



New Direction School



## Safer Recruitment Policy

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## CONTENTS

<b>1. PURPOSE AND SCOPE</b>	<b>4</b>
<b>2. LEGAL AND STATUTORY FRAMEWORK</b>	<b>4</b>
<b>3. PRINCIPLES OF SAFER RECRUITMENT</b>	<b>5</b>
<b>4. ROLES AND RESPONSIBILITIES</b>	<b>5</b>
<b>5. REGULATED ACTIVITY AND SUITABILITY CHECKS</b>	<b>6</b>
<b>6. PLANNING RECRUITMENT</b>	<b>6</b>
<b>7. ADVERTISING AND RECRUITMENT INFORMATION</b>	<b>6</b>
<b>8. APPLICATION FORMS AND CANDIDATE INFORMATION</b>	<b>7</b>
<b>9. SHORTLISTING AND ONLINE SEARCHES</b>	<b>7</b>
<b>10. REFERENCES</b>	<b>7</b>
<b>11. INTERVIEWS AND ASSESSMENT</b>	<b>8</b>
<b>12. CONDITIONAL OFFERS AND PRE-EMPLOYMENT CHECKS</b>	<b>8</b>
<b>13. DBS, BARRED LIST AND CRIMINAL RECORD INFORMATION</b>	<b>9</b>
<b>14. OVERSEAS CHECKS</b>	<b>9</b>
<b>15. VOLUNTEERS, VISITORS AND CONTRACTORS</b>	<b>9</b>
<b>16. AGENCY, SUPPLY AND THIRD-PARTY STAFF</b>	<b>10</b>
<b>17. ALTERNATIVE PROVISION AND WORK EXPERIENCE</b>	<b>10</b>
<b>18. SINGLE CENTRAL RECORD</b>	<b>11</b>
<b>19. INDUCTION, PROBATION AND ONGOING VIGILANCE</b>	<b>11</b>
<b>20. ALLEGATIONS, LOW-LEVEL CONCERNS AND REFERRALS</b>	<b>11</b>
<b>21. RECORD KEEPING, RETENTION AND DATA PROTECTION</b>	<b>12</b>
<b>22. MONITORING AND REVIEW</b>	<b>12</b>
<b>APPENDIX 1: RECRUITMENT CHECKLIST</b>	<b>13</b>
<b>APPENDIX 2: SCR CHECKLIST</b>	<b>14</b>
<b>APPENDIX 3: SELF-DISCLOSURE MODEL WORDING</b>	<b>14</b>

## Policy statement

New Direction School is committed to safeguarding and promoting the welfare of children and young people. All recruitment, selection, appointment and induction processes are designed to deter, identify, reject and prevent unsuitable people from working with pupils. All posts are subject to safer recruitment checks proportionate to the role, including identity, right to work, qualification, reference, prohibition, section 128, overseas, DBS and barred list checks where required.

The pupils who attend New Direction may be particularly vulnerable. Recruitment processes must therefore be rigorous, consistent, well recorded and rooted in a culture of professional curiosity, appropriate challenge and ongoing vigilance.

## 1. Purpose and scope

This policy sets out how New Direction School recruits, selects, appoints, inducts and monitors staff and others who work with, or have contact with, pupils. It applies to all employees, prospective employees, supply staff, agency workers, contractors, volunteers, directors, the proprietor, people involved in school management, visiting professionals where relevant, and any other adults engaged by or on behalf of the school.

The policy should be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-Level Concerns procedure, Whistleblowing Policy, Managing Allegations Against Staff procedure, GDPR/Data Protection Policy, Equality Policy, Health and Safety Policy, Positive Handling Policy and any recruitment or HR procedures used by the school.

## 2. Legal and statutory framework

This policy has been reviewed with regard to the following legislation and guidance, as amended from time to time:

- Keeping Children Safe in Education 2025 (KCSIE), including Part Three: Safer Recruitment and Part Four: Safeguarding concerns or allegations made about staff.
- Working Together to Safeguard Children 2026.
- The Education (Independent School Standards) Regulations 2014, including Part 3, welfare, health and safety of pupils, and Part 4, suitability of staff, supply staff and proprietors.
- Education Act 2002, section 157, as applicable to independent schools.
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012.
- Childcare Act 2006 and Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, where applicable.
- Equality Act 2010.
- UK GDPR and Data Protection Act 2018.
- Rehabilitation of Offenders Act 1974 and Exceptions Order 1975, as amended.
- DBS filtering guidance and DBS code of practice.
- Immigration, Asylum and Nationality Act 2006 and current right to work requirements.
- Prevent duty guidance and Counter-Terrorism and Security Act 2015, where relevant to safeguarding culture.

New Direction will also have regard to Derbyshire local safeguarding arrangements and relevant expectations of placing local authorities, including Nottinghamshire, Rotherham and Sheffield where pupils are placed by those authorities.

### 3. Principles of safer recruitment

Safer recruitment is one part of the school's wider safeguarding system. It is designed to deter unsuitable applicants, identify and reject unsuitable applicants, prevent appointment where suitability has not been established, and maintain a safe culture after appointment.

- All recruitment activity will promote safeguarding and the welfare of pupils.
- All selection decisions will be based on objective criteria linked to the role, person specification and safeguarding requirements.
- At least one person involved in recruitment will have completed safer recruitment training.
- Information provided by candidates will be scrutinised and followed up where there are gaps, anomalies, inconsistencies or concerns.
- Concerns about suitability will be explored before appointment and, where appropriate, a conditional offer will be withdrawn.
- Safeguarding checks will be completed and recorded before employment or engagement begins, except where KCSIE allows limited supervised commencement while a DBS certificate is awaited and a separate barred list check has been completed.
- Safer recruitment will operate alongside equality, data protection and employment law duties.

### 4. Roles and responsibilities

Role	Responsibility
Proprietor: Yvonne Evans	Ensures the school has effective arrangements to safeguard pupils and complies with suitability requirements for staff, supply staff and proprietors.
Directors: Luke Collins and Hannah Oliver	Support strategic oversight of safeguarding, safer recruitment practice and compliance with statutory expectations.
Head of Education: Luke Collins	Operational lead for implementing this policy, ensuring recruitment panels are appropriately trained and checks are completed before appointment.
DSL: Luke Collins	Advises on safeguarding concerns arising during recruitment, induction or ongoing employment.
Deputy DSLs: Hannah Oliver, Emily Smith and Nikki Morris	Support the DSL and contribute to safeguarding decision-making where concerns arise.
Reception/administration: Laura Donaldson, where delegated	Supports recruitment administration, checking documentation and maintaining records where authorised.

Recruitment panel members	Apply this policy consistently, scrutinise applications, explore safeguarding issues and maintain accurate recruitment records.
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A panel should normally include at least two people. Wherever possible, panels will include an odd number of at least three people. At least one panel member must have completed safer recruitment training, and that person should be involved throughout the selection process.

## 5. Regulated activity and suitability checks

Most staff and regular workers in a school are engaged in regulated activity because they teach, train, instruct, care for, supervise, provide advice or guidance to pupils, or work regularly in a specified establishment with opportunity for contact with children. New Direction will assess each role and ensure that the correct level of checks is completed.

Where a role is in regulated activity, New Direction will obtain an enhanced DBS certificate with children’s barred list information. It is unlawful for a barred person to work in regulated activity, and the school must not knowingly permit this.

Where an individual is not in regulated activity, the school will consider proportionate checks, supervision and risk controls. There is no entitlement to request barred list information for individuals who are not in regulated activity.

### *Existing staff*

If concerns arise about an existing member of staff’s suitability to work with children, or where a person moves from a role not involving regulated activity into one that does, the school will carry out any checks considered necessary as if the person were a new starter and will follow safeguarding, HR and allegations procedures as appropriate.

## 6. Planning recruitment

Before advertising a vacancy, the Head of Education or delegated recruitment lead will review the need for the post, the job description and the person specification. The review will ensure that safeguarding responsibilities are explicit and that the recruitment process is proportionate to the role.

All job descriptions will normally include the post title, purpose, duties, line management arrangements, safeguarding responsibilities, professional conduct expectations, health and safety responsibilities and equality expectations. Person specifications will identify qualifications, experience, knowledge, skills, values and safeguarding attributes needed for the role.

The person specification should state that selection will explore: motivation to work with children; ability to form and maintain appropriate professional boundaries; emotional resilience; attitudes to safeguarding, behaviour and authority; and suitability to work with vulnerable pupils.

## 7. Advertising and recruitment information

All advertisements and recruitment materials will include a clear safeguarding statement. The following wording should be used or adapted:

New Direction School is committed to safeguarding and promoting the welfare of children and young people. All posts are subject to safer recruitment checks, including an enhanced DBS check and barred list check where the role is in regulated activity. Shortlisted candidates may be subject to an online search as part of due diligence.

- Recruitment packs will normally include the application form or application route, job description, person specification, safeguarding statement, information about the selection process and any relevant information about the school.
- Where TES or another recruitment platform is used, the school will ensure the platform requirements are consistent with this policy and statutory safer recruitment expectations.

## **8. Application forms and candidate information**

New Direction will normally use a structured application form for all posts. CVs will not be accepted as the sole basis for appointment, although they may be considered alongside a full application where appropriate.

- Application forms should require candidates to provide:
  - full name, previous names, address and contact details;
  - education, employment and voluntary work history since leaving school, including explanations for gaps;
  - qualifications and professional registration details, where applicable;
  - current or most recent employer and reason for leaving;
  - details of at least two referees, including the current or most recent employer and, where relevant, the most recent employer where the applicant worked with children;
  - a declaration that the information provided is true and complete.

Criminal record self-disclosure information must not be used to decide who is shortlisted. A separate self-disclosure request will be made only to shortlisted candidates, as set out in section 13 and Appendix 3.

## **9. Shortlisting and online searches**

Shortlisting will be carried out by at least two people using the criteria in the person specification. Applications will be scrutinised for completeness, gaps in employment or education, frequent changes of employment, inconsistencies, unexplained breaks, vague information, concerns about suitability and any safeguarding issues.

Shortlisted candidates will be asked to complete a self-declaration of relevant criminal history. The declaration will be considered only after shortlisting and will be discussed with the candidate where relevant.

As part of due diligence, New Direction may carry out an online search on shortlisted candidates. Candidates will be informed that this may take place. The purpose of the search is to identify any incidents or issues that are publicly available online and may need to be explored at interview. Online searches will be proportionate, relevant to safeguarding and conducted in line with UK GDPR, the Data Protection Act 2018, the Human Rights Act 1998 and the Equality Act 2010. Searches must not be used to unlawfully discriminate.

## **10. References**

Two references will normally be obtained directly from referees before interview wherever possible. Open testimonials or references provided by the candidate will not be accepted as a substitute. References should be scrutinised and compared with the application form before interview so that concerns, discrepancies or gaps can be explored.

- One referee should be the current or most recent employer.
- Where the current or most recent employer is a school, the reference should normally be from the headteacher, principal or equivalent senior leader.
- Where the applicant is not currently working with children but has done so previously, one reference should be from the most recent employer where the applicant worked with children.
- References should ask about dates of employment, role, duties, performance, conduct, suitability to work with children, safeguarding concerns, disciplinary or capability warnings, allegations relating to children, reason for leaving and whether the referee would re-employ.
- References for teaching roles should ask about relevant capability proceedings within the required period.
- Vague, incomplete, contradictory or concerning references must be followed up with the referee and discussed with the candidate where appropriate.

Health-related questions must not be asked before a conditional offer except where permitted by the Equality Act 2010, such as to establish reasonable adjustments for the selection process or whether a candidate can carry out an intrinsic function of the role.

## **11. Interviews and assessment**

All shortlisted candidates will be interviewed. The panel will agree questions and assessment activities in advance. The interview will include safeguarding questions appropriate to the role, and will explore the candidate's motivation, values, boundaries, understanding of safeguarding responsibilities, ability to work with vulnerable pupils and responses to relevant scenarios.

The panel will also explore any gaps, anomalies or concerns from the application, online search, self-disclosure or references. Additional assessment methods may include observed teaching or activity, written tasks, role play, presentation, data task, scenario task or practical task relevant to the post.

Candidates will be asked to bring original documents needed for identity, qualification and right to work checks. Adjustments will be made where required for candidates with disabilities or additional needs.

## **12. Conditional offers and pre-employment checks**

Any offer of employment will be conditional on the satisfactory completion of all required pre-employment checks. A verbal offer, where made, must also be clearly expressed as conditional.

Checks may include, as relevant to the role:

- identity check using original documents;
- right to work in the UK;
- enhanced DBS certificate and children's barred list check where the role is in regulated activity;
- prohibition from teaching check for teachers;
- section 128 direction check for people taking part in management of an independent school;
- verification of qualifications and professional status where required;
- references judged satisfactory by the school;
- medical fitness declaration after conditional offer;
- childcare disqualification declaration where relevant;
- further checks where the person has lived or worked outside the UK;
- confirmation of agency, supply or third-party checks, where applicable.

The majority of checks must be completed before a person starts work. In exceptional circumstances, where an enhanced DBS certificate is awaited, the school may allow supervised commencement only where a separate barred list check has been completed, all other checks are satisfactory, a written risk assessment is completed and supervision arrangements are recorded and monitored.

Where checks are unsatisfactory, incomplete, contradictory or raise safeguarding concerns, the school may withdraw the conditional offer and may make referrals to the DBS, Teaching Regulation Agency, local authority designated officer or other relevant body where required.

### **13. DBS, barred list and criminal record information**

New Direction will comply with DBS eligibility rules and will request the level of check legally permitted for the role. Staff in regulated activity will normally require an enhanced DBS certificate with children's barred list information.

Shortlisted candidates will be asked to complete a criminal record self-disclosure form. Candidates must not be asked to disclose protected cautions or protected convictions. The wording used must reflect current DBS filtering guidance. The fact that a candidate discloses a criminal record will not automatically prevent appointment. The school will assess relevance, seriousness, timing, pattern, safeguarding risk, explanation, evidence of rehabilitation and the nature of the role.

Where a DBS certificate contains information, the certificate will be reviewed by an authorised senior person. Any risk assessment and appointment decision will be recorded. DBS certificates will not normally be copied or retained. Where a copy is retained with the individual's consent, it will not be kept for longer than six months unless there is a lawful reason.

Where a candidate subscribes to the DBS Update Service, the original certificate must be seen, the certificate must be for the same workforce and level of check, and the candidate's consent must be obtained before the online status check is completed.

### **14. Overseas checks**

Candidates who have lived or worked outside the UK will be subject to the same checks as all other candidates. In addition, New Direction will carry out further checks considered appropriate to the circumstances. These may include overseas criminal records checks, certificates of good conduct, checks of professional standing, references from overseas employers and any other information needed to establish suitability.

Where sufficient overseas information cannot be obtained, the school will consider whether appointment is appropriate and will record the rationale, risk assessment and any additional safeguards.

### **15. Volunteers, visitors and contractors**

#### **Volunteers**

Volunteers are seen by pupils as trusted adults. The level of recruitment and checking will depend on the role, frequency, supervision and whether the volunteer is in regulated activity.

- Regular unsupervised volunteers in regulated activity will require an enhanced DBS certificate with barred list information.

- Regular supervised volunteers not in regulated activity may be asked to obtain an enhanced DBS certificate without barred list information where appropriate.
- One-off volunteers who are supervised and do not have unsupervised access to pupils will not normally require a DBS check.
- Volunteers will receive appropriate safeguarding information, induction and supervision.

### **Visitors**

Visitors will be managed in line with the school's visitor procedures. There is no entitlement to request DBS or barred list checks for visitors who do not work with pupils. Professional judgement will be used about identity checks, signing in, badges, supervision and escorting.

### **Contractors**

Contractors will be assessed according to the nature, frequency and location of their work. Contractors who have opportunity for regular contact with pupils may require appropriate checks or written confirmation from their employer. Contractors not checked must be supervised and must not have unsupervised access to pupils.

## **16. Agency, supply and third-party staff**

Before agency, supply or third-party staff work at New Direction, the school will obtain written confirmation from the agency or organisation that the required safer recruitment checks have been completed. This includes identity, right to work, enhanced DBS, barred list where relevant, prohibition from teaching where relevant, qualifications where relevant, overseas checks where relevant and section 128 where relevant.

The school will check the identity of the person presenting for work on arrival. Where written confirmation states that the DBS certificate contains information, the school will obtain a copy of the certificate from the agency before the person begins work and will risk assess the information.

Agency and supply staff will receive the safeguarding information needed for their role, including reporting arrangements, DSL details, the Staff Code of Conduct and relevant site procedures.

## **17. Alternative provision and work experience**

### **Alternative provision**

Where New Direction places a pupil with an alternative provider, the school remains responsible for safeguarding the pupil and for being satisfied that the placement is appropriate. Before and during placement, the school will obtain written confirmation that the provider has completed appropriate safeguarding checks on staff and adults working with pupils. The school will also consider the suitability of the setting, quality of supervision, any subcontracted or satellite sites, attendance arrangements, risk assessments, transport, information sharing and review arrangements.

Alternative provision placements will be reviewed regularly and at least half-termly. The school will know where the pupil is during school hours and will respond promptly to attendance, safeguarding, welfare or behaviour concerns.

### **Work experience**

When arranging work experience, the school will ensure that pupils are protected from harm. The school will consider whether adults supervising pupils are in regulated activity and

whether barred list checks or other assurances are required. DBS checks cannot be requested for children under 16.

## **18. Single Central Record**

New Direction will maintain a Single Central Record (SCR) of pre-appointment checks. The SCR will be kept up to date and monitored by the Head of Education or delegated senior leader. It will include all staff, salaried teacher trainees, agency and third-party supply staff, regular volunteers, the proprietor and people taking part in the management of the independent school.

The SCR will record whether each required check has been completed, the date completed or certificate obtained, and who completed the check. Where applicable it will include:

- identity;
- enhanced DBS;
- children's barred list;
- right to work in the UK;
- prohibition from teaching;
- section 128 direction check;
- professional qualifications;
- overseas checks;
- childcare disqualification declaration;
- written confirmation of checks for agency, supply and third-party staff.

The SCR should not be cluttered with unnecessary information or copies of documents. Supporting documents will be retained securely in line with data protection and retention requirements.

## **19. Induction, probation and ongoing vigilance**

Induction is part of safer recruitment. All new staff, supply staff, volunteers and contractors where relevant will receive safeguarding information proportionate to their role before or on commencement.

Induction will include:

- KCSIE Part One and Annex B where applicable;
- Safeguarding and Child Protection Policy;
- Staff Code of Conduct, including acceptable use of technology and staff/pupil boundaries;
- Behaviour Policy and Positive Handling Policy;
- Low-Level Concerns and Whistleblowing procedures;
- identity of the DSL and Deputy DSLs;
- how to report concerns using CPOMS and urgent reporting routes;
- procedures for attendance, visitors, emergency arrangements and site security;
- Prevent, online safety and child-on-child abuse information relevant to the role.

New staff will complete any required probation period. Teachers who are Early Career Teachers will be supported in line with current statutory induction arrangements.

Safeguarding will remain a regular agenda item in supervision, staff meetings, training, appraisal and day-to-day leadership.

## **20. Allegations, low-level concerns and referrals**

Concerns about the suitability, conduct or behaviour of staff, volunteers, contractors, agency workers or other adults must be reported promptly in line with the Safeguarding and Child

Protection Policy, Managing Allegations Against Staff procedure and Low-Level Concerns procedure.

Where a concern meets the harm threshold, the Head of Education or appropriate senior leader will contact the local authority designated officer without delay. Where the concern relates to the Head of Education, the matter will be reported to the proprietor or appropriate nominated person. Where a person is dismissed or removed from regulated activity, or would have been removed had they not resigned, because they harmed or posed a risk of harm to a child, the school will consider its legal duty to refer to the DBS. Where a teacher is dismissed for serious misconduct or would have been dismissed had they not resigned, the school will consider referral to the Teaching Regulation Agency.

Low-level concerns that do not meet the harm threshold will still be recorded, reviewed and responded to so that patterns can be identified and safe professional culture maintained.

## **21. Record keeping, retention and data protection**

Recruitment records will be kept securely and accessed only by those who need them. Records for unsuccessful candidates will normally be retained for 12 months after the recruitment process ends and then securely destroyed, unless there is a lawful reason to keep them longer.

For successful candidates, recruitment records will be held on the personnel file. This may include the application form, shortlisting records, interview notes, references, offer letter, evidence of checks, right to work evidence, qualification evidence, medical fitness confirmation, induction records and contract. DBS certificates will not normally be retained beyond six months.

Records relating to allegations will be retained in line with KCSIE. Malicious allegations will be removed from personnel records. For all other allegations, a clear and comprehensive summary, actions taken and decisions reached will be kept confidentially and retained at least until the person reaches normal retirement age or for 10 years from the allegation, whichever is longer.

Personal data will be processed in accordance with UK GDPR, the Data Protection Act 2018 and the school's data protection policies and privacy notices.

## **22. Monitoring and review**

This policy will be reviewed at least annually and sooner if statutory guidance, legislation, local safeguarding arrangements or school practice changes. The Head of Education will ensure that recruitment files and the SCR are periodically audited and that any learning from recruitment processes, checks, allegations or safeguarding concerns is used to improve practice.

## Appendix 1: Recruitment checklist

No.	Action	Completed/date
1	Review role, job description and person specification, including safeguarding responsibilities.	
2	Confirm panel membership and safer recruitment trained panel member.	
3	Advert includes safeguarding statement and online search notice.	
4	Applications received on structured application form; CV not sole evidence.	
5	Shortlisting completed by at least two people using objective criteria.	
6	Employment gaps, anomalies and concerns identified for follow-up.	
7	Self-disclosure requested from shortlisted candidates only.	
8	Online search completed where appropriate and relevant findings recorded.	
9	References requested directly from referees and scrutinised before interview wherever possible.	
10	Interview includes safeguarding questions and explores gaps/concerns.	
11	Conditional offer issued only subject to satisfactory checks.	
12	Identity, right to work, qualifications and professional status checked.	
13	DBS/barred list/prohibition/section 128/overseas/childcare disqualification checks completed as required.	
14	Risk assessment completed if DBS certificate is awaited and supervised start is considered.	
15	SCR updated before start date.	
16	Induction arranged and safeguarding documents issued.	

## Appendix 2: SCR checklist

SCR field/check	Notes
Full name and role	Include all staff, supply/agency staff, regular volunteers, proprietor and management roles.
Identity check	Record date and checker.
Right to work	Record date and checker; retain evidence on file.
Enhanced DBS	Record certificate date and who checked.
Children's barred list	Required for regulated activity; record date.
Prohibition from teaching	For teaching roles; record date.
Section 128	Required for proprietor and those taking part in management of independent school.
Qualifications/professional status	Where required for role.
Overseas checks	Where person has lived or worked outside UK.
Childcare disqualification	Where relevant.
Agency/supply confirmation	Written confirmation of checks; identity checked on arrival.

## Appendix 3: Self-disclosure model wording

The following wording should be used for shortlisted candidates only and checked against the latest DBS filtering guidance before use:

This role is exempt from the Rehabilitation of Offenders Act 1974. You are required to disclose any relevant criminal history that is not protected under DBS filtering rules. You should not disclose protected cautions or protected convictions. You must disclose any unspent conditional cautions or convictions and any adult cautions or spent convictions that are not protected. The information you provide will be considered fairly, proportionately and only in relation to your suitability for the role. Disclosure of a criminal record will not automatically prevent appointment.

Do you have any relevant criminal history to disclose that is not protected under DBS filtering rules? Yes / No. If yes, please provide details in a sealed confidential declaration or through the secure process provided.