



SAFER RECRUITMENT POLICY & PROCEDURE

Trust Version

Table of Contents

TABLE OF CONTENTS	2
POLICY STATEMENT	4
SCOPE OF THIS POLICY AND PROCEDURE	4
WHO SHOULD I CONTACT WITH ANY QUESTIONS?	5
LEGISLATION AND GUIDANCE	5
MONITORING THE IMPACT OF THE POLICY	5
DATA PROTECTION	5
1. PLANNING FOR RECRUITMENT	7
2. AUTHORISATION, ADVERTS AND CANDIDATE MANAGEMENT	7
Recruitment Authorisation	7
Advertising.....	7
Adverts and Job Descriptions	7
Recruitment Agencies	8
3. APPLICATIONS AND SHORT LISTING	8
Recruitment Panel.....	8
Safer Recruitment Training.....	9
Shortlisting	9
4. INVITATION TO INTERVIEW	9
5. PRE-INTERVIEW CHECKS	9
Self-Declaration	10
Searches	10
References.....	11
Reference Checking	12
Teaching Roles.....	12
Concerns on References.....	12
6. THE INTERVIEW.....	12
Remote Recruitment	13
7. AFTER THE INTERVIEW	14
Interview Notes	15
Low-Level Concerns.....	15
8. PRE-APPOINTMENT CHECKS	15
Internal Promotions.....	15

References	16
Enhanced Disclosure and Children Barred List Check	16
Right to Work	16
Visas & Residence Permits	17
Occupational Health Check.....	17
Prohibition from Teaching Check	18
Overseas Checks	18
Childcare Disqualification Regulation	19
Professional Registration and Qualifications.....	19
9. NON-EMPLOYEES AND SAFER RECRUITMENT	19
Agency and Third-Party Employees	19
Contractors.....	20
Trainee and Student Teachers	20
Volunteers	20
10. REFERRALS TO THE DBS AND TEACHING REGULATION AGENCY	21
APPENDIX 1: DEFINITIONS	22
APPENDIX 2 - PROVIDING REFERENCES	24
APPENDIX 3: ROLE AND RESPONSIBILITIES – RECRUITMENT	25

Policy Statement

The Primary First Trust (the “Trust”) recognises that our employees are fundamental to our success and continue to provide outstanding education and support. We are also committed to having an inclusive workforce and, therefore, need to be able to attract and retain employees of the highest calibre.

This policy sets out to provide a sound framework for the recruitment and selection of candidates and our approach to recruitment, interviewing and pre-boarding checks to ensure:

- The best possible staff are recruited based on their merits, abilities and suitability for the position while having the appropriate attitude, values and behaviours to work with children.
- That all job applicants are considered equally and consistently.
- No job applicant is treated unfairly on any grounds, including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.
- Compliance with all relevant legislation, recommendations and guidance, including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (KCSIE), Disqualification Under the Childcare Act (2006) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- The Trust meets its commitment to safeguarding and promoting the welfare of children and young people by conducting all necessary pre-employment checks and by managing the recruitment process in a way that prevents, as far as possible, the recruitment of unsuitable individuals to work with children.

The purpose of safer recruitment is to ensure that the Trust has rigorous policies and procedures that help deter, reject or identify potential staff who might abuse children or adults at risk or who are otherwise unsuitable to work with them.

The Trust is also committed to promoting positive working relationships and providing a working environment where all employees are treated with dignity, fairness, and respect, as this starts at the first point of contact in the application process.

This policy aligns with the Trust value of Excellence, where we set high standards, champion ambition, and reward dedication.

Scope of this Policy and Procedure

This policy applies to all Trust employees and candidates. For guidance on recruiting volunteers, please see the Volunteer Recruitment Policy & Procedure.

This policy and procedure will be periodically reviewed. The People Team will notify employees of any amendments, and such written notice will inform them of the date when any modification takes effect.

This policy does not form part of employment contracts, and we reserve the right to

amend or withdraw it at any time.

Who should I contact with any Questions?

Questions on this policy and procedure should be directed to a member of the People Team at pftpeople@theprimaryfirsttrust.co.uk

If any aspect of this policy or procedure causes you difficulty on account of any disability or if you need assistance because English is not your first language, you should raise this issue with the People Team, who will make appropriate arrangements.



For further information, process maps, shortlisting guidance, and in-depth guidance for staff and managers is available at the [PFT Our People Hub](#).

Legislation and Guidance

This policy has due regard to all relevant legislation, including, but not limited to, the following:

- Keeping Children Safe in Education 2025/6
- Rehabilitation of Offenders Act 1974
- Children Act 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The UK General Data Protection Regulation (UK GDPR)

Monitoring The Impact of The Policy

This policy will be reviewed annually by the People & Culture Committee and updated annually in line with statutory changes and Trust priorities.

Data Protection

The Trust is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the Trust to enable the Trust to carry out the checks that are applicable to their role.

The Trust will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the Trust not being able to meet its employment, safeguarding or legal obligations.

The Trust will process any data, information, or evidence collected as part of this process



in accordance with our data protection policy. Data collected from the point at which we become aware of the issue is held securely and accessed by, and disclosed to, individuals only for the purposes of providing the necessary support.

1. Planning for Recruitment

Recruitment generally happens for three reasons:

- An employee leaves their role
- There is a business need for more employees in an existing role
- There is a business role for the new role

When considering filling a role, whether it is for a specific project or to fill a vacant position, the Hiring Manager should consider:

- Is the role necessary?
- Could the duties be performed by other employees within the team by developing the existing staff: this could be beneficial in various ways, not only in recruitment but also for the staff's growth and development.
- Is this an opportunity to reorganise the team?
- Could the working pattern be changed?
- Does the job description need updating?
- Are new skills needed? Establish if there is a need for specialist skills or knowledge.

2. Authorisation, Adverts and Candidate Management

The Trust utilises an Applicant Tracking System (ATS) – My New Term – to manage the entire candidate recruitment process, encompassing the posting of advertisements and communication with candidates.

Recruitment Authorisation

All roles must be authorised before being advertised. This is done via the My New Term System by posting a vacancy, completing the 'Reason for Vacancy' section, and submitting it for approval.

Advertising

Once the vacancy has been approved, all roles are posted on My New Term and the Department of Education websites as standard. All roles are also advertised internally on a weekly basis.

For non-teaching roles, online job boards are utilised, and specialist recruitment websites are engaged, if necessary, with careful regard for the Trust's Equality, Equity, Diversity, and Inclusion Policies, to ensure the advertisement reaches a diverse range of groups.

Roles are also advertised on the Trust's and School's Social Media feeds per the Trust's Social Media guidelines.

Adverts and Job Descriptions

The Trust uses standard Adverts and Job Descriptions to ensure continuity and a high



standard. The Trust's approach is to use job descriptions that define responsibilities and accountabilities, rather than listing job tasks.

The adverts show the following information for the role:

- The skills, abilities, experience, attitude, and behaviours necessary for the role.
- The safeguarding requirements include the extent of the role's contact with children and whether the appointed staff member will be engaging in regulated activity.

Advertisements will include:

- A statement of the school's commitment to safeguarding and promoting the welfare of pupils, while clearly stating that safeguarding checks will be conducted.
- The safeguarding duties of the role are outlined in the job description and person specification.
- Information regarding whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013, and 2020.

All adverts will also display the closing and interview dates, along with the contact details of a staff member to whom candidates can reach out about the role and for an informal chat.

The Trust reserves the right to conduct interviews for this position earlier than the stated closing date if a suitable candidate is identified. Therefore, early submission is encouraged.

Recruitment Agencies

The Trust only engages with recruitment agencies when a clear business case has been approved by the Chief People Officer prior to engagement. A member of the PFT People Team must make all contact with recruitment agencies.

3. Applications and Short Listing

All applications for roles with the Trust are made via the Application Tracking System, and the Trust does not accept application forms or CVs.

Recruitment Panel

A recruitment panel, consisting of at least two staff members, will be set up for all recruitment processes. The panel will include the Hiring Manager, who is responsible for overseeing the entire recruitment process. At least one member of the panel must have completed the latest Safer Recruitment Training.

If a member of the recruitment panel knows a candidate personally, they must declare this as a conflict of interest as soon as they become aware of it and refrain from any further involvement in the process.

Safer Recruitment Training

At least one member of the recruitment panel will have completed formal Safer Recruitment training through the National College. This training needs to be updated every two years or in response to any changes in legislation or guidance.

The other members of the Recruitment Panel will have an awareness of this policy and the following:

- The recruitment and selection process
- Pre-appointment and vetting checks, regulated activity and recording of information
- Other checks that may be necessary for staff, volunteers and others
- How to ensure the ongoing safeguarding of children and legal reporting duties on employers

Shortlisting

Candidates who are shortlisted will meet all the essential aspects of the person specification requirements. The Trust will ensure that the shortlisting process is as systematic as possible and that the recruitment panel reviews all applications. Each panel member will produce their shortlist, which will then be collated and discussed. Candidates will be assessed against the same shortlisting criteria to ensure a fair process.

As part of the shortlisting process, the candidate's application will be assessed for any inconsistencies or gaps in their employment history and the reasons provided, and all potential concerns will be considered.

Requests for further information from candidates will be responded to promptly, and all candidates will be informed via My New Term whether they have been shortlisted or not.

4. Invitation to Interview

Once a shortlist has been finalised, the Hiring Manager needs to update the candidates through My New Term.

Along with details about the interview arrangements, including how they will be conducted, the areas to be explored, and the documents candidates should bring, each candidate will also receive a pack with the following information:

- The job description and person specification
- Any equal rights material, e.g. an equal opportunities statement
- A brief outline of the Trust and school, its values and aims
- Any relevant school policies, e.g. the Child Protection and Safeguarding Policy

5. Pre-interview checks

The Hiring Manager will liaise with the PFT People Team Administrator to ensure that the following pre-interview checks are carried out:

- Subject to the candidate allowing the Trust to contact their references, two references will be obtained directly from each shortlisted candidate's referees. Where possible, one of these references will pertain to the role in which the candidate worked with children.
- Checking references against application forms, noting down discrepancies or concerns, and following up on these concerns with referees.
- Checking and, where necessary, following up on candidates' self-declaration forms

Self-Declaration

Shortlisted candidates will be asked to complete a self-declaration via My New Team and asked to disclose any relevant information, including:

- If they have a criminal history.
- If they are included on the children's barred list.
- If they are prohibited from teaching.
- If they are prohibited from taking part in the management of an independent school.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.

Shortlisted candidates must sign the declaration and a physical copy of their application form to confirm that the information they have provided is accurate and true.

Searches

In line with KCSIE, the Trust will conduct online searches on shortlisted candidates as part of its due diligence. These searches are solely meant to help identify any incidents or issues that have occurred and are publicly accessible online, which the school may wish to discuss with the applicant during the interview.

Online searches will be conducted on shortlisted candidates only and undertaken by the PFT People Team Administrator or school administrator who is not part of the shortlist and interview process to minimise the risk of bias or discrimination and ensure that only relevant information is considered.

The Trust will consider any potential risks associated with online searches, such as unlawful discrimination or invasion of privacy, and will ensure that staff conducting online searches are clear about the purpose of the search.

Online searches will only review publicly accessible data. No requests to 'follow' or send friend requests will be made to shortlisted candidates on social media platforms to obtain additional details or information.

The online search process may include searching for the candidate by name via search engines and social media platforms.

When carrying out searches of shortlisted candidates' online presence, the Trust will look out for indicators of concern, such as:

- Inappropriate behaviour, jokes or language.
- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the candidate may not be suitable to work with children.
- Anything that could harm the reputation of the school or the Trust.

Any concerns will be addressed during the interview process. The Trust will ensure that candidates are allowed to discuss any concerns raised by the online search.

References

References will be requested through My New Term, which uses a standard reference form designed for the referee's role. Electronic references will be checked to ensure that they originate from a legitimate source.

One reference must be from the candidate's current or most recent employer. If the candidate is unemployed, confirmation of their most recent period of employment and the reasons for leaving will be obtained from their previous employer. Where possible, at least one reference will be from an employment setting where the candidate has worked with children.

When seeking references, we will:

- Do not accept open references (e.g. "to whom it may concern").
- Do not accept references from family members.
- Liaise directly with referees and verify any information contained within the references with them.
- Ensure all references come from the candidate's current employer and are completed by a senior individual. When the referee is based in a school, we will ask the headteacher to confirm the reference's accuracy regarding disciplinary investigations.
- Secure a reference from the relevant employer from the last time the candidate worked with children, if they are not currently working with children. If the applicant has never worked with children, ensure that a reference is from their current employer, training provider, or educational setting.
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or where insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before the appointment is confirmed
- 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

Reference Checking

References will be checked upon receipt to ensure that all questions have been answered satisfactorily and that information is not contradictory or incomplete.

The referee will be contacted to provide further clarification where necessary, such as when answers could be more detailed or if contradictory information has been provided. The reference will be checked for consistency with the information on the candidate's application form. Any discrepancies between the reference and the application form will be discussed with the candidate during the interview or prior to it, as necessary.

Where a reference appears incomplete or other concerns arise, the Trust will carry out one of the following actions:

- Call the referee to discuss the reference further
- Email the referee the reference for confirmation of its accuracy

The Hiring Manager will ensure that any past disciplinary actions or allegations disclosed as part of a reference are carefully considered when assessing the candidate's suitability for the role. If this involves safeguarding or potential safeguarding concerns, the DSL will be consulted to help assess the candidate's suitability.

Teaching Roles

When a candidate applies for a teaching position, including senior management roles in a school, they will be asked to provide information about any capability procedures they have undergone in the past two years, along with the reasons for these procedures.

Concerns on References

Any concerns will be resolved satisfactorily before confirming an appointment. Where appropriate, they can be explored further with the referee and discussed with the candidate at the interview.

A People Team member must be consulted when there are concerns over a reference before deciding not to appoint a candidate based on an unsatisfactory reference. Once the decision is made, the Hiring Manager will record this as the reason for non-appointment on the recruitment file.

6. The Interview

The recruitment panel will ask open-ended questions to assess the candidate's experience and suitability for the role, as well as to explore their motivation for safeguarding and their ability to work with children. The responses will be recorded to enable comparison among the panel members.

Interview questions seek to:

- Find out what attracted the candidate to the post being applied for and their motivation for working with children.

- Exploring their skills and asking for examples of their experience working with children.
- Looking at any gaps in employment or where the candidate has changed employment or location frequently, and asking about the reasons for this.
- Seek examples of the candidate's previous experience.

The Trust may employ various selection methods to identify the most suitable candidate for the position, including psychometric testing, exercises, lesson observation, group work, and assemblies.

Interviews will also be used to identify potential concerns and assess the applicant's suitability to work with children, including discussing any issues raised by contact with referees with the candidate at this stage.

Areas that may raise concerns and lead to further enquiry include:

- The implication that adults and children are equal.
- Lack of recognition or understanding of the vulnerability of children.
- Inappropriate idealisation of children.
- Inadequate understanding of appropriate boundaries between adults and children.
- Indicators of negative safeguarding behaviours.
- Attempts to push or overstep boundaries.
- Consistent rule-breaking behaviour.

Candidates will also be asked to show proof of identification and qualifications at the interview. The interview panel will view and check this proof and reconfirm the contents of the self-disclosure form.

The candidate will also be given the opportunity to discuss any concerns or ask any questions.

Remote Recruitment

The Trust may conduct initial or first-round interviews online. However, second-round or final interviews must be conducted face-to-face.

The recruitment panel members conducting an online interview will ensure they understand how to operate the relevant functionalities of the online interview platform, such as sharing their screen before the interview begins and adjusting privacy settings appropriately on the provider's site or application.

The Trust is aware of and considers the potential risks associated with online communication, such as the ease of anonymity, and will take appropriate precautions, including encrypting data where feasible.

The Hiring Manager will communicate their expectations to candidates about using the online platform well in advance of the interview. These expectations will include, but will not be limited to, the following:

- The candidate will participate in the interview with both the video camera and

microphone features enabled at all required times

- The candidate will participate in the interview in a suitable setting – a quiet area with a neutral background
- The candidate will keep personal information, which is not relevant to the recruitment process, private, e.g. their email password, and will not ask the staff members interviewing to share any such private information.

The Hiring Manager will ensure that any tasks set for candidates during the interview are compatible with the online nature of the interview, e.g. they do not require the exchange of physical paper resources.

When recording an online interview, prior written permission will be obtained from the candidate via email, and all interview participants will be notified via email before the interview commences. They will also be notified again once they have joined the interview and the recording is about to begin. If the candidate does not provide consent to recording the interview, the school will consider whether the online interview can still take place in line with the Trust's safeguarding and records management responsibilities.

The Trust will not discriminate against candidates who are recruited remotely; they will be considered reasonably alongside any candidates who are not recruited remotely.

If a candidate refuses to interview remotely, the school will consider whether alternative arrangements for an in-person interview are possible, taking into account the school's duty to promote equality at all times. If this is not possible, the school will sensitively inform the candidate that the remote interview process is a requirement of the application process and have a considerate and good-natured discussion with them regarding whether they can continue with the recruitment process at this time.



For further information on remote interviews, please see the DfE's advice on [‘Attending your first remote interview’](#) prior to the interview.

7. After the Interview

Once the interviews are completed, the recruitment panel will evaluate all candidates' performance using the same agreed criteria and decide who will be appointed.

The Hiring Manager will offer the role to the successful candidate(s), subject to the completion of pre-employment checks, and confirm their verbal acceptance of the role.

The outcome of the interview is confirmed in writing via My New Term for successful and unsuccessful candidates.

Once the successful candidate has accepted the role, the Hiring Manager will update My New Term to indicate who was successful and who was not. They also need to ensure that the PFT People Team Administrator is informed so they can initiate the Pre-employment checks.

The Hiring Manager should also provide verbal feedback to the unsuccessful candidates if requested, based on evidence of their performance against the person specification for the role.

Interview Notes

All interview notes and assessment materials will be securely stored for an appropriate period after the interviews, on the candidate's record in the Applicant Tracking System, in case any aspect of the recruitment process is challenged.

Low-Level Concerns

If a low-level safeguarding concern is identified during recruitment (e.g. through references or interviews), it will be:

- Recorded confidentially.
- Reviewed by a Designated Safeguarding Lead (DSL) at the school level.
- Considered in the context of other information.
- Escalated if they meet the harm threshold.

8. Pre-Appointment Checks

All appointments will be conditional upon the satisfactory completion of the necessary pre-appointment checks. The PFT People Team Administrator will carry out or start the process for the following checks:

- References
- Enhanced Disclosure and Children and Barred List Check
- Right to Work in the UK
- Occupational Health Check
- Prohibition from Teaching Check
- Section 128 Check
- Overseas Checks
- Childcare Disqualification Regulation
- Professional Registration and Qualifications

These checks aim to determine whether anything would render the candidate unsuitable for working with children or as a teacher.

All the above are recorded in the Trust's Single Central Record (SCR)

Internal Promotions

Where a staff member has been internally promoted to a significantly different role, e.g.

- Teaching Assistant to Higher Level Teaching Assistant.
- The teacher becomes a Assistant Headteacher
- Assistant Headteacher becomes a Deputy Headteacher
- Deputy Headteacher becomes a Headteacher

The Trust will undertake a new:

- Enhanced DBS Check with Barred List Check
- Prohibition from teaching check (for teaching staff)
- Qualifications check (if required for the role)
- Section 128 check (for management positions)

The Right to Work, Overseas check, and original references will be carried over from the original point of recruitment. We will also request a new reference from an SLT member in the school, based on the change in role.

If a member of staff changes their hours or an Early Careers Teacher becomes a Qualified Teacher, the new checks are not needed.

References

References will be requested if they were not previously obtained before the interview.

Any references received are subject to signing off by the Hiring Manager.

Enhanced Disclosure and Children Barred List Check

All roles in the Trust are subject to an Enhanced Disclosure & Barring Service (DBS) and Children Barred List check. This is completed via the SCR Tracker System and utilises Digital ID to confirm the candidate's identity without requiring physical verification of documentation.

In cases where information is disclosed on the DBS certificate, the Hiring Manager will assess all cases fairly and individually. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented to enable the Trust to defend its decision if challenged.

The Trust will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post to which they have applied to
- How long ago the offence occurred
- The country where the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances surrounding and at the time of the incident
- Whether the individual accepted responsibility for what happened
- Whether the offence has been decriminalised

If a candidate is part of the DBS Update service, we will use their original DBS certificate and information from the DBS Update service, rather than requesting a new DBS certificate.

Right to Work



All roles in the Trust are subject to a Right to Work check, which is also completed via the SCR Tracker System. Digital ID is used to confirm the candidate's identity without the need to check documentation physically.

The Trust will not make assumptions about a person's right to work in the UK or their immigration status based on their race, ethnicity, nationality, length of residence in the UK or background. All candidates, including British citizens, will have their right to work in the UK checked.

Visas & Residence Permits

The Trust is unable to sponsor candidates requiring a visa to work; however, candidates may be eligible to work under certain visa conditions.

Where applicable, overseas recruits must provide original Visa/ Residence Permit documents to be checked and copied by the People Team. The copy taken must be kept on their personnel file, along with the completed Home Office Right to Work Checklist; dates and restrictions must be checked and recorded, to ensure that any required repeat checks are conducted, prior to the expiry date.

In cases of candidates being on a visa or residence permit, they will be offered a fixed-term contract until the expiry date of the Visa or residence permit

Occupational Health Check

All appointments are subject to confirmation of a candidate's mental and physical fitness to perform their role. The Trust's Occupational Health Service conducts this assessment and will confirm whether the candidate is fit for the role or if any reasonable adjustments are required.

The Trust is legally obliged to verify the medical fitness of anyone appointed to a role within the Trust after an offer of employment has been made but before the appointment is finalised. It is the Trust's policy that all applicants offered employment must complete a medical questionnaire.

This information will be analysed against the job description for the specific role, along with details of any other physical or mental requirements, such as the proposed timetable and co-curricular activities.

If the Trust has concerns about a candidate's fitness, it will consider reasonable adjustments in consultation with the applicant. The Trust may also obtain a further medical opinion from a specialist or request that the candidate undergo a full medical assessment.

The Trust recognises its obligations under the Equality Act 2010. No job offer will be withdrawn without first consulting the candidate, reviewing medical evidence, considering reasonable adjustments, and exploring suitable alternative employment.

Section 128 Check



For all management, trustees, members and governor roles, a Section 128 check will be completed.

The school will use the Employer Secure Access sign-in portal, accessible via the Teaching Regulation Agency Teacher Services web page, to check if a proposed governor is barred as a result of being subject to a Section 128 direction.

Prohibition from Teaching Check

Due to the nature of our roles in the schools, all candidates will undergo a Secretary of State Teacher Prohibition Order check to ensure that they are not prohibited from teaching as defined in the Teachers' Disciplinary (England) Regulations 2012.

In doing so, the Trust applies the definition of 'teaching work' set out in the Teachers' Disciplinary (England) Regulations (2012), which states that the following activities amount to 'teaching work':

- Planning and preparing lessons and courses for pupils
- Delivering lessons to pupils
- Assessing the development, progress and attainment of pupils; and
- Reporting on the development, progress and attainment of pupils

The Trust uses the Teachers' Service System to check whether successful applicants are subject to a prohibition or interim prohibition, an order issued by a professional conduct panel on behalf of the Teacher Regulation Agency (TRA).

In addition, we ask all candidates for roles which involve 'teaching work' to declare in the application whether they:

- Have they ever been the subject of a sanction, restriction or prohibition issued by the TRA, or any predecessor or successor body; and
- Have they ever been the subject of any proceedings before a professional conduct panel of the TRA, or equivalent body in the UK.

The Trust recognises that a prohibition from teaching may not last indefinitely, and the existence of any relevant information is not a bar to employment at the Trust.

The Trust also notes that professional conduct panels do not always impose sanctions on the subject of the hearing. However, to fully assess the suitability of the applicant, the Trust considers it important that all relevant information is provided during the recruitment process. If an applicant is not currently barred from teaching but has previously been the subject of a professional conduct hearing resulting in a sanction, or if a sanction has expired or been lifted, the Trust will evaluate whether the circumstances of the case make the applicant unsuitable to work at the Trust.

Overseas Checks

For candidates who have resided in another country outside the UK, including EEA countries for more than three months within the last ten years, all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary.

This includes an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

Candidates will need to supply a Certificate of Good Conduct/ Overseas Police Check from that country (where available).

Where a Certificate of Good Conduct/ Overseas Police Check is delayed and has yet to be issued, a candidate may be permitted to start if all other pre-employment checks have been satisfactorily completed. A risk assessment will be completed, with safeguarding procedures put in place to ensure the new joiner is appropriately supervised. The candidate must be aware of and agree to these procedures until the required check is completed.

For anyone who has taught overseas, The Trust will contact the relevant teaching regulatory body to confirm that the person was a registered teacher and that there are no known concerns about their suitability.

Childcare Disqualification Regulation

The 2018 Childcare Disqualification Regulations required the Trust to undertake a Childcare Disqualification check for staff and management working with reception class children under five or children under eight in wraparound care settings.

Due to the nature and working of the roles in schools, this check is completed for all staff working across the Trust.

Professional Registration and Qualifications

For candidates who are required to hold and maintain a professional registration, original documentation evidencing this must be checked against the relevant register to ensure they are fit to practice and not in contravention of a prohibition order, an interim prohibition order, or any other disqualification or restriction.

A copy of the candidate's professional qualifications will be reviewed and kept on the candidate's electronic file.

9. Non-Employees and Safer Recruitment

Agency and Third-Party Employees

Where an employee working at the school is sourced from an agency or third-party organisation. e.g., catering staff, cleaners, sports coaches, music clubs, etc. This includes online delivery to pupils.

The Trust will obtain written confirmation (Letter of Assurance) from their employer that they have carried out the same safer recruitment checks that the Trust would otherwise perform on any individual working for the Trust.

A copy of the enhanced DBS certificate will be obtained from the agency or third-party organisation where it was obtained before the person is due to commence work and has



disclosed any relevant matter or information.

The employee ID will be obtained once they have verified that they are the same person for whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate.

Contractors

A contractor is a person whom the Trust does not employ; in most cases, they will be self-employed and unable to obtain a DBS check themselves, as self-employed individuals cannot apply directly to the DBS.

Contractors engaged by the Trust must undergo the same safer recruitment checks for their employees as the Trust is required to complete for its own staff.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we determine that an individual falls outside the scope of these regulations and we do not conduct such checks, we will maintain a record of our assessment. This will include our evaluation of any risks and control measures implemented, as well as any advice sought.

For all other contractors who are not engaging in regulated activity but whose work provides them with regular contact opportunities with children, an enhanced DBS check (excluding barred list information) will be required. Under no circumstances will a contractor, with respect to whom no checks have been obtained, be allowed to work unsupervised or engage in a regulated activity.

Trainee and Student Teachers

The Trust will ensure that enhanced DBS certificates and barred list checks are obtained on all salaried candidates for initial teacher training who are in regulated activity.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. The school will obtain written confirmation from the training provider that the checks have been carried out. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and the Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all new volunteers working in regulated activities.
- Conduct a risk assessment when deciding whether to request an enhanced DBS

check without barred list information for any volunteers not involved in regulated activity. We will retain a record of this risk assessment.

- Obtain references for volunteers before they are recruited.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and the Childcare Act 2006. Where we determine that an individual falls outside the scope of these regulations and we do not conduct such checks, we will maintain a record of our assessment. This will include our evaluation of any risks and control measures implemented, as well as any advice sought.

For Trustees and Governor Partners, an identity check, a right to work in the UK, and a Section 128 check are additionally required, alongside the checks listed above.

10. Referrals to the DBS and Teaching Regulation Agency

This policy is primarily concerned with promoting safer recruitment and outlines the pre-employment checks that will be undertaken. Whilst these are pre-employment checks, the Trust has a legal duty to refer to the DBS:

- Any applicant who has applied for a position at the Trust despite being barred from working with children, or
- Anyone who has harmed, or poses a risk of harm to, a child, and has been removed from working (paid or unpaid) in a regulated activity or would have been removed had they not left.

Failure to refer in circumstances where the above criteria are met is an offence. Where there are serious concerns about a teacher's suitability to work with children, separate consideration will be given to whether a referral to the TRA should be made. This is the case irrespective of whether the DBS criteria have been met.

Appendix 1: Definitions

The following definitions are used in this document:

“Regulated activity” includes:

- Being responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.
- Working for a limited range of establishments (known as ‘specified places’, which include schools and colleges), or in connection with the purposes of the establishment, with the opportunity for contact with children, but not including work undertaken by supervised volunteers.
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Regulated activities do not include:

- Paid work in specified places which is occasional and temporary and does not involve teaching or training.
- Supervised activities which are paid in non-specified settings.
- A supervised volunteer who regularly teaches or looks after children.

“Teaching role” refers to a role involving planning and preparing lessons and courses for pupils; delivering lessons to pupils; and assessing and reporting on the development, progress and attainment of pupils. These activities are not teaching work for the purposes of KCSIE if the person carrying out the activity does so (other than for the purposes of induction), subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

A “standard DBS” provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.

An “enhanced DBS” provides the same information as the standard DBS, plus any additional information, e.g. interviews and allegations, held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

An “enhanced DBS with barred list check” check is required for when people are working or seeking to work in regulated activity with children. This check allows for additional checks to be made as to whether the person appears on the children’s barred list.

The “children’s barred list” is a list maintained by the DBS which covers individuals who are unsuitable to work with children and vulnerable adults. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the candidate is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.

A “section 128 check” provides for the Secretary of State to direct that a person may be



prohibited or restricted from participating in the management of an independent school (which includes academies and free schools). A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a governor of a maintained school.

“Safer recruitment” is the safeguarding and protection of pupils during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

Appendix 2 - Providing References

References will only be provided once written consent has been obtained from the person requesting a reference.

The member of staff providing a reference will follow this policy's procedures and the prospective employer's requests as much as is reasonably possible, e.g. if a pro-forma is provided, they will complete the form. If the reference is not requested in a specific format, the member of staff will decide the most appropriate method, e.g. a pro-forma or a letter-formatted reference.

The headteacher will decide, in exceptional circumstances, whether a reference cannot be provided or if specific questions asked by the prospective employer cannot be answered, seeking PFT People Team advice when appropriate.

Staff members will make the headteacher aware when they have been asked to provide a personal reference, e.g. for a current or former colleague. The staff member will make it clear within the reference that it is a personal one and is not written for or on behalf of the school. The staff member will use their own paper or an email address unaffiliated with the school and ensure that the reference is not linked to the school in any way.

Details of any capability procedures in the previous two years for a teacher (including headteacher) or former teacher at the school, and the reasons for these, will be provided if requested.

If, as part of a settlement agreement, the school has agreed to provide a reference for a member of staff, the headteacher will ensure it is provided in line with the agreement and this policy. In circumstances where new evidence emerges that indicates information provided in the reference is incorrect, the headteacher will decide if the reference is changed or withdrawn, with legal advice sought where necessary, and will notify the employee of any decision first.

The school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

Appendix 3: Role and Responsibilities – Recruitment

Task	Responsibility	System / Link
Request a role	Headteacher / School	My New Term
Authorise role	CEO / DCEO / CFO / HRL	My New Term
Publish role	Human Resources Lead / People Team Administrator	My New Term
Organise Interviews	Hiring Manager / School	My New Term
Shortlist	Hiring Manager / School	My New Term
Physical check of documents at interview	Hiring Manager / School	
Undertake Interviews	Hiring Manager / School	My New Term
Request Reference (Before Interview)	Hiring Manager / School	My New Term
Inform Candidates of Outcome	Hiring Manager / School	My New Term
Inform Human Resources of the Outcome	Hiring Manager / School	My New Term
Open SCR Record	People Team Administrator	Sign In Central Record
Collect and Save Interview Notes	Hiring Manager / School	My New Term
Issue Offer Letter / Contract / Starter Pack	People Team Administrator	SAMPeople
Open HR & Payroll System Record	People Team Administrator	Catalyst
Request DBS	People Team Administrator	Sign In Central Record
Request Children's barred list (if not via DBS)	People Team Administrator	GOV.UK Link
Request Reference (After Interview)	People Team Administrator	My New Term
Request Right to Work Check	People Team Administrator	Sign In Central Record
Request Occupational Health Check	People Team Administrator	Occupational Health System
Request Section 128 Check (via DBS)	People Team Administrator	Sign In Central Record
Request Prohibition from Teaching Check	People Team Administrator	Check a Teachers Record - GOV.UK
Ensure Oversea Check is completed	Candidate / People Team Administrator	Recruit Teachers From Overseas - GOV.UK
Request Childcare Disqualification Check	People Team Administrator	Sign In Central Record – DBS Check
Professional Qualification Checks	People Team Administrator	
Request Teacher Qualification Check	People Team Administrator	Check a Teachers Record - GOV.UK
Update SCR with Outcomes	People Team Administrator	Sign In Central Record
Close Down Candidate Record in MNT	People Team Administrator	My New Term
Inform School and Confirm Start Date	People Team Administrator	
Starter Confirmation Letter Sent	People Team Administrator	SamPeople