

SIAL

Code of Practice for Safer Recruitment

Last Reviewed September 2025

Reviewed by DSL Date of next review September 2026

INTRODUCTION

In order to ensure the safety of the children within our school, it is essential that robust recruitment and selection procedures are followed in accordance with the Education (Independent School Standards) Regulations 2014 (as amended), the Equality Act 2010, the Protection of Freedoms Act 2012, the Prevent Duty Guidance (2023), the Education and Training (Welfare of Children) Act 2021, and Keeping Children Safe in Education 2025 (KCSIE), as well as the Independent Schools Inspectorate Regulatory Requirements. Reference should also be made to the school's Safeguarding and Child Protection Code of Practice.

All staff on the Senior Management Team and any staff responsible for recruitment are trained in safer recruitment, with training refreshed at least every three years. Every recruitment panel includes at least one member who has completed safer recruitment training.

Aims

- To protect and safeguard the children of our school community
- To establish a robust and efficient system of vetting and checking
- To maintain comprehensive centralised records of evidence of safe recruitment

Objectives

- To ensure advertisements for posts state the school's commitment to safeguarding and promoting the welfare of children
- To ensure job descriptions highlight safeguarding responsibilities
- To ensure person specifications include suitability to work with children
- To obtain and scrutinise comprehensive applicant information, resolve any discrepancies, and explore employment gaps
- To obtain professional and character references that address suitability to work with children, following up any concerns
- To conduct a face-to-face or virtual interview exploring suitability to work with children and suitability for the role
- To verify applicants' identity, qualifications, and previous employment history
- To confirm health and physical capacity for the job
- To carry out an enhanced DBS check with barred list information for all staff in regulated activity (or a barred list check before starting if DBS is pending)
- To conduct a Section 128 direction check for management roles
- To complete online searches (including publicly available social media) for shortlisted candidates as part of due diligence
- To ensure child protection checks apply to any staff from other organisations working with pupils on site

Note:

The definition of 'staff' includes any person working at the school, whether under a contract of employment or a contract for services. This includes teachers, peripatetic teachers, part-time staff, volunteers, administrative staff, caretakers, ancillary staff, staff appointed from overseas, and those with a significant break in service.

The full legal definition of 'regulated activity' is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012. Regulated activity includes:

- (a) Teaching, training, instructing, caring for (see (c) below), or supervising children if unsupervised; providing advice or guidance on well-being; or driving a vehicle solely for children.
- **(b)** Work in specified places (including schools and colleges) with the opportunity for contact with children, not including supervised volunteers.

Work in (a) or (b) is regulated activity if it is carried out frequently (known as the 'frequency test') or if the period condition is satisfied: activity takes place on more than three days in any 30-day period, or at any time between 2 am and 6 am with the opportunity for face-to-face contact with children.

• (c) Regulated activity also includes, regardless of frequency or supervision, relevant personal care or health care provided by, or under the supervision of, a regulated health care professional.

- Personal care includes helping a child (due to age, illness, or disability) with eating, drinking, toileting, washing, bathing, or dressing.
- Health care means care provided by, or under the direction of, a regulated health care professional.

SINGLE CENTRAL REGISTER OF STAFF

The Headteacher is responsible for maintaining and regularly updating the Single Central Register (SCR). The SCR includes all staff (permanent, fixed-term, supply, and agency), governors/trustees, volunteers, contractors in regulated activity, and any other adults who work regularly with children.

SIAL adopts a best practice approach by recording all relevant statutory and non-statutory checks, with dates of completion, the initials of the staff member completing the check, and any additional relevant information. The SCR is regularly reviewed to ensure compliance with *Keeping Children Safe in Education 2025* (KCSIE).

For each individual, the SCR records whether the following checks have been carried out and when:

- Name
- Address
- Date of Birth
- Post and Date of appointment
- Professional qualifications required
- Right to work in the UK
- Enhanced DBS disclosure

The school may accept a DBS certificate from another school or college if it was obtained while the applicant was working in regulated activity, subject to a risk assessment and a separate Children's Barred List check. The school's general policy is to carry out a new enhanced DBS check when appointing all new permanent staff. When a DBS is accepted from another institution, this will be logged on the SCR with further information detailed under the "Further Information" column.

• Children's Barred List

Where the position applied for amounts to 'regulated activity' the School obtains confirmation that the applicant is not named on the Children's Barred List. Most positions at the School will amount to regulated activity and a Children's Barred List check will therefore be carried out in nearly all cases. This check is completed as part of the Enhanced DBS check. Where an individual commences work prior to the School receiving the DBS disclosure a separate check of the Children's Barred List will be carried out before work starts via the Teaching Regulation Agency (TRA) Teacher Services website.

• Prohibition from Teaching Check

This is required for all teaching staff and details the date that checks have been done to confirm that the applicant is not subject to a teacher prohibition order (nor to any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012). These checks are carried out via the Teaching Regulation Agency (TRA) Teacher Services website.

Prohibition from Management of Independent Schools Directions (Section 128 directions)
 This applies to all staff appointed to management positions, including governors/trustees,
 headteachers, all staff on the senior leadership team (including non-teaching staff) and teaching
 positions with departmental headship. The information is contained in the enhanced DBS disclosure certificate or obtained through the TRA Teacher Services website.

• Overseas criminal records or certificate of good conduct

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, the School will make such further checks as it considers appropriate in order to verify a person's suitability to work with children due to them having lived or worked overseas prior to their being appointed to a position at the School. The date of receipt of the overseas criminal records check / certificate of good conduct is logged in this column with additional information logged under the 'further information' column if necessary.

Criminal records checks for overseas applicants - Home Office guidance can be found on: https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

• Two written references obtained

Two satisfactory written references are required

Medical fitness

A declaration is required from all staff, duly signed, that they know of no reasons, on grounds of mental or physical health, why they should not be able to discharge with due care and skill the responsibilities required by the post in question.

Reasonable adjustments are considered under the Equality Act 2010.

• Latest Safeguarding Training level 1 undertaken

New staff, including temporary staff, volunteers, and governors, will receive training on appointment as part of their induction, overseen by the Designated Safeguarding Leads (DSL), which includes: the Safeguarding and Child Protection Policy, the identity of the DSLs and deputies, Code of Conduct, safeguarding response to children who go missing from education, behaviour and staff behaviour policies, and a copy of Part 1 and Annex B of KCSIE. All staff will be required to sign to confirm they have understood this information. The date of induction training is entered on the SCR under this column. Existing staff also receive regular internal training. The date of the latest internal safeguarding training is entered in this column.

Level 3 Child Protection Training

This identifies those members of staff (the Designated Safeguarding Leads and deputy) who have undertaken Level 3 Child Protection Training and the date the qualification was taken.

• Latest Internal Safeguarding and Child Protection Induction

New staff, including temporary staff and volunteers, and Governors will receive training on appointment as part of their induction, overseen by the Designated Safeguarding Leads (**DSL**), which includes: The Safeguarding and Child Protection Policy, the identity of the DSLs and deputies, Code of Conduct, safeguarding response to children who go missing from education, behaviour and staff behaviour policies and a copy of Part One of KCSIE. All staff will be required to sign to confirm that they have understood this information. The date of the induction training is entered on the SCR under this column. Existing staff also receive regular internal training. The date of the latest internal safeguarding training is entered in this column.

• Receipt of Safeguarding & Child Protection documents

All staff are required to confirm that they have received and read all the relevant safeguarding and child protection documents and know the location of all school policies. This is the latest date they signed the form to confirm this.

Confirmation of receipt of KCSIE, Part 1

This confirms the date of receipt of the latest version of KCSIE, Part 1 to each member of staff.

• Online Safety – Staff Acceptable Use Agreement Form

All staff are required to sign the school's Online Safety Acceptable Use Agreement form. This is the latest date they signed the form.

• Safer Recruitment Training

At least one member of every appointment panel will have received safer recruitment training. In addition, any member of staff responsible for assessing pre-employment checks will have received the relevant training. The individuals who have received the appropriate training and the date the Safer Recruitment training expires is logged on the SCR.

E-Safety Training

This identifies those members of staff who have undertaken e-Safety Training and the date the qualification was taken.

First Aid Training

This identifies those members of staff who have undertaken Pediatric First Aid Training and the date the qualification was taken.

• Fire Warden Training

This identifies those members of staff who have undertaken Fire Warden Training and the date the qualification was taken.

Further Information

The 'Further Information' column will include additional relevant comments, e.g. changes in role, further relevant trainings, overseas checks information, notes of Risk Assessments put in place.

PROCEDURES FOR EMPLOYING STAFF

The procedures to be followed:

- Advertising
- Drawing up a short list
- The interview process
- Offer of appointment
- Post appointment

Advertising

- Advertisement to include statement of school's commitment to safeguarding and promoting the welfare of children.
- Advertisement to indicate that applicants must request an application form.
- On request, send application form, job description (which includes a requirement for compliance with the school's Safeguarding and Child Protection and Safer Recruitment Codes of Practice), person specification, and statement of terms and conditions relating to the post.

Drawing up a short list

- Application forms scrutinised to ensure there are no discrepancies and to identify any gaps in employment, which should be noted and explored if shortlisted.
- All candidates to be assessed equally against criteria contained in the person specification.
- A shortlist of candidates will then be drawn up.
- Shortlisted candidates called for interview.

The interview process

- The interview will assess the merit of each candidate against the job requirements and explore their suitability to work with children.
- Candidates will be given all necessary information about time, place, interview structure, trial lesson (if used), and interview panel members.
- Documentary evidence of identity (meeting DBS requirements) and evidence of all relevant qualifications will be requested.
- Copies of all documents will be kept on the successful candidate's file; unsuccessful candidates' documents will be shredded.
- Interviews will normally be conducted by at least two interviewers, one of whom is safer recruitment trained. A structured set of questions will be drawn up in advance, based on the job description, person specification, application form, and references. Questions will also cover:
 - The candidate's attitude towards safeguarding and child protection
 - Their ability to support the school's safeguarding culture
 - Any gaps in employment history
 - Concerns or discrepancies in their application or references
 - An opportunity to disclose anything relevant in light of DBS and other vetting requirements
 - For teaching roles, a trial lesson will form part of the process and will be observed by two staff
 members: a panel member and a teacher familiar with the class. Teaching assistants will spend a
 trial session with the relevant teacher.
 - Where possible, candidates may also meet with the School Council (supervised).
 - The candidate will be informed of the timeframe for the decision.
 - Two written references will be obtained for the preferred applicant.
 - For overseas candidates, an online interview (e.g., video call) will be conducted, and all identity documents, qualifications, and references must be verified before an offer is made.

• Online searches (including publicly available social media) will be carried out for all shortlisted candidates as part of safer recruitment checks (KCSIE 2025, para. 262).

Offer of appointment

Offer of appointment will be conditional on receipt of the following:

- Satisfactory enhanced DBS disclosure
- Two satisfactory character and professional references
- Confirmation that the candidate is not subject to a Teaching Prohibition Order (via TRA)
- Confirmation that the candidate is not subject to a Prohibition from Management of Independent Schools (Section 128 direction), if appropriate
- Confirmation of:
 - Identity
 - Medical fitness (with reasonable adjustments under the Equality Act 2010)
 - Right to work in the UK
 - Previous employment history
 - Proof of qualifications
 - For applicants who have lived or worked overseas: additional checks in line with *DfE guidance*.

Each new appointment will be entered on the Single Central Register when the job offer is made, including all checks, dates, and who carried them out.

Where a DBS disclosure has not been received before employment starts, a Barred List check will be carried out first. A Barred List check is also required if a portable DBS is used. No staff member or volunteer will be left unsupervised with children until satisfactory vetting checks are completed.

Procedure should there be a disclosure on DBS form: The Head undertakes to discuss any matter revealed in a Disclosure with the person seeking a position at the school. Having a caution or conviction will not necessarily bar an applicant from working with us. It would depend on the nature of the position and the circumstances, background and nature of the offence. The Head would make a judgement based on the information revealed and a discussion with the candidate as to whether employing the candidate would in any way compromise her duty of safeguarding and protecting the children in her care.

If employing supply staff from an agency, the school will obtain written confirmation from the agency that all required checks (including an enhanced DBS and Barred List check where appropriate) have been completed.

In line with the Statutory Framework for the Early Years Foundation Stage (EYFS) (2024), a person who is disqualified will not be employed in connection with Early Years provision. Should the school become aware of information that may lead to disqualification, immediate action will be taken to safeguard children, including suspension or redeployment where appropriate, pending investigation.

Post appointment

The school conducts an Induction Inset for all staff and volunteers to:

- Provide training and information about the school's codes of practice and procedures
- Support individuals in a way that is appropriate for the role for which they have been engaged
- Confirm safe practice and standards of conduct and behavior expected of staff and pupils within the school
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities
- Enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately
- Ensure new staff are aware of the codes of practice and procedures that relate to safeguarding and promoting welfare and safety of children: e.g., Safeguarding and Child Protection (including *Keeping Children Safe in Education 2025*), Anti-Bullying, Equality, Diversity and Inclusion, Behavior Policy, Use of

Force to Control and Restrain Pupils, Pastoral Care, Online Safety

- Ensure new staff receive the Code of Conduct, the Staff Handbook, and relevant safeguarding policies
- Ensure new staff complete a thorough fire safety and health and safety induction
- Explain how and to whom any safeguarding or conduct concerns should be raised

PROCEDURE FOR SUPPLY/AGENCY STAFF

No person may begin work in the school unless the Head has received written confirmation from the supply agency that all appropriate checks have been carried out including: including: identity, references, relevant qualifications, application form/background history, medical fitness, an enhanced DBS with Barred List check, right to work in the UK, prohibition order checks, Section 128 check if applicable, disqualification under the *Childcare Act 2006*, and overseas checks where relevant.

Agencies must provide written confirmation that all required checks have been completed and are current and valid in line with *Keeping Children Safe in Education 2025*. Before a supply teacher begins work, the school will verify their identity and DBS certificate. Where a supply teacher will be at the school on a regular basis, safeguarding induction will be provided together with copies of safeguarding documentation and an induction form completed.

PROCEDURE FOR VOLUNTEERS

When a volunteer is involved in a school activity on a supervised and 'one off' basis, such as a school trip, vetting checks would not normally be required.

If a volunteer becomes involved in a school activity on a regular basis (i.e. once a week or more, or three or more occasions in a 30 day period), an informal interview with the Head and/or member of staff involved will take place. A copy of ID will be requested and held on file. The need for written references will be at the discretion of the Head. The volunteer will be briefed by the member of staff involved and provided (where appropriate) with safeguarding and procedural documentation. A DBS disclosure will be obtain where it is considered that the role will be 'unsupervised'. No volunteer in regulated activity will be left unsupervised with children until they have a satisfactory DBS. The Head will be responsible for keeping a list of all current volunteers who have been DBS checked and inform other members of staff accordingly.

PROCEDURES FOR CONTRACTORS

Contractors and their employees must not be left unsupervised on site unless a current enhanced DBS check (with Barred List check if engaging in regulated activity) has been obtained. All contractors and their employees are required to present identification on arrival and sign in.

PROCEDURE TO CHECK VISITORS TO THE SCHOOL

Visitors to the school must sign in at the School Office. They will be given a visitor's badge and be asked to read the school's Safeguarding leaflet. They will also be made aware of fire safety procedures.

Visitors should not be left unsupervised whilst on the school premises.