Safer Recruitment Policy

St Edward's Cheltenham

Document control

Field	Details
School	St Edward's Cheltenham
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Contents

1. Purpose and principles
2. Scope
3. Legal and statutory framework
4. Roles and accountability
5. Planning the recruitment process
6. Advertising and recruitment information
7. Applications and employment history
8. Shortlisting and online searches
9. References and verification
10. Selection and interview
11. Conditional offers and pre-appointment checks
12. Specific checks by role or circumstance
13. Starting work before all checks are complete
14. Single Central Record
15. Agency and third-party staff
16. Contractors and visitors
17. Volunteers
18. Governors, proprietors and management checks
19. Trainee teachers, students and work experience
20. Overseas applicants and overseas checks
21. EYFS and childcare disqualification
22. Boarding provision
23. Ongoing suitability and repeat checks
24. Concerns arising during recruitment
25. Record keeping, retention and data protection
26. Training, monitoring and review
27. Other settings and 2026 regulated-activity changes
28. Policies and procedures to be read in conjunction
29. Source register

1. Purpose and principles

The School is committed to safeguarding and promoting the welfare of children. Safer recruitment is one part of a wider safeguarding culture designed to deter, identify and reject people who may be unsuitable to work with children, while treating applicants fairly, lawfully and with dignity.
No appointment, engagement or placement will be treated as fully cleared until the School is satisfied that the person is suitable for the role and all checks required by law, statutory guidance and this policy have been completed and recorded. Except for a lawful and expressly authorised exceptional start under Section 13, a person will not commence work before the required pre-appointment checks are complete.

The School will apply a consistent, proportionate and risk-based process. Decisions will be based on the role, the nature and frequency of contact with children, whether the work is regulated activity, the level of supervision and any specific statutory requirements.

2. Scope

This policy applies to employees, supply and agency staff, contractors, consultants, coaches, peripatetic teachers, governors, proprietors, volunteers, trainee teachers, students, work-experience placements, host families and any other person whose work or presence may bring them into contact with pupils.

3. Legal and statutory framework

This policy has been prepared with regard to the following, as applicable:

- Keeping Children Safe in Education 2026, particularly Part Three;
- Working Together to Safeguard Children 2026;
- the Education (Independent School Standards) Regulations 2014, as amended;
- the applicable Early Years Foundation Stage statutory framework;
- the Education Act 2002 and Education and Skills Act 2008;
- the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012;
- the Childcare Act 2006 and Disqualification under the Childcare Act 2006 statutory guidance;
- the Rehabilitation of Offenders Act 1974 and Exceptions Order;
- the Equality Act 2010;
- the UK General Data Protection Regulation, Data Protection Act 2018 and Data (Use and Access) Act 2025;
- DBS eligibility and regulated-activity guidance;
- Teaching Regulation Agency requirements, including prohibition checks; and
- section 128 directions relating to the management of independent schools.

4. Roles and accountability

4.1 Proprietor or Governing Body

- ensure the School has effective safer-recruitment policies and procedures;
- ensure appropriate checks are completed and the Single Central Record is accurate;
- ensure at least one person conducting each interview has completed suitable safer-recruitment training;
- receive assurance through audit and reporting; and
- ensure statutory referrals are made where required.

4.2 Headteacher

- implement this policy and maintain a safeguarding culture;
- ensure recruitment panels are appropriately constituted and trained;
- approve any exceptional risk-managed start before a check is complete;
- ensure concerns are referred to the DSL, LADO, DBS, police or other body where required; and
- ensure records are complete, secure and available for inspection.

4.3 HR or Recruitment Lead

- coordinate the recruitment process and statutory checks;
- verify identity, qualifications, references and employment history;

- maintain the Single Central Record and recruitment file;
- escalate discrepancies or concerns; and
- ensure no person starts work without formal clearance.

5. Planning the recruitment process

Before advertising, the School will define the role, decide whether it involves regulated activity, identify the required checks and prepare a clear job description and person specification. Safeguarding responsibilities and the duty to promote pupils' welfare will be explicit.

- the level of contact with children and whether contact is supervised;
- whether the role includes teaching, management, childcare, boarding, driving, medical or intimate-care duties;
- whether a section 128, prohibition, childcare-disqualification or overseas check is required;
- the selection stages, panel membership and assessment methods; and
- the information and evidence that the successful candidate must provide.

6. Advertising and recruitment information

Advertisements, applicant information and the School website will make clear the School's commitment to safeguarding and the checks that apply. Recruitment materials will state that the post is exempt from the Rehabilitation of Offenders Act 1974 where applicable and that shortlisted candidates may be subject to an online search.

The School is committed to safeguarding and promoting the welfare of children. Applicants must be willing to undergo child-protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service.

7. Applications and employment history

The School will use a standard application form. A curriculum vitae may supplement, but will not replace, the completed application form, which will contain:

- full identifying and contact details;
- a complete employment and education history with dates;
- explanations for gaps, repeated changes or inconsistencies;
- details of relevant qualifications and professional status;
- a declaration of relationships with existing staff, pupils, governors or proprietors;
- consent to required checks and references; and
- a signed declaration that the information is true and complete.

Incomplete applications will not normally proceed. Deliberately false, misleading or omitted information may result in withdrawal of an offer, disciplinary action or referral to an appropriate authority.

8. Shortlisting and online searches

At least two people will carry out the shortlisting exercise, applying the same published criteria to all candidates. Wherever practicable, those who shortlist will also take part in the interview process to support a consistent approach.

As part of due diligence, the School will consider carrying out an online search on shortlisted candidates. Candidates will be told that this may happen. Searches will be proportionate, relevant to suitability and safeguarding, documented, and separated from unlawful or irrelevant consideration of protected characteristics.

Where an online search identifies potentially relevant material, the candidate will normally be given an opportunity to explain it. A record of the search, date, source, findings and decision will be retained.

Shortlisted candidates will be required to complete a self-declaration of their criminal record and any other information that may make them unsuitable to work with children, subject to the law on protected matters. This may include relevant criminal history, inclusion on the children's barred list, prohibition from teaching, prohibition from participation in the management of an independent school and childcare disqualification where applicable. The purpose of the self-declaration is to enable relevant information to be considered and discussed before appointment and before the DBS certificate is received.

9. References and verification

The School will normally obtain at least two satisfactory references for the preferred candidate, one of which will be from the candidate's current or most recent employer. Where the candidate is not currently working with children but has done so

previously, the School will also obtain a reference from the employer by whom the candidate was most recently employed in work with children. References will be obtained directly from referees. Open references, testimonials or references supplied by the candidate will not be relied upon.

- references should be obtained before interview where possible, unless there is a legitimate reason not to do so;
- the current or most recent employer should normally be approached, and where the applicant has worked with children, the School will seek relevant safeguarding information;
- references will ask whether the referee is satisfied that the applicant is suitable to work with children and will seek factual information about any substantiated safeguarding concerns or allegations that meet the harm threshold, relevant disciplinary findings and the reason for leaving. Low-level concerns will only be included where they relate to matters that would normally be included in a reference, such as misconduct or poor performance;
- factual information, dates and roles will be checked against the application;
- references will be verified with the author by telephone or another reliable method; and
- any discrepancy, vague response or concern will be resolved before appointment.

Information about allegations that were false, unfounded, unsubstantiated or malicious will not be included in employer references, in accordance with KCSIE. Substantiated safeguarding concerns and relevant disciplinary findings will be considered lawfully and fairly.

Where the referee is a school or college, the reference will be provided by, or confirmed as accurate by, a suitably senior person with appropriate authority. Electronic references must originate from a legitimate source. Vague or insufficient information will be clarified with the referee, and discrepancies between the reference and application will be resolved before appointment.

10. Selection and interview

At least one member of the interview panel must have completed suitable safer-recruitment training. The panel will explore the candidate's motivation, values, experience, professional boundaries, safeguarding understanding and response to realistic scenarios.

- identity and original qualification documents will be checked or arrangements made for formal verification;
- gaps, changes, discrepancies and declarations will be explored;
- questions will test attitudes towards children, authority, boundaries, reporting and whistleblowing;
- the panel will remain alert to rehearsed, vague, defensive or concerning answers; and
- selection decisions and reasons will be recorded.

11. Conditional offers and pre-appointment checks

Every offer will be conditional on satisfactory completion of all checks relevant to the role. The School will verify and record:

- identity, including photographic identification and current address;
- the right to work in the United Kingdom;
- an enhanced DBS certificate, with children's barred-list information where the role is regulated activity;
- a separate barred-list check where permitted and required before the DBS certificate is available;
- the person's mental and physical fitness to carry out the role, using a lawful and proportionate process after conditional offer;
- professional qualifications claimed and required for the role;
- prohibition from teaching, where applicable;
- section 128 prohibition from management, where applicable;
- childcare disqualification status, where applicable;
- appropriate checks for persons who have lived or worked outside the UK;
- references and employment history; and
- any additional check required by the EYFS, boarding standards, immigration law, professional regulator or the nature of the post.

The School will normally obtain and inspect the required original DBS certificate before the individual takes up post. An individual will only be permitted to start before the DBS certificate is available in exceptional circumstances, where this is lawful, necessary and expressly authorised under the exceptional-start procedure in this policy. Any such arrangement must be supported by all other required pre-employment checks, including a separate children's barred-list check where the role is regulated activity, an appropriate written risk assessment, proportionate supervision and a clear time limit pending receipt and inspection of the DBS certificate.

Where a DBS certificate is required, the original certificate must normally be seen before the individual starts work. If an exceptional start has been authorised in accordance with this policy, the original certificate must be obtained and inspected as soon as practicable after appointment. A DBS certificate number alone is not evidence of suitability.

DBS costs and acceptance of existing certificates

For appointments to paid roles, where the School requires a new DBS check as a condition of appointment, the successful candidate will be responsible for the cost of the DBS application and any associated administration charge. The requirement to meet the cost of the check will be made clear during the recruitment process. This does not affect any statutory fee exemption applicable to an eligible volunteer DBS application.

The School may accept an existing DBS certificate instead of requiring a new DBS certificate only where the School is satisfied that it is appropriate for the new role, is at the required level and workforce, includes children's barred-list information where required, the individual's identity and original certificate have been verified, and there is no information or change in circumstances that gives rise to a safeguarding or suitability concern.

Where an applicant moves directly from employment in a school in England to employment at an Alpha school, an existing enhanced DBS certificate may be accepted where the conditions in current statutory guidance are met, including that the qualifying previous employment ended no more than three months before the new appointment.

Where the new role is regulated activity and the School relies on the previous-school exception instead of obtaining a new enhanced DBS certificate, the School will obtain a separate children's barred-list check before the individual undertakes regulated activity, in accordance with current statutory guidance. The School retains discretion to require a new enhanced DBS check where it considers this appropriate.

Where an applicant moves directly from one nursery setting to another nursery setting, an existing enhanced DBS certificate may be accepted where it is appropriate for the new role and satisfies the School's required level, child-workforce and barred-list requirements. Where portability is being established through the DBS Update Service, the School will see the original certificate, verify the applicant's identity and obtain the applicant's consent before completing a satisfactory status check.

As an Alpha Schools Group policy, an existing DBS certificate will not ordinarily be accepted for a cross-setting transfer between a nursery and a school. A new DBS check appropriate to the new role and setting will be required.

12. Specific checks by role or circumstance

12.1 Regulated activity and barred-list checks

The School will determine whether the role is regulated activity using current statutory definitions. A barred-list check will only be requested where the law permits it. It is a criminal offence for a barred person to seek or undertake regulated activity, and for an employer knowingly to permit it.

Where a person teaches, trains, instructs, cares for or supervises children with the required frequency or overnight, supervision by another person will no longer prevent that activity from being regulated activity. The School will assess paid and voluntary roles against the amended statutory definition and obtain children's barred-list information where required and legally permitted.

12.2 Teaching prohibition

Before a person undertakes teaching work, the School will use the Department for Education's service to check whether the individual is subject to a prohibition order, interim prohibition order or relevant restriction. Where an agency supplies a teacher, the School will obtain written confirmation that the check has been completed.

12.3 Section 128

A section 128 check will be completed for proprietors and for individuals taking part in the management of the School where required. This may include senior leaders, governors and persons with management responsibility, depending on their role.

12.4 Qualifications

Qualifications that are legally or operationally required will be verified directly or through reliable evidence. Copies will be retained where appropriate.

12.5 Right to work

The School will complete and record a compliant right-to-work check before employment begins and will repeat time-limited checks where required.

12.6 Health and fitness

Health information will be sought only after conditional offer, except where lawful questions are needed to establish whether reasonable adjustments are required for selection. Decisions will focus on the person's ability to carry out the role safely, with reasonable adjustments where appropriate.

13. Starting work before all checks are complete

A person will not normally start work until all required checks are complete. Any exception must be lawful, necessary, time-limited, approved by the Headteacher, supported by a written risk assessment, and recorded on the Single Central Record and personnel file.

Where a DBS certificate is outstanding but other checks are satisfactory, the School may, only where legally permitted, use a separate barred-list check and implement safeguards such as supervision, restricted duties, no unsupervised contact, identity verification and frequent review. A person must never undertake regulated activity if the required barred-list status has not been established.

14. Single Central Record

The School will maintain a complete, accurate and up-to-date Single Central Record for all persons required by KCSIE and the Independent School Standards. It will record whether each required check was completed, the date of the check and, where appropriate, who completed it or the evidence relied upon.

- identity;
- barred-list check;
- enhanced DBS check or certificate;
- prohibition from teaching;
- section 128 direction;
- right to work;
- further overseas checks;
- professional qualifications;
- childcare disqualification, where applicable; and
- the required confirmations for agency and third-party staff.

The SCR may include additional columns used by the School, but supplementary information must not obscure the statutory record. The SCR will be checked regularly and audited at least termly by a suitably senior person independent of day-to-day entry wherever practicable.

15. Agency and third-party staff

Before an agency or third party worker starts, the School will obtain written confirmation that the supplier has completed all checks the School would otherwise be required to complete, including identity, enhanced DBS, barred-list, right-to-work, prohibition and overseas checks as applicable.

The School will check the person's identity on arrival and ensure it matches the agency confirmation and DBS information. Where an enhanced DBS certificate obtained by the agency or third party has disclosed any matter or information relevant under the applicable DBS provisions, the School will obtain a copy of the certificate from the agency before the individual begins work so that suitability can be assessed.

The School will retain the supplier's confirmation and record the required information on the SCR.

16. Contractors and visitors

Contractors engaged in regulated activity must have an enhanced DBS check including barred-list information. Contractors whose work provides an opportunity for regular contact with children but is not regulated activity will be required to have an enhanced DBS check without barred-list information, where eligible.

A contractor without the required checks will not be permitted to engage in regulated activity and must be appropriately supervised. The School will agree responsibility for checks in contracts and obtain written assurance before work begins.

Where a contractor is not engaging in regulated activity and does not have an opportunity for regular contact with children, the School will determine whether a DBS check is appropriate and legally available having regard to the nature, location and circumstances of the work, and will put appropriate supervision and access controls in place.

Ordinary visitors who are not working with children are not normally subject to DBS checks, but will be identified, signed in, given safeguarding information and supervised in accordance with risk.

17. Volunteers

The School will undertake a written risk assessment for each volunteer role, taking account of the activity, frequency, age of pupils, setting and opportunity for contact. From 1 September 2026, supervision does not remove a volunteer role from regulated activity where the statutory activity and frequency or overnight conditions are met.

- a volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight where the statutory condition is met, is in regulated activity even if supervised and must have an enhanced DBS check with children's barred-list information;
- for a volunteer who is not in regulated activity, the School will use its written risk assessment to decide what check is appropriate; this may include an enhanced DBS check without barred-list information where eligible, or a basic DBS check for another volunteer who may have access to children;
- the School must not request a barred-list check unless legally entitled to do so;
- existing volunteers will be reassessed before 1 September 2026 and whenever duties, frequency or circumstances change; any existing volunteer who becomes regulated activity because of the 2026 change must have children's barred-list status checked in accordance with KCSIE 2026; and
- volunteers will receive induction, safeguarding information and the Staff Code of Conduct.

18. Governors, proprietors and management checks

The School will complete the checks required for governors, directors, trustees, members of the proprietor body and other persons involved in management. These may include identity, enhanced DBS, barred-list information where relevant, right-to-work where employed, overseas checks and section 128 checks.

Where the proprietor is a body of persons, the chair or equivalent will ensure the required checks are completed and recorded. Where an individual proprietor is subject to checks by the Secretary of State or another authority, the School will retain appropriate evidence and record the position.

19. Trainee teachers, students and work experience

Responsibility for checks on salaried trainee teachers normally rests with the School as employer. For fee-funded trainees, the accredited provider will normally carry out checks and provide written confirmation. The School will verify identity and retain the confirmation.

Students, placements and work-experience participants will be risk assessed. The School will decide what checks, supervision, induction and restrictions are required, taking account of age, role and access to pupils. Pupils under 16 on work experience are not normally eligible for DBS checks.

20. Overseas applicants and overseas checks

For any person who has lived or worked outside the UK, the School will make such further checks as it considers appropriate so that relevant events occurring overseas can be considered. There is no single universal check, and the School will assess the country, duration, role, available evidence and reliability of documentation.

- criminal-record or certificate-of-good-conduct information where available;
- professional-regulatory or teaching-authority checks;
- additional references and verification;
- evidence of identity, residence and employment overseas; and
- a documented risk assessment where information is unavailable or incomplete.

Overseas checks do not replace the required DBS and other UK checks.

21. Ongoing suitability and repeat checks

Safer recruitment does not end on appointment. All staff and relevant adults must disclose without delay any change that may affect their suitability, including criminal matters, professional restrictions, safeguarding investigations, immigration status, driving status where relevant, or childcare disqualification.

The School is not required to repeat DBS checks routinely where a person remains in continuous employment, but may do so where there is a concern, break in service, change of role, statutory requirement or other reasonable basis. The DBS Update Service may be used with the individual's consent where appropriate.

The School will maintain induction, probation, supervision, appraisal, low-level concerns and safeguarding reporting arrangements to monitor ongoing suitability.

22. Concerns arising during recruitment

Any safeguarding concern, discrepancy, allegation, adverse reference, criminal-record information or online-search finding will be considered fairly, proportionately and on its facts. The School will assess relevance, seriousness, recency, pattern, explanation, role, access to children and any evidence of rehabilitation.

Where information suggests that a child may be at risk or a criminal offence may have occurred, the School will consult or refer to the DSL, LADO, children's social care, police, DBS, TRA or other authority as appropriate. Recruitment must not proceed merely because the concern arose before employment.

The School will make a DBS referral where the legal referral conditions are met, including where a person is removed from regulated activity, or would have been removed had they not left, because they harmed or posed a risk of harm to a child.

23. Record keeping, retention and data protection

Recruitment information will be processed lawfully, fairly and securely. Applicants will receive privacy information explaining what data is collected, why it is used, who may receive it and how long it is retained.

- the School will retain a clear recruitment decision record, application, references, check evidence and interview notes for the period set out in its retention schedule;
- a copy of a DBS certificate will not normally be retained for longer than six months unless the School has a lawful reason;
- the date, certificate number and decision may be recorded in accordance with DBS rules;
- sensitive information will be accessed only by those who need it; and
- records will be available for inspection and audit.

26. Training, monitoring and review

At least one member of every interview panel will have completed suitable safer-recruitment training. Staff responsible for checks and the SCR will receive role-specific training and updates when guidance changes.

The Headteacher and Proprietor will monitor implementation through SCR audits, sample recruitment-file checks, review of agency assurances, volunteer risk assessments and any concerns or inspection findings.

This policy will be reviewed at least annually and sooner where law, statutory guidance, inspection standards or School provision changes.

27. Other settings and regulated-activity changes

- A volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in a 30-day period, or overnight is in regulated activity. The School must obtain the appropriate enhanced DBS check with children's barred-list information and must review existing volunteers affected
- No unchecked volunteer may be left unsupervised or undertake regulated activity. A written role-specific risk assessment is required where a volunteer is not in regulated activity.
- Where frequency is accumulated across several settings, the settings should coordinate who obtains the check and how assurance is shared.
- For alternative provision, obtain written assurance that appropriate checks have been completed and that the provider will notify the School of staffing changes that could affect risk.
- For work experience, assess the placement's safeguarding arrangements and determine checks according to the adult's activity, frequency, overnight contact and the statutory definition of regulated activity.

- For host families or homestay arranged by the School, complete the checks and suitability arrangements required by KCSIE and the applicable boarding standards.
- For external sports, clubs and visiting organisations, assess educational value, age appropriateness, supervision, identity and assurance of appropriate checks. The School retains responsibility for pupils while they are in its care.

28. Policies and procedures to be read in conjunction

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Allegations Against Staff and Low-Level Concerns procedures
- Non-Discrimination and Inclusion Policy
- Data Protection Policy

29. Source register

Source	Application
Keeping Children Safe in Education 2026, Part three	Recruitment, selection, checks, regulated activity, SCR, agency staff, contractors, volunteers, governance, overseas checks, alternative provision, work experience and homestay.
Education (Independent School Standards) Regulations 2014 and DfE guidance, April 2026	Required suitability checks and SCR requirements for independent schools.
Early Years Foundation Stage statutory framework, September 2026	Suitability, references, disclosure and disqualification requirements where EYFS is provided.
Working Together to Safeguard Children 2026	Wider safeguarding and information-sharing context.
Safeguarding Vulnerable Groups Act 2006 and Crime and Policing Act 2026	Barred-list framework and 2026 regulated-activity changes affecting volunteers.
Police Act 1997 and DBS statutory guidance	Criminal-record checks, certificates and handling of information.
Childcare Act 2006 and Childcare (Disqualification) Regulations 2018	Disqualification requirements for relevant early and later-years childcare.
Education and Skills Act 2008 and section 128 regulations	Prohibition on participation in management of independent schools.
Teachers' Disciplinary (England) Regulations 2012	Teacher-prohibition checks and teaching work.
Immigration, Asylum and Nationality Act 2006 and Home Office guidance	Right-to-work checks.
Equality Act 2010	Fair recruitment, reasonable adjustments and limits on pre-employment health questions.
UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025	Lawful recruitment processing, online searches, criminal-offence data and retention.