



Safer Recruitment Policy

2026-2027

Person responsible for the Policy:	Jack Beech
Date Written:	February 2026
Signed:	
Date for Review:	August 2026 (Reviewed) August 2027
Key Changes Made:	

1. Policy statement and purpose

Everly East is committed to safeguarding and promoting the welfare of children and young people. We expect everyone who works for, or with, our school community to share this commitment and to engage in safe, fair, and inclusive recruitment practices that keep children safe—especially children with SEND who may have additional barriers to disclosure and help-seeking. Our approach follows the Department for Education’s statutory guidance **Keeping Children Safe in Education (KCSIE)**, **Working Together to Safeguard Children**, the **Independent School Standards (ISSR)** and the relevant inspection frameworks for independent schools.

2. Scope

This policy covers every stage of recruitment and ongoing safeguarding of adults working with pupils, including: role design, advertising, shortlisting, interviewing, preemployment vetting, decisionmaking, onboarding/induction, probation, ongoing checks (where required), and recording on the **Single Central Record (SCR)**. It also covers volunteers, proprietors, contractors, supply/agency staff, and adults who work with our pupils in other settings (e.g., alternative provision).

3. Roles and responsibilities

- **Proprietor Body:**
Ensures the school meets safer recruitment standards, that at least one person on every recruitment panel has current safer recruitment training, and that leadership/management arrangements promote pupils’ welfare. Approves and annually reviews this policy and scrutinises compliance via SCR audits.
- **Headteacher:**
Implements this policy; ensures robust processes and quality assurance; ensures all preemployment checks are completed, recorded, and retained lawfully; notifies the proprietor of material risks or incidents.
- **Designated Safeguarding Lead (DSL):**
Advises on risk assessments (including any supervised start in rare, justified cases); delivers induction on safeguarding and code of conduct; assures alignment with child protection procedures (KCSIE Part 4).
- **Recruiting Managers/Panel Members:**
Apply safer recruitment principles throughout; use school application forms; probe gaps/inconsistencies; seek and verify references; complete interview records; ensure the SCR is updated.

- **Proprietor Body**

Completes, evidences, and records vetting; maintains SCR to ISSR/KCSIE standards; schedules periodic internal audits.

4. A safer recruitment culture

We actively promote safeguarding in all recruitment communications and processes. That will include:

- **Adverts and candidate packs** stating our safeguarding commitment and that safeguarding checks will be undertaken, including online searches for shortlisted candidates where appropriate.
 - **Role descriptions and person specifications** that are explicit about safeguarding responsibilities (all roles) and leadership/management responsibilities (where applicable).
 - **Application form** (no CVs alone) capturing full chronological employment history, reasons for leaving, qualifications, and declaration of legal/disciplinary matters under the ROA Exceptions Order.
 - **Shortlisting** that scrutinises gaps/anomalies and plans interview probes accordingly; conducts **online (open-source) searches** proportionately to help identify any incidents or issues that may be relevant to the candidate's suitability to work with children.
 - **Interviews** with at least one panel member trained in safer recruitment; questions test values, safeguarding judgment, and professional boundaries; scenariobased questions include SENDspecific safeguarding prompts. All of our proprietors are trained in Safer Recruitment from The National Online College.
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5. References

We obtain **two references**, one from the current or most recent employer (and most recent education employer if applicable), verified independently (school email/telephone) and scrutinised for safeguarding concerns, disciplinary issues (including those that meet/approach the harm threshold), and patterns of absence/concern. Open testimonials or "to whom it may concern" references will not be accepted.

6. Pre-employment checks (all appointments as applicable)

Pre-employment vetting is completed **before start**. Exceptionally, if a start is unavoidable before all checks are returned, the Headteacher may authorise a **time-limited, supervised start** with a **written risk assessment** and a clear long-stop date; barred-list checks (where eligible), identity and right-to-work must always be completed first. All outcomes and dates are recorded on the SCR.

6.1 Identity

Verified from original, current documents (photo ID, address). Keep a record of what was checked, by whom, and when.

6.2 Right to work in the UK

Checked in line with Home Office requirements and recorded on the SCR.

6.3 Enhanced DBS certificate (children's workforce) and children's barred-list check (where eligible)

- **Enhanced DBS** for all employees and regular volunteers in regulated activity; **barred-list** where the role is regulated activity with children. For some roles not in regulated activity (e.g., supervised volunteers) the barred list is not available. Follow KCSIE and DBS eligibility rules.
- Where an applicant has lived or worked overseas, make **overseas criminal record checks** and seek a letter of professional standing (where relevant).

6.4 Prohibitions, directions, sanctions and restrictions (Teaching Regulation Agency checks)

For teaching roles (including those with teaching work), check the teacher's record for **prohibition from teaching**, QTS/induction status, and any sanctions/restrictions via DfE services (or confirm via agency). Record the date and outcome.

6.5 Section 128 direction (management prohibition)

Mandatory for those taking part in management in **independent schools**—including proprietors, Headteacher, SLT, and typically heads of department/year depending on role design; evidence on SCR. Often combined via barredlist route for those in regulated activity; otherwise via DfE route or the published list.

6.6 Qualifications and professional registrations

Verify essential qualifications and professional registrations stated in the person specification (e.g., QTS, therapy/professional registrations for specialist roles).

6.7 Employment history and explanation of gaps

Cross-check the application, references, and interview responses; record rationale for clearance.

6.8 Childcare Disqualification (where applicable)

Apply **Disqualification under the Childcare Act 2006** where the role involves relevant early years or later years childcare (including wraparound for under-8s). Note that **disqualification by association** no longer applies in schools/non-domestic settings since 2018.

6.9 Rehabilitation of Offenders Act disclosures

Schools are excepted for many roles; candidates must disclose relevant spent convictions/cautions subject to filtering rules; handle disclosures lawfully and proportionately.

6.10 Data protection and privacy

We process recruitment data under UK GDPR/DPA 2018 (lawful basis typically **legitimate interests** pre-offer, **legal obligation** for vetting, and **employment** post-offer). We follow ICO guidance on recruitment/selection and DfE data protection in schools. Privacy notices explain what we collect, why, retention, and candidate rights.

7. Additional arrangements by engagement type

7.1 Supply/agency staff

We obtain written confirmation from the agency that all required checks have been completed in line with KCSIE, including DBS, barred-list (if applicable), right-to-work, identity, references, and—where relevant—TRA and **Section 128**. We verify the individual's identity on arrival and record the checks/confirmation on the SCR.

7.2 Contractors

Contractors and their employees who work regularly on site when children are present are subject to appropriate checks proportionate to their access/role. Supervision arrangements are risk-assessed and documented. SCR entries cover those in regular contact.

7.3 Volunteers

- **Regular/unsupervised volunteers in regulated activity:** Enhanced DBS + barred-list.
- **Supervised volunteers (not in regulated activity):** Enhanced DBS (no barred-list) may be obtained following risk assessment.

We apply proportionate checks and record on the SCR.

7.4 Proprietors

All proprietors receive the appropriate **enhanced DBS** (type depends on access), **identity**, **right to work** as relevant, **Section 128** (mandatory), and other checks as per role. Record on SCR.

7.5 Adults working with our pupils off site (e.g., alternative provision)

We obtain and record assurance about vetting and safeguarding culture from the host provider; we remain responsible for safeguarding of pupils we place.

8. Single Central Record (SCR)

We maintain an SCR that is **accurate, accessible, current**, and aligned to ISSR and KCSIE requirements. For each person, the SCR records (as applicable): identity, **enhanced DBS** (and barred-list where relevant), right-to-work, qualifications (if required), **TRA** prohibition, **Section 128**, overseas checks, references, and the **date** and **initials** of the checker. Regular internal audits and leadership scrutiny are scheduled and documented.

9. SEND sensitive practice

As a special independent school, our processes reflect the additional vulnerabilities and communication needs of pupils with SEND. Recruitment materials, interviews, and induction emphasise: professional curiosity; communication strategies; intimate care and physical intervention boundaries; and safer working practice adapted to complex needs. (KCSIE highlights extra safeguarding considerations for pupils with SEND.)

10. Decision making, conditional offers, and onboarding

- **Conditional offers** are issued only after satisfactory interview outcomes and pending completion of all mandatory checks. Conditions are explicit, time-bound, and include withdrawal where checks are unsatisfactory.
- **Induction** includes: KCSIE Part 1 (or Annex A, as applicable), staff code of conduct, safeguarding/child protection policy, low-level concerns and whistleblowing, behaviour and positive handling, online safety, SEND safeguarding, and reporting lines to DSL.
- **Probation**: clear objectives and supervision; any safeguarding concerns are addressed immediately under KCSIE Part 4 processes.

11. Ongoing safeguarding of the workforce

- **Change in role**: where responsibilities move into management/teaching work, conduct any **additional checks** (e.g., **Section 128**) and update SCR.

- **Periodic rechecks:** We do not routinely repeat DBS checks without cause, but we may use the DBS Update Service or conduct targeted re-verification based on risk/role change.
- **Allegations and concerns about staff (including supply, contractors, volunteers):** Managed under KCSIE Part 4 (harm threshold and low-level concerns).

12. Information management and privacy

We apply **data minimisation**, secure handling and retention in line with UK GDPR/DPA 2018 and DfE's data protection guidance for schools. Recruitment privacy notices explain lawful bases, data sharing (e.g., DBS/TRA/DFE checks), retention schedules, and rights. We recognise ICO's guidance that **data protection is not a barrier to safeguarding** and information may be shared to protect a child.

13. Equality, diversity and inclusion

Our recruitment practices promote equality of opportunity and comply with the Equality Act 2010. We use objective criteria; make reasonable adjustments; and ensure no unlawful discrimination in vetting decisions—while prioritising child safety in line with KCSIE/ISSR.

14. Monitoring, assurance and review

- **Quality assurance:** termly SCR audits; sampling of recruitment files; review of conditional offers, risk assessments, and induction completion. Reported to the proprietor/governing body.
- **Policy review:** annually or sooner following updates to KCSIE, Working Together, ISSR, or inspection frameworks (including ISI/Ofsted updates for independent schools).

15. Linked policies and documents

- Child Protection and Safeguarding Policy (incl. KCSIE Part 4)
- Staff Code of Conduct / Safer Working Practice
- Behaviour and Relationships Management
- Online Safety
- Data Protection (incl. privacy notices)
- Whistleblowing / Low-Level Concerns

Appendices

Appendix A — Safer recruitment statement for adverts and packs

Everly East is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Our recruitment processes follow **Keeping Children Safe in Education**. All roles are subject to robust vetting, including an enhanced DBS (with barred-list where applicable), online searches for shortlisted candidates, verification of identity and right-to-work, professional references, and (for relevant roles) Teaching Regulation Agency and **Section 128** checks. [\[gov.uk\]](#), [\[gov.uk\]](#)

Appendix B — Pre-employment vetting checklist (file cover sheet)

- Identity (originals seen; details; date; checker) [\[gov.uk\]](#)
- Right-to-work (method; date; checker) [\[gov.uk\]](#)
- Enhanced DBS (number/date); Barred-list (if eligible) [\[gov.uk\]](#)
- Overseas criminal record checks / letters of professional standing (if applicable) [\[gov.uk\]](#)
- TRA: prohibition/QTS/induction status (if applicable) [\[schoolsweb...ire.gov.uk\]](#)
- **Section 128** (management roles) [\[gov.uk\]](#)
- Qualifications verified (as required) [\[gov.uk\]](#)
- Two references received and verified (dates; who verified; concerns addressed) [\[gov.uk\]](#)
- Employment history/gaps explored and recorded [\[gov.uk\]](#)
- Childcare Disqualification declaration (where applicable) [\[gov.uk\]](#)
- Online search completed for shortlisted candidate (date; summary; any follow-up) [\[gov.uk\]](#)
- Safeguarding risk assessment (if any supervised start) with review date [\[gov.uk\]](#)

Appendix C — Single Central Record (minimum fields)

For each person (as applicable): full name; role; ID check (date/checker); right-to-work (date/checker); enhanced DBS (date/number/issuing body); barred-list (date); TRA teacher prohibition (date); **Section 128** (date); qualifications (where required); overseas checks (date/type); references verified (date); **notes** column; **checker initials** and **review date**. Keep SCR **accurate, current, and auditable**. [\[assets.pub...ice.gov.uk\]](#), [\[leap.hilli...don.gov.uk\]](#), [\[onlinescr.co.uk\]](#)

Appendix D — Handling ROA disclosures (summary for panels)

- Explain ROA Exceptions in schools and DBS filtering; consider relevance, recency, pattern; record a **reasoned, proportionate** decision; consult DSL/Head as needed; keep data secure/minimised. [\[gov.uk\]](https://www.gov.uk), [\[legislation.gov.uk\]](https://www.legislation.gov.uk)

Appendix E — Data protection in recruitment (privacy summary)

- Lawful bases (pre-offer: legitimate interests; vetting: legal obligation; post-offer: employment), retention periods, candidate rights, and secure handling. Signpost ICO/DfE guidance in candidate information. [\[ico.org.uk\]](https://ico.org.uk), [\[gov.uk\]](https://www.gov.uk)

Key sources (statutory and inspection)

- **Keeping Children Safe in Education (current edition)** – safer recruitment (Part 3), allegations (Part 4), and SCR recording. [\[gov.uk\]](https://www.gov.uk), [\[assets.pub...ice.gov.uk\]](https://assets.publishing.service.gov.uk)
- **Working Together to Safeguard Children (2023, updated 2025 page)** – multi-agency safeguarding expectations. [\[gov.uk\]](https://www.gov.uk)
- **Independent School Standards (ISSR)** – Part 4 suitability and SCR expectations. [\[assets.pub...ice.gov.uk\]](https://assets.publishing.service.gov.uk)
- **Independent school inspection frameworks (ISI/Ofsted)** – inspection approach and emphasis on safeguarding assurance. [\[isi.net\]](https://www.isi.net), [\[gov.uk\]](https://www.gov.uk)
- **Section 128** guidance and list; **TRA** teacher prohibition checks. [\[gov.uk\]](https://www.gov.uk), [\[assets.pub...ice.gov.uk\]](https://assets.publishing.service.gov.uk), [\[schoolsweb...ire.gov.uk\]](https://schoolsweb.derbyshire.gov.uk)
- **Childcare Disqualification** guidance (2018) – scope and removal of “disqualification by association” for schools. [\[gov.uk\]](https://www.gov.uk), [\[wilsonslp.com\]](https://www.wilsonslp.com)
- **ROA & Exceptions Order** – what candidates must declare and how to handle spent convictions. [\[gov.uk\]](https://www.gov.uk), [\[legislation.gov.uk\]](https://www.legislation.gov.uk)
- **ICO recruitment & DfE data protection in schools** – lawful processing, online searches, retention, and rights. [\[ico.org.uk\]](https://ico.org.uk), [\[gov.uk\]](https://www.gov.uk)