS certificate is available and where permitted by the relevant guidance.
- Obtain appropriate information to verify that the individual has the health and physical capacity to carry out the role, in accordance with the Equality Act 2010.
- Verify their right to work in the UK. We will retain evidence of this verification in accordance with our data retention requirements.
- Verify their professional qualifications, where appropriate.
- Ensure they are not subject to a prohibition order if they are employed to teach.
- Carry out further additional checks where appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - Criminal records checks for overseas applicants and other relevant overseas checks.
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
    - Any other checks considered necessary and proportionate to establish the candidate's suitability to work with children.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.

Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers and finance mangers.

Regulated activity

Regulated activity with children includes activities which involve teaching, training, instructing, caring for or supervising children where the relevant frequency or period conditions are met, as well as other activities and work in specified establishments as set out in the relevant legislation and guidance.

From 1 September 2026, the previous supervision exemption for volunteers will no longer apply. This means that volunteers who meet the relevant criteria for regulated activity will be required to have an enhanced DBS check with children's barred list information.

All paid staff who meet the definition of regulated activity will continue to require the appropriate level of DBS check.

The school will assess each role individually to determine whether the individual is engaging in regulated activity and the appropriate level of DBS check.

We will ensure that no person who is barred from regulated activity with children is permitted to engage in regulated activity.

For definition of regulated activity, please refer to paragraphs 315 and 381-387 of Keeping Children Safe in Education 2026

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children.
- An individual moves from a post that is not regulated activity to one that is.
- There has been a break in service of 12 weeks or more, not including statutory leave such as maternity leave where applicable.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where the relevant conditions for referral are met including where:

- We believe the individual has engaged in relevant conduct.
- We believe the individual has received a caution or conviction for a relevant offence.
- We believe the 'harm test' is satisfied in respect of the individual.
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Volunteers

The school will ensure that appropriate safeguarding checks are carried out on volunteers according to the nature of their role and whether they are engaging in regulated activity.

From 1 September 2026, volunteers who engage in regulated activity with children will require an enhanced DBS check with children's barred list information.

Volunteers who are not engaging in regulated activity will be subject to the appropriate level of DBS check, where applicable.

Occasional volunteers, such as parents or carers helping with an occasional school activity or day trip, will not automatically require an enhanced DBS check with children's barred list information. The school will assess the nature and frequency of the activity and determine whether a DBS check is appropriate.

All volunteers will be subject to appropriate safeguarding arrangements and will not be permitted to undertake regulated activity until the required checks have been completed.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform.

We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Where agency or third-party staff are engaging in regulated activity, we will ensure that the appropriate enhanced DBS check, including children's barred list information where required, has been completed.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check where required.

This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.
- Contractors who have not had t checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Where a contractor is not required to have a DBS check, the school will ensure that appropriate safeguarding arrangements are in place.

Governors and Trustees

All governors and trustees will have an enhanced DBS check without barred list information, unless the nature of their role means that a higher level of check is required.

Governors and trustees who engage in regulated activity will have an enhanced DBS check with children's barred list information.

The chair of the board will have their DBS check countersigned by the secretary of state where required.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). A section 128 check is only required for local governors if they have retained or been delegated any management responsibilities.
- Identity.
- Right to work in the UK where applicable.
- Other checks deemed necessary where they have lived or worked outside the UK.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

We will satisfy ourselves that the provider has appropriate safeguarding arrangements in place and will take appropriate action where concerns are identified.

External Providers

Where external providers are engaged to deliver services, activities or education to pupils, the school will undertake appropriate safeguarding, and safer recruitment checks before the provider begins work.

The school will obtain written assurance that the provider has carried out appropriate pre-employment checks on all individuals working with pupils, including identity, right to work, relevant qualifications, employment history and DBS checks where required.

The level of DBS check will be determined by the nature of the role and whether the individual is engaging in regulated activity.

The school will also seek assurance that appropriate safeguarding training, procedures and arrangements are in place.

Where the provider uses new or replacement staff, the provider must notify the school and confirm that the appropriate checks have been completed before the individual works with pupils.

The school will retain appropriate evidence of these assurances and will address any concerns before allowing the provider or its staff to work with pupils.

Low Level Concerns

The Headteachers will manage allegations, safeguarding concerns and low-level concerns relating to staff in accordance with its Child Protection and Safeguarding Policy and Staff Code of Conduct.

Staff transferred under TUPE

The Trust will undertake all safeguarding checks required by KCSIE where staff transfer into the Trust under TUPE arrangements and will seek appropriate written assurances where checks have previously been undertaken.

Single central record

The school will maintain a single central record of the required recruitment and safeguarding checks for staff, agency staff, trustees, governors, external providers, volunteers and other individuals where the checks are required by statutory guidance.

The SCR will be kept up to date and will contain the information required by Keeping Children Safe in Education, 2026.

The school will ensure that recruitment and safeguarding records are maintained securely and in accordance with data protection legislation and the school's data retention arrangements.

Annual Declarations

The Trust may require employees to complete an annual safeguarding and suitability declaration to confirm that no information has arisen that may affect their suitability to work with children. This declaration supplements, and does not replace, statutory safeguarding checks.

Data Protection

Recruitment records will be processed in accordance with UK GDPR, the Data Protection Act 2018 and the Trust's data protection policies and privacy notices.