

THE IVORY FEDERATION

Propps Hall Junior, Infant and Nursery School | Springhead Infant and Nursery School | Rushcroft Primary School

SAFER RECRUITMENT, STAFFING CHECKS & SINGLE CENTRAL RECORD POLICY

RATIONALE

The Ivory Federation gives the highest importance to safeguarding and promoting the welfare of children. Robust safer recruitment and vetting arrangements are an essential part of creating a safe culture. The Federation will deter, identify and reject people who are unsuitable to work with children and will ensure that all required pre-appointment checks are completed and accurately recorded.

This policy combines the Federation's previous Safer Recruitment and Staffing Checks policies and should be read alongside the Safeguarding and Child Protection Policy, Staff Code of Conduct, Data Protection Policy and relevant HR procedures.

STATUTORY FRAMEWORK

This policy has been reviewed with regard to:

- Keeping Children Safe in Education (KCSIE) 2026, particularly Part Three: Safer Recruitment
- Working Together to Safeguard Children 2026
- School Staffing (England) Regulations 2009, as amended
- Safeguarding Vulnerable Groups Act 2006, as amended, including changes made by the Crime and Policing Act 2026
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act 1974 and Exceptions Order, as amended
- Childcare Act 2006 and Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Equality Act 2010
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- DBS Code of Practice

PURPOSE

1. To ensure recruitment and selection procedures safeguard and promote the welfare of children.
2. To appoint the most suitable person for each role through a fair, consistent and lawful process.
3. To ensure the correct pre-appointment checks are completed for staff, volunteers and others according to their role and whether they are engaging in regulated activity.
4. To ensure appropriate assurance is obtained for agency, third-party and trainee staff.
5. To maintain an accurate and compliant Single Central Record (SCR).
6. To ensure information arising from checks is handled securely, proportionately and in accordance with data protection law.

SAFER RECRUITMENT PRINCIPLES

- At least one person conducting an interview will have completed appropriate safer recruitment training.
- Those involved in recruitment will understand the safeguarding requirements of the role and the relevant provisions of KCSIE Part Three.
- Recruitment decisions will be made fairly and without unlawful discrimination.
- No person who is barred from regulated activity will be permitted to undertake regulated activity with children.
- Checks will be proportionate to the role. Children's barred list information will only be requested where the individual is engaging in, or seeking to engage in, regulated activity.

RECRUITMENT AND SELECTION

Advertising and application

- Job descriptions and person specifications will set out the safeguarding responsibilities of the role and whether the post involves regulated activity.
- Advertisements will state the Federation's commitment to safeguarding and promoting the welfare of children, that safeguarding checks will be undertaken, and whether the post is exempt from the Rehabilitation of Offenders Act 1974.
- Where a role involves regulated activity, applicant information will make clear that it is an offence for a barred person to apply for the role.
- Applicants must complete the Local Authority application form. A curriculum vitae will only be accepted alongside a completed application form and will not be accepted on its own.
- Applicants will be provided with, or signposted to, the school's Safeguarding and Child Protection Policy and the Federation's arrangements for the recruitment of ex-offenders, which are contained within this policy.

Shortlisting and due diligence

- At least two people will carry out the shortlisting exercise. Wherever practicable, those who shortlist will also form part of the interview panel.
- Applications will be scrutinised for inconsistencies, unexplained gaps, frequent changes of employment and any other potential concerns. These will be explored with the candidate.
- Shortlisted candidates will be asked to complete an appropriate self-declaration of criminal record and other information that may make them unsuitable to work with children, in accordance with current Ministry of Justice guidance.
- Shortlisted candidates will be informed that an online search may be carried out as part of the Federation's due diligence. Any relevant publicly available information identified will be considered fairly and, where appropriate, explored at interview.

References

- Two references will normally be obtained and will be sought before interview wherever possible, so that concerns can be explored with the referee and candidate.
- Open references or testimonials addressed 'to whom it may concern' will not be accepted.
- References will be obtained directly from the referee and not through the applicant.
- A reference will be sought from the candidate's current employer and completed by a senior person with appropriate authority. Where the referee is school-based, relevant disciplinary information will be confirmed as accurate by the headteacher or principal.
- Where the applicant is not currently employed, the most recent relevant employment will be verified. Where the applicant has previously worked with children, a reference will be sought from the relevant employer from the last time they worked with children.
- Electronic references will be checked to ensure they originate from a legitimate source. Information will be verified with the referee, and vague, incomplete or inconsistent information will be followed up.
- References will be compared with the application form and any discrepancies explored with the candidate.

Interview and conditional offer

- Interviews will explore both the candidate's suitability for the role and their suitability to work with children.
- Identity will be checked against original photographic identification and relevant original documentation.
- Any gaps, discrepancies, safeguarding concerns, self-declared information or relevant findings from online due diligence will be explored appropriately.
- Any offer of appointment will be conditional on satisfactory completion of all required pre-appointment checks.

PRE-APPOINTMENT CHECKS

The precise checks required depend on the role. Most school staff will be engaging in regulated activity and will therefore require an enhanced DBS check with children's barred list information. The Federation will determine the appropriate level of check in accordance with KCSIE and the legal definition of regulated activity.

- Identity, including current photographic identification and appropriate evidence of name/address.
- Enhanced DBS certificate at the appropriate level; children's barred list information where the role is regulated activity.
- A separate children's barred list check only where legally permitted, including where a newly appointed person in regulated activity is permitted to start before the enhanced DBS certificate is received and all other relevant checks have been completed.
- Right to work in the United Kingdom.
- Full employment history, with satisfactory exploration of gaps and discrepancies.
- Professional qualifications where required. For teachers, the DfE Check a teacher's record service will be used to verify QTS and relevant teacher status information.
- Teacher prohibition and any relevant historic sanctions/restrictions for those undertaking teaching work.
- Further checks considered appropriate for people who have lived or worked outside the UK.
- Childcare disqualification checks/declarations where the Childcare Disqualification Regulations 2018 apply, including relevant staff working in Reception or wraparound care for children up to age 8 and those directly concerned with management of that provision.
- Medical fitness/capacity for the specific role, after an offer has been made and in accordance with the Equality Act 2010.

Where an individual is permitted to begin regulated activity before the DBS certificate is available, this will only occur after all other relevant checks have been completed, including a separate children's barred list check, and with an appropriate documented risk assessment and supervision arrangement until the certificate is seen.

DBS CERTIFICATES AND UPDATE SERVICE

- The original DBS certificate will be seen and checked against the individual's identity where required.
- Where the DBS Update Service is used, the Federation will obtain the individual's consent, check identity, examine the original certificate and confirm that the level and workforce are appropriate before carrying out a status check.
- Information disclosed on a DBS certificate will be considered fairly and individually.

RECRUITMENT OF EX-OFFENDERS

The Federation is committed to equality of opportunity and to the fair treatment of applicants, while maintaining its overriding commitment to safeguarding children.

Having a criminal record will not necessarily prevent an individual from working within the Federation. Where information is disclosed through the recruitment process or a DBS check, it will be considered fairly and on an individual basis. Consideration will be given to the nature and seriousness of the offence, its relevance to the role, the circumstances surrounding it, the time that has elapsed and any other relevant information.

The Federation will only ask applicants to disclose convictions and cautions that it is legally entitled to ask about. Information will be handled confidentially and discussed with the applicant where appropriate before a recruitment decision is made.

A person who is barred from regulated activity will not be appointed to undertake regulated activity.

REGULATED ACTIVITY AND VOLUNTEERS - 2026 REQUIREMENTS

The Crime and Policing Act 2026 removed the previous 'supervision exemption' for relevant volunteer activity. Supervision therefore does not, by itself, prevent teaching, training, instructing or supervising children from becoming regulated activity when the frequency/period condition is met.

- A volunteer who teaches, trains, instructs or supervises children frequently, on more than 3 days in any 30-day period, or overnight, is in regulated activity and the school will obtain an enhanced DBS check with children's barred list information.
- Existing volunteers whose role becomes regulated activity from 1 September 2026 because of this change will have their children's barred list status checked, normally through an enhanced DBS check with barred list information.
- Where a volunteer carries out relevant personal care or healthcare, this may be regulated activity regardless of frequency.
- A volunteer who is not in regulated activity will not automatically require a DBS check. The school will complete and record a written risk assessment, considering the nature and frequency of the role, opportunity for contact with children, what is known about the volunteer and whether another level of DBS check is appropriate.
- A volunteer on whom no appropriate checks have been obtained will never be left unsupervised or permitted to undertake regulated activity.
- Where the period condition is met through volunteering across more than one education setting, the settings will work together to determine who will apply for the enhanced DBS check with barred list information.

AGENCY, THIRD-PARTY AND SUPPLY STAFF

- Before an agency or third-party worker begins, the school will obtain written confirmation that the agency has carried out the checks the school would otherwise be required to perform and has obtained the appropriate certificates.
- Where an enhanced DBS certificate obtained by the agency contains disclosed information, the school will obtain a copy from the agency before the person begins work.
- Where the role requires children's barred list information, the agency/third party must have obtained an enhanced DBS certificate with barred list information before appointment.
- The school will verify that the person presenting for work is the same person on whom the checks were carried out.

CONTRACTORS AND SELF-EMPLOYED PEOPLE

- Safeguarding requirements will be made clear in relevant contracts.
- Contractors engaging in regulated activity will require an enhanced DBS check with children's barred list information.
- Contractors not in regulated activity but with opportunity for regular contact with children will require an enhanced DBS check without barred list information. Where there is no opportunity for regular contact, the school will decide whether a basic DBS check is appropriate.
- No contractor without appropriate checks will be permitted to work unsupervised or engage in regulated activity.
- The identity of contractors will be checked on arrival. For self-employed people, the school will obtain or verify the appropriate DBS check at the level required for the role.

TRAINEE / STUDENT TEACHERS AND OTHER STUDENTS

- For salaried trainee teachers employed by the school, the school will complete all necessary checks, including an enhanced DBS check with children's barred list information.
- For fee-funded trainee teachers, the initial teacher training provider is responsible for the pre-appointment checks. The school will obtain written confirmation that the required checks have been completed and that the trainee has been judged suitable to work with children.

- Fee-funded trainee teachers do not have to be recorded on the SCR, although the Federation may record them as non-statutory information.
- For other students/placements, the school will obtain appropriate written assurance from the placing organisation and determine any additional checks or supervision required according to the role and activity. Students will not be treated as automatically exempt from regulated activity requirements.

VISITORS

- The Senior Leaders will use professional judgement to determine appropriate escort or supervision arrangements for visitors.
- The school will not request DBS or barred list checks for ordinary visitors such as relatives attending a sports day or school event.
- For visitors attending in a professional capacity, the school will check identity and obtain assurance that appropriate checks have been completed by the employer where required. The school should not normally ask to see the DBS certificate in these circumstances.
- The suitability and educational value of external organisations, speakers and performers will be considered before access to pupils is agreed.

GOVERNORS

- All governors of the Federation's maintained schools will have an enhanced DBS check.
- Governance itself is not regulated activity, so children's barred list information will only be obtained where a governor separately undertakes regulated activity.
- A section 128 check will be carried out for school governors, as a person subject to a section 128 direction is disqualified from being a governor of a maintained school.

EXISTING STAFF AND ONGOING SUITABILITY

The Federation has adopted a policy, agreed by the governing bodies, of renewing DBS checks for existing staff every five years as an additional safeguarding measure. This is a Federation requirement rather than a statutory requirement under KCSIE.

A further DBS or other appropriate check may also be undertaken before the five-year renewal point where there are concerns about an individual's suitability, where an individual moves into a role requiring a different level of check, or where required by law or current statutory guidance.

- Staff and volunteers are expected to disclose relevant information in accordance with the Staff Code of Conduct, contractual requirements and applicable law.
- Where information raises a safeguarding concern or allegation, the Federation will follow its Safeguarding and Child Protection Policy and KCSIE Part Four, including referral to the LADO where appropriate.
- The Federation will fulfil any legal duty to refer an individual to the DBS and will consider referral to the Teaching Regulation Agency where the relevant criteria are met.

SINGLE CENTRAL RECORD (SCR)

Each school will maintain its Single Central Record (SCR) electronically using CPOMS StaffSafe. The SCR will be kept in a form that can be inspected promptly and will be monitored by senior leaders as part of the Federation's safeguarding assurance.

The SCR will include all staff, salaried trainee teachers, and agency/third-party supply staff, even where they work for only one day. It will record, as applicable:

- identity check and date completed
- children's barred list check, where a standalone check has been carried out
- enhanced DBS check/certificate information and date
- teacher prohibition check
- further checks for individuals who have lived or worked outside the UK
- professional qualifications, where required
- right to work in the UK
- for agency/third-party supply staff, written confirmation that required checks have been completed, the date confirmation was received and whether details of any enhanced DBS certificate were provided

The Federation may also record non-statutory information on the SCR, including checks on volunteers and governors, childcare disqualification information, safer recruitment/safeguarding training dates and the name of the person who completed each check. Information held within CPOMS StaffSafe will be retained and removed in accordance with statutory requirements, the Federation's records retention arrangements and data protection requirements.

RECORD RETENTION AND CONFIDENTIALITY

- Copies of documents used to verify identity, right to work and required qualifications will be retained securely on the personnel file in accordance with the Federation's retention arrangements.
- The Federation does not need to retain a copy of a DBS certificate to meet SCR requirements. Where a copy is retained, there must be a valid reason and it will not normally be retained for longer than six months.
- DBS and criminal record information will be handled securely and in accordance with the DBS Code of Practice and data protection law.

MONITORING AND REVIEW

The Executive Headteacher and governing bodies are responsible for ensuring that safer recruitment arrangements are implemented effectively.

The Single Central Record, maintained through CPOMS StaffSafe, will be checked periodically by the Executive Headteacher and independently checked periodically by the Chair of the Staffing Committee. Any omissions, discrepancies or actions identified through these checks will be addressed promptly.

Safer recruitment practice will also be monitored to ensure that the procedures set out in this policy are being followed consistently.

This policy will be reviewed annually and sooner where there are changes to legislation, statutory guidance or Federation procedures.

LINKED POLICIES

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

Policy reviewed: August 2026