



SAFE START SCHOOL

WILLPOWER-INITIATIVE-SUCCESS-EMPATHY-RESPECT

Safe Start

Safer Recruitment Policy

Policy Reviewed: October 2026

Reviewed by: Grace Speakman

Ratified by: Rachel Pilling

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1. Statement of Intent

Safe Start School is committed to safeguarding and promoting the welfare of children and young people. All staff, volunteers and those working on our behalf are expected to share this commitment. Recruitment will deter, identify and reject unsuitable applicants through careful selection, appropriate checks and clear accountability.

We apply fair recruitment procedures, make reasonable adjustments and assess suitability for the particular role. Recruitment decisions will consider our pupils' special educational needs, communication needs and vulnerability. KCSIE applies to children under 18; staff working with adult learners must also follow the school's adult safeguarding arrangements and any role-specific requirements.

2. Legal and Regulatory Framework

The principal framework is Keeping children safe in education 2026, particularly Parts three and four; the Education (Independent School Standards) Regulations 2014, particularly Part 4; the Safeguarding Vulnerable Groups Act 2006 as amended, including by the Crime and Policing Act 2026; and the Education and Skills Act 2008, including section 128.

Other relevant provisions include the Children Acts 1989 and 2004; the Police Act 1997; the Rehabilitation of Offenders Act 1974 and Exceptions Order; the Equality Act 2010; the Teachers' Disciplinary (England) Regulations 2012; immigration and right-to-work requirements; and applicable data protection laws, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

This policy operates alongside the Child Protection and Safeguarding Policy, Low-Level Concerns Policy, Whistleblowing Policy, Staff Code of Conduct, Behaviour Policy, Equal Opportunities Policy and data protection and retention arrangements. Maintained-school staffing and appraisal regulations are not presented as general statutory recruitment requirements for this independent school.

3. Regulated activity and DBS eligibility

HR will assess the actual duties, frequency and opportunity for contact with children before deciding the level of Disclosure and Barring Service (DBS) check. A job title or the presence of another adult does not determine eligibility.

Regulated activity includes paid or unpaid teaching, training, instruction, care, supervision, advice or guidance on physical, emotional or educational wellbeing, and driving a vehicle only for children, where the applicable frequency or period conditions are met. It also includes other paid work in a specified establishment such as a school, with opportunity for contact with children, subject to the statutory conditions and exceptions.

The relevant conditions include activity carried out frequently or on more than three days in 30 days. Relevant overnight activity between 2am and 6am involving opportunity for face-to-face contact can qualify. Relevant personal care, including disability-related help with

eating, drinking or toileting, and qualifying healthcare can be regulated activity even once. HR must consult the full statutory definition when applying these rules.

From 1 September 2026 supervision no longer removes otherwise qualifying activity from regulated activity. This applies to volunteers as well as paid roles. Enhanced DBS checks with children's barred list information are required for roles in regulated activity. Barred list information must not be requested for a role that is not eligible. Other DBS checks will be obtained only where legally eligible and appropriate.

4. Recruitment responsibilities and training

The proprietor retains responsibility for compliance with the Independent School Standards. The Headteacher oversees recruitment decisions. HR coordinates checks, maintains evidence and the single central record, and confirms clearance. The DSL advises on safeguarding concerns. Governors monitor implementation within their delegated responsibilities.

As a school requirement, every recruitment panel will include at least one person who has completed appropriate safer recruitment training. The school retains its five-year refresher cycle, with earlier updates when legislation or guidance changes. This cycle is a school procedure, not a KCSIE statutory renewal interval. At least two people will shortlist; panel members must understand this policy and declare conflicts of interest.

5. Advertising and applications

Job descriptions and person specifications will identify safeguarding responsibilities, required skills, attitudes and behaviours, contact with children and whether the role involves regulated activity. Adverts will state our safeguarding commitment and that appropriate safeguarding checks will be undertaken. They will explain any exemption from the Rehabilitation of Offenders Act and the protection of filtered cautions and convictions.

For regulated activity, application information will state that it is an offence for a barred person to apply. Applicants will receive the job description, person specification, application form, safeguarding policy or link, selection arrangements and closing date. Section 8 below provides the school's approach to recruiting applicants with criminal records.

Applicants must complete the school application form. A CV may accompany it but will not replace it. The form will request current and former names, address, national insurance number, full history since leaving school including education, employment and volunteering, reasons for gaps and leaving posts, qualifications and awarding bodies, referees and evidence against the person specification.

6. Shortlisting and online searches

Two panel members will assess applications against the person specification and record decisions. They will identify inconsistencies, unexplained gaps and matters requiring

clarification. Shortlisted candidates will complete a separate signed safeguarding and criminal-record self-declaration, limited to information that may lawfully be requested. It will not be used to decide the initial shortlist. Candidates will confirm the accuracy of their application, signing a hard copy at interview where the application was signed electronically.

The school will conduct a proportionate online search of shortlisted candidates as its chosen due-diligence procedure. KCSIE says schools should consider online searches; it does not describe them as a universal statutory requirement. Candidates will be told in advance.

The search will use publicly available material relevant to suitability and safeguarding. It will not involve requests for private passwords or access to restricted accounts. HR will record the date, searcher, sources, relevant findings and outcome, check identity carefully, and allow the candidate to explain concerns. Irrelevant personal information and protected characteristics will not influence selection.

7. Employment references

The school will normally obtain two satisfactory references directly from referees, before interview wherever possible. One must be from the current employer or verify the most recent relevant employment if the applicant is not currently employed. Where the applicant previously worked with children, a reference must be obtained from the relevant last employer if this is not the current employer.

References must be completed by a senior person with appropriate authority. School references should be confirmed by the headteacher or principal as accurate regarding disciplinary investigations. HR will authenticate the source independently, verify information with the referee, record telephone enquiries, compare references with the application and resolve discrepancies before confirming appointment. Open testimonials and applicant-supplied references will not be accepted as substitutes.

Requests will seek factual confirmation of employment, responsibilities, reasons for leaving, suitability to work with children and substantiated safeguarding concerns or allegations meeting the harm threshold. Unsubstantiated, unfounded, false or malicious allegations must not be included. Low-level concerns will not normally be included unless they relate to matters normally included in a reference, such as misconduct or poor performance; matters found to meet the harm threshold will be treated accordingly under Part four of KCSIE.

8. Selection and criminal record assessment

Interviews will explore motivation to work with children, professional boundaries, safeguarding knowledge, relevant experience and attitudes. Panels will use structured questions, including a safeguarding scenario, and address application gaps, references, declarations and relevant online findings. Interview arrangements will normally be face-to-face; any necessary secure video arrangements must still permit reliable assessment and verification.

Where appropriate, pupils will contribute meaningfully through planned, supervised activities adapted to their needs. Candidates will not have unsupervised access to pupils during selection. Decisions and reasons will be recorded.

A criminal record does not automatically prevent appointment unless a legal bar or restriction applies. The Headteacher, with HR and safeguarding advice, will assess relevant information fairly, considering seriousness, relevance, elapsed time, circumstances, patterns, the applicant's explanation and responsibility taken. Protected cautions and convictions must not be requested or considered. A person barred from children's regulated activity cannot be appointed to such work.

9. Pre employment checks and clearance

Offers are conditional on satisfactory checks. HR will verify identity, including name changes; right to work; required qualifications; employment history and references; role-appropriate enhanced DBS and barred list information; teaching prohibitions and applicable historic GTCE restrictions for teaching work; section 128 restrictions for management roles; relevant overseas history; and fitness for the work. Check dates, verifier and decisions will be documented.

DfE's Check a teacher's record will be used for applicable teaching, direction and restriction checks and to verify QTS and induction where relevant. Teaching prohibition checks apply to teaching work even where QTS is not required for the role. A qualification or teacher reference number is not evidence of safeguarding clearance.

Fitness enquiries will be relevant to the role, normally after a conditional offer, comply with Equality Act restrictions on pre-offer health questions and consider reasonable adjustments. Disability or a health condition is not itself a reason to reject an applicant.

Childcare disqualification checks will be used only where the provision and duties fall within the applicable childcare regulations; they do not routinely apply to this school's secondary and post-16 provision.

No general risk assessment can waive a statutory check. The normal rule is that all required checks are satisfactorily completed before work begins. Exceptionally, a directly appointed individual may start while the enhanced DBS certificate is pending only where legally permitted, all other checks are satisfactorily complete, any required separate children's barred list check is complete, and the Headteacher has approved recorded supervision and a time-limited risk assessment. HR will chase the certificate and review restrictions until it is seen. Agency staff must satisfy section 11.

10. DBS certificates and overseas checks

The original DBS certificate must be examined and matched to the individual. HR will record the certificate details, level, workforce, barred list coverage where relevant, date seen and recruitment decision securely. Any disclosure must be assessed before clearance. The school will not routinely copy certificates, except where a specific requirement applies, including the agency disclosure requirement below.

The DBS Update Service may be used with consent after checking identity and the original certificate and confirming the appropriate level, workforce and barred list coverage. HR will record the status result and date and obtain a new check where required. Applicants can join when applying or within 30 calendar days of certificate issue. Membership does not replace the other recruitment checks.

For anyone who has lived or worked outside the UK, HR will consider appropriate additional checks based on their individual history. There is no blanket 12-month residence threshold or 10-year look-back exemption. Checks may include overseas criminal-record certificates, professional regulator information for teachers, authenticated references and evidence of work or study. An overseas check does not replace required UK checks.

Where records cannot be obtained, HR will document attempts, reasons, alternative evidence and the suitability decision. The Headteacher will seek advice where needed and will not appoint where suitability cannot be established.

11. Agency and third party staff

Before deployment, HR must obtain written notification that the agency or third-party organisation has undertaken the same relevant checks the school would perform, including confirmation that the appropriate enhanced DBS certificate has been obtained. This includes people providing education on the school's behalf online. Required barred list information must be obtained by the agency through the appropriate enhanced DBS check before appointment.

Where the agency certificate discloses information, or relevant information was provided to the employment business, the school must obtain a copy of the certificate and assess the matter before deployment. Access and retention will be restricted. Reception or the responsible manager will check the arriving person's identity against the cleared individual. HR will record confirmation and relevant dates on the SCR. Agency service does not automatically clear an individual for direct employment; HR must complete the checks required for the new appointment.

12. Trainee and student teachers

The school will undertake all necessary checks for salaried trainees and include them on the SCR. For fee-funded trainees, the training provider must confirm in writing that all relevant checks have been completed and that the trainee is suitable to work with children. The school will verify identity and provide induction. Fee-funded trainees may be recorded separately; KCSIE does not require their inclusion on the SCR.

13. Contractors and visitors

Contracts will specify safeguarding requirements. Contractors undertaking regulated activity require an enhanced DBS check with children's barred list information. Contractors outside regulated activity whose work permits regular contact with children require an enhanced check without barred list information. For other contractors, the school will consider whether a basic check is appropriate. Self-employed people must provide the appropriate certificate or the school will arrange the required check.

Identity must be checked on arrival. An unchecked contractor must not work unsupervised or undertake regulated activity. The school will determine supervision and restrict access according to the work and risks.

Parents and ordinary event visitors will not be asked for DBS certificates solely because they visit. Professional visitors must show identity and the school must be assured of appropriate checks through the visitor's employer where applicable; it should not ask to see their certificate where employer assurance is used. External speakers and organisations will be assessed for suitability, content and supervision.

14. Volunteers

HR and the activity leader will assess every volunteer role in writing, including duties, frequency across settings, personal care and overnight work. Supervision must not be used to classify an otherwise qualifying role as outside regulated activity.

Volunteers in regulated activity require an enhanced DBS check with children's barred list information. Existing volunteers newly brought within regulated activity from September 2026 must have their barred list status checked. HR will obtain the appropriate enhanced check; a standalone barred list check may be used in the circumstances permitted by KCSIE paragraph 385, including pending the enhanced certificate or following a recent enhanced certificate without barred list information where there has been no break in service.

Where activity across several settings meets the period condition, the school will coordinate checks with those settings and verify the individual's certificate or appropriate Update Service status. Any start pending a certificate must meet section 9.

For volunteers outside regulated activity, a recorded risk assessment will determine appropriate checks and supervision, considering duties, what is known about the person and available references. An enhanced check without barred list information may be appropriate for eligible infrequent activity, or a basic check for other roles. An unchecked volunteer must never work unsupervised or undertake regulated activity.

15. Governors and the proprietor body

Section 128 checks must cover those participating in management, including governors with management responsibilities, relevant members of the proprietor body, the Headteacher and

other managers whose actual duties bring them within scope. HR will consider responsibilities rather than title alone.

The school will follow the Independent School Standards and DfE arrangements for checks on the proprietor and the chair of a corporate proprietor body. The Secretary of State undertakes the relevant checks on the individual proprietor or chair. The chair is responsible for ensuring the required identity, enhanced DBS, section 128 and appropriate overseas checks on other members of the proprietor body.

The school retains an enhanced DBS requirement for governors, subject to lawful eligibility, and records their status and responsibilities. Governance alone is not regulated activity; barred list information is requested only where additional duties make the individual eligible. Advisory roles must be distinguished from membership of the proprietor body or delegated management.

16. The single central record

HR will maintain an accurate SCR covering all staff, including salaried trainees and agency or third-party supply staff, and those required by the Independent School Standards in relation to the proprietor body. It must identify whether relevant checks were undertaken or certificates obtained and the applicable dates.

Records will cover identity, appropriate enhanced DBS and certificate details, separate barred list checks where applicable, teaching prohibitions, section 128 for management, required qualifications, right to work and appropriate overseas checks. Agency entries must record written confirmation, the date received, required DBS information and the date the certificate was obtained. Non-applicable checks must be clearly identified with reasons where needed.

The school will additionally record volunteer and governor checks, risk assessments, training and the person completing each check, either on the SCR or in linked secure records. HR will check entries before deployment and update them promptly. The Headteacher will arrange termly audits, with findings and actions reported to governors and the proprietor. Leavers will be removed from the live SCR; associated personnel records follow the retention schedule.

17. Induction and ongoing vigilance

All new staff must receive and read KCSIE 2026 Part one in full; the former condensed Annex A is no longer an alternative. Induction will cover the safeguarding policy, staff conduct, low-level concerns, allegations and whistleblowing, behaviour, children absent from education, DSL and deputy identities, online safety and filtering and monitoring responsibilities.

Training will address the safeguarding needs of pupils with SEND and how to recognise and report concerns. Safeguarding training will be updated regularly, with updates at least

annually. Volunteers, contractors and agency workers will receive information and training appropriate to their role before contact with pupils.

Managers will meet new staff regularly during their first three months and address concerns promptly. Staff must report relevant changes affecting suitability, restrictions or permission to work. Further checks will be carried out where an existing staff member or volunteer moves from a role outside regulated activity into regulated activity, following a break in service of 12 weeks or more, or where concerns arise about their suitability to work with children. HR will identify and complete the checks appropriate to the circumstances.

18. Alternative provision and work experience

For commissioned alternative provision, the school retains safeguarding responsibility. It will obtain written confirmation of appropriate staff checks and an undertaking to report changes that may place pupils at risk, including staffing changes, so that assurances can be updated. This supports the school's wider monitoring and quality assurance arrangements.

Work experience providers must have arrangements to protect pupils from harm. The school will assess the role, pupil age, supervision and activities before deciding whether any check is legally eligible. It will not demand enhanced DBS and barred list checks indiscriminately from all workplace staff. Staff uninvolved in teaching, training, instruction, care or supervision are not in regulated activity merely because a pupil attends the workplace.

The school will apply KCSIE paragraphs 406 to 410, including the restriction on requesting an enhanced DBS check with children's barred list information for staff supervising 16- and 17-year-olds on work experience. DBS checks cannot be requested for children under 16. Placement risk assessments and reporting arrangements remain necessary regardless of DBS eligibility. Any school-arranged homestay will be assessed under KCSIE paragraphs 411 to 420 before approval.

19. Information retention and safeguarding escalation

Recruitment information will be held securely with access limited to authorised staff and a documented lawful basis, including the additional requirements for criminal-offence and health data. Applicants will receive appropriate privacy information. Unsuccessful recruitment records will normally be retained for 12 months under the school's retention arrangements, subject to documented justification, legal holds and secure disposal. Successful applicants' relevant evidence will transfer to the personnel file.

DBS certificate copies and detailed criminal-record disclosures will not be retained routinely. Any necessary copy will have a documented reason for retention and will be securely destroyed as soon as it is no longer required, and no later than six months after retention begins. The school may retain the permitted record of the check, its result and the recruitment decision.

Recruitment concerns must be escalated promptly to the Headteacher, with DSL and HR advice. Allegations about the Headteacher go to the proprietor; concerns involving a

conflicted proprietor or where direct external referral is appropriate go to the LADO under local procedures. Immediate child protection risks must be referred to children's social care or police as appropriate. Low-level concerns follow the school's reporting procedure and are reviewed for patterns.

The school must refer to DBS when the statutory conditions are met, including where it removes someone from regulated activity, or would have done had they not left, because of relevant conduct, the harm test or a relevant offence. This applies to volunteers as well as employees. Resignation or ending an agency placement does not remove the duty. HR and the Headteacher must also consider a TRA referral where a teacher's services end, or would have ended, for serious misconduct.

20. Monitoring and review

The Headteacher and HR Manager will monitor recruitment clearance, volunteer classifications, SCR accuracy, induction and concerns arising during probation. The proprietor and governing body will review audit findings, actions and implementation within their respective responsibilities.

This policy will be reviewed annually and sooner following legislative changes, new guidance or an identified safeguarding weakness. Approval and implementation dates must be recorded by the school.

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Implementation checklist

- ☐ Record approval and communicate the policy to recruiters and managers.
- ☐ Review all volunteer roles against the September 2026 definition and complete any newly required barred list checks before permitting the activity.
- ☐ Update recruitment adverts, application packs, references and online-search notices to match this policy.
- ☐ Audit outstanding checks and remove any assumption that a general risk assessment permits statutory checks to be waived.
- ☐ Check section 128 coverage against actual management and proprietor responsibilities.
- ☐ Confirm the SCR, induction records and all-staff reading of KCSIE Part one are up to date.