



### 1. DISABILITY DISCRIMINATION ACT STATEMENT

The Directors, Chief Executive Officer, Principals, and senior management of Lumen Christi are committed to promoting equality of opportunity and full participation for disabled applicants, staff, pupils, and students.

Disabled people have the right to equal access to training, jobs, promotion, and facilities offered through the Lumen Christi schools and an equal opportunity to work and learn and receive reasonable resources and adjustments to cater for their needs.

At Lumen Christi, we will work proactively to identify and eliminate all forms of disability discrimination and to continually improve services to ensure an inclusive environment.

We are committed to developing training and guidance for staff to promote sensitivity and awareness of disability issues.

We are also committed to providing equal access and reasonable adjustments for disabled people to increase their opportunities.

Lumen Christi recognises the value of a diverse staff and school population and will provide equality of opportunity for all disabled pupils, students, and staff by:

- Taking effective action to prevent discrimination, bullying or harassment
- Promoting equality of access for all staff to education, training, and development
- Providing flexible learning and working opportunities to support differing aspirations and goals
- Promoting good practice in all activities such as recruitment, selection, promotion, and curriculum practices
- Listening to and involving disabled staff, pupils, and students in the development of services
- Eliminating discrimination that is unlawful under the Equality Act 2010
- Encouraging participation by disabled persons in public life
- Promoting fundamental British values

### 2. INTRODUCTION

This policy has been developed to embed safer recruitment practices and procedures throughout Lumen Christi schools and to support the creation of a safer culture by reinforcing the safeguarding and well-being of children in our care. This policy complies with guidance outlined in Keeping Children Safe in Education and will be reviewed annually.

This policy reinforces the expected conduct outlined in the Staff Code of Conduct and Whistleblowing Policy with which all staff are expected to be familiar. All successful candidates for paid and volunteer positions will be made aware of these documents.

This policy is an essential element in creating and maintaining a safe and supportive environment for students, pupils, staff, and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- Attracting the best possible candidates/volunteers to vacancies
- Deterring prospective candidates/volunteers who are unsuitable from applying for vacancies
- Identifying and rejecting those candidates who are unsuitable to work with children and young people

Lumen Christi is committed to using procedures that deal effectively with those adults who fail to comply with our safeguarding and child protection policies and procedures.

As an employer, we are under a duty to refer any allegation of abuse made against a member of staff to the Designated Officer for the Local Authority (LADO) within one working day of the allegation being made. A referral will be made if a teacher or member of staff (including volunteers) has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicated he or she will pose a risk of harm if they work regularly or closely with children.
- Behaved in a way that indicates he/she is unsuitable to work with children

As an employer, we are under a duty to refer to the Disclosure and Barring Service (DBS), any member of staff who, following disciplinary investigation, is dismissed or resigns because of misconduct towards a child and we may refer any concerns we have before the completion of this process.

### 3. ROLES AND RESPONSIBILITIES

The School Standards Committee will:

- Ensure that the school, informed by Lumen Christi-wide policies, has effective policies and procedures in place for the safe and fair recruitment and selection of staff and volunteers in accordance with the Department for Education guidance and legal requirements.
- Monitor the school's compliance with them.
- Ensure that appropriate staff and Representatives have completed safer recruitment training (and repeat at least every three years)
- Ensure that the Principal reports compliance monitoring for the single central record on a termly basis

The Principal will:

- Ensure that the school operates safe and fair recruitment and selection procedures which are regularly reviewed and up-dated to reflect any changes to Lumen Christi-wide policy, legislation, and statutory guidance.
- Ensure that all appropriate checks have been carried out on staff and volunteers in the school.
- Promote the safety and well-being of children and young people at every stage of the process.
- Ensure the single central record is maintained and monitored for compliance on a monthly basis

Shared Services HR will:

- Lead and coordinate the recruitment and selection process across all schools and the central team, from pre-advert to interview.
- Develop and maintain standardised job descriptions, person specifications, and advertisement templates to ensure consistency and compliance with safer recruitment expectations.
- Conduct initial application reviews, identifying gaps in employment, safeguarding flags, or other concerns, and flagging these for panel consideration.
- Create and manage shortlisting grids to support objective and criteria-based candidate assessment.

- Undertake online searches for shortlisted candidates to ensure consistent due diligence in line with KCSIE guidance.
- Manage reference requests and verification, ensuring that all references are obtained, checked, and followed up where necessary before appointment decisions are made.
- Support interview panels by providing safeguarding-focused question banks and guidance on recording candidate responses.
- Monitor and support compliance with safer recruitment training requirements for all panel members.
- Oversee record-keeping practices, ensuring that recruitment documentation is stored securely and in line with GDPR and inspection requirements.
- Support the maintenance and audit of the Single Central Record (SCR) and personnel files to ensure they meet Ofsted and statutory expectations.
- Provide training and guidance to school leaders and administrative staff on safer recruitment procedures and policy updates.

### 4. RECRUITMENT AND SELECTION PROCESS

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

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

#### 4.1 ADVERTISING

When advertising roles, we will make clear:

- Lumen Christi's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken, including online checks
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

All advertisements for posts for regulated activity, paid or unpaid, will include the following statement:

*Lumen Christi Catholic Multi Academy is committed to safeguarding children and young people. All post holders in regulated activity are subject to appropriate vetting procedures and a satisfactory Enhanced Disclosure and Barring Service check.*

Advertisements for posts should also make clear that staff will be expected to promote fundamental British values.

When applying for a position, all applicants will receive a pack containing:

- A statement of the school's commitment to ensuring the safety and well-being of the pupils/students.
- A job description and person specification
- An application form (including the rehabilitation of offender declaration)
- Consent to obtain reference form

- They will also be advised where to find copies of the following policies:
  - Safeguarding Policy
  - Safer Recruitment Policy
  - Whistleblowing Policy
  - Staff and Volunteer Code of Conduct

Prospective applicants must complete, in full, and return a signed Catholic Education Service (CES) application form including the supplementary CES 'recruitment monitoring', consent to obtain references and 'rehabilitation of offender' declaration forms. Incomplete application forms will be returned to the applicant where the deadline for completed forms has not passed.

Candidates submitting an application form completed online will be asked to sign the form if called for interview.

A Curriculum Vitae will not be accepted in place of a completed application form.

### 4.2 SHORTLISTING

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- As part of our due diligence, we will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online, which we may want to explore with applicant at interview.

### 4.3 SEEKING REFERENCES AND CHECKING EMPLOYMENT HISTORY

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be

- confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### 4.4 INTERVIEW AND SELECTION

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### 4.5 PRE-APPOINTMENT VETTING CHECKS

We will record all information on the checks carried out in the post-holding school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

## 5. NEW STAFF

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

### Disqualification under the Childcare Act 2006

In accordance with the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006, Lumen Christi Catholic Multi Academy ensures that appropriate checks are carried out for relevant staff working in early years provision or later years provision for children under the age of 8.

These checks apply to:

- Staff directly involved in the provision of childcare.
- Staff who manage or are directly concerned with the management of such provision.

Lumen Christi will not knowingly employ a person who is disqualified under the 2018 Regulations. Where a disqualification is identified, or a person is unsure whether they are disqualified, they will be directed to apply to Ofsted for a waiver.

Where we determine that a role falls outside the scope of the disqualification requirements, we will record our rationale and any risk assessment undertaken in the individual's personnel file, in line with statutory guidance.

This approach reflects the clarification in Keeping Children Safe in Education 2024 that disqualification checks are only required for relevant childcare roles and not for all school staff.

### Regulated Activity:

Regulated activity in relation to children is defined as work that a barred person must not do. It includes:

- Unsupervised activities: teaching, training, instructing, caring for or supervising children, or providing advice/guidance on well-being.
- Work for a limited range of establishments (known as 'specified places'), such as schools, children's homes, and childcare premises, with the opportunity for contact with children.
- Relevant personal care: e.g. helping a child with eating or drinking due to illness or disability, or with toileting, washing, bathing, or dressing due to age, illness, or disability.
- Health care provided by or under the direction or supervision of a regulated health care professional.

This work is regulated activity only if done frequently (once a week or more), intensively (on 4 or more days in a 30-day period), or overnight (between 2am and 6am with the opportunity for face-to-face contact).

Some activities, such as personal or intimate care, are regulated activity even if done once and regardless of supervision.

## 6. EXISTING STAFF

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### 7. AGENCY AND THIRD-PARTY STAFF

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### 8. CONTRACTORS

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors and will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

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

For self-employed contractors such as music teachers or sports coaches working in Lumen Christi primary schools, 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 decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### 9. TRAINEE/STUDENT TEACHERS

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, in Lumen Christi primary schools this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### 10. 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 volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- 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 decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### 11. MEMBERS, DIRECTORS & SCHOOL STANDARDS COMMITTEE REPRESENTATIVES

All Directors and School Standards Committee Representatives will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

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

All Directors and School Standards Committee Representatives will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### 12. STAFF WORKING IN ALTERNATIVE PROVISION SETTINGS

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

### 13. ADULTS WHO SUPERVISE PUPILS ON WORK EXPERIENCE

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### 14. PUPILS STAYING WITH HOST FAMILIES

Where a Lumen Christi school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

# LUMEN CHRISTI CATHOLIC MULTI ACADEMY

## SAFER RECRUITMENT POLICY



Lumen Christi  
CATHOLIC MULTI ACADEMY

Where a Lumen Christi school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

<b>Date Approved/Approving Body:</b>	21 <sup>st</sup> May 2025, Board
<b>Signed:</b>	Bernard O'Driscoll, Acting Chair of the Board
<b>Minuted:</b>	Hollie Parrish, 21.5.25
<b>Date of Next Review:</b>	Summer 2026



Lumen Christi Catholic Multi Academy is a private company limited by guarantee, with charitable status, registered in England and Wales (company number: 09471525) and whose registered office address is at St. Thomas Aquinas Catholic School, Wychall Lane, Birmingham B38 8AP.

