Enemy of Boredom

Safer Recruitment Policy

Approved by:	Steve Godwin, CEO
Date approved:	12th October 2026
Next review due by:	Within 12 months of approval, or sooner if legislation or statutory guidance changes
Policy owner:	Tracey Clark, COO
Applies to:	All recruitment and engagement of adults who may work with our learners

1. Scope

This policy applies to the recruitment and engagement of every adult who may work with our learners, whether children or adult learners, including:

- employees, whether permanent, fixed term or zero hours;
- agency staff;
- contractors, consultants, peripatetic staff and self-employed people;
- volunteers and interns;
- board members; and
- anyone else who may have unsupervised access to learners or access to sensitive information.

It is our policy on the employment of people with criminal records (section 12), and it should be read alongside our Child Protection and Safeguarding Policy and Staff Code of Conduct.

2. Aims and principles

We aim to make sure that everyone working with children and young people is suitable to do so, so we are extremely vigilant when recruiting. Our recruitment process is designed to deter, identify and reject anyone who might pose a risk to learners.

We are committed to providing the best possible care to our learners, and to safeguarding and promoting their welfare. We are also committed to providing a supportive working environment for our staff. To achieve both aims it is of fundamental importance to attract, recruit and retain people who share this commitment. We expect all staff, volunteers and agency staff to share it.

3. Legal and statutory framework

Guidance is referred to by name rather than by year, and each link leads to the current version.

- Keeping children safe in education (KCSIE), Part Three. This is written for schools and colleges. Our commissioners are bound by it and we follow it as our benchmark.
- Non-school alternative provision: voluntary national standards, standard 1.1, which sets the Department for Education's expectations of our recruitment checks.

Our legal duties include the Safeguarding Vulnerable Groups Act 2006, amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026' ; the Police Act 1997; the Rehabilitation of Offenders Act 1974 and its Exceptions Order; the Immigration, Asylum and Nationality Act 2006; the Education Act 2002 and the Education and Skills Act 2008 and Children's Wellbeing and Schools Act 2026 (teaching prohibitions and section 128 directions); the Equality Act 2010; and the Data Protection Act 2018 and UK GDPR. We also follow the DBS Code of Practice.

4. Definitions

Regulated activity: work with children that a barred person must not do, as defined in the Safeguarding Vulnerable Groups Act 2006 and government guidance on regulated activity with children. It includes regularly teaching, training, instructing, caring for or supervising children, and giving them advice or guidance on their wellbeing. Most of our staff will be in regulated activity.

Enhanced DBS check with children's barred list information: the level of Disclosure and Barring Service check required for regulated activity with children, and for managing people who carry it out.

Prohibition and section 128 checks: checks, through the Teaching Regulation Agency, that a person is not prohibited from teaching and is not subject to a direction under section 128 of the Education and Skills Act 2008, which bars a person from taking part in management.

Single Central Record (SCR): our single record of the safeguarding and suitability checks made on everyone working with our learners.

Conditional offer: an offer of appointment that depends on satisfactory completion of all pre-appointment checks.

Commissioner: the school or local authority that places a learner with us.

5. Roles and responsibilities

- **The COO and Heads of Centre** make sure this policy is applied consistently and that recruitment decisions put safeguarding first. They are responsible for making sure the SCR is accurate, up to date and reviewed regularly.
- **Recruiting managers and panel chairs** run safe recruitment processes, make sure every check is completed, follow up concerns, and keep accurate records.
- **Panel members** understand and follow this policy and our safeguarding procedures. At least one member of every panel has completed accredited safer recruitment training and understands current safeguarding expectations.

- **Training.** The COO and every Head of Centre hold accredited safer recruitment training, which is refreshed annually.
- **The Designated Safeguarding Lead** (see Child Protection and Safeguarding Policy, section 5.3) is consulted whenever a safeguarding concern arises during recruitment.

6. Advertising and applications

6.1 Advertising

Every advert states our commitment to safeguarding and promoting the welfare of children and young people, that safeguarding checks will be carried out, and the safeguarding responsibilities of the role, including how much contact it involves with learners. It also states whether the role is exempt from the Rehabilitation of Offenders Act 1974, in which case certain spent convictions and cautions are protected and do not need to be disclosed. Job descriptions and person specifications set out the role's safeguarding responsibilities.

6.2 Application forms

Every candidate completes an application form. A curriculum vitae may support it but is never accepted in its place. The form:

- requires a full employment history since leaving secondary school (including education and voluntary work) with dates, an explanation of any gaps, and details of qualifications;
- asks for referee details, including the current employer;
- states that it is an offence to apply for a role in regulated activity with children if the applicant is barred from it; and
- includes a copy of, or a link to, this policy and our Child Protection and Safeguarding Policy.

7. Shortlisting

At least two people shortlist against the person specification. They look for inconsistencies and gaps in employment and the reasons given, and explore every potential concern.

Shortlisted candidates are told how the selection process will work, and that we may carry out an online search. They are asked to complete a self-declaration of their criminal record and of any other matter that may affect their suitability to work with children and young people, including whether they are barred or prohibited and any relevant information from overseas. The candidate signs the paper copy of the self-declaration at interview to confirm that it is true. This allows any relevant matters to be identified and explored before appointment. The form is never used to decide who is shortlisted.

Online searches

- We may carry out an online search of publicly available information on shortlisted candidates, to identify incidents or issues that may be relevant to their suitability to work with children and young people or to their professional conduct.
- Searches are proportionate, carried out by an appropriate person, and limited to public information. We never ask candidates for passwords or access to private accounts, or for anything else that would be inappropriate or unlawful to request.
- We record only information relevant to suitability and disregard information about protected characteristics.
- Where a search finds something that may be relevant to the role or raises a safeguarding concern, we discuss it with the candidate and consider it as part of the overall assessment.

8. References

We ask for a minimum of two satisfactory written references, one of which is from the current employer wherever possible. References are requested before interview where possible, so that any concern can be explored at interview. We:

- obtain references directly from the referee and never rely on the candidate to obtain them;
- do not accept open references or testimonials, such as “to whom it may concern”;
- check that electronic references come from a legitimate source, and verify references, for example by a follow-up call using independently sourced contact details;
- if the candidate is not currently employed, seek a reference from their most recent employer, and from the last employer where they worked with children if that was a different one;
- compare each reference with the application form and the interview, explore any discrepancy with the candidate and the referee, and ask the referee to clarify anything vague; and
- resolve every concern before an appointment is confirmed.

References ask for, as a minimum: the referee’s relationship to the candidate (role, dates and capacity); confirmation of employment dates, role and duties; performance and conduct; reliability and attendance where relevant; suitability to work with children and young people; whether there were any disciplinary issues, safeguarding concerns, investigations or allegations, including low-level concerns where lawful to share; and the reason for leaving.

For a candidate who works or has worked in a school, college or alternative provision, we ask the head teacher, principal or director of that setting, or another senior person with authority to do so, to confirm the reference, including that it is accurate in respect of any disciplinary investigations. Where a reference comes only from a line manager, head of department or peer, we ask the organisation to have it confirmed by a senior leader before we accept it.

9. Interview and selection

Interviews are face to face, wherever possible by a panel of at least two people, at least one of whom is trained (section 5). The panel:

- probes any gaps in employment, and any frequent changes of employer or location, and asks the candidate to explain them;
- explores any discrepancy between the application, the interview and the references, and any other area of concern, including the reason for leaving previous employment; and
- records all the information it considers and the decisions it makes.

Where a face to face interview is not possible, an online interview may be used. In this case, cameras are on and the candidate's identity is checked against photo identification.

Before shortlisting or interviewing begins, every panel member declares any personal or family relationship, or other conflict of interest, with a candidate. Where a conflict is declared, that person takes no part in shortlisting, interviewing or deciding on that candidate, and this is recorded. Where every available panel member has a conflict with a candidate, the COO arranges for an independent person to join the panel.

Candidates invited to interview are asked to bring the original identity documents required by the DBS identity checking guidelines, including proof of address, evidence of their right to work in the UK, and original certificates for any qualifications they refer to. If a candidate has changed their name, we ask for the documents that show it, for example a deed poll.

10. Conditional offers and pre-appointment checks

Successful candidates receive a letter offering the post, conditional on satisfactory completion of all the pre-appointment checks in this section. For each role we complete the following, as the role requires.

- **Identity.** We verify the candidate's identity from original documents, in line with the DBS identity checking guidelines.
- **Right to work.** We check the candidate's right to work in the UK in line with current Home Office guidance, and keep a copy of the check for the duration of their employment and for two years afterwards.
- **Enhanced DBS check.** For anyone in regulated activity with children, or managing people who are, we obtain an enhanced DBS certificate with children's barred list information. No role currently involves personal care for learners. Before any role is changed to include personal care, or any other regulated activity with adults, we review the checks it requires.
- **Prohibition and section 128 checks.** We check that every candidate is not prohibited from teaching and is not subject to a section 128 direction.

- **Qualifications.** We verify professional qualifications where the role requires them, and are satisfied that everyone has the skills, experience and knowledge to do the work.
- **Overseas checks.** Where a candidate has lived or worked outside the UK, we carry out the additional checks that are available, including criminal records checks for overseas applicants and, for teaching roles, a letter from the professional regulator in the country concerned.
- **References.** We obtain satisfactory references (section 8).
- **Medical fitness.** After the conditional offer, and not before, we verify that the candidate is physically and mentally fit to carry out the role, with any reasonable adjustments. Health questions are limited to the person's ability to carry out the work and are managed by our HR partner separately from the recruitment file.

We obtain a new enhanced DBS certificate with children's barred list information, or check an existing certificate through the Update Service, for every appointment (rather than relying on the three-month exemption that KCSIE allows schools and colleges).

No one starts work in regulated activity until every required check is complete and recorded to our satisfaction.

11. DBS certificates and the Update Service

Because of the nature of our work we apply to the Disclosure and Barring Service for enhanced certificates, and we cover the cost. An enhanced certificate may contain convictions, cautions and other relevant information held by the police and, where appropriate, whether the person is barred from working with children. We follow the DBS Code of Practice. In particular we:

- see the original certificate, or, with the person's consent, check its status through the DBS Update Service;
- store certificates and associated correspondence securely, with access restricted to authorised staff;
- normally keep a copy of a certificate for no longer than six months, although we keep a record of the date of the certificate, its number, the result of the check and the recruitment decision on the person's file; and
- consider any information disclosed fairly, proportionately and in the context of the role.

We ask staff to subscribe to the DBS Update Service within 30 days of their certificate being issued, and to allow us to carry out status checks. We use the service to monitor regularly for any change in a person's DBS status that they may not have told us about, so that everyone remains fit and safe to work with children at all times.

12. Recruiting people with criminal records

We do not automatically reject an applicant because of a criminal record, unless the law bars or prohibits them from the role. We consider each case individually, and fairly, looking at the relevance of the offence to the role, how long ago it happened, its seriousness and the person's circumstances since. We take advice from the DSL, and where necessary from the LADO or the DBS, and record our decision and the reasons.

We ask about criminal records only as the Rehabilitation of Offenders Act 1974 and its Exceptions Order allow. Protected convictions and cautions do not need to be disclosed and, if they are, we cannot take them into account. Applicants are told what information we will ask for and why.

13. Single Central Record and recruitment records

We keep a Single Central Record of the checks made on everyone working with our learners, in line with statutory guidance and the national standards. It covers employees, agency and supply staff, contractors, volunteers, board members and anyone else for whom safeguarding checks are required. It is held securely, in paper or electronic form, with appropriate protection.

For each person, the SCR shows which checks have been made, when, and by whom, including identity, right to work, the DBS certificate and barred list information, prohibition and section 128 checks, qualifications where relevant, overseas checks and medical fitness. Where the same information is also held on our management information system, it is kept consistent with the SCR.

Before anyone starts work with us, their details and the dates of every check must be recorded on the SCR. The COO and Heads of Centre review it regularly. Interview notes, self-declarations, online search notes, risk assessments and check confirmations are kept securely, and are handled and retained in line with our Data Protection Policy and retention schedule.

14. Agency staff, contractors, volunteers, trainees and board members

Safeguarding responsibilities apply to everyone who works with our learners or has access to sensitive information, not only to employees. Before any such person begins work, we make sure that the checks suitable to their role and access have been completed.

Agency and supply staff. We obtain written confirmation from the agency or third party that it has made the necessary checks on each named individual. The evidence must be specific to that person and not a general statement, and must include a suitable DBS certificate no more than three months old when they start. We check their identity when they arrive.

Contractors and self-employed people. We make sure that they, and any of their staff, have the level of DBS check that their work requires: an enhanced check with barred list information for regulated activity, or an enhanced check without it where their work gives them regular opportunity for contact with learners. For a self-employed contractor we either obtain the check or see the certificate. We

check identity on arrival. A contractor who has not had the required checks never works unsupervised and never carries out regulated activity.

Volunteers and interns. We never allow a volunteer to work in regulated activity until their checks are complete, and never leave an unchecked volunteer unsupervised. Every volunteer in regulated activity has an enhanced DBS check with children's barred list information. For a volunteer who is not in regulated activity, we carry out and record a risk assessment, based on their role, their supervision and their contact with learners, of whether to seek a check, and at what level.

Trainees on placement. Where we take them on, we obtain written confirmation from their training provider that the necessary checks have been made and that the trainee is suitable to work with children.

Board members. We carry out the highest level of DBS check for which each board member is eligible, as confirmed by our umbrella body, with barred list information only where they work in regulated activity, together with identity, right to work, section 128 and any overseas checks that apply.

Everyone in these groups follows our safeguarding procedures, professional boundaries and centre rules.

15. Assurance for commissioners

- On request, we give commissioners written confirmation that appropriate safeguarding checks have been made on everyone working with their learners.
- We tell commissioners promptly when the staff working with their learners change, so that they can assure themselves that new staff have been checked.

16. Starting work, induction and probation

New staff are on a three-month probation period to no more than five months in total. A final review is held before the probation period ends. During it they read the staff handbook and our policies and procedures, including the Staff Code of Conduct and Whistleblowing Policy, are trained in all areas of the role, and complete an induction programme, guided by a mentor, generally the Head of Centre, who introduces them to the way we work. Induction covers, as a minimum, safeguarding training including reporting routes and the names of the DSLs, approved Prevent duty training (repeated every year, as set out in our Child Protection and Safeguarding Policy), the Staff Code of Conduct and professional boundaries, whistleblowing, behaviour expectations, online safety and acceptable use of technology, confidentiality and data protection, and health and safety, fire and centre security.

Mandatory induction training must be completed within the timescales we set. Probation review meetings monitor progress, identify any support needed, and confirm that the person understands the standards we expect. All staff receive safeguarding and child protection training at induction and at least annually, and regular supervision from the start.

17. Ongoing suitability

- Staff must tell the COO as set out in section 8 of the Staff Code of Conduct, including about any arrest, charge, caution, conviction or investigation, and any change that may affect their DBS status. Staff who have a health issue that may affect their ability to carry out their role safely can tell their Head of Centre in confidence, so that we can support them and consider reasonable adjustments.
- We consider every disclosure fairly, sensitively and in line with our safeguarding and employment obligations. A failure to disclose relevant information may be treated as a serious matter and may lead to disciplinary action, up to and including dismissal.
- In some circumstances we repeat all the relevant checks as if the person were a new starter. These are where there are concerns about their suitability, where they move from a role that is not regulated activity to one that is, and where there has been a break in service of 12 weeks or more.
- Allegations and low-level concerns about staff, and referrals to the DBS, are dealt with under section 11 of our Child Protection and Safeguarding Policy.

18. Concerns during recruitment

If a concern arises at any stage, including at application, references, interview, checks or induction, we will:

- assess it and gather further information as needed;
- consult the DSL where safeguarding is relevant;
- consider whether an offer should be withdrawn or an engagement ended, which is a decision for the COO or CEO, taking HR/legal advice where it may relate to a protected characteristic); and
- refer to external bodies where required, such as the LADO, the DBS, the police or a professional regulator.

We record every decision with the reasons for it.

19. Fairness and data protection

We recruit fairly and do not discriminate against any candidate on the grounds of a protected characteristic. We make reasonable adjustments to our recruitment process for disabled candidates. We tell applicants how we will use their personal information in a privacy notice, and we handle it, including criminal record and health information, in line with the Data Protection Act 2018 and UK GDPR.

20. Monitoring arrangements

This policy is reviewed annually by the COO. At every review, the policy is approved by the CEO. It is reviewed sooner if legislation or statutory guidance changes, or following an incident or learning from a commissioner's quality assurance visit. It is published on our website and is available to commissioners, parents and carers, applicants and the public.

21. Related policies

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Data Protection Policy
- Equality and Diversity Policy