

Safer Recruitment Policy

Document number:	2-5
School:	All
Issue:	3-5
Portfolio Director:	Director of Education, Safeguarding & Standards
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Approved by:	The Executive Board
Effective date:	1st September 2026
Next review due by:	1st September 2027

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2. Issue and Revision History

Issue	Description	Author	Effective Date
1.0	Initial Release	T. Warner	01/06/11
1.1	Review	T. Warner	01/09/12
2.0	Annual Review	T. Warner / J. Payne	26/08/13
2.1	Annual Review	T. Warner	02/09/14
2.2	Annual Review	D. Payne	27/08/15
2.3	Annual Review Renamed Policy to Safer Recruitment Policy Updated Summary Inclusion of KCSIE, SCR Inclusion of Rehab of Offenders Act 1974 Inclusion of Prevent duty Removal of Training	D. Payne / T. Warner	09/02/17
2.4	Annual Review	T. Warner	14/03/18
2.5	Annual Review	T. Warner	19/03/19
2.6	Annual Review. Reword final paragraph 7.2 Addition of DBS Update Service to 7.5.2 7.5.4.1 Inclusion of HR Director approval Addition of 7.6.2 and reference to F0013HR Probationary Review Form	T. Warner	05/08/20
3.0	Annual Review Rewrite in line with ISS and OfSTED standards. All sections.	T. Warner	12/10/21
3.1	Annual Review (KCSIE22) 9.4.1 Statement re CV's 9.4 Addition of online search as due diligence 10.1 Addition of points 3 & 4 re TRA and GTCE	T. Warner	01/09/22
3.2	Annual Review (KCSIE23)	T. Warner	01/09/23

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	9.4 Online due diligence notification to candidates added 9.7 Retention of Documents added 10.3 Removal of 3 year checking for existing staff members		
3.3	Annual Review (KCSIE24) 10. Addition of 'Update Service' - Updated wording for new employees starting work whilst awaiting DBS checks to 'appropriately supervised' 10.3.1 Updated to include contract obligation of joining the DBS Update Service Addition of 10.3.3.3 A prohibited person must not be appointed	T. Warner	26/08/24
3.4	Updated Summary 9.4 Addition re: AI in Recruitment KCSIE '25 9.4.3 Terminology Update: Child-on-Child Abuse 10.4 Induction updated with clarification on Online Safety and Filtering Responsibilities 10.3.2 Reinforcement of DBS Retention Limits Appendix 'A' updated with ID Checking Guidelines (effective April 2025 with transition until 1 November 2025)	T. Warner	25/08/25
3.5	Comprehensive review against KCSIE 2026 and current Independent School Standards. Strengthened safer recruitment, vetting, SCR, regulated activity, ongoing suitability and referral requirements; updated arrangements for external workers and work experience; clarified governance responsibilities; and introduced enhanced audit, monitoring and	T. Warner	01/09/26

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	recruitment documentation controls.		
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3. Summary

This policy sets out Educ8 Group's arrangements for safer recruitment, selection and pre-employment checking to ensure that individuals working with, or having access to, children are suitable to do so.

It reflects the requirements and expectations of **Keeping Children Safe in Education 2026 (KCSIE)**, the **Independent School Standards**, relevant safeguarding and employment legislation, and current Disclosure and Barring Service requirements.

The policy establishes a consistent safer recruitment framework across Educ8 Group, including requirements for:

- recruitment planning, advertising, applications, shortlisting and candidate self-declarations;
- appropriate safer recruitment training and robust selection and interview processes;
- online searches for shortlisted candidates;
- verification of employment history, references and identity;
- DBS, Children's Barred List, prohibition, Section 128, right to work and overseas checks, where applicable;
- assessment and recording of any concerns arising from recruitment checks;
- appropriate arrangements for agency staff, contractors, volunteers, alternative provision and work experience;
- maintenance and quality assurance of the Single Central Record and supporting recruitment records; and
- ongoing monitoring, audit and review of safer recruitment practice.

The policy also reflects the changes to the definition of **regulated activity with children taking effect from 1 September 2026**, including the removal of the supervision exemption.

Safer recruitment is treated as an integral part of Educ8 Group's wider safeguarding arrangements. No individual will be permitted to undertake duties involving children unless the required checks have been completed, or any exceptional commencement arrangements have been formally risk assessed, authorised and appropriately safeguarded in accordance with this policy.

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4. Document Release

This document has been reviewed in accordance with the Educ8 Quality System and the requirements of this policy/procedure. Staff have been made aware of its issue, including any updates/amendments to its contents and where necessary appropriate training has been provided to those staff.

Where policies are available for download online, the previous version is removed and this new version replaces it.

The release of this document is indicated by the effective date.

5. Purpose

The purpose of this policy is to ensure that Educ8 Group operates robust, consistent and legally compliant safer recruitment practices which **deter, identify and prevent individuals who are unsuitable to work with children from gaining access to them through employment, volunteering or other forms of engagement.**

The policy establishes the principles and minimum requirements that must be followed when recruiting, selecting, appointing and engaging individuals across Educ8 Group. It is designed to ensure that:

- safeguarding and the welfare of children are central to every stage of recruitment and selection;
- appropriate checks are undertaken to establish an individual's identity, suitability, qualifications and eligibility for the role;
- recruitment decisions are informed by appropriate scrutiny of applications, employment history, references, interviews and statutory checks;
- statutory safeguarding and vetting requirements are completed before an individual undertakes duties for which those checks are required;
- recruitment decisions and checks are appropriately documented and capable of audit;
- individuals involved in recruitment understand and discharge their safer recruitment responsibilities; and
- concerns about the ongoing suitability of individuals working with children are identified and acted upon appropriately.

Safer recruitment is an essential component of Educ8 Group's wider safeguarding arrangements. It is not limited to the completion of pre-employment checks but forms

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part of a continuing culture of vigilance, professional curiosity and safeguarding responsibility throughout an individual's employment or engagement with Educ8.

This policy should be read alongside the safeguarding, conduct, recruitment and employment policies and procedures identified in Section 6 – Associated Documents.

6. Scope

This policy applies to all recruitment, selection, vetting and appointment processes undertaken across Educ8 Group. Its purpose within these processes is to ensure that individuals who work with, or may have contact with, children are recruited and engaged safely, consistently and in accordance with applicable safeguarding requirements.

This policy applies, as relevant to their role and circumstances, to:

- employees, including permanent, temporary, fixed-term and casual staff;
- agency, supply and other third-party workers;
- self-employed contractors and consultants;
- volunteers;
- student teachers, trainees and apprentices;
- Directors, members of the Executive Board and other individuals undertaking governance or management responsibilities where relevant statutory vetting requirements apply;
- individuals supervising or otherwise involved in work experience or placements where relevant safeguarding or vetting requirements apply; and
- any other individual engaged by, or working on behalf of, Educ8 Group whose role may involve contact with children.

The requirements of this policy apply throughout the relevant stages of the recruitment and engagement lifecycle, including advertising, application, shortlisting, selection and interview, conditional appointment, pre-employment vetting, induction and probation. They also extend, where applicable, to maintenance of the Single Central Record (SCR), changes of role or circumstances, and the ongoing consideration of an individual's suitability to work with children.

Associated Policies and Documents

This policy should be read alongside the following Educ8 Group policies, procedures and documents, as applicable:

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- Safeguarding and Child Protection Policy;
- Staff Handbook, including its relevant provisions relating to induction, convictions and offences, equality, safeguarding, professional conduct, disciplinary and capability matters, whistleblowing and data protection;
- Staff & Volunteers Code of Conduct;
- procedures for managing allegations and low-level concerns about adults working with children;
- Whistleblowing Policy, where maintained as a separate policy;
- **Educ8's Acceptable Use of Technology and Online Safety Policy.;**
- Behaviour Policy;
- Data Protection Policy and relevant privacy notices;
- Governance & Leadership Handbook; and
- relevant recruitment, induction, probation and safer recruitment forms, checklists and templates.

Where a policy or procedure is incorporated within the Staff Handbook rather than maintained as a standalone document, references within this policy should be read as referring to the relevant provisions of the Staff Handbook.

Where this policy differs from a local recruitment procedure or practice, the requirements of this policy will take precedence in relation to safer recruitment and safeguarding.

Legislative and Guidance Framework

This policy has been developed with regard to the following legislation, statutory guidance and relevant safer recruitment guidance:

- DfE *Keeping Children Safe in Education 2026*;
- DfE *Working Together to Safeguard Children*;
- *Prevent Duty Guidance*;
- Education (Independent School Standards) Regulations 2014, as amended;
- relevant Disclosure and Barring Service (DBS) guidance;
- Rehabilitation of Offenders legislation; and
- relevant safer working practice and safer recruitment guidance.
- Crime and Policing Act 2026, - regulated activity arrangements relating to children;

7. Definitions and Acronyms

Delivery Staff

Staff employed by Educ8 to provide instruction and

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	tutoring services
DBS	Disclosure & Barring Service
DSL/DDSL	Designated Senior Person(s) for Child Protection
Learners	All students, participants and users of Educ8 learning programmes. Generally these are under 18 years of age.
KCSIE	DfE Document: ' Keeping Children Safe in Education: for schools and colleges ' (see GOV.UK for most recent version)
SCR	Single Central Record
DPA	Data Protection Act
TRA	Teaching Regulation Agency
School	Educ8 Alternative Education Site registered with OfSTED as an independent school.
Headteacher	Educ8 Staff member with management and leadership responsibility for an Educ8 Alternative Education School
Executive Board	Directors/Senior staff with Governance responsibilities for the school(s)
GTCE	General Teaching Council for England

8. Policy

8.1 Aims and Objectives

The aims of Educ8's Safer Recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that 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;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping

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Children Safe in Education (KCSIE), the Prevent Duty Guidance and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and

- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

The school has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the school based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The school aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at any and all Educ8 schools.

8.2 Roles & Responsibilities

The **registered proprietor** has ultimate responsibility for ensuring that the school complies with the safeguarding and safer recruitment requirements applicable to independent schools.

Educ8's **Executive Board** provides strategic governance and oversight of safer recruitment arrangements across the organisation in accordance with Educ8's internal governance framework.

Within Educ8's internal governance arrangements, the Executive Board is responsible for:

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- ensuring that appropriate policies and procedures are in place for the safer recruitment, selection and vetting of staff, volunteers and other individuals working with children;
- ensuring that appropriate arrangements are in place for maintaining the Single Central Record (SCR);
- providing appropriate scrutiny and assurance that safer recruitment arrangements are operating effectively across Educ8 schools;
- ensuring that proportionate independent assurance of safer recruitment arrangements is undertaken, including termly sample checking of each school's SCR and supporting recruitment records by an individual who is sufficiently independent of the day-to-day recruitment and SCR process; and
- ensuring that any deficiencies identified through audit, inspection, independent checking or other quality assurance activity are addressed appropriately.

The **Director responsible for HR and recruitment**, supported by the HR function, is responsible for the effective implementation and administration of Educ8's safer recruitment arrangements, including:

- ensuring that recruitment processes and associated documentation comply with this policy;
- coordinating and recording the required pre-employment checks;
- ensuring that appropriate DBS, barred list, prohibition, section 128, right to work, identity, qualification and other relevant checks are undertaken according to the requirements of the role;
- ensuring that appropriate recruitment and vetting records are maintained;
- overseeing the maintenance and accuracy of the SCR;
- providing advice and support to recruiting managers on the application of this policy; and
- acting as the formal safer recruitment clearance point and confirming that an individual may commence duties only when the required pre-employment checks have been satisfactorily completed or an expressly permitted exception has been appropriately authorised and safeguarded.

The **Executive Headteachers** are responsible for providing oversight of recruitment within the schools for which they have responsibility and for supporting Headteachers to ensure that recruitment and selection

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processes are consistent with this policy, Educ8's delegated authority arrangements and wider safeguarding requirements.

The **Headteacher** is responsible for ensuring that safer recruitment procedures are followed within their school. This includes:

- ensuring that recruitment requirements are properly identified and that recruitment does not proceed without the necessary authorisation, budgetary and HR approvals;
- participating in and, where appropriate, leading recruitment and selection processes within their delegated authority;
- ensuring that safeguarding and suitability to work with children are properly considered when selecting and recommending candidates for appointment;
- ensuring that agency workers, contractors, volunteers and other individuals working within the school are subject to the appropriate checks, assurances and local safeguarding arrangements;
- promptly notifying HR of any change in an individual's role or circumstances which may require their safeguarding or vetting requirements to be reconsidered;
- ensuring that no individual commences duties within the school until HR has confirmed formal safer recruitment clearance and any required local induction or safeguarding arrangements are in place;
- providing regular local assurance that the school's SCR accurately reflects the staff and other individuals currently working at or through the school, and promptly raising with HR any apparent omission, discrepancy or change requiring investigation; and
- ensuring that any safer recruitment or SCR deficiencies identified within the school are addressed promptly in conjunction with HR.

All employees involved in recruitment and selection are responsible for complying with this policy and must undertake appropriate safer recruitment training where required. **At least one person involved in each recruitment process must have undertaken appropriate safer recruitment training.**

All those involved in recruitment have a responsibility to maintain professional curiosity, identify and explore inconsistencies or concerns, and place the safeguarding and welfare of children at the centre of recruitment and selection decisions.

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Assurance will not rely solely upon those responsible for operating the recruitment and SCR process. In addition to local Headteacher assurance, a termly independent sample check of each school's SCR and supporting recruitment records will be undertaken, alongside the annual Safer Recruitment Compliance and Effectiveness Audit set out in Section 11. Any material safeguarding or statutory compliance omission identified through these arrangements must be escalated immediately and must not await the next scheduled review or audit.

8.3 Definition of Regulated Activity and Frequency

Regulated activity is work that a person who is barred from working with children must not undertake. It is an offence for a person who is barred from working with children to engage in regulated activity and for an organisation knowingly to permit a barred person to engage in regulated activity.

Educ8 Group will determine whether a role constitutes regulated activity in accordance with the Safeguarding Vulnerable Groups Act 2006, as amended, Keeping Children Safe in Education (KCSIE) and current Disclosure and Barring Service (DBS) and Department for Education guidance.

In a school setting, regulated activity with children includes, subject to the statutory conditions and exemptions:

- teaching, training or instructing children;
- caring for or supervising children;
- providing advice or guidance to children relating to their physical, emotional or educational wellbeing;
- driving a vehicle being used solely for the purpose of conveying children and their carers or supervisors;
- relevant personal care and healthcare activities; and
- certain work carried out regularly within specified establishments, including schools, where the statutory conditions for regulated activity are met.

For teaching, training, instructing, caring for or supervising children, the activity will constitute regulated activity where it is carried out:

- on **more than three days in any 30-day period**; or

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- **overnight**, between 2.00am and 6.00am, where the individual has the opportunity for face-to-face contact with children.

From **1 September 2026**, the previous exemption under which certain activities undertaken by a volunteer could fall outside regulated activity because the volunteer was subject to day-to-day supervision no longer applies. Where a person, including a volunteer, teaches, trains, instructs, cares for or supervises children with the required frequency or overnight, the activity will be regulated activity irrespective of whether that person is supervised.

Accordingly, volunteers undertaking such regulated activity must have an **enhanced DBS check including children's barred list information** before undertaking the activity, subject to the limited arrangements permitted by statutory guidance where an individual begins regulated activity before receipt of the DBS certificate.

An individual who assists only occasionally, and whose activities do not otherwise meet the statutory definition of regulated activity, will not become engaged in regulated activity solely because they have contact with children. For example, an individual assisting on an occasional school day trip would not ordinarily meet the frequency condition on that basis alone. Appropriate safeguarding arrangements, including consideration of the appropriate level of DBS check and supervision, must nevertheless be determined according to the nature of the activity and the circumstances.

All volunteers assisting on an **overnight school trip** will be regarded as undertaking regulated activity where the statutory overnight condition is met and must therefore have an enhanced DBS check including children's barred list information.

Paid staff working in schools who have the opportunity for contact with children will ordinarily be undertaking regulated activity where the relevant statutory conditions are met. The appropriate level of DBS and barred list check must therefore be established for each role before appointment.

Educ8 Group will assess the activities actually undertaken by an individual, rather than relying solely upon their job title or employment status, when determining whether a role constitutes regulated activity. Where an individual's role or duties change, their eligibility for and the level of DBS check required will be reconsidered.

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Where there is any uncertainty as to whether a role constitutes regulated activity, Educ8 Group will refer to current Department for Education and DBS guidance and will not permit an individual to undertake regulated activity until the appropriate safeguarding checks have been completed.

9. Recruitment and Selection Procedure

9.1 Recruitment Authority

No recruitment may commence unless the position has been appropriately authorised in accordance with Educ8's delegated authority, approved staffing structure and budgetary arrangements.

Authority to **create or fund a position, conduct the recruitment and selection process, select a preferred candidate, formally appoint an individual and provide safer recruitment clearance are separate responsibilities** and must be exercised in accordance with Educ8's Governance & Leadership Handbook, Scheme of Delegation and the authority of the relevant employing company.

Headteachers and Executive Headteachers may initiate recruitment and lead or participate in selection processes within their delegated authority. They must not create an unapproved position, commit Educ8 to expenditure outside an approved budget or make a formal appointment on behalf of an employing company unless appropriately authorised to do so.

Senior appointments, including Headteachers and Executive Headteachers, will be undertaken in accordance with Educ8's governance and delegated-authority arrangements and the authority of the relevant employing company.

For other appointments, the Headteacher or appropriate recruiting manager will normally lead the selection process and recommend the preferred candidate, subject to the required budgetary, management and HR approvals.

Formal appointment and contractual commitment will be made only by a person authorised to act on behalf of the relevant employing company.

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No individual may commence duties until HR has provided formal safer recruitment clearance in accordance with section 9.6.1.

Nothing in this section permits any individual to waive or override the safeguarding and pre-employment requirements of this policy.

9.1.1 Job Descriptions and Person Specifications

A job description and person specification will be prepared or reviewed before recruitment activity commences for every vacant post.

The **job description** will clearly and accurately set out the duties and responsibilities of the role, including the individual's responsibility for safeguarding and promoting the welfare of children where applicable. It will also identify any particular responsibilities arising from the nature of the role, including leadership, management, supervision or responsibility for safeguarding.

The **person specification** will identify the qualifications, skills, knowledge, experience and competencies required to perform the role effectively. It will include the competencies and behaviours required to safeguard and promote the welfare of children and will make clear that the successful applicant must demonstrate their suitability to work with children.

In preparing or reviewing the job description and person specification, consideration will be given to:

- whether the role constitutes regulated activity with children;
- the nature and level of contact with children;
- whether the role involves teaching work and therefore requires a prohibition from teaching check;
- whether the role involves participation in the management of an independent school and therefore requires a section 128 direction check;
- any qualifications, professional registrations or other requirements that must be verified as a condition of appointment; and

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- the appropriate pre-employment and safeguarding checks required for the role.

The safeguarding responsibilities and level of vetting required will be determined by the **actual duties and responsibilities of the role**, rather than by the job title alone.

Job descriptions and person specifications will be reviewed when a vacancy arises to ensure that they remain accurate and reflect current safeguarding, organisational and statutory requirements.

The approved job description and person specification will form part of [T0073HR Recruitment Pack Template](#) and will be used consistently throughout advertising, shortlisting, interview and selection.

9.2 Planning for Recruitment

Prior to undertaking recruitment activity for vacancies other than the Headteacher, the Headteacher will, working with a senior manager as appropriate, ensure that there is a review of the job description and person specification and ensure that this document is an accurate reflection of the role to be filled.

The Headteacher alongside the Executive Head will make a determination as to whether a role is to be filled on a permanent, fixed-term, temporary or any other basis, taking into account any advice received from the Educ8 HR department.

9.3 Advertising

Educ8 is committed to ensuring that safeguarding considerations are embedded from the outset of every recruitment process.

All recruitment advertisements will provide sufficient information about the role and will include:

- Educ8's commitment to safeguarding and promoting the welfare of children and young people and confirmation that appropriate safeguarding checks will be undertaken;

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- the safeguarding responsibilities of the post, consistent with the relevant job description and person specification;
- the principal responsibilities of the role and the qualifications, skills, experience, attitudes and behaviours required;
- where appropriate, confirmation that the role involves contact with children and whether it involves regulated activity relevant to children;
- confirmation of whether the post is exempt from the Rehabilitation of Offenders Act 1974 and, where applicable, that certain convictions and cautions are protected and are not required to be disclosed; and
- the appropriate requirements relating to Disclosure and Barring Service (DBS) and other pre-employment checks.

Where the role involves regulated activity relevant to children, the application form or other information provided to applicants will make clear that it is an offence for a person who is barred from engaging in regulated activity relevant to children to apply for the role.

Applicants will be provided with, or directed to, Educ8's Safeguarding and Child Protection Policy and relevant information concerning the employment of ex-offenders as part of the recruitment information provided to them.

Educ8 will seek to attract a sufficiently wide and diverse field of suitably qualified applicants and will ensure that recruitment advertising and selection arrangements comply with applicable equality and employment legislation.

All information obtained or generated through the recruitment process will be handled securely and confidentially in accordance with applicable data protection legislation and Educ8's data protection arrangements.

9.4 Shortlisting and Selection Processes

Educ8 will operate a fair, consistent and safeguarding-focused shortlisting and selection process. Safeguarding and the suitability of applicants to work with children will be considered throughout the process and not solely as part of pre-employment vetting.

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At least one person involved in the recruitment and selection process will have completed appropriate safer recruitment training.

Where possible, the same individuals will be involved throughout the shortlisting and interview stages to support consistency and continuity in the assessment of candidates.

For senior leadership appointments, including Headteacher and Executive Headteacher roles, the selection arrangements and appointment decision will be determined in accordance with Educ8's governance and delegated authority arrangements. For other appointments, the appropriate recruiting manager and/or Headteacher will lead the selection process, supported by HR as appropriate.

Shortlisting

Educ8 will ensure that:

- At least two people will undertake the shortlisting exercise. It is recommended that those involved in shortlisting also participate in the interview process to support a consistent approach.
- all applications are assessed consistently against the criteria contained within the job description and person specification;
- the criteria used for shortlisting are agreed before applications are assessed;
- the reasons for shortlisting decisions are recorded;
- applications are scrutinised for inconsistencies, anomalies, unexplained gaps in employment, repeated or frequent changes of employment, or other information that may require further exploration;
- any concerns or discrepancies identified during shortlisting are recorded and explored with the applicant at interview;
- information provided within the application is considered alongside any references obtained before interview; and
- safeguarding concerns arising at any stage of the process are appropriately considered and resolved before an appointment is confirmed.

Shortlisting and selection decisions will be based upon the requirements of the role and the applicant's ability and suitability to undertake it.

Self-declaration by shortlisted candidates

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Following shortlisting, candidates will be required to complete a self-declaration regarding their criminal record and any other information that may make them unsuitable to work with children, in accordance with current statutory guidance.

The self-declaration will seek relevant information which Educ8 is lawfully entitled to request, which may include whether the candidate:

- has a relevant criminal history;
- is included on the Children's Barred List;
- is prohibited from teaching;
- is prohibited from participating in the management of an independent school;
- has relevant criminal offences committed outside the UK;
- is known to the police or children's social care in circumstances relevant to their suitability;
- is subject to applicable childcare disqualification requirements; or
- has other relevant overseas information which may affect their suitability to work with children.

Candidates will not be required to disclose protected convictions or cautions.

This information will only be requested following shortlisting and will not be used to determine which applicants are shortlisted. The purpose of the declaration is to enable relevant information to be considered and, where appropriate, discussed with the candidate at interview before receipt of the DBS certificate.

Candidates will be required to confirm that the information they have provided is true and complete.

Online Searches

As part of its due diligence, Educ8 will consider carrying out an online search using an internet search engine on shortlisted candidates. The purpose of the search is to identify any incidents, issues or publicly available information that may be relevant to the applicant's suitability to work with children and which may warrant further exploration at interview.

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Applicants will be informed during the recruitment process that online searches may be undertaken as part of Educ8's safer recruitment due diligence.

Online searches will:

- be proportionate and relevant to the purpose of safer recruitment;
- normally be undertaken only after shortlisting;
- focus on publicly available information relevant to the applicant's suitability for the role and to work with children;
- not be used to make decisions on the basis of protected characteristics or other information irrelevant to the recruitment decision; and
- be handled in accordance with applicable data protection requirements.

Any information identified through an online search that may be relevant to the applicant's suitability will be considered in context and, where appropriate, discussed with the applicant at interview. An appointment decision will not be based solely upon unverified or irrelevant information identified online.

A record that the online search has been undertaken, together with any relevant matters requiring further consideration, will be retained as part of the recruitment record in accordance with Educ8's records retention arrangements. Where a search is not undertaken, the reason will be recorded.

Use of Artificial Intelligence

Educ8 recognises that applicants may use artificial intelligence and other digital tools when preparing applications.

Applicants remain responsible for ensuring that all information submitted as part of their application is accurate, complete and a genuine representation of their qualifications, experience, knowledge and suitability for the role.

Where information within an application appears inconsistent, generic, inaccurate or does not correspond with information obtained elsewhere in the recruitment process, this will be explored with the applicant.

Educ8 does not currently use automated decision-making or artificial intelligence to determine recruitment or selection decisions. Should

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such technology be introduced, its use will be subject to appropriate human oversight and will comply with applicable data protection, equality and employment requirements.

Applicants will be shortlisted (using [F0070 Recruitment Shortlist Form](#)) by cross referencing the Job Description and Person Specification for the role against the completed [F0003HR Application for Employment Form](#).

9.4.1 Applications

Educ8 will use its own application form ([F0003HR Application for Employment Form](#)) for recruitment to posts covered by this policy.

A curriculum vitae (CV) may be submitted in support of an application but will not be accepted as a substitute for a fully completed Educ8 application form.

Applicants will be required to provide sufficient information to enable Educ8 to assess their suitability for the role, including:

- personal and contact information;
- relevant academic and professional qualifications;
- a full chronological employment history;
- an explanation for any gaps in employment;
- reasons for leaving previous employment where requested;
- relevant experience, skills and suitability for the role;
- details of referees; and
- appropriate declarations relating to their suitability to work with children and any information which they are legally required to disclose.

Applicants will be required to account for any gaps, discrepancies or anomalies in their employment or education history. Where information provided is incomplete or unclear, Educ8 may seek further information before determining whether the application should proceed.

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Applicants will be informed that it is an offence for a person who is barred from engaging in regulated activity relevant to children to seek to engage in such activity.

The application form will make clear that providing false, misleading or incomplete information may result in:

- rejection of the application;
- withdrawal of an offer of employment;
- disciplinary action or dismissal where employment has commenced; and/or
- referral to the police, Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or another appropriate body where required.

Applicants will only be required to disclose criminal information that Educ8 is legally entitled to request. Applicants will not be required to disclose protected convictions or cautions.

Information concerning criminal records and other sensitive personal information obtained during recruitment will be handled confidentially and in accordance with applicable data protection legislation and Educ8's records retention arrangements.

9.4.2 References

References are an important component of Educ8's assessment of an applicant's suitability to work with children and will be obtained, scrutinised and verified in accordance with safer recruitment requirements.

Wherever possible, references will be obtained before interview so that any concerns, discrepancies or inconsistencies can be explored with the applicant during the selection process.

All offers of employment will be conditional upon receipt of satisfactory references appropriate to the role.

Educ8 will normally obtain a minimum of two references. One reference will be from the applicant's current or most recent

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employer. Where the applicant is not currently working with children but has previously done so, a reference should also be obtained from the employer by whom the applicant was most recently employed to work with children, where practicable.

Where an applicant has not previously been employed, Educ8 will obtain references from appropriate alternative referees who are able to comment meaningfully upon the applicant's suitability for the role and to work with children.

References will:

- be obtained directly from the referee rather than relying upon references or testimonials supplied by the applicant;
- be provided by an appropriately senior person with suitable authority to provide the reference;
- not normally be accepted from relatives or individuals whose relationship with the applicant means that an objective professional assessment cannot reasonably be provided;
- be scrutinised against the information contained within the application form and other information obtained during the recruitment process;
- be checked for inconsistencies, omissions, ambiguous statements or other matters requiring clarification;
- seek objective and factual information relevant to the applicant's suitability for the role and to work with children; and
- be verified with the person who provided the reference, with reasonable steps taken to establish that the reference and referee are genuine;

For applicants who are currently working with children, Educ8 will seek confirmation of whether the applicant has been subject to any substantiated safeguarding concerns or allegations that meet the harm threshold and, where applicable, the outcome of those matters.

Where an applicant has previously worked with children, appropriate safeguarding information will be sought from the relevant former employer in accordance with current statutory guidance.

Information about allegations that were found to be false, unfounded, unsubstantiated or malicious will not be requested or

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taken into account. Low-level concerns will not normally be included in references unless they relate to matters which would normally be included in an employment reference, such as misconduct or poor performance, or where a pattern of concerns has met the harm threshold.

Where a reference is received electronically, Educ8 will take reasonable steps to establish that it originates from a legitimate source. Where necessary, the referee will be contacted directly using independently obtained contact information.

Any discrepancy or concern arising from a reference will be followed up with the referee and, where appropriate, explored with the applicant before an appointment is confirmed.

References will not request information about an applicant's health or medical fitness before a conditional offer of employment has been made, except where permitted by law.

Where an applicant has requested that their current employer is not contacted before interview, Educ8 will consider that request but will make clear that a satisfactory reference from the current employer will normally be required before an appointment can be confirmed.

References will be requested using the relevant Educ8 reference documentation and retained in accordance with Educ8's records retention arrangements.

9.4.3 Interviews & Selection

Shortlisted candidates will normally participate in a formal interview as part of the selection process. Other appropriate selection activities may also be used according to the nature and responsibilities of the role, including teaching or classroom observations, presentations, written exercises, practical assessments or other role-specific activities.

Interviews will normally be conducted by at least two interviewers. At least one person involved in the recruitment and selection process will have completed appropriate safer recruitment training.

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Where appropriate to the role, pupils may be involved meaningfully in the selection process. This may include appropriately supervised interaction with shortlisted candidates, observation of teaching or other suitable activities. Any pupil involvement will supplement, rather than replace, the formal recruitment and safeguarding assessment undertaken by the selection panel.

The interview and selection process will assess both:

- the applicant's ability to fulfil the requirements of the job description and person specification; and
- their suitability to work with children and to contribute to Educ8's safeguarding culture.

The interview will include appropriate questions designed to explore the applicant's:

- motivation for working with children and young people;
- understanding of safeguarding and child protection;
- attitudes towards children and professional boundaries;
- understanding of appropriate professional conduct;
- ability to recognise and respond appropriately to safeguarding concerns;
- understanding of relevant safeguarding risks, including child-on-child abuse, online safety and Prevent where appropriate to the role; and
- values, behaviours and suitability for the responsibilities associated with the position.

The interview panel will also explore, where relevant:

- gaps in employment or education;
- repeated or unexplained changes of employment;
- discrepancies or inconsistencies within the application;
- concerns or discrepancies arising from references;
- relevant information identified through online due diligence;
- reasons for leaving previous employment;
- disciplinary matters or safeguarding information that Educ8 is lawfully entitled to consider; and
- any other information relevant to the applicant's suitability for the role or to work with children.

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Candidates will be given an appropriate opportunity to explain relevant discrepancies, concerns or information identified during the recruitment process. The panel will consider the applicant's explanation alongside the other evidence available before reaching its decision.

Candidates invited to interview will be required to provide appropriate evidence of their identity and, where applicable, qualifications and other documentation necessary for the pre-employment checking process. Documents will be checked and retained only in accordance with Educ8's pre-employment checking and records retention arrangements.

The outcome of the interview and other selection activities will be formally documented using Educ8's approved recruitment documentation. Selection decisions will be evidence-based and recorded against the requirements of the job description and person specification.

No applicant will be appointed where the recruitment and selection process gives Educ8 reasonable grounds to conclude that they are unsuitable to work with children, or where a statutory prohibition or restriction prevents their appointment.

Interviews will be documented using [F0068HR Interview Assessment Form](#) and selection made and recorded using [F0069HR Interview Summary Sheet](#).

9.5 Outcome of Selection Processes

A selection decision will be made based on a fair and thorough assessment of the skills, abilities, experience and suitability demonstrated by candidates against the requirements of the person specification and job description during the selection process.

Following completion of the selection process, the preferred candidate will be **recommended for appointment**, subject to the approvals required under Educ8's delegated authority, budgetary arrangements and the authority of the relevant employing company. The reasons for the selection decision will be appropriately recorded and retained as part of the recruitment record.

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For Headteacher and Executive Headteacher recruitment, the selection panel will make a recommendation in accordance with Educ8's governance and delegated-authority arrangements. Formal appointment must be authorised by, or on behalf of, the relevant employing company in accordance with the authority delegated to make that appointment.

For all other school staff appointments, the Headteacher or appropriate recruiting manager will normally select and recommend the preferred candidate within their delegated authority. This does not, by itself, confer authority to create or fund a position or to enter into a contractual commitment on behalf of the relevant employing company.

Any offer of employment or engagement made to the preferred candidate will be conditional, in writing, and subject to satisfactory completion of the pre-employment and safeguarding requirements applicable to the role (see sections 9.6 and 10). An offer may only be issued by, or with the authority of, a person authorised to act on behalf of the relevant employing company.

Selection of a preferred candidate, approval of an appointment, issue or acceptance of a conditional offer, or agreement of a proposed start date **does not constitute safer recruitment clearance to commence duties**.

HR will provide formal safer recruitment clearance in accordance with section 9.6.1. The Headteacher or appropriate operational manager may confirm the individual's operational commencement only after that clearance has been received.

9.6 Offers of Employment

Any offer of employment made by Educ8 will be conditional upon the satisfactory completion of the pre-employment checks applicable to the role.

The successful applicant will be informed that the offer remains conditional until Educ8 is satisfied that all relevant safeguarding, employment and suitability requirements have been met.

Depending upon the role and circumstances of the appointment, the conditions of appointment may include:

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- verification of the applicant's identity;
- satisfactory references;
- verification of the applicant's right to work in the UK;
- an appropriate Disclosure and Barring Service (DBS) check;
- a children's barred list check where the individual will undertake regulated activity and Educ8 is legally entitled to undertake the check;
- a prohibition from teaching check where the role involves teaching work;
- a section 128 direction check where the role involves participation in the management of an independent school;
- appropriate checks where the applicant has lived or worked outside the UK;
- verification of relevant professional or academic qualifications;
- confirmation of the applicant's medical fitness for the role, where appropriate and in accordance with applicable equality legislation;
- any applicable disqualification requirements; and
- any other check required by legislation, statutory guidance or considered necessary having regard to the nature and circumstances of the role.

The checks required will be determined by the duties and responsibilities of the particular role. Not every check listed above will apply to every appointment.

A conditional offer will only be confirmed once Educ8 is satisfied that all required pre-employment checks have been completed satisfactorily.

Where information obtained through the pre-employment checking process raises a concern, discrepancy or question regarding the applicant's suitability, this will be considered and, where appropriate, discussed with the applicant before a final appointment decision is made. Educ8 will undertake an appropriate assessment of the information available and will seek HR and/or safeguarding advice where necessary.

An offer may be withdrawn where:

- a required pre-employment check is unsatisfactory;
- the applicant is unable to demonstrate that they meet a statutory requirement of the role;
- information provided during the recruitment process is found to be false, misleading or materially incomplete;

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- Educ8 is not satisfied as to the applicant's suitability to work with children; or
- a statutory prohibition, restriction or other legal requirement prevents the appointment.

No individual will normally commence work until all required pre-employment checks have been satisfactorily completed and recorded.

In exceptional circumstances, Educ8 may permit an individual to commence work before receipt of a DBS certificate where this is permitted by law and statutory guidance. This will only occur where all other required checks have been satisfactorily completed, including a separate children's barred list check where the role constitutes regulated activity and such a check is legally permitted.

Before any such commencement, a written risk assessment must be completed and approved in accordance with Educ8's procedures. The assessment will determine the safeguarding arrangements required, including appropriate supervision, restrictions on duties and the frequency with which the arrangements will be reviewed.

The reason for permitting the individual to commence work, the checks completed, the outstanding check, the risk assessment and the safeguarding measures implemented will be formally recorded.

An individual must never be permitted to undertake regulated activity where Educ8 knows, or has reason to believe, that the individual is barred from working with children.

All required pre-employment checks and the dates on which they were completed will be recorded on the Single Central Record (SCR) where required and retained in accordance with Educ8's recruitment and records management arrangements.

9.6.1 Clearance to Commence Employment or Engagement

Completion of the recruitment and selection process, or the issue of a conditional offer, does not in itself authorise an individual to commence work or undertake duties within Educ8.

HR will act as the formal safer recruitment clearance point and will confirm that the pre-employment and safeguarding checks required for

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the individual's role have been satisfactorily completed and appropriately recorded.

Where this policy expressly permits an individual to commence before a particular check has been completed, HR will confirm that the required risk assessment, authorisation and safeguarding controls are in place before clearance is given.

The Headteacher or other appropriate operational manager may only confirm an individual's commencement of duties once HR has provided safer recruitment clearance.

No Headteacher, recruiting manager or other member of staff may waive a statutory safeguarding check or independently authorise commencement where the requirements of this policy have not been satisfied.

HR clearance confirms that the safer recruitment and pre-employment requirements applicable to the role have been satisfied. **It does not replace the responsibility of the Headteacher, recruiting manager or other authorised decision-maker for determining that the individual is suitable for appointment to the role.**

9.7 Retention of of Recruitment and Vetting Documents

Recruitment, vetting and pre-employment information will be retained only for as long as necessary and in accordance with applicable legislation, statutory guidance, Educ8's records-retention arrangements and data-protection requirements.

Educ8 is not required to retain copies of Disclosure and Barring Service (DBS) certificates in order to maintain the Single Central Record. Where a copy of a DBS certificate is retained, there must be a valid reason for doing so and it will normally be retained for no longer than six months. Educ8 may retain a record that the check was undertaken, the outcome of the check and the recruitment decision made.

Evidence obtained for the purposes of establishing an individual's right to work in the UK will be retained securely for the duration of the individual's employment and for a further two years after their

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employment ends, in accordance with current Home Office requirements.

Copies of other identity documents, qualifications and recruitment documentation will be retained only where there is a lawful and proportionate reason to do so and in accordance with Educ8's applicable records-retention schedule.

All retained information will be stored securely, access will be restricted appropriately and documents will be securely destroyed when the applicable retention period has expired.

10. Pre-employment Checks

Educ8 recognises that robust pre-employment checking is an essential part of safeguarding children and ensuring that individuals appointed to work within its schools are suitable for their roles.

Educ8 will undertake the recruitment and vetting checks required by legislation, the Independent School Standards, Keeping Children Safe in Education (KCSIE), Disclosure and Barring Service (DBS) requirements and other relevant statutory guidance.

The checks required will be determined according to the nature and responsibilities of the particular role. Consideration will include whether the individual will:

- engage in regulated activity with children;
- undertake teaching work;
- participate in the management of an independent school;
- have regular contact with children;
- require particular qualifications or professional status;
- have lived or worked outside the UK; or
- be subject to any other statutory or regulatory requirement relevant to the role.

As applicable to the role and circumstances, pre-employment checks may include:

- verification of identity;
- an enhanced DBS check;

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- a children's barred list check where the individual will undertake regulated activity and Educ8 is legally entitled to obtain such information;
- verification of the individual's right to work in the UK;
- prohibition from teaching checks where the role involves teaching work;
- a section 128 direction check where the individual will participate in the management of an independent school;
- checks arising from the individual's previous residence or employment outside the UK;
- verification of relevant academic and professional qualifications;
- appropriate references;
- consideration of the individual's employment history and any gaps or discrepancies;
- confirmation of medical fitness for the role following a conditional offer of employment and in accordance with applicable legislation;
- any applicable disqualification requirements; and
- any other checks required by legislation, statutory guidance or considered appropriate having regard to the nature of the role.

The checks undertaken, the date on which each check was completed and the identity of the person completing or verifying the check will be recorded in accordance with Educ8's recruitment procedures and on the Single Central Record (SCR) where required.

Pre-employment checks must be completed and considered as a whole. Completion of an individual check does not, in itself, establish that an applicant is suitable for appointment. Educ8 will consider all information obtained during the recruitment and vetting process when determining an individual's suitability to work with children.

Any discrepancy, concern or adverse information identified during the checking process will be appropriately investigated and considered before an appointment is confirmed. Where necessary, advice will be sought from HR, the Designated Safeguarding Lead and/or other appropriate professional or regulatory bodies.

An individual will not normally commence work until all required pre-employment checks have been completed satisfactorily.

In the exceptional circumstances where an individual is permitted to commence work before receipt of a DBS certificate, the arrangements set out in section 9.6 of this policy must be followed. All other required checks must have been completed satisfactorily, including a separate children's barred list check where the role involves regulated activity and such a check is legally permitted. A written risk assessment, appropriate supervision and any

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necessary restrictions on duties must be in place and kept under review until the outstanding check has been satisfactorily completed.

Identity and right to work in the UK must always be satisfactorily established before employment commences.

Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK will be subject to the same checks as other applicants.

In addition, Educ8 will consider whether further checks are appropriate to establish the individual's suitability, having regard to the countries in which they have lived or worked and the nature and duration of that residence or employment.

Such checks may include criminal records information or certificates of good conduct from the relevant country and, where the applicant has undertaken teaching work outside the UK, information from the relevant professional or regulatory authority where available.

Educ8 recognises that the availability and reliability of overseas checks varies between countries. Where it is not possible to obtain a particular check, Educ8 will consider what alternative evidence or additional safeguarding measures are appropriate and will record the assessment and rationale.

Overseas checks do not replace the DBS or other checks required for an individual working in England.

Agency, supply and third-party workers

Where an individual is supplied by an employment business or other third-party organisation, Educ8 will obtain written notification that the organisation has completed the checks that Educ8 would otherwise be required to undertake and that the individual is suitable to work with children.

The confirmation must relate to the individual being supplied and must provide Educ8 with sufficient assurance that the required checks have been satisfactorily completed.

Educ8 will verify the identity of the individual when they first attend the school and ensure that the person presenting for work is the same person in respect of whom the checks have been undertaken.

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Detailed requirements relating to agency and third-party workers are set out in section 10.8.

Trainee and student teachers

Where a trainee or student teacher is employed by Educ8, Educ8 will undertake the required pre-employment checks in the same manner as for other employees.

Where a trainee or student teacher is placed at an Educ8 school by an accredited training provider and is not employed by Educ8, the training provider will normally be responsible for carrying out the required checks. Educ8 will obtain appropriate written confirmation that the checks have been completed before the individual is permitted to undertake their placement.

Detailed requirements relating to trainee and student teachers are set out in section 10.10.

A risk assessment (using [F0021HR Starting Work Prior to DBS Form](#)) will also be carried out to determine whether other safeguarding measures may need to be put in place.

10.1 New Employee Vetting Process

Following selection of the preferred candidate, any offer of employment will remain conditional upon Educ8 being satisfied that the applicant meets all statutory and organisational requirements applicable to the role.

The following checks will be undertaken as applicable:

10.1.1 Identity

Educ8 will verify the applicant's identity using appropriate original documentation and/or an approved digital identity checking process where permitted.

Particular care will be taken where an applicant has changed their name or where information contained within identity documentation

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differs from information provided during the recruitment process. Any discrepancy will be satisfactorily resolved.

The detailed requirements for identity checking are contained within Appendix A of this policy.

10.1.2 References and Employment History

Educ8 will ensure that satisfactory references have been obtained and scrutinised in accordance with section 9.4.2 of this policy.

The applicant's employment history will be reviewed and any gaps, inconsistencies or discrepancies will be satisfactorily explored and considered before the appointment is confirmed.

10.1.3 Disclosure and Barring Service Checks

Educ8 will determine the appropriate level of DBS check according to the duties of the role and the individual's eligibility for a particular level of check.

Where the individual will undertake regulated activity with children, an enhanced DBS check including children's barred list information will be obtained.

A children's barred list check will only be undertaken where Educ8 is legally entitled to obtain barred list information.

Where an enhanced DBS check is appropriate but the role does not constitute regulated activity, barred list information will not be requested unless another statutory basis permits it.

The detailed arrangements for DBS checks are set out in section 10.3.

10.1.4 Prohibition from Teaching

Where an individual will undertake teaching work, Educ8 will check whether the individual is subject to a prohibition order or other restriction which prevents them from carrying out teaching work.

A prohibition from teaching check will be undertaken irrespective of whether the individual holds Qualified Teacher Status (QTS). The requirement arises from the teaching work being undertaken rather than from the individual's qualification or job title.

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Educ8 will use the DfE's Check a teacher's record service, or any successor service, to undertake the relevant checks and, where relevant, to verify QTS and completion of statutory induction.

A person who is prohibited from teaching must not be appointed to undertake teaching work.

10.1.5 Section 128 Direction

Educ8 will undertake a section 128 direction check where an individual is to participate in the management of an independent school.

This includes, as applicable, members of the proprietor body and individuals appointed to management positions within the school, including Headteachers and other senior leaders whose responsibilities amount to participation in the management of the school.

Whether a section 128 check is required will be determined by the individual's actual responsibilities and authority rather than solely by their job title.

A person who is subject to a section 128 direction must not be appointed to, or permitted to continue in, a management position from which they are prohibited.

10.1.6 Right to Work in the UK

Educ8 will verify that every person employed by the organisation has the legal right to work in the UK before employment commences.

Checks will be undertaken in accordance with current Home Office requirements using the appropriate documentary, online or digital checking process.

Where an individual's right to work is time limited, Educ8 will record this and undertake the required follow-up checks before the existing permission expires.

10.1.7 Qualifications and Professional Requirements

Educ8 will verify any academic, professional or vocational qualification which is an essential requirement of the role.

Where an applicant cites qualifications or professional status that are material to the appointment decision, Educ8 may also verify those

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qualifications directly with the awarding or professional body where considered appropriate.

Any required professional registration, licence or accreditation will be verified where applicable to the role.

10.1.8 Individuals who have lived or worked outside the UK

Where an applicant has lived or worked outside the UK, Educ8 will undertake the additional consideration and checks described in section 10 of this policy.

Where the applicant has undertaken teaching work outside the UK, Educ8 will consider whether information should be sought from the relevant professional or regulatory authority in the country concerned, where such information is available.

The checks undertaken, or the reasons why a particular overseas check could not reasonably be obtained, will be documented.

10.1.9 Medical Fitness

Following a conditional offer of employment, Educ8 will obtain appropriate confirmation that the applicant has the health and physical capacity required to undertake the role, subject to the requirements of the Equality Act 2010.

Health information will not be sought or used during the recruitment process in circumstances prohibited by law.

Reasonable adjustments will be considered where required.

10.1.10 Final Verification and Recording

Before an appointment is confirmed, the person responsible for recruitment will ensure that all checks required for the particular role have been satisfactorily completed and that any discrepancies or concerns arising during the recruitment process have been resolved.

Required checks will be recorded on the Single Central Record in accordance with the Independent School Standards and KCSIE.

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Relevant supporting documentation will be retained on the individual's personnel record in accordance with Educ8's records retention arrangements and applicable data protection requirements.

A personal file/recruitment checklist will be used to provide an auditable record that the required safer recruitment process has been completed.

No appointment will be confirmed where Educ8 has not established, to its satisfaction, that the individual is suitable for the role and to work with children.

10.2 The Rehabilitation of Offenders Act 1974

Most roles within Educ8 involve working with children and are exempt from the provisions of the Rehabilitation of Offenders Act 1974 by virtue of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended.

Where an exemption applies, Educ8 is entitled to ask applicants about relevant convictions and cautions, including those which are spent, subject to the statutory rules concerning protected convictions and cautions.

Applicants are **not required to disclose protected convictions or cautions**, and Educ8 will not ask for, take into account or make recruitment decisions on the basis of information which is protected under the relevant legislation.

Recruitment information and application documentation will make clear:

- that the role is exempt from the Rehabilitation of Offenders Act 1974 where applicable;
- that applicants may be required to disclose relevant spent and unspent convictions and cautions;
- that protected convictions and cautions do not need to be disclosed; and
- that any information disclosed will be considered fairly and only insofar as it is relevant to the applicant's suitability for the role and to work with children.

Having a criminal record will not automatically prevent an individual from being appointed by Educ8. Where relevant criminal information is

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disclosed or identified through an appropriate DBS check, Educ8 will undertake an individual assessment having regard to the nature, seriousness, circumstances and relevance of the information to the role and to the safeguarding of children.

Further arrangements for considering information disclosed through a DBS check are set out in section 10.3.3 of this policy.

Any criminal records information obtained during the recruitment process will be handled confidentially, securely and in accordance with the DBS Code of Practice, applicable data protection legislation and Educ8's records retention arrangements.

10.3 Disclosure and Barring Service (DBS) Checks

Educ8 will obtain the appropriate level of Disclosure and Barring Service (DBS) check for individuals working within its schools where the role is eligible for such a check.

The level of DBS check required will be determined by the activities and responsibilities of the role and the applicable statutory eligibility criteria, rather than solely by the individual's job title or employment status.

Where an individual will undertake regulated activity with children, Educ8 will obtain an **enhanced DBS check including Children's Barred List information**.

Where a role is eligible for an enhanced DBS check but does not constitute regulated activity, Educ8 may obtain an **enhanced DBS check without Children's Barred List information**, where permitted.

Educ8 will only request Children's Barred List information where there is a lawful entitlement to do so.

The appropriate level of DBS check will be determined before the individual commences the relevant duties and will be reconsidered where an individual's role, duties or circumstances change in a way that may affect their eligibility for a particular level of check.

A DBS check provides information available at the point at which the certificate is issued and forms one part of Educ8's wider assessment of an individual's suitability to work with children. A satisfactory DBS

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check does not remove the requirement for the other safer recruitment checks required by this policy.

Applicants will be provided with, or directed to, information concerning the DBS Code of Practice and Educ8's arrangements for the recruitment of individuals with a criminal record.

Educ8 will handle all DBS information fairly, securely and confidentially and in accordance with the DBS Code of Practice, applicable data protection legislation and Educ8's records retention arrangements.

Educ8 will not operate an automatic programme of periodic DBS rechecking solely because a particular period of time has elapsed. A new DBS check may, however, be required where:

- an individual's role or duties change and a different level of check is required;
- there has been a break in service and Educ8 considers a new check appropriate;
- Educ8 becomes aware of information which raises concerns about the individual's suitability to work with children;
- the individual's DBS Update Service status indicates that new information is available;
- a statutory or regulatory requirement requires a further check; or
- Educ8 otherwise considers a new check appropriate following an assessment of the circumstances.

Employees, volunteers and other individuals covered by this policy are required to inform Educ8 promptly of any relevant change in circumstances, criminal investigation, caution, conviction, barring decision or other matter which may affect their suitability to work with children, subject to the statutory rules relating to protected convictions and cautions.

Where an individual is permitted exceptionally to commence work before receipt of a DBS certificate, the requirements of sections 9.6 and 10 of this policy must be followed.

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10.3.1 Existing DBS Certificates and the DBS Update Service

Educ8 may accept an existing DBS certificate supported by a satisfactory DBS Update Service status check where all statutory and organisational requirements are met.

Before relying upon an existing certificate and Update Service status check, Educ8 will:

- obtain the individual's consent to undertake the status check;
- verify the individual's identity;
- examine the original DBS certificate;
- confirm that the certificate relates to the individual concerned;
- confirm that Educ8 would be legally entitled to request the same level of DBS check for the role;
- confirm that the certificate is for the appropriate workforce;
- confirm that the certificate is at the appropriate level for the role;
- where Children's Barred List information is required, confirm that the original certificate included the appropriate Children's Barred List check; and
- undertake an online Update Service status check to establish whether the certificate remains current.

An existing DBS certificate must not be relied upon through the Update Service where it relates to a different workforce, is at a lower level than that required for the role, or does not include the appropriate barred list information where such information is required.

Where the Update Service confirms that no new information has been identified and the certificate is otherwise appropriate for the role, Educ8 may rely upon the existing certificate as part of its pre-employment checking process.

Where the Update Service indicates that the certificate is no longer current because new information is available, Educ8 will obtain a new DBS check before relying upon the individual's DBS status.

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Where appropriate and legally permitted, Educ8 may undertake further Update Service status checks during an individual's employment or engagement. The individual's consent will be obtained for such checks.

Educ8 requires relevant employees to subscribe to and maintain their subscription to the DBS Update Service where this forms part of their contractual requirements. Individuals are responsible for maintaining their own Update Service subscription and ensuring that it does not expire.

Use of the DBS Update Service does not replace any other safer recruitment check required by this policy.

Where Educ8 requires an individual to subscribe to the DBS Update Service, the individual must do so when making their DBS application or within the period permitted by the DBS, currently 30 calendar days from the issue date of the certificate.

10.3.2 DBS Certificates and Information

DBS certificates are issued to the applicant. Where Educ8 requires a DBS check, the individual must make their original certificate available to Educ8 for examination where required.

Educ8 will verify that the certificate relates to the individual concerned and is appropriate for the role before making or confirming the relevant recruitment or safeguarding decision.

Information contained within a DBS certificate will only be used for the purpose for which it was obtained and will only be accessible to individuals who require access as part of their professional responsibilities.

Educ8 will not routinely retain copies of DBS certificates.

Where a copy of a DBS certificate or other DBS information is retained because it is necessary for the recruitment or safeguarding decision, it will be stored securely and separately from general personnel information, with access strictly controlled.

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A copy of a DBS certificate or certificate information will not normally be retained for longer than **six months** after the relevant recruitment or suitability decision has been made. Where exceptional circumstances require information to be retained for longer, Educ8 will ensure that there is a lawful and documented reason for doing so and will have regard to DBS requirements and applicable data protection legislation.

Educ8 may retain an appropriate record that a DBS check has been undertaken, including:

- the date the certificate was issued;
- the name of the individual;
- the type and level of DBS check undertaken;
- whether the appropriate barred list information was requested;
- the position for which the check was undertaken;
- the unique certificate number; and
- the date on which the check was verified.

The required information will be recorded on the Single Central Record (SCR) and/or relevant recruitment records in accordance with statutory requirements and Educ8's records management arrangements.

10.3.3 Criminal Record Information and Positive DBS Disclosures

A criminal record or other information contained on a DBS certificate will not automatically prevent an individual from being appointed or continuing in a role with Educ8, unless the information establishes that the individual is legally prohibited from undertaking the role.

Where relevant information is disclosed by an applicant or appears on a DBS certificate, Educ8 will undertake an individual and proportionate assessment before reaching a decision.

In considering the information, Educ8 will have regard, as appropriate, to:

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- the nature and seriousness of the offence or information;
- its relevance to the particular role and to working with children;
- the circumstances surrounding the matter;
- how long ago the matter occurred;
- the individual's age at the time;
- whether the matter represents an isolated incident or forms part of a pattern of behaviour;
- the applicant's explanation and any evidence of changed circumstances;
- evidence of rehabilitation, remorse or subsequent conduct;
- the nature and level of contact the role will have with children;
- any particular vulnerability of the children with whom the individual may work;
- any potential risk to children, colleagues, the school or the wider Educ8 organisation; and
- any other information relevant to determining the individual's suitability.

Educ8 will not require an individual to disclose, or take into account, a conviction or caution which is protected under the statutory filtering rules.

The assessment and decision will be documented using the appropriate Educ8 Positive DBS Disclosure Decision Form or other approved risk assessment documentation.

10.3.3.1 Consideration and Decision

Where criminal record or other relevant information requires further consideration, the applicant or employee will be given an appropriate opportunity to discuss the information and provide any relevant explanation or supporting evidence.

The information will be considered by an appropriately authorised manager in consultation with HR and, where safeguarding considerations arise, the Designated Safeguarding Lead or other appropriate safeguarding lead.

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The assessment will consider the requirements of the role, the safeguarding of children and the principles set out in section 10.3.3.

The final decision and the reasons for it will be documented. Any appointment or continuation in employment where relevant DBS information has been identified must be approved in accordance with Educ8's delegated authority arrangements.

Where the assessment concludes that the individual is unsuitable for the role, a conditional offer may be withdrawn or, in the case of an existing worker, the matter will be addressed under the appropriate Educ8 employment or safeguarding procedure.

10.3.3.2 Disputed DBS Information

Where an applicant or employee believes that information contained within their DBS certificate is inaccurate, they should raise the matter with the DBS through the appropriate dispute procedure.

Where the individual would otherwise be considered suitable for appointment or continued employment, Educ8 may, where appropriate, defer a final decision for a reasonable period to allow the individual an opportunity to challenge the information.

Any interim arrangements will be determined having regard to safeguarding requirements and the nature of the information being disputed. Educ8 will not permit an individual to undertake regulated activity where doing so would be unlawful.

10.3.3.3 Barred or Prohibited Individuals

An individual who is included on the Children's Barred List must not be permitted to undertake regulated activity with children.

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It is a criminal offence for a barred individual to seek to engage in regulated activity with children and for an organisation knowingly to permit a barred individual to undertake regulated activity.

A person who is subject to a prohibition order must not be appointed or permitted to undertake teaching work to which that prohibition applies.

A person subject to a section 128 direction must not be appointed or permitted to participate in the management of an independent school where the direction prohibits them from doing so.

Where Educ8 identifies information indicating that an individual is barred, prohibited or otherwise legally restricted from undertaking the proposed role, the individual will not be appointed to, or permitted to continue undertaking, the prohibited activity.

Educ8 will consider and make any referral to the DBS, Teaching Regulation Agency or other relevant body required by law or statutory guidance.

10.4 Induction

All new staff, including temporary staff and volunteers where appropriate to their role, will receive an appropriate safeguarding induction before, or as soon as practicable after, commencing their duties.

The purpose of induction is to ensure that individuals understand their role and responsibilities, Educ8's expectations of professional conduct, the safeguarding arrangements operating within the school and the procedures they must follow where they have a concern about a child or the conduct of an adult.

As part of induction, all staff will be provided with, and required to read and understand, **Part One of the current Keeping Children Safe in Education (KCSIE)**.

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Staff will also be provided with, or directed to, the policies and procedures relevant to their role, including as a minimum:

- Educ8's Safeguarding and Child Protection Policy;
- the Staff Code of Conduct;
- the Behaviour Policy;
- the school's procedures for managing concerns and allegations about staff, including low-level concerns;
- the Whistleblowing Policy and arrangements for raising concerns about safeguarding practice; and
- relevant online safety, filtering and monitoring arrangements.

Staff must understand the identity and role of the Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Leads and know how and when safeguarding concerns must be reported.

All staff will receive appropriate safeguarding and child protection training as part of their induction. This will include online safety and an understanding of the expectations, applicable roles and responsibilities relating to the school's filtering and monitoring systems.

Safeguarding and child protection training will be regularly updated. In addition, staff will receive safeguarding and child protection updates, including online safety updates, as required and at least annually, to ensure that they continue to have the relevant skills and knowledge to safeguard children effectively.

Induction will also ensure, as appropriate to the individual's role, that they:

- understand Educ8's safeguarding culture and that safeguarding is everyone's responsibility;
- understand the standards of behaviour and professional boundaries expected of adults working with children;
- know how to identify and report safeguarding concerns;
- understand the procedures for reporting concerns about the behaviour or conduct of another member of staff, volunteer, contractor or other adult;
- understand the arrangements for managing allegations and low-level concerns;
- understand their responsibilities in relation to child-on-child abuse and harmful behaviour;
- understand relevant online safety risks and their responsibilities in relation to filtering and monitoring;

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- understand the Prevent duty and how concerns relating to radicalisation should be reported;
- understand relevant information-sharing and safeguarding record-keeping requirements;
- understand Educ8's expectations regarding confidentiality and the appropriate use of personal and organisational information; and
- receive any additional safeguarding training required by the nature of their role.

The induction process will also be used to confirm, where not already completed during recruitment, that relevant employment documentation and information required by Educ8 has been received and appropriately recorded.

Completion of induction and required safeguarding training will be documented using Educ8's approved induction documentation. Staff will be required to confirm that they have received, read and understood the policies, guidance and information required for their role.

Induction does not replace the requirement for ongoing safeguarding training, professional development, supervision or management oversight.

10.4.1 Single Central Record (SCR)

Educ8 will maintain a **Single Central Record (SCR)** for each registered independent school in accordance with the Independent School Standards and Keeping Children Safe in Education (KCSIE).

The SCR provides a central record of the recruitment and vetting checks required in respect of individuals working at or connected with the school and is a key element of Educ8's assurance that appropriate safer recruitment checks have been completed.

The SCR will include the categories of individuals required by the Independent School Standards and KCSIE, including:

- members of staff employed by the school;
- supply staff provided through an employment business or agency; and

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- members of the proprietor body.

Educ8 may additionally record other individuals, including volunteers, contractors, trainee teachers and other persons working regularly within the school, where this supports effective safeguarding assurance. Where information is recorded voluntarily, this will be clearly distinguishable from information that is required by statute.

For each relevant individual, the SCR will record the checks required according to their role and circumstances. As applicable, this will include whether the following checks have been carried out or certificates obtained and the date on which each check was completed:

- identity;
- enhanced DBS check;
- Children's Barred List check where the individual is engaged in regulated activity and such a check is legally permitted;
- prohibition from teaching check where the individual undertakes teaching work;
- section 128 direction check where the individual participates in the management of an independent school;
- right to work in the UK;
- further checks considered appropriate where the individual has lived or worked outside the UK;
- verification of professional qualifications where these are required for the role; and
- any other information required by the Independent School Standards or KCSIE.

For supply staff, the SCR will record the required confirmation that the relevant employment business or agency has undertaken the necessary checks, together with the date on which that confirmation was received or checked, as required.

For members of the proprietor body, the SCR will record the checks required by the Independent School Standards, including the relevant DBS and section 128 arrangements.

The SCR will distinguish clearly between:

- a check being **required**;
- a check being **not applicable** to the particular role; and
- a check being **outstanding**.

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Where a check is not applicable, this should be identifiable from the record where necessary to demonstrate that the requirement has been considered rather than omitted.

The SCR must be updated promptly when an individual joins, changes role or leaves Educ8, or where any information recorded on the SCR changes. The details of an individual will be removed from the statutory SCR once they no longer work at the school. Any historical recruitment records Educ8 is required or chooses lawfully to retain will be maintained separately from the current SCR.

No individual responsible for maintaining or reviewing the SCR should assume that an entry is correct solely because information has previously been entered. The underlying recruitment evidence must be capable of supporting the information recorded.

Responsibility for maintaining the SCR sits with the Director responsible for HR and recruitment, supported by appropriately authorised staff. Headteachers are responsible for ensuring that HR is promptly informed of starters, leavers, changes of role and other circumstances that may affect the information required on the SCR.

Individuals will be removed from the SCR when they cease to work at the school, while appropriate historical recruitment records will be retained separately in accordance with Educ8's retention arrangements.

The SCR will be subject to regular internal review and quality assurance to ensure that it is accurate, complete and supported by appropriate recruitment records.

Any omission, discrepancy or outstanding check identified through review or audit will be investigated promptly. Where an omission may affect an individual's suitability to work with children or their legal entitlement to undertake their duties, appropriate safeguarding action will be taken immediately.

The SCR will be made available to inspectors and other authorised bodies where required.

The SCR is a record of checks undertaken and does not replace the requirement to maintain appropriate recruitment and personnel records demonstrating how Educ8 satisfied itself that the individual was suitable for appointment.

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Local and independent assurance

Each Headteacher will regularly confirm that the school's SCR accurately reflects the staff and other individuals currently working at or through the school and will promptly notify HR of any apparent omission, discrepancy or change requiring investigation.

In addition, a **termly independent sample check** of each school's SCR and supporting recruitment records will be undertaken by an individual who is sufficiently independent of the day-to-day recruitment and SCR process. The check will test the accuracy of a proportionate sample of SCR entries against the underlying evidence and identify any systemic or recurring weaknesses.

Findings and required actions will be recorded and followed through to completion. **Any material safeguarding or statutory compliance omission will be escalated immediately and will not await the next scheduled review or annual audit.**

10.4.2 Probationary Period and Ongoing Suitability

New employees will normally be subject to a probationary period in accordance with the terms and conditions applicable to their employment.

The probationary period provides an opportunity for Educ8 to assess the individual's performance, conduct, attendance, professional behaviours and suitability for their role following appointment.

Safeguarding and suitability to work with children will remain relevant throughout the probationary period and will not be regarded as having been established solely because the individual successfully completed the pre-employment checking process.

During probation, managers will consider, as appropriate:

- the individual's performance against the requirements of their job description;
- professional conduct and compliance with the Staff Code of Conduct;
- safeguarding practice and understanding;
- professional boundaries and relationships with children;
- completion of required induction and mandatory training;
- any concerns raised about conduct, behaviour or suitability;
- attendance and other relevant employment matters; and

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- any additional training, supervision or support required.

Probationary objectives and review meetings will be recorded using Educ8's approved probationary review documentation (see [F0013HR Probationary Review Form](#)).

Where safeguarding or suitability concerns arise during probation, they will be addressed promptly under the appropriate safeguarding and/or employment procedure and will not be deferred until a scheduled probationary review.

Successful completion of probation does not remove the individual's ongoing responsibility to comply with Educ8's safeguarding requirements or Educ8's responsibility to respond to any subsequent information that may call into question their suitability to work with children.

10.5 Visitors and Visiting Speakers

Educ8 recognises the value that visitors and external speakers can bring to the education and development of pupils. Appropriate arrangements will be in place to ensure that visitors do not present a safeguarding risk and that their presence within the school is managed in accordance with the school's safeguarding responsibilities.

The level of checking and supervision required will be determined according to the **purpose of the visit, the activities to be undertaken, the frequency of attendance, the level of contact with children and whether the individual will be undertaking regulated activity**.

Visitors

All visitors to an Educ8 school will be managed in accordance with the school's visitor and safeguarding arrangements.

As appropriate to the nature of the visit, Educ8 will:

- establish the visitor's identity and purpose for attending the school;
- verify the visitor's identity on arrival where appropriate;
- require visitors to sign in and comply with the school's identification and access-control arrangements;

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- ensure that visitors are provided with relevant safeguarding information, including how to report a safeguarding concern;
- determine whether the visitor requires supervision while on the premises;
- ensure that visitors do not have unsupervised access to children unless Educ8 has established that the appropriate safeguarding and vetting requirements have been satisfied; and
- maintain an appropriate record of the visit.

Professional visitors whose roles involve working with children, including social workers, educational professionals and other representatives of recognised organisations, will normally be expected to provide appropriate identification and evidence of their professional capacity where this has not already been established.

Educ8 will not routinely undertake DBS checks on visitors simply because they enter school premises. Whether a DBS or other safeguarding check is required will depend upon the activities the individual will undertake and whether the statutory eligibility requirements for such a check are met.

Where a visitor will undertake regulated activity with children, the requirements of this policy relating to regulated activity and the appropriate pre-employment or vetting checks will apply.

Visitors who have not been subject to the checks required for unsupervised access to children will be appropriately supervised according to the circumstances of their visit.

Visiting Speakers

Educ8 will undertake appropriate due diligence before inviting or permitting an external speaker to address pupils.

The purpose of the due diligence is to establish that the proposed speaker and the content or purpose of their visit are appropriate for the school and do not present an identified safeguarding risk.

The assessment will be proportionate to the circumstances and may include consideration of:

- the identity and background of the speaker;
- the organisation or body they represent;
- the purpose and proposed content of the presentation, activity or discussion;

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- the age and vulnerability of the pupils who will participate;
- publicly available information relevant to the individual's suitability or proposed activity;
- whether the proposed content is compatible with Educ8's safeguarding responsibilities and the school's educational values;
- any potential risk of extremist, discriminatory, harmful or otherwise inappropriate content;
- whether the visit engages Educ8's responsibilities under the Prevent duty; and
- the level of staff supervision required.

Where appropriate, Educ8 may request further information from the speaker or their organisation before approving the visit.

Visiting speakers will be required to provide appropriate proof of identity on arrival and will be subject to the school's normal visitor arrangements.

A visiting speaker will not normally be left unsupervised with pupils unless Educ8 has established that the nature of their activities permits this and all safeguarding and vetting requirements applicable to those activities have been satisfactorily met.

The school will ensure that an appropriate member of staff is responsible for the visit and that suitable arrangements are in place to monitor the content and conduct of the session.

Where a visiting speaker expresses views or presents material which gives rise to a safeguarding concern, including concerns relating to radicalisation or extremism, staff will respond in accordance with Educ8's safeguarding procedures and the concern will be referred to the Designated Safeguarding Lead (DSL) where appropriate.

Educ8 will maintain an appropriate record of visiting speakers and the checks or due diligence undertaken.

The requirement to undertake appropriate due diligence must not be used to prevent the lawful discussion of controversial, political, religious or social issues. Educ8 will balance its safeguarding and Prevent responsibilities with its obligations relating to freedom of speech and the provision of a broad and balanced education.

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10.6 Ongoing Suitability and Existing Staff and Volunteers

Educ8 recognises that safer recruitment does not end when an individual is appointed. The suitability of staff and volunteers to work with children is an ongoing safeguarding responsibility throughout their employment or engagement.

Educ8 will maintain a safeguarding culture in which staff and volunteers understand their responsibility to disclose relevant information and in which concerns about an individual's conduct or suitability to work with children can be raised and addressed appropriately.

Staff and volunteers are required to inform Educ8 promptly of any relevant change in circumstances which may affect their suitability to work with children or their ability to undertake their role. This includes, where relevant:

- any arrest, criminal investigation, charge, caution or conviction that may be relevant to their role or suitability to work with children, subject to the statutory rules relating to protected convictions and cautions;
- any barring decision, prohibition, restriction or other regulatory action relevant to their role;
- any involvement with the police or other statutory agency which may have implications for safeguarding or their suitability to work with children;
- any relevant professional or regulatory investigation, sanction or restriction;
- any change affecting their legal right to work in the UK;
- any relevant conduct or behaviour, including conduct outside work or online, which may raise safeguarding concerns or call into question their suitability to work with children; and
- any other circumstance which may affect their ability to meet the safeguarding or statutory requirements of their role.

A disclosure or concern will not automatically result in disciplinary action or termination of employment or engagement. Educ8 will consider the circumstances fairly and proportionately, with the safeguarding and welfare of children as the primary consideration.

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Where Educ8 receives information or becomes aware of conduct which may raise concerns about an existing member of staff or volunteer, it will consider whether:

- the individual continues to be suitable to work with children;
- the matter meets the harm threshold for managing allegations against adults working with children;
- the matter constitutes a low-level concern;
- advice or involvement from the Local Authority Designated Officer (LADO), police, children's social care or another relevant body is required;
- a new or updated DBS or other safeguarding check should be undertaken;
- any interim safeguarding arrangements, restrictions or risk assessment are required; and
- any referral to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or another professional or regulatory body is required.

Any concerns will be managed in accordance with Educ8's Safeguarding and Child Protection Policy, procedures for managing allegations and low-level concerns, Staff Code of Conduct and relevant employment procedures.

Changes of Role or Duties

Where an existing member of staff or volunteer changes role, duties or working arrangements, Educ8 will consider whether the change affects the safeguarding and vetting requirements applicable to that individual.

In particular, Educ8 will undertake the appropriate additional checks where an individual moves from a role that does not involve regulated activity into a role that does.

Educ8 will also consider whether additional checks are required where a change of role results in the individual:

- undertaking teaching work;
- participating in the management of an independent school;
- requiring a qualification or professional registration not previously required;
- becoming eligible for a different level of DBS check; or

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- undertaking duties which otherwise create additional statutory safeguarding requirements.

The required checks must be satisfactorily completed before the individual undertakes duties for which they are legally required.

Breaks in Service

Where an individual returns to work following a break in service of **12 weeks or more**, Educ8 will undertake the checks required by current statutory guidance before the individual resumes duties.

The nature and extent of the checks required will be determined according to the individual's role, the circumstances of the break and the requirements of Keeping Children Safe in Education (KCSIE) in force at the time.

Periods of authorised absence where the employment or engagement relationship has continued, such as maternity, paternity or other family leave, sickness absence or other authorised leave, will not automatically be treated as a break in service solely because the absence exceeds 12 weeks.

Repeat DBS and Other Checks

Educ8 does not routinely repeat DBS checks solely because a specified period of time has elapsed.

A new DBS check or other safeguarding check may, however, be undertaken where:

- required following a break in service;
- the individual's role or duties change;
- the individual moves into regulated activity;
- Educ8 receives information which gives rise to concerns about the individual's suitability;
- an Update Service status check indicates that new information is available;
- a statutory, regulatory or contractual requirement requires a further check; or
- Educ8 otherwise considers that a further check is appropriate following an assessment of the circumstances.

Where Educ8 relies upon the DBS Update Service, status checks will be undertaken in accordance with section 10.3.1 of this policy.

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Ongoing Responsibility

Managers have an ongoing responsibility to remain alert to safeguarding or conduct concerns which may call into question an individual's suitability to work with children and to ensure that such concerns are reported promptly through the appropriate safeguarding or employment procedure.

Staff and volunteers must not assume that information is irrelevant simply because it relates to conduct outside the workplace. Where there is uncertainty about whether information may have safeguarding implications, advice should be sought from the Designated Safeguarding Lead (DSL) and/or HR.

Educ8 will ensure that safeguarding concerns relating to existing staff and volunteers are appropriately recorded, considered and acted upon. Where an individual leaves Educ8 while a safeguarding matter is ongoing, the matter will continue to be considered and any statutory referral requirements will be addressed in accordance with **section 10.7** of this policy.

10.7 Leaving Employment and Statutory Referrals

The safeguarding responsibilities of Educ8 do not cease when an individual's employment or engagement ends. Where a member of staff, volunteer or other individual leaves Educ8, any outstanding safeguarding concerns will continue to be considered and any statutory referral duties will be fulfilled.

All employees leaving Educ8 will be managed in accordance with the applicable contractual and employment procedures. Appropriate arrangements will be made for the return of Educ8 property, removal of access to premises and information systems, completion of relevant records and notification of appropriate internal functions.

Where appropriate, employees may be invited to participate in an exit interview to provide feedback about their employment and identify any matters requiring further consideration.

Where an individual leaves while a safeguarding allegation, conduct investigation or other concern regarding their suitability to work with children is ongoing, Educ8 will not regard the individual's resignation,

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termination of employment or other departure as bringing the safeguarding process to an end.

Where reasonably possible, Educ8 will continue and conclude the relevant safeguarding investigation or fact-finding process, even where the individual:

- resigns;
- ceases to provide their services;
- refuses to participate in the process;
- reaches the end of a fixed-term or temporary engagement; or
- otherwise leaves Educ8 before the process has concluded.

The purpose of continuing the process is to establish, so far as reasonably possible, the facts and determine whether any safeguarding, regulatory or statutory action is required.

Any allegation relating to a member of staff or volunteer will continue to be managed in accordance with Educ8's Safeguarding and Child Protection Policy and procedures for managing allegations against adults working with children, including liaison with the Local Authority Designated Officer (LADO) where applicable.

10.7.1 Disclosure and Barring Service (DBS) Referrals

Educ8 has a legal duty to make a referral to the Disclosure and Barring Service (DBS) where the statutory referral conditions are met.

A referral will be made where Educ8:

- withdraws permission for an individual to engage in regulated activity with children because the individual has engaged in relevant conduct, satisfied the harm test or received a caution or conviction for a relevant offence; **or**
- would have withdrawn permission for the individual to engage in regulated activity on those grounds had the individual not resigned, retired, been made redundant, been redeployed to duties that are not regulated activity or otherwise ceased to undertake the activity,

and the statutory conditions for referral to the DBS are met.

Withdrawing permission to engage in regulated activity may include:

- dismissal;

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- removal from regulated activity;
- redeployment to duties that do not constitute regulated activity;
- termination of a volunteer or other engagement; or
- any other action which has the effect of preventing the individual from undertaking regulated activity.

An individual's resignation or departure from Educ8 will **not prevent a DBS referral** where the statutory referral criteria are satisfied.

Educ8 will not enter into a settlement or other agreement which prevents or restricts it from making a DBS referral where there is a legal duty to do so.

Where there is uncertainty as to whether the statutory referral criteria are met, Educ8 will seek appropriate safeguarding, HR and/or legal advice. The final decision and rationale will be documented.

A DBS referral will be made as soon as practicable once Educ8 has sufficient information to establish that the statutory referral conditions have been met.

10.7.2 Teaching Regulation Agency (TRA) Referrals

Where the individual has undertaken teaching work, Educ8 will separately consider whether the circumstances require or justify referral to the Secretary of State through the Teaching Regulation Agency (TRA).

A referral to the TRA will be considered where a teacher has been dismissed for serious misconduct or Educ8 has ceased to use their services because of serious misconduct, or where Educ8 would have dismissed the teacher or ceased to use their services had the individual not resigned or otherwise left.

Matters that may warrant consideration for referral include serious misconduct involving:

- safeguarding or the welfare of children;
- violence;
- sexual misconduct;
- serious dishonesty;
- discrimination or intolerance;
- serious breaches of professional boundaries;
- conduct which may undermine public confidence in the teaching profession; or

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- other conduct potentially amounting to unacceptable professional conduct or conduct that may bring the teaching profession into disrepute.

The requirement to consider a TRA referral applies according to the **teaching work undertaken**, and is not dependent upon the individual holding Qualified Teacher Status.

A referral to the TRA is separate from a referral to the DBS. Where the relevant criteria are met, Educ8 may be required to make, or consider making, referrals to both bodies.

10.7.3 Other Statutory and Professional Referrals

Educ8 will consider whether information arising from an individual's conduct or departure should be shared with any other relevant statutory, professional or regulatory body.

Depending upon the circumstances, this may include:

- the police;
- children's social care;
- the Local Authority Designated Officer (LADO);
- a relevant professional regulator;
- the Department for Education; or
- another body where Educ8 has a statutory or safeguarding obligation to provide information.

Information will be shared in accordance with applicable safeguarding, information-sharing and data protection requirements.

10.7.4 Employment References Following Safeguarding Concerns

Where Educ8 subsequently provides an employment reference for an individual who has left the organisation, the reference will be prepared in accordance with current statutory safeguarding guidance and Educ8's reference procedures.

Substantiated safeguarding concerns or allegations that meet the harm threshold will be included where they are relevant to the purpose of the reference.

Allegations that were found to be false, unfounded, unsubstantiated or malicious will not be included in employer references.

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Low-level concerns will not normally be included unless they relate to matters which would normally be included in a reference, such as misconduct or poor performance, or where a pattern of concerns has met the harm threshold.

References will be factual, accurate and fair and will not contain information which Educ8 is not lawfully entitled to disclose.

10.7.5 Records and Organisational Access

When an individual's employment or engagement ends, Educ8 will ensure that:

- the individual's leaving date is appropriately recorded;
- the Single Central Record (SCR) is updated as appropriate;
- access to Educ8 premises, systems, email accounts, data and other organisational resources is removed at the appropriate time;
- Educ8 equipment, identification, keys, access fobs and other property are returned;
- relevant personnel and safeguarding records are retained in accordance with applicable statutory guidance and Educ8's records retention arrangements; and
- any outstanding safeguarding investigation, referral or information-sharing requirement is appropriately recorded and progressed.

Where safeguarding concerns have arisen, records will be retained and managed in accordance with the requirements applicable to safeguarding allegations and personnel records and will not be destroyed simply because the individual has left Educ8.

10.8 Agency and Supply Staff

Where Educ8 uses staff supplied by an employment business or agency, it will ensure that the requirements of the Independent School Standards and Keeping Children Safe in Education (KCSIE) relating to agency and supply staff are satisfied before the individual commences work.

Educ8 will obtain **written confirmation from the employment business or agency in respect of each individual supplied** that the

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recruitment and vetting checks which Educ8 would otherwise be required to undertake have been completed satisfactorily.

A general assurance from an employment business or agency regarding its recruitment procedures will not, by itself, be sufficient. The confirmation must relate specifically to the individual being supplied.

As applicable to the individual's role and circumstances, Educ8 will obtain confirmation that the employment business or agency has:

- verified the individual's identity;
- obtained the appropriate enhanced Disclosure and Barring Service (DBS) check;
- obtained Children's Barred List information where the individual will undertake regulated activity and such a check is legally permitted;
- verified the individual's right to work in the UK;
- undertaken a prohibition from teaching check where the individual will undertake teaching work;
- undertaken a section 128 direction check where the individual will participate in the management of an independent school;
- undertaken or considered any further checks appropriate where the individual has lived or worked outside the UK;
- verified relevant professional qualifications where these are required for the role; and
- completed any other checks required by legislation, the Independent School Standards or KCSIE for the particular role.

Educ8 will ensure that the written confirmation provides sufficient information to establish that the required checks have been completed. Where the information supplied is incomplete, unclear or inconsistent, clarification will be obtained from the employment business or agency before the individual commences work.

Where an enhanced DBS certificate obtained by the employment business or agency contains information, Educ8 will obtain a copy of the certificate from the employment business or agency before the individual commences work.

The use of an employment business or agency does not remove Educ8's responsibility to establish that the individual presenting for work is the same person in respect of whom the checks have been undertaken.

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When an agency or supply worker first attends the school, Educ8 will:

- verify the individual's identity;
- ensure that their identity corresponds with the information provided by the employment business or agency;
- ensure that the required written confirmation of checks has been received;
- provide an appropriate safeguarding induction;
- ensure that the individual knows the identity of the Designated Safeguarding Lead (DSL) and relevant Deputy DSLs;
- ensure that the individual understands how to report safeguarding concerns;
- provide or direct the individual to the relevant safeguarding and conduct requirements; and
- ensure that the individual understands the standards of professional behaviour expected whilst working within Educ8.

Where an agency or supply worker will undertake **teaching work**, Educ8 will ensure that the appropriate prohibition from teaching check has been completed. This requirement arises from the nature of the work undertaken and does not depend upon the individual holding Qualified Teacher Status.

Where an agency or supply worker will **participate in the management of an independent school**, Educ8 will ensure that an appropriate section 128 direction check has been completed.

Where an agency or supply worker has lived or worked outside the UK, Educ8 will ensure that the employment business or agency has considered and, where appropriate, undertaken further checks to establish the individual's suitability. Overseas checks do not replace the DBS or other checks required for work undertaken in England.

Where a particular overseas check cannot reasonably be obtained, Educ8 will satisfy itself that the employment business or agency has appropriately considered the circumstances and will determine whether any additional safeguarding measures are required before accepting the individual.

The required information relating to agency and supply staff will be recorded on the school's **Single Central Record (SCR)** in accordance with the Independent School Standards and KCSIE.

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The underlying written confirmation received from the employment business or agency will be retained as evidence supporting the SCR entry in accordance with Educ8's records retention arrangements.

Where an agency or supply worker's role or duties change, Educ8 will consider whether the checks previously confirmed remain appropriate and whether any additional checks are required before the individual undertakes the changed duties.

Where Educ8 becomes aware of a safeguarding, conduct or suitability concern relating to an agency or supply worker, the concern will be addressed immediately in accordance with Educ8's safeguarding procedures. Educ8 will liaise with the employment business or agency as appropriate and will ensure that any immediate action necessary to safeguard children is taken.

Educ8 will not cease to consider a safeguarding matter solely because the employment business or agency removes the individual from the placement. Where applicable, Educ8 will work with the agency and relevant safeguarding bodies to ensure that the matter is appropriately investigated and that any statutory referral obligations to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or another relevant body are considered and fulfilled.

Educ8 retains responsibility for satisfying itself that the statutory requirements applicable to agency and supply staff have been met. **No agency or supply worker will commence work until Educ8 has received and satisfactorily reviewed the required individual-specific assurance and has established the individual's identity.**

10.9 Contractors and Self-Employed Individuals

Educ8 will ensure that appropriate safeguarding arrangements are in place for contractors and self-employed individuals undertaking work within its schools.

The checks and safeguarding arrangements required will be determined according to the nature of the work being undertaken, the frequency and duration of attendance, the individual's level of contact with children and whether the activities constitute regulated activity.

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No contractor or self-employed individual who has not been subject to the appropriate checks will be permitted to engage in regulated activity or have unsupervised access to children.

10.9.1 Contractors Employed by an External Organisation

Where an individual working at an Educ8 school is employed by a contractor or other external organisation, Educ8 will obtain appropriate **written confirmation from the employing organisation in respect of the individual concerned** that the safeguarding and vetting checks required for the activities they will undertake have been completed.

The checks required will depend upon the individual's activities and may include:

- verification of identity;
- the appropriate Disclosure and Barring Service (DBS) check;
- Children's Barred List information where the individual will undertake regulated activity and such a check is legally permitted;
- verification of the individual's right to work in the UK;
- prohibition from teaching checks where the individual will undertake teaching work;
- section 128 direction checks where the individual will participate in the management of an independent school;
- further checks considered appropriate where the individual has lived or worked outside the UK; and
- any other checks required by legislation, statutory guidance or the nature of the work being undertaken.

The written confirmation must relate to the individual attending the school. A general assurance regarding the contractor's recruitment or vetting procedures will not, by itself, be sufficient where individual confirmation is required.

When the contractor first attends the school, Educ8 will verify their identity and ensure that the person presenting for work is the same person in respect of whom the safeguarding assurance has been provided.

Where a contractor has not been subject to the checks required for unsupervised access to children, Educ8 will ensure that appropriate supervision and other safeguarding arrangements are in place. Supervision must not be used as a means of permitting an individual

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to undertake regulated activity without the checks legally required for that activity.

Safeguarding requirements applicable to contractors will be set out within the relevant contract or contractual arrangements.

10.9.2 Self-Employed Individuals

Where Educ8 engages a self-employed individual directly, Educ8 will determine and undertake the appropriate safeguarding and vetting checks rather than relying upon the individual to provide assurance about their own suitability.

Where the self-employed individual will undertake regulated activity with children, Educ8 will ensure that an **enhanced DBS check including Children's Barred List information** is obtained in accordance with current DBS eligibility and application arrangements.

Where the individual's activities do not constitute regulated activity but their work provides them with an opportunity for regular contact with children, Educ8 will ensure that an enhanced DBS check without Children's Barred List information is obtained.

Where the individual's activities do not provide an opportunity for regular contact with children, Educ8 will determine whether a basic DBS check or other safeguarding arrangements are appropriate having regard to the nature of the work and the circumstances.

As applicable to the role, Educ8 will also undertake or obtain appropriate evidence of:

- identity;
- right to work in the UK where applicable to the nature of the engagement;
- prohibition from teaching status where teaching work will be undertaken;
- section 128 status where the individual will participate in the management of an independent school;
- relevant qualifications or professional registrations;
- appropriate overseas checks where the individual has lived or worked outside the UK; and
- any other check required by legislation or statutory guidance.

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The checks required will be completed before the individual undertakes duties for which those checks are legally required.

10.9.3 Safeguarding Arrangements While on Site

All contractors and self-employed individuals attending an Educ8 school will be subject to appropriate visitor, access-control and safeguarding arrangements.

As appropriate to their activities, they will:

- have their identity verified on first attendance;
- sign in and comply with the school's identification and access-control arrangements;
- receive appropriate safeguarding information;
- know how to report a safeguarding concern and how to contact the Designated Safeguarding Lead (DSL);
- comply with relevant requirements of the Staff Code of Conduct and other safeguarding procedures;
- be appropriately supervised where required; and
- only access areas of the school necessary for the work they are undertaking.

The level of supervision required will be determined through consideration of the nature of the work, the safeguarding checks undertaken, the location in which the work will take place and the likelihood of contact with children.

Where practical, works involving contractors who have not been appropriately checked for unsupervised contact with children should be scheduled at times or in locations which minimise contact with pupils.

10.9.4 Contractors Arranged by Third Parties

Where contractors attend an Educ8 school under arrangements made by a landlord, managing agent, local authority or another third party, Educ8 will not assume that appropriate safeguarding checks have been undertaken solely because the contractor has been arranged by that organisation.

The school will establish what checks or assurances have been obtained and will implement appropriate access, identification and supervision arrangements according to the circumstances.

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Where Educ8 cannot obtain sufficient assurance that the checks necessary for the activities to be undertaken have been completed, the individual will not be permitted to undertake regulated activity or have unsupervised access to children.

10.9.5 Records and Ongoing Concerns

Educ8 will retain appropriate evidence of the assurances and checks undertaken in relation to contractors and self-employed individuals in accordance with its records retention arrangements.

Where contractors or self-employed individuals are recorded on the Single Central Record (SCR) as part of Educ8's wider safeguarding assurance arrangements, it will be clear where such recording is additional to, rather than required by, the statutory SCR requirements.

Where a safeguarding or conduct concern arises regarding a contractor or self-employed individual, Educ8 will take immediate action to safeguard children and will follow its safeguarding procedures.

The individual's employer or contracting organisation will be informed where appropriate. Educ8 will also consider whether the matter requires referral to the Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA), police, children's social care or another relevant body.

The fact that an individual is employed by an external organisation or engaged on a self-employed basis does not remove Educ8's responsibility to take appropriate action where safeguarding concerns arise.

10.10 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.

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10.11 Volunteers

Educ8 recognises that volunteers can make an important contribution to the work of its schools. The same safeguarding principles that underpin the recruitment of paid staff will be applied when assessing the suitability of volunteers to work with children.

Before a volunteer commences their role, Educ8 will consider the nature of the activities they will undertake, the frequency with which they will undertake them and whether those activities constitute regulated activity as defined in section 8.3 of this policy.

From 1 September 2026, the previous supervision exemption from regulated activity no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in any 30-day period, or overnight between 2.00am and 6.00am, will therefore be undertaking regulated activity irrespective of whether they are supervised by a member of staff.

Where a volunteer will undertake regulated activity, Educ8 will:

- obtain an enhanced DBS check including children's barred list information;
- verify the volunteer's identity;
- undertake any other checks considered appropriate having regard to the nature of the role and the circumstances of the individual;
- obtain and scrutinise appropriate references where required by Educ8's safer recruitment procedures;
- ensure that the volunteer receives appropriate safeguarding information, induction and training relevant to their role; and
- record the required information in accordance with Educ8's safer recruitment and Single Central Record arrangements.

A volunteer must not be permitted to undertake regulated activity unless Educ8 has established that they are not barred from working with children. Where a volunteer is permitted to commence regulated activity before receipt of their DBS certificate, this will only occur in accordance with the exceptional arrangements set out elsewhere in this policy, including completion of all other appropriate checks, confirmation of the barred list check where available and permitted, an appropriate written risk assessment and appropriate supervision.

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All volunteers assisting on an overnight school trip will be undertaking regulated activity and must have an enhanced DBS check including children's barred list information before undertaking that activity.

Where a volunteer's activities do **not** constitute regulated activity, Educ8 will undertake a risk assessment to determine what checks and safeguarding arrangements are appropriate. In determining whether an enhanced DBS check without children's barred list information should be obtained, consideration will be given to:

- the nature of the work with children;
- the frequency and duration of the volunteer's involvement;
- the ages and vulnerability of the children concerned;
- whether the volunteer will have direct contact with children;
- the level and nature of supervision available;
- the location and circumstances in which the activity will take place; and
- any other relevant safeguarding considerations.

The outcome of this assessment and the rationale for the checks undertaken will be recorded.

Occasional volunteers, such as parents or carers assisting at an occasional school event or non-overnight day trip, will not normally be undertaking regulated activity solely on that basis. Appropriate safeguarding arrangements and supervision will nevertheless be put in place according to the circumstances.

Where an enhanced DBS check is obtained for a volunteer who is **not** undertaking regulated activity, it must **not include children's barred list information** unless the individual is otherwise legally eligible for such a check.

Educ8 will check the identity of volunteers and ensure that they are appropriately supervised and made aware of the school's safeguarding expectations, Staff Code of Conduct and procedures for reporting safeguarding concerns.

Where an existing volunteer's duties, frequency of attendance or circumstances change, Educ8 will reassess whether the role constitutes regulated activity and whether any additional DBS or other safeguarding checks are required.

No person who is barred from working with children will be permitted to undertake regulated activity. It is a criminal offence for a barred

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person to engage in regulated activity and for an organisation knowingly to permit a barred person to undertake such activity.

Existing volunteers

Before 1 September 2026, Educ8 will identify any existing volunteer whose activities will become regulated activity as a consequence of the removal of the supervision exemption. Where this applies, Educ8 will ensure that the volunteer's Children's Barred List status is checked in accordance with current statutory guidance before they continue to undertake regulated activity from that date.

10.12 Proprietors, Directors and Governance Roles

Educ8 will ensure that proprietors and individuals participating in the governance or management of its independent schools are subject to the checks required by the Independent School Standards, Keeping Children Safe in Education (KCSIE) and other applicable statutory requirements.

For the purposes of the Independent School Standards, the **proprietor of each registered independent school is the person or body formally recorded as proprietor by the Department for Education (DfE).**

Educ8's internal governance arrangements, including the Executive Board, do not alter the identity of the registered proprietor for statutory purposes unless and until a change of proprietor has been formally recognised by the DfE.

The checks required for an individual will be determined according to their legal status, responsibilities and activities, including whether they are:

- the registered proprietor;
- a member of a body formally registered as proprietor;
- a director or member of the Executive Board;
- participating in the management of an independent school;
- undertaking teaching work; or
- undertaking regulated activity with children.

10.12.1 Registered Proprietor

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Educ8 will ensure that the individual or body recorded by the DfE as proprietor of each registered independent school is subject to the checks prescribed by the Independent School Standards.

Where the registered proprietor is an **individual**, the checks applicable to an individual proprietor will be undertaken in accordance with the requirements of the Independent School Standards and the arrangements operated by the DfE.

Where the registered proprietor is a **body of persons**, the checks applicable to the Chair and other members of that body will be undertaken in accordance with the Independent School Standards.

Educ8 will cooperate with the DfE and provide any information necessary to facilitate proprietor checks.

Any proposed change to the identity or constitution of the registered proprietor will be managed in accordance with the applicable DfE registration and regulatory requirements. Educ8 will not treat an intended or internally agreed governance change as having altered the statutory proprietor arrangements until the appropriate DfE process has been completed.

10.12.2 Executive Board Members and Directors

Where a Director or member of the Executive Board is not, in their capacity as a Director or Board member, part of the body formally recorded by the DfE as proprietor, they will not be described or treated as a member of the proprietor body solely by virtue of their Educ8 governance role.

However, Educ8 will consider the checks required according to the individual's actual responsibilities.

Where a Director or Executive Board member **participates in the management of an independent school**, Educ8 will undertake a section 128 direction check to establish that the individual is not prohibited from participating in the management of an independent school.

Whether an individual participates in management will be determined by their actual responsibilities, authority and involvement in the management of the school rather than solely by their job title or membership of an internal governance structure.

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Where a Director or Executive Board member also undertakes regulated activity with children, teaching work, employment or another operational role, Educ8 will separately undertake the safeguarding and employment checks applicable to that role.

10.12.3 Section 128 Directions

No individual who is subject to a section 128 direction which prohibits them from participating in the management of an independent school will be appointed or permitted to continue in a role to which that prohibition applies.

Section 128 checks will be undertaken for individuals where required by the Independent School Standards or KCSIE, including individuals whose responsibilities amount to participation in the management of an independent school.

The requirement will be determined by the individual's actual functions and authority rather than solely by their job title, employment status or membership of an internal committee or governance structure.

10.12.4 Changes to Proprietor or Governance Arrangements

Educ8 will ensure that proposed changes to the registered proprietor or governance arrangements of a registered independent school are considered against the applicable DfE registration and regulatory requirements before implementation.

Where Educ8 proposes to change the registered proprietor, constitute a body of persons as proprietor, or otherwise make a change requiring notification to or approval by the DfE, the appropriate process will be followed.

Recruitment, vetting and Single Central Record arrangements will be reviewed and updated when any such change becomes effective.

Until a change has been formally recognised by the DfE, the existing registered proprietor arrangements will continue to be treated as the statutory position for the purposes of this policy.

10.12.5 Single Central Record

The required information relating to the registered proprietor and other individuals subject to statutory checks will be recorded on the school's

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Single Central Record (SCR) in accordance with the Independent School Standards and KCSIE.

The SCR and supporting records will accurately reflect the **current registered proprietor arrangements** for the individual school.

Where Directors, Executive Board members or other individuals are subject to section 128 or other checks because of their management or operational responsibilities, these will be appropriately recorded.

The SCR will not describe an individual or body as the statutory proprietor where that status has not been formally established through the applicable DfE arrangements.

10.13 Alternative Provision

Where Educ8 places a pupil with an alternative provision provider, Educ8 will satisfy itself that appropriate safeguarding arrangements are in place, including appropriate safer recruitment and vetting arrangements for individuals working with children.

Educ8 will obtain appropriate written assurance from the alternative provision provider that staff and other individuals working with the pupil have been subject to the safeguarding and safer recruitment checks required for the activities they undertake.

Educ8 will also obtain written confirmation that the alternative provision provider will inform Educ8 of any arrangements or changes which may put the pupil at risk, including relevant changes of staff, so that Educ8 can satisfy itself that appropriate safeguarding checks have been completed in respect of any new individuals working with the pupil.

The level of assurance sought will be proportionate to the nature of the provision and the individual's contact with children. This may include assurance regarding:

appropriate Disclosure and Barring Service (DBS) checks;
Children's Barred List checks where individuals undertake regulated activity and such checks are legally permitted;
prohibition from teaching checks where individuals undertake teaching work;

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appropriate checks for individuals who have lived or worked outside the UK; and
any other safeguarding or vetting checks required by the individual's role.

Educ8 will not normally duplicate checks properly undertaken by the alternative provision provider but must be satisfied that the provider has appropriate safer recruitment arrangements and that the necessary checks have been completed.

Where Educ8 has reason to question the adequacy of a provider's safer recruitment or vetting arrangements, further assurance will be sought and any concerns must be satisfactorily resolved before the placement commences or continues.

Appropriate evidence of the assurance obtained will be retained in accordance with Educ8's records management arrangements.

Where Educ8 itself provides alternative provision to pupils commissioned or placed by another school, local authority or other organisation, Educ8 will provide appropriate assurance regarding its safer recruitment and vetting arrangements where requested.

10.14 Adults Who Supervise Learners on Work Experience

When arranging work experience placements, Educ8 will ensure that the placement provider has appropriate policies and procedures in place to protect children from harm.

Educ8 will consider the specific circumstances of each placement when determining whether safeguarding and vetting checks are required in respect of individuals who will supervise a child on work experience.

Where a child is **under the age of 16**, an individual who teaches, trains, instructs, cares for or supervises the child in connection with their work experience may be undertaking regulated activity with children where the relevant statutory conditions are met.

In determining whether the activity constitutes regulated activity and whether an **enhanced Disclosure and Barring Service (DBS) check including Children's Barred List information** is appropriate, Educ8 will consider:

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- the age of the child;
- the nature of the activity being undertaken;
- the nature and frequency of the teaching, training, instruction, care or supervision;
- whether the activity takes place on more than three days in any 30-day period or overnight between 2am and 6am; and
- any other circumstances relevant to determining whether the statutory definition of regulated activity is met.

Where the statutory criteria for regulated activity are met, Educ8 will ensure that the appropriate safeguarding assurance is obtained from the work experience provider, including confirmation of an enhanced DBS check with Children's Barred List information where required.

Where a young person is aged 16 or 17 and the teaching, training, instruction, care or supervision is provided solely in connection with their paid or unpaid employment or work experience, this activity does not, by itself, constitute regulated activity with children. **Educ8 will not require the work experience provider to obtain an enhanced DBS check with Children's Barred List information for an individual solely on the basis that they supervise a 16 or 17-year-old on work experience.** Appropriate safeguarding arrangements will nevertheless be established for the placement.

Educ8 will not request, or require a placement provider to obtain, Children's Barred List information unless there is a lawful entitlement to do so.

Any decision regarding safeguarding or vetting requirements for a work experience placement will be proportionate to the circumstances of the placement and appropriately recorded.

11. Metrics

The Director responsible for HR and recruitment will be responsible for monitoring and evaluating the implementation and effectiveness of this policy. **Assurance will not rely solely upon the function responsible for operating the recruitment and SCR process.**

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Educ8 will operate a proportionate three-level assurance framework comprising:

- **local assurance** – regular Headteacher confirmation that the school's SCR reflects the staff and other individuals currently working at or through the school;
- **independent assurance** – a termly sample check of each school's SCR and supporting recruitment records by an individual sufficiently independent of the day-to-day recruitment and SCR process; and
- **annual assurance** – an annual Safer Recruitment Compliance and Effectiveness Audit covering the operation of the safer recruitment framework across Educ8.

Findings and actions arising from assurance activity will be recorded and monitored to completion. Material safeguarding or statutory compliance failures will be escalated promptly through the appropriate leadership and governance arrangements and will not await the next scheduled assurance activity.

An annual Safer Recruitment Compliance and Effectiveness Audit will be undertaken using the framework at Appendix B. The audit will include review of the Single Central Record and a proportionate sample of recruitment and personnel files, together with relevant agency, contractor, volunteer and safeguarding/referral records.

The audit will include:

- **Single Central Record (SCR)** – completeness, accuracy and evidence supporting recorded checks;
- **Pre-employment compliance** – percentage of starters for whom all required checks were satisfactorily completed before commencement, including review of any authorised exceptions;
- **Recruitment process compliance** – sample review of advertisements, applications, shortlisting, online searches, references, interviews and appointment records;
- **Recruitment files** – completeness of the required safer recruitment and personnel documentation;
- **Agency, contractor and volunteer arrangements** – evidence that required checks, assurances and risk assessments have been completed;
- **Induction and training** – completion of required safeguarding induction and safer recruitment training;
- **Ongoing suitability** – appropriate action following changes of role, relevant concerns or other circumstances requiring further checks;

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- **Safeguarding and referrals** – relevant allegations and concerns, and DBS, TRA or other statutory referrals considered or made; and
- **Audit findings and actions** – identified non-compliance, recurring themes and completion of corrective actions.

A target of **100% compliance** will apply to statutory safeguarding and pre-employment checking requirements.

Any material safeguarding or statutory compliance failure identified through monitoring will be escalated promptly and will not wait for the annual reporting cycle.

12. Quality Records

The following Quality Records shall be generated and managed in accordance with Doc. 10:

Required Record	Custodian
Completed Statement of Suitability	HR Director
Completed Staff Code of Conduct	HR Director
Completed KCSIE Declaration	HR Director
Completed DBS Disclosure Record Form	HR Director
Completed Induction Form	HR Director
Completed Application Form	HR Director
Completed Probationary Review Form	HR Director
Completed Interview Assessment Forms	HR Director
Completed Interview Summary Sheets	HR Director
Completed New Employee Reference Alt Ed	HR Director
Completed Recruitment Shortlist Forms	HR Director

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13. Form(s)/Template(s)

There following form(s)/template(s) are required for this document:

Form Number	Title
F0020HR	Employee Induction Form
F0013HR	Probationary Review Form
F0003HR	Application for Employment Form
T0028SA	Statement of Suitability to Work with Young People
F0021HR	Starting Work Prior to DBS Form
D0006HR	Staff & Volunteers Code of Conduct
F0014SA	KCSIE & Safeguarding Declaration
F0068HR	Interview Assessment Form
F0069HR	Interview Summary Sheet
F0031HR	New Employee Reference Alt Ed
F0070HR	Recruitment Shortlist Form
F0073HR	Recruitment Pack Template

Appendix 'A' - Identity and Right to Work Checking Procedure

A1. Purpose

This appendix sets out Educ8's requirements for verifying the identity and right to work of individuals engaged to work within its schools.

Identity verification is an essential component of safer recruitment and must be undertaken alongside the other pre-employment checks required by this policy.

Educ8 will undertake identity checks in accordance with current Disclosure and Barring Service (DBS) requirements and right to work checks in accordance with current Home Office requirements.

DBS identity verification and right to work checks are separate processes. Completion of a DBS identity check does not, in itself, establish an individual's right to work in the UK, and completion of a right to work check does not replace the identity verification required for a DBS application.

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The current GOV.UK guidance must always be consulted when undertaking checks. Educ8 will not rely upon historic lists of acceptable documents where these differ from current statutory or DBS guidance.

A2. General Identity Checking Principles

Educ8 must establish the identity of an applicant before appointment and ensure that the person presenting for work is the same person who has been subject to the recruitment and vetting process.

When undertaking identity verification, Educ8 will:

- follow the current DBS identity checking requirements where a DBS check is being undertaken;
- verify the applicant's full name, including any previous names or aliases;
- verify the applicant's date of birth;
- ensure that the applicant provides a complete five-year address history for the purposes of their DBS application;
- compare identity information with the information provided within the individual's application and other recruitment documentation;
- ensure that photographs and identifying information are consistent with the individual presenting the documents;
- investigate and satisfactorily resolve discrepancies before proceeding;
- ensure that documents and information used for identity verification meet current DBS requirements; and
- maintain an appropriate audit record of the identity verification undertaken.

An individual undertaking an identity check must not verify the identity of:

- a relative or partner;
- a person who lives in the same household; or
- a personal friend.

Where such a relationship exists, the identity check must be undertaken by another appropriately authorised person.

The person checking identity must not amend information provided by an applicant without the applicant's knowledge and agreement.

Any discrepancy between the information supplied by the applicant and the identity evidence presented must be investigated and resolved. Where there is reason to suspect identity fraud or deliberate misrepresentation, the matter must be escalated to the Director responsible for HR and recruitment and consideration given to obtaining appropriate advice and/or making a referral to the relevant authority.

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A3. DBS Identity Verification

Where an individual requires a standard or enhanced DBS check, Educ8 will verify their identity in accordance with the current DBS identity checking guidelines.

Identity may be established through:

1. an appropriate digital identity verification process; or
2. the DBS manual identity checking process.

The person undertaking the check must use the current DBS guidance to establish which documents and combinations of documents are acceptable at the time the check is undertaken.

Educ8 will not reproduce a definitive list of acceptable DBS identity documents within this policy because the documents, validity periods and technical requirements may be amended by the DBS from time to time.

A4. Digital Identity Verification

Where available and appropriate, Educ8 may use digital identity verification as part of the DBS application process.

Any digital identity verification service used for DBS purposes must meet the current requirements established by the DBS and the applicable government digital identity framework.

Where digital identity verification is used, Educ8 will ensure that:

- the service being used is appropriate for DBS identity verification;
- the level of identity verification satisfies the requirements applicable to the DBS check;
- the identity established relates to the applicant;
- any additional identity evidence required by the DBS process is obtained;
- discrepancies or failed verification results are appropriately investigated; and
- an appropriate record of the identity verification is retained.

Successful digital identity verification does not remove Educ8's responsibility to ensure that the person presenting for employment or engagement is the same person whose identity has been verified.

Where digital verification cannot establish the applicant's identity to the required standard, the appropriate manual identity checking process will be followed.

A5. Manual DBS Identity Verification

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Where identity is verified manually, Educ8 will follow the current DBS three-route identity checking process.

The routes must be considered in the order prescribed by the DBS.

Route 1

Route 1 should be used wherever the applicant is able to provide the required combination of acceptable identity documents.

The applicant must provide the combination of Group 1, Group 2a and/or Group 2b documents specified within the current DBS identity checking guidance.

The documents must establish the applicant's identity in accordance with current DBS requirements, including their name and date of birth.

Route 2

Where the applicant cannot satisfy Route 1, Route 2 may be used where the applicable DBS requirements are met.

The applicant must provide the combination of identity documents required under the current DBS guidance and the required external identity validation process must be completed.

Route 3

Route 3 may only be used where the applicant cannot satisfy Routes 1 or 2 and meets the eligibility requirements prescribed by the DBS.

The applicant must provide the combination of documents specified within the current DBS guidance.

Inability to Establish Identity

Where an applicant cannot establish their identity through the prescribed DBS routes, Educ8 will follow the current DBS procedure for applicants who are unable to satisfy the standard identity checking routes.

The recruitment process must not proceed on the assumption that identity has been satisfactorily established where the required DBS identity verification has not been completed.

A6. Checking Identity Evidence

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The person undertaking a manual identity check must examine the evidence in accordance with current DBS requirements and satisfy themselves, as far as reasonably possible, that:

- the documents are genuine and have not been altered or tampered with;
- the documents relate to the applicant;
- photographs are consistent with the applicant's appearance;
- dates of birth are consistent across the documents and recruitment information;
- names are consistent or any differences can be satisfactorily explained;
- previous names and changes of name have been appropriately evidenced;
- documents remain valid where a current document is required; and
- the information corresponds with the applicant's DBS application and other recruitment information.

Where a document contains signs of alteration, inconsistency or suspected fraud, the identity checking process must not proceed until the matter has been satisfactorily resolved.

A7. Names and Address History

Applicants must provide all names by which they have previously been known where required as part of the DBS process.

Appropriate evidence of a change of name may be required in accordance with current DBS guidance.

Applicants must also provide a complete address history covering the period required by the DBS, currently five years, without unexplained gaps.

The requirement to provide an address history for a DBS application should not be confused with a requirement to provide proof of each address. The documentary evidence required for identity verification will be determined by the applicable DBS identity checking route and current DBS guidance.

Where an applicant has an unusual or complex address history, including periods with no fixed abode, overseas residence or other circumstances that make the standard address requirements difficult to apply, current DBS guidance concerning unusual addresses must be followed.

A8. Right to Work in the UK

Educ8 must establish that every person it employs has the legal right to undertake the work offered before employment commences.

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Right to work checks will be undertaken in accordance with current Home Office guidance.

Depending upon the individual's immigration status and documentation, the check may be undertaken using:

- the Home Office online right to work checking service;
- an approved digital identity verification process where legally permitted; or
- an appropriate manual document check.

The method used must be one which provides Educ8 with the appropriate statutory excuse against liability for employing a person who does not have permission to undertake the work concerned.

Online Right to Work Checks

Where an individual has an immigration status that can or must be checked using the Home Office online service, Educ8 will obtain the appropriate share code from the applicant and undertake the check using the official Home Office service.

Educ8 will check that:

- the photograph displayed is of the individual presenting for work;
- the individual has permission to work in the UK;
- the permission permits the type of work being offered;
- any restrictions or conditions are understood and can be complied with; and
- the permission has not expired.

Evidence of the completed check will be retained in accordance with current Home Office requirements.

Manual Right to Work Checks

Where a manual right to work check is permitted, Educ8 will obtain and examine the original documents prescribed by current Home Office guidance.

The person undertaking the check will satisfy themselves that:

- the documents are genuine, original and have not been altered;
- they relate to the individual presenting them;
- photographs are consistent with the individual's appearance;
- dates of birth are consistent;
- the documents demonstrate an appropriate right to undertake the work offered;
- any time limit on the individual's permission has not expired; and

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- any differences in names are satisfactorily explained and supported by appropriate documentation.

Copies of the relevant documents will be made and endorsed or otherwise recorded in accordance with current Home Office requirements.

Time-Limited Right to Work

Where an individual's right to work is time limited, Educ8 will record the expiry date and ensure that an appropriate follow-up check is completed before the existing permission expires.

The individual's continued employment will remain subject to their continuing legal entitlement to work in the UK.

A9. Overseas Applicants

Applicants who have lived or worked outside the UK must have their identity and right to work established in the same manner as other applicants.

Additional checks arising from overseas residence or employment are separate from identity and right to work verification and will be undertaken in accordance with section 10 of this policy.

A DBS check does not replace appropriate overseas checks, and overseas criminal record information does not replace the DBS checks required for work undertaken in England.

A10. Recording Identity Checks

Educ8 will maintain an auditable record of the identity verification undertaken as part of the recruitment process.

The recruitment record will identify, as appropriate:

- the identity checking method used;
- the documents or digital identity evidence relied upon;
- the person who undertook or verified the check;
- the date on which the check was completed;
- any discrepancy identified and how it was resolved; and
- confirmation that the identity requirement was satisfactorily completed.

Where a digital identity verification service is used, the appropriate verification result and audit information will be retained in accordance with the requirements applicable to that service.

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The completion and date of the required identity check will also be recorded on the Single Central Record (SCR) where required.

A11. Retention of Identity Documentation

Educ8 will distinguish between:

- the **record that an identity check has been undertaken**;
- copies or images of the **identity documents themselves**;
- information retained for **DBS identity verification**;
- evidence retained to establish the statutory **right to work**; and
- copies of **DBS certificates or criminal record information**.

These records have different legal purposes and may be subject to different retention requirements.

Educ8 will retain the evidence and audit records required by the DBS, Home Office and applicable legislation for the period specified by the relevant current guidance.

Identity documents will not be copied or retained simply because they have been presented during recruitment. Copies will only be retained where there is a lawful and necessary reason to do so.

Right to work evidence will be retained for the period required by current Home Office guidance.

DBS certificates and criminal record information will be handled and retained separately in accordance with section 10.3.2 of this policy.

All information retained will be stored securely, with access restricted to authorised individuals, and disposed of securely when no longer required.

A12. Responsibility and Current Guidance

The person responsible for undertaking or overseeing recruitment must ensure that identity and right to work checks have been satisfactorily completed before an individual's appointment is confirmed.

The individual undertaking a check is responsible for using the **current version** of the relevant government guidance at the time the check is undertaken.

The principal guidance to be consulted is:

- Disclosure and Barring Service – current identity checking guidelines for standard and enhanced DBS checks;
- Disclosure and Barring Service – current digital identity verification guidance;

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- Home Office – current employer's guide to right to work checks; and
- any other relevant GOV.UK guidance applicable to the individual's circumstances.

Where current statutory or government guidance differs from the procedures contained within this appendix, the current statutory or government requirement will take precedence and the matter should be referred to the Director responsible for HR and recruitment for clarification.

No individual will be permitted to commence employment unless Educ8 has satisfactorily established their identity and right to work in the UK.

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APPENDIX 'B' – Safer Recruitment Compliance and Effectiveness Checklist

Requirement	Compliant	Non-Compliant	N/A	Responsibility
Safer Recruitment Policy reviewed and updated in accordance with current statutory requirements and guidance	☐	☐	☐	Director responsible for HR and recruitment
Recruitment procedures applied consistently across relevant categories of staff and workers	☐	☐	☐	Director responsible for HR and recruitment
Current application form used and CVs not accepted as a substitute	☐	☐	☐	HR
Job descriptions and person specifications include appropriate safeguarding responsibilities and suitability requirements	☐	☐	☐	HR / Recruiting Manager
Recruitment advertisements contain the required safeguarding and Rehabilitation of Offenders Act information	☐	☐	☐	HR
Shortlisting decisions recorded against agreed selection criteria	☐	☐	☐	Recruiting Panel
Shortlisted candidates complete the required safer recruitment self-declaration and relevant matters are appropriately explored at interview	☐	☐	☐	Recruiting Panel
Employment gaps, inconsistencies and discrepancies appropriately identified and explored	☐	☐	☐	Recruiting Panel
Online searches undertaken for shortlisted candidates in accordance with this policy	☐	☐	☐	HR / Recruiting Panel
Appropriate references obtained, scrutinised and discrepancies followed up	☐	☐	☐	HR / Recruiting Panel

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Interviews include appropriate assessment of safeguarding knowledge, attitudes, behaviours and suitability to work with children	☐	☐	☐	Recruiting Panel
At least one person involved in the recruitment process has appropriate safer recruitment training	☐	☐	☐	Recruiting Manager
Required identity checks completed	☐	☐	☐	HR
Right to work in the UK established before employment commences	☐	☐	☐	HR
Appropriate DBS and Children's Barred List checks completed according to the role and regulated activity status	☐	☐	☐	HR
Prohibition from teaching checks completed where required	☐	☐	☐	HR
Section 128 checks completed where required	☐	☐	☐	HR
Required qualifications and professional registrations verified	☐	☐	☐	HR
Appropriate additional checks considered and completed for individuals who have lived or worked outside the UK	☐	☐	☐	HR
Any commencement before receipt of a DBS certificate appropriately authorised, risk assessed and supported by required safeguards	☐	☐	☐	HR / Headteacher
Conditional offers only confirmed following satisfactory completion of required checks	☐	☐	☐	HR
Required pre-employment checks accurately recorded on the SCR and supported by underlying evidence	☐	☐	☐	HR

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Agency/supply and contractor arrangements supported by appropriate individual-specific safeguarding assurance	☐	☐	☐	HR / School
Appropriate checks, risk assessments and safeguarding arrangements completed for volunteers and other relevant workers	☐	☐	☐	HR / School
New starters receive and complete required safeguarding induction and training	☐	☐	☐	Headteacher / DSL
Changes of role or circumstances appropriately considered for additional or repeat checks	☐	☐	☐	HR
Leavers with relevant safeguarding concerns considered for DBS, TRA or other statutory referral	☐	☐	☐	HR / DSL
Recruitment and safeguarding records retained in accordance with applicable requirements	☐	☐	☐	HR
Previous safer recruitment audit actions have been completed and recurring weaknesses addressed	☐	☐	☐	Director responsible for HR and recruitment

Overall assessment: _____

Areas of non-compliance / improvement identified:

Required actions:

Responsible person(s): _____

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Target completion date(s): _____

Date completed / verified: _____

Audit completed by: _____

Date: _____

Reported through governance arrangements on: _____