Feniscowles Primary School

Safer Recruitment Policy

Striving for Excellence

Approved by	Full Governing Board
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Next review	November 2027, or sooner if statutory guidance changes
Responsibility	Headteacher (Full Governing Board approval)

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1. Scope, Purpose and Aims

1.1 Feniscowles Primary School is committed to safeguarding and promoting the welfare of children and expects all staff, governors, volunteers, contractors and visitors to share this commitment.

1.2 The Governing Board recognises that safeguarding begins before an individual enters the school and that safer recruitment forms an essential part of the school's safeguarding culture.

1.3 The purpose of this policy is to ensure that robust, fair and consistent recruitment procedures are in place which deter, identify and reject people who may be unsuitable to work with children.

1.4 This policy applies to all recruitment undertaken by Feniscowles Primary School including:

- permanent staff
- temporary staff
- agency staff
- volunteers
- governors
- contractors where appropriate
- apprentices
- students
- work experience placements
- peripatetic staff

1.5 This policy should be read alongside the school's Child Protection and Safeguarding Policy. Safer recruitment is one element of the school's wider safeguarding responsibilities and should never be viewed in isolation.

1.6 The school follows:

- Keeping Children Safe in Education (KCSIE) (September 2026)
- Working Together to Safeguard Children
- The Education Act
- The Equality Act 2010
- The Rehabilitation of Offenders Act 1974
- The Early Years Foundation Stage statutory framework (for Reception and any other early years provision)
- The Childcare (Disqualification) Regulations 2018
- Data protection laws (Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025)
- Blackburn with Darwen Borough Council Recruitment and Selection Policy

while implementing additional school-specific safeguarding measures where appropriate.

1.7 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone involved in recruitment has a responsibility to ensure that safeguarding remains at the centre of every recruitment decision.

1.8 The school will continually review recruitment procedures to ensure they remain compliant with current legislation and reflect best practice guidance issued by the Department for Education, the Local Authority and safeguarding partners.

2. Definitions

2.1 Safeguarding is defined as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring children grow up in circumstances consistent with safe and effective care
- taking action to enable all children to have the best outcomes.

2.2 Safer Recruitment means the process of attracting, selecting and appointing staff in a way that promotes the welfare of children and prevents unsuitable people from gaining access to them.

2.3 Regulated Activity has the meaning given within the Safeguarding Vulnerable Groups Act 2006, as amended. Following the removal of the "supervision exemption" by the Crime and Policing Act 2026, and as set out in Keeping Children Safe in Education 2026, a person who teaches, trains, instructs, cares for or supervises children frequently, or on more than three days in any 30-day period, or overnight, is engaged in regulated activity **regardless of whether they are supervised by another member of staff**. Intimate care, healthcare and overnight activity (between 2am and 6am, with the opportunity for face-to-face contact with children) are regulated activity even where they occur only once.

2.4 Staff includes all employees, supply staff, agency workers, casual workers, volunteers and anyone engaged to work on behalf of the school.

2.5 Recruitment Panel means those responsible for shortlisting, interviewing and selecting candidates.

3. Principles of Safer Recruitment

Feniscowles Primary School believes that safeguarding is far more than completing pre-employment checks. It is about creating a culture where safeguarding is embedded throughout every stage of employment.

The school will therefore:

- place safeguarding at the centre of every recruitment exercise
- actively deter unsuitable applicants
- promote an open safeguarding culture
- treat applicants fairly whilst maintaining rigorous safeguarding standards
- ensure all recruitment decisions are evidence based
- maintain professional curiosity throughout recruitment
- scrutinise inconsistencies rather than make assumptions
- challenge unexplained gaps in employment

- verify qualifications and professional history
- obtain and scrutinise references
- undertake all statutory safeguarding checks
- maintain accurate recruitment records
- ensure safeguarding remains an ongoing responsibility after appointment.

Recruitment decisions will never be based solely on qualifications or experience. The school will seek to appoint individuals whose values, behaviours and attitudes align with the school's safeguarding culture and commitment to protecting children.

4. Creating a Culture of Safeguarding

Feniscowles Primary School is committed to creating and maintaining a culture where safeguarding is everyone's responsibility.

The Governing Board and senior leaders recognise that safer recruitment is only one aspect of safeguarding. The school will therefore ensure that:

- safeguarding responsibilities are clearly understood by all staff;
- staff maintain an attitude of "it could happen here";
- concerns are raised promptly and acted upon appropriately;
- professional curiosity is encouraged throughout recruitment and employment;
- staff feel confident to challenge unsafe practice;
- safeguarding training is provided and regularly updated;
- safer recruitment is supported by robust induction, supervision and performance management.

The school recognises that safeguarding is an ongoing process. Appointment to a post does not remove the responsibility to continually assess suitability to work with children throughout employment.

5. Roles and Responsibilities

5.1 Governing Board Responsibilities

The Governing Board recognises that safeguarding is the highest priority in all recruitment decisions and is committed to ensuring that robust safer recruitment practices are implemented consistently throughout the school.

The Governing Board will:

- ensure the school complies with all relevant safeguarding and employment legislation;
- approve and review this policy annually, or sooner where statutory guidance changes;
- ensure appropriate safeguarding arrangements are in place for all recruitment activity;
- monitor compliance through regular safeguarding and Single Central Record audits;
- ensure sufficient resources are available to enable robust recruitment practices;
- appoint a suitably qualified Headteacher to lead safer recruitment within the school;

- ensure recruitment procedures support equality, diversity and inclusion whilst maintaining the highest safeguarding standards;
- receive assurance that statutory recruitment checks are completed before staff commence work;
- challenge leaders where recruitment processes do not fully meet statutory requirements.

5.2 Headteacher Responsibilities

The Headteacher has overall responsibility for ensuring that recruitment within the school complies with statutory safeguarding requirements.

The Headteacher will:

- promote a culture where safeguarding is central to all recruitment decisions;
- ensure recruitment procedures comply with current legislation and statutory guidance;
- ensure safer recruitment practices are consistently applied;
- appoint appropriately trained recruitment panels;
- ensure all required safeguarding checks are completed before employment commences;
- ensure any risk assessments relating to recruitment are robustly documented;
- make final appointment decisions where delegated by the Governing Board;
- ensure the Single Central Record is maintained accurately;
- ensure recruitment documentation is retained securely in accordance with data protection legislation;
- review recruitment practices regularly to identify improvements.

5.3 School Business Manager (or Person Responsible for HR Administration)

The School Business Manager (or delegated officer responsible for recruitment administration) will support the Headteacher by ensuring all recruitment documentation is completed accurately and statutory checks are recorded.

Responsibilities include:

- administering recruitment processes;
- arranging interviews;
- requesting references;
- verifying identity documentation;
- checking qualifications;
- undertaking right to work checks;
- arranging DBS applications;
- obtaining prohibition and Section 128 checks where appropriate;
- maintaining the Single Central Record;
- securely storing recruitment documentation;
- ensuring recruitment files are complete before employment begins.

5.4 Recruitment Panel Responsibilities

All members involved in recruitment are responsible for safeguarding children by ensuring that only suitable individuals are appointed.

Recruitment panel members will:

- prepare thoroughly before interviews;
- review applications carefully;
- identify anomalies or gaps requiring clarification;
- scrutinise employment history;
- assess candidates against both the person specification and safeguarding requirements;
- ask safeguarding-focused interview questions;
- explore attitudes, values and behaviours;
- professionally challenge inconsistent responses;
- contribute to objective appointment decisions based on evidence.

Recruitment panel members will maintain confidentiality throughout the recruitment process.

5.5 Safer Recruitment Training

Feniscowles Primary School is committed to ensuring recruitment decisions are made by appropriately trained individuals.

> At least one member of every interview panel must have successfully completed accredited Safer Recruitment Training, the content of which covers, as a minimum, Part Three of Keeping Children Safe in Education.

Wherever possible, the trained member will participate throughout the recruitment process, including:

- drafting recruitment documentation;
- shortlisting;
- planning interview questions;
- participating in interviews;
- evaluating safeguarding responses;
- making appointment recommendations.

The school will maintain records of safer recruitment training and ensure refresher training is undertaken periodically in line with national guidance and local safeguarding expectations.

5.6 Designated Safeguarding Lead (DSL)

Although recruitment is led by the Headteacher, the Designated Safeguarding Lead has an important advisory role in ensuring safeguarding remains central to recruitment.

The DSL may:

- advise recruitment panels on safeguarding issues;
- support risk assessments where safeguarding concerns arise;
- provide guidance regarding safeguarding disclosures;
- advise where additional safeguarding measures may be appropriate;

- support induction arrangements for newly appointed staff.

The DSL will also ensure safeguarding induction forms part of every new employee's induction programme.

5.7 All Staff

Every member of staff has a responsibility to contribute to a safeguarding culture.

Staff are expected to:

- report concerns regarding recruitment practices;
- challenge unsafe practice where appropriate;
- maintain professional standards;
- disclose any circumstances that may affect their suitability to work with children;
- understand that safeguarding is an ongoing responsibility throughout employment.

6. Equal Opportunities

Feniscowles Primary School is committed to providing equality of opportunity throughout every stage of recruitment.

Recruitment decisions will always be based upon:

- merit;
- qualifications;
- experience;
- professional competence;
- suitability to work with children.

No applicant will receive less favourable treatment because of:

- age;
- disability;
- race;
- ethnicity;
- religion or belief;
- sex;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- marriage or civil partnership,

except where safeguarding legislation requires particular recruitment checks to be undertaken.

The school recognises that safeguarding requirements and safer recruitment checks form lawful occupational requirements and will always take precedence where necessary to protect children.

7. Confidentiality and Data Protection

Recruitment information contains sensitive personal data and will be processed in accordance with data protection laws, comprising the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The school will:

- collect only information necessary for recruitment;
- store recruitment information securely;
- restrict access to recruitment records;
- retain documentation only for appropriate periods;
- dispose of records confidentially when retention periods expire.

Disclosure information obtained through the Disclosure and Barring Service will be handled in accordance with the DBS Code of Practice, including the retention limits set out at Section 29 of this policy.

8. Recruitment Planning

8.1 Before any recruitment activity begins, the Headteacher (or delegated senior leader) will review the staffing requirement to determine whether the vacancy is necessary and how it contributes to the effective delivery of education and the safeguarding of children.

8.2 The recruitment process will be planned to ensure sufficient time is available to complete all safer recruitment procedures before any appointment is confirmed.

8.3 Prior to advertising, the following documentation will be reviewed or prepared:

- Job Description
- Person Specification
- Salary information
- Recruitment timetable
- Interview arrangements
- Safeguarding requirements
- Statutory pre-employment checks required for the post

9. Job Descriptions and Person Specifications

9.1 Every vacancy will have an up-to-date Job Description and Person Specification.

9.2 These documents will clearly describe:

- the purpose of the role;
- key responsibilities;
- safeguarding responsibilities;
- reporting arrangements;
- professional expectations;

- qualifications and experience required.

9.3 All Job Descriptions will contain an explicit safeguarding statement, for example:

> The post holder is responsible for safeguarding and promoting the welfare of children and young people and is expected to uphold the school's safeguarding policies and procedures at all times.

9.4 The Person Specification will identify the knowledge, skills, experience and personal qualities required for the role, including an individual's commitment to safeguarding children.

10. Advertising Vacancies

10.1 The school is committed to attracting high-quality applicants whilst deterring unsuitable individuals from applying.

10.2 Every advertisement will clearly state the school's commitment to safeguarding children.

Advertisements will include wording similar to:

> Feniscowles Primary School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. The successful applicant will be required to complete all statutory safer recruitment checks, including an Enhanced DBS check with Children's Barred List information where appropriate.

10.3 Advertisements will also make clear that:

- references will be sought;
- online searches may be undertaken;
- identity and qualification checks will be completed;
- overseas checks may be required where applicable;
- employment is conditional upon satisfactory safeguarding checks.

10.4 A copy of the school's Child Protection & Safeguarding Policy (or a link to it) will be provided with the application pack, and applicants will be directed to this Safer Recruitment Policy where appropriate.

10.5 Applicants for posts that involve regulated activity will be told that it is an offence to apply for the role if they are barred from working with children.

11. Application Forms

11.1 The school will only accept applications made on the official application form unless exceptional circumstances apply.

Curriculum Vitae (CVs) alone will not be accepted.

Where a CV is received, applicants will be required to complete the school's application form before being considered.

11.2 Application forms require applicants to provide:

- full employment history;

- explanations for all employment gaps;
- qualifications;
- professional memberships where appropriate;
- overseas employment history;
- overseas residence history;
- referees;
- right to work information.

11.3 Applicants must declare:

- all previous names;
- all periods living overseas;
- all previous work involving children;
- any investigations by professional bodies;
- any prohibition or restrictions affecting employment.

Providing false information may result in withdrawal of an offer of employment or dismissal if discovered after appointment.

11.4 The application form does not ask applicants to declare their criminal record. That declaration is requested from shortlisted candidates only (see Section 12).

12. Shortlisting

12.1 Shortlisting will be undertaken by at least two members of staff wherever practicable.

12.2 Applicants will be assessed objectively against the Person Specification.

12.3 During shortlisting, the panel will actively identify and record any issues requiring clarification, including:

- unexplained employment gaps;
- incomplete employment history;
- repeated short periods of employment;
- discrepancies between application forms and CVs;
- unexplained changes in career;
- anomalies within references;
- overseas employment;
- overseas residence;
- safeguarding concerns identified during previous employment.

These matters will be explored during interview.

12.4 Professional curiosity will be exercised throughout the recruitment process.

Panel members will not make assumptions regarding inconsistencies but will seek satisfactory explanations supported by evidence wherever appropriate.

12.5 Shortlisted candidates will be asked to complete a self-declaration of their criminal record and of any information that may make them unsuitable to work with children. This is a separate

form, requested after shortlisting and not as part of the application form, so that candidates have the opportunity to share relevant information before the DBS certificate is received. Any information disclosed will be explored at interview.

13. Online Searches of Shortlisted Candidates

13.1 In accordance with Keeping Children Safe in Education, the school will undertake an online search of all shortlisted candidates.

The purpose of the search is to identify information that may:

- affect an individual's suitability to work with children;
- identify safeguarding concerns;
- identify behaviour inconsistent with the school's values;
- identify publicly available information relevant to safeguarding.

13.2 Online searches are **not** intended to:

- discriminate unlawfully;
- investigate protected characteristics;
- obtain irrelevant personal information.

13.3 Searches will normally be undertaken after shortlisting but before interview to allow candidates the opportunity to discuss any relevant findings.

13.4 Only publicly available information will be considered.

The school will not request passwords or access to private social media accounts.

13.5 Searches will normally be undertaken by a member of staff not involved in the appointment decision wherever possible. Only information relevant to safeguarding or suitability will be shared with the recruitment panel.

13.6 Where concerning information is identified, candidates will be given the opportunity to provide an explanation before any recruitment decision is made.

14. References

14.1 References form an essential part of safer recruitment. The school will seek references directly from referees and will never accept references provided by applicants.

14.2 Wherever possible, references will be obtained **before interview** to enable any concerns to be explored with candidates. Where this is not possible, references must be received and scrutinised before any appointment is confirmed.

14.3 References will normally include:

- dates of employment;
- job title;
- duties undertaken;
- attendance record where appropriate;
- disciplinary history;

- capability concerns;
- safeguarding concerns;
- suitability to work with children;
- reason for leaving.

14.4 The school will request confirmation that:

- the referee believes the applicant is suitable to work with children;
- there are no known safeguarding concerns;
- there are no concerns regarding the applicant's conduct or behaviour that would make them unsuitable to work with children.

14.5 Open references or generic testimonials will not be accepted in place of employer references.

14.6 References will be scrutinised carefully. Any discrepancies, vague wording, omissions or concerns will be followed up directly with the referee before an appointment is confirmed. Telephone conversations used to clarify references will be documented and retained on the recruitment file.

14.7 Where concerns arise from a reference, the Headteacher will determine whether additional safeguarding enquiries or risk assessments are required before proceeding. Where a risk assessment is undertaken, the rationale and outcome will be recorded on the recruitment file, consistent with the approach set out at Section 18.2(C) for overseas-check decisions.

14.8 For Reception and any other early years provision, the school will obtain at least one written reference before the person is recruited, will not accept references from a family member, and will ensure that electronic references originate from a legitimate source.

14.9 Where the school is asked to provide a reference for a former member of staff, it will give factual information, including the facts (not opinions) of any substantiated safeguarding concerns or allegations that met the harm threshold.

15. Interview Process

15.1 Feniscowles Primary School recognises that interviews are an essential part of safer recruitment and provide an opportunity to assess not only a candidate's knowledge and experience but also their suitability to work with children.

15.2 All interviews will be conducted by an appropriately constituted panel of at least two people wherever practicable. At least **one member of every interview panel must have successfully completed accredited Safer Recruitment Training**, which, as a minimum, covers the content of Part Three of *Keeping Children Safe in Education*.

15.3 The interview panel will assess candidates against the Person Specification and the safeguarding requirements of the role.

15.4 Every interview will include questions designed to assess the candidate's:

- motivation to work with children;
- understanding of safeguarding responsibilities;
- commitment to promoting the welfare of children;

- professional values;
- ability to maintain appropriate professional boundaries;
- understanding of confidentiality;
- understanding of the Prevent Duty and awareness of radicalisation and extremism risk indicators;
- knowledge of statutory safeguarding responsibilities.

15.5 Candidates will also be asked to explain:

- gaps in employment;
- reasons for leaving previous posts;
- any discrepancies between application forms, references and interview responses;
- periods spent living or working overseas;
- any disciplinary findings or professional investigations where relevant.

15.6 The recruitment panel will exercise professional curiosity throughout the interview and will seek clarification where responses appear inconsistent or incomplete.

Interview notes will be retained as part of the recruitment record in accordance with the school's Data Protection Policy.

16. Conditional Offers of Employment

16.1 No offer of employment will become substantive until all required pre-employment checks have been completed to the satisfaction of the school.

16.2 Offers of employment will always be conditional upon satisfactory completion of the statutory recruitment checks applicable to the role.

These include, where appropriate:

- Enhanced DBS Certificate;
- Children's Barred List Check;
- Identity verification;
- Right to Work in the UK;
- Medical fitness declaration;
- Childcare disqualification declaration where applicable;
- Verification of qualifications;
- Professional registration where applicable;
- Prohibition from Teaching check;
- Section 128 Direction check;
- Overseas criminal record checks where required;
- Receipt of satisfactory references;
- Verification of employment history.

17. Pre-Employment Checks

17.1 General Principles

Feniscowles Primary School will complete all statutory pre-employment checks before an individual commences work.

No individual will undertake regulated activity unless the school is satisfied that all safeguarding requirements have been met.

17.2 Identity

The school will verify the identity of every successful candidate in accordance with Keeping Children Safe in Education and the DBS identity-checking guidelines, using original documents and, where available, checking the name on the candidate's birth certificate. Names previously used will be recorded.

Copies of the documents used will be kept on the personnel file and retained securely in accordance with data protection legislation.

17.3 Right to Work

The school will verify every employee's legal right to work in the United Kingdom before employment commences. Where required, follow-up checks will be undertaken before visa expiry dates.

17.4 Enhanced DBS Checks

All staff engaged in regulated activity will obtain an Enhanced Disclosure and Barring Service (DBS) Certificate with Children's Barred List information before commencing employment.

Where an Enhanced DBS Certificate reveals information, the Headteacher will undertake an individual risk assessment before determining suitability for employment. The rationale and outcome of that risk assessment will be recorded and retained on the recruitment file.

Barred list information will not be requested for any person who will not be engaged in regulated activity.

17.5 DBS Update Service

Where a prospective member of staff, volunteer or contractor holds a subscription to the DBS Update Service and an existing enhanced certificate of the correct type and level for the role, the school may rely on the Update Service in place of commissioning a new application. The school will first obtain the individual's consent to carry out an online status check, confirm the certificate type and level, check the individual's identity against the certificate and complete the status check. The decision and its rationale will be recorded on the recruitment file and the Single Central Record.

17.6 Children's Barred List Check

Where legally permitted, a Children's Barred List check will be completed before appointment to any regulated activity.

A person who is barred from working with children will not be appointed.

17.7 Qualifications

Original qualification certificates required for the role will be verified before employment commences. Where certificates cannot be produced, alternative verification will be sought directly from awarding organisations wherever possible.

17.8 Professional Status

Where relevant, the school will verify:

- Qualified Teacher Status (QTS);
- Teacher Reference Number (TRN);
- induction status;
- professional registrations.

17.9 Prohibition from Teaching

A Prohibition from Teaching Check will be undertaken for all teaching appointments, using the Department for Education's Check a teacher's record service (which replaces the former Teacher Regulation Agency Employer Access Service). Individuals prohibited from teaching will not be appointed to teaching roles.

17.10 Section 128 Checks

A section 128 check will be undertaken for every governor. It will also be undertaken for any other individual in a management position where the guidance requires it.

17.11 Medical Fitness

Successful applicants will complete a confidential medical declaration before employment commences.

Where appropriate, Occupational Health advice will be sought to ensure reasonable adjustments can be considered.

17.12 Commencing Work Before All Pre-Employment Checks Are Complete

As a matter of policy, no individual will commence work, whether in a paid, agency, voluntary or contracted capacity, until all required pre-employment checks are complete.

Reception and early years provision. No employee or volunteer will start work in Reception, or in any other provision covered by the Early Years Foundation Stage framework, until the school holds an enhanced DBS certificate that includes children's barred list information.

All other roles. Only in exceptional circumstances, such as urgent short-term supply cover, may the Headteacher permit an individual to begin work in regulated activity before the DBS certificate is available, and only where:

- a separate children's barred list check has been obtained and is clear before the individual starts;
- a written, dated risk assessment has been completed and approved by the Headteacher;
- the individual is appropriately supervised and is never left unsupervised with children;
- all other checks (identity, right to work, references, prohibition checks) have already been satisfactorily completed;

- the arrangement and its rationale are recorded on the recruitment file and reviewed as soon as the certificate is received.

17.13 Re-engagement of Former Staff

Where a former employee, volunteer or contractor is re-engaged by the school, the pre-employment checks applicable to the role will be repeated, including a new enhanced DBS certificate, and historic checks alone will not be relied upon. For a break in service of 12 weeks or more this is required in every case. For a shorter break the Headteacher will record a risk assessment of which checks are needed.

17.14 Childcare Disqualification

The Childcare (Disqualification) Regulations 2018 apply to staff who work with children in Reception and other early years provision, and in wraparound care for children up to the age of eight. Applicants for these roles will be asked to declare any matter that may disqualify them, and the school will check the declaration before employment commences. A person who is disqualified will not be appointed to the role unless Ofsted has granted a waiver. The outcome will be recorded on the Single Central Record, and the school will follow Blackburn with Darwen Council HR guidance on declarations and disqualification.

18. Enhanced Overseas Recruitment Checks

18.1

Feniscowles Primary School recognises that applicants who have lived or worked overseas may not have a complete safeguarding history available through UK recruitment checks alone.

In accordance with *Keeping Children Safe in Education*, the school will undertake any additional checks it considers appropriate to establish an applicant's suitability to work with children.

Applicants are required to declare all periods of residence and employment outside the United Kingdom as part of the recruitment process.

18.2 School's Graduated Approach

To ensure a consistent and proportionate approach, the school will normally apply the following process.

A. Applicants currently living overseas or returning directly from overseas employment

Where an applicant is applying directly from living or working overseas, the school **will obtain official overseas criminal record information or a Certificate of Good Conduct (where available)** from the relevant country or countries before confirming employment.

This will be undertaken in addition to all UK statutory recruitment checks.

B. Applicants who have lived overseas within the previous five years

Where an applicant has lived overseas at any point during the previous **five years**, the school will normally obtain official overseas criminal record information (or the equivalent certificate of good conduct where available).

This requirement applies regardless of whether the overseas residence was for employment, study, travel or other purposes where the individual established residence.

C. Applicants who have lived overseas within the previous ten years

Where an applicant has lived overseas within the previous **ten years** and **has not subsequently worked within UK education or another regulated activity involving children**, the school will normally obtain official overseas criminal record information before employment is confirmed.

The rationale is that no UK employer working with children will have subsequently completed the full range of safeguarding checks expected within regulated activity.

Where an applicant **has returned to the UK and has subsequently been employed within education or another regulated activity involving children**, with appropriate safeguarding checks completed by that employer, the Headteacher may determine that additional overseas checks are not required following an individual safeguarding risk assessment.

The rationale for any decision will be recorded on the recruitment file.

19. Single Central Record (SCR)

19.1 Feniscowles Primary School maintains a Single Central Record (SCR) in accordance with statutory guidance contained within *Keeping Children Safe in Education*.

The SCR provides evidence that all required safeguarding and recruitment checks have been completed for individuals working within the school.

19.2 The Single Central Record will include, where applicable:

- all employees;
- supply and agency staff;
- trainee teachers;
- apprentices;
- volunteers undertaking regulated activity;
- governors where required;
- contractors who regularly work within the school and whose work gives rise to safeguarding considerations.

19.3 The SCR will record the completion of statutory checks including, where applicable:

- identity verification;
- right to work in the UK;
- Enhanced DBS Certificate;
- Children's Barred List check;
- prohibition from teaching check;
- prohibition from management (Section 128);
- qualification checks;
- overseas checks;
- medical clearance where applicable;
- references;
- date employment commenced.

19.4 The SCR will be maintained by the School Business Manager (or nominated member of staff) and monitored by the Headteacher.

19.5 The Headteacher will undertake regular audits of the SCR to ensure accuracy and compliance.

The Safeguarding Governor will periodically sample the SCR as part of safeguarding monitoring.

Any discrepancies identified during audits will be addressed immediately.

20. Agency and Supply Staff, Trainees and Placements

20.1 The school recognises that agency and supply staff play an important role in supporting pupils and must meet the same safeguarding expectations as directly employed staff.

20.2 Before an agency worker commences work, the school will obtain written confirmation from the supplying agency that all statutory recruitment checks have been completed.

This confirmation will include, where appropriate:

- Enhanced DBS;
- Children's Barred List check;
- identity verification;
- right to work;
- prohibition from teaching;
- qualifications;
- overseas checks where applicable.

20.3 The school will check the identity of agency and supply staff on arrival, and may request evidence of any recruitment check where necessary.

20.4 Agency staff will receive an appropriate safeguarding induction before beginning work. This will include:

- identity of the DSL and Deputy DSL;
- safeguarding procedures;
- reporting concerns;
- behaviour expectations;
- emergency procedures;
- staff code of conduct.

20.5 Agency staff remain subject to the same professional expectations as permanently employed staff throughout their placement.

20.6 Where a trainee teacher is salaried by the school, the school will complete the pre-employment checks required for any other member of staff. Where a trainee teacher is fee-funded, the initial teacher training provider is responsible for the checks, and the school will obtain written confirmation from the provider that they have been completed and will check the trainee's identity on arrival.

20.7 Students and others on work experience placements will be risk assessed before they start. The school will not allow anyone on the barred list to take part in regulated activity, and, where

a placement is arranged by another organisation, will obtain written confirmation of the checks that organisation has completed.

21. Volunteers

21.1 The school values the contribution made by volunteers and recognises that they play an important role in supporting children's education. However, safeguarding responsibilities apply equally to volunteers.

21.2 Before volunteering begins, the school will assess whether the role amounts to regulated activity, and will record the assessment in writing whatever the outcome. A volunteer is in regulated activity where they teach, train, instruct, care for or supervise children:

- frequently; or
- on more than three days in any 30-day period; or
- overnight (between 2am and 6am, with the opportunity for face-to-face contact with children),

regardless of whether the volunteer is supervised by another member of staff. Intimate care, healthcare and overnight activity count even where they occur only once. This follows the removal of the "supervision exemption" by the Crime and Policing Act 2026, as set out in Keeping Children Safe in Education 2026.

21.3 A volunteer in regulated activity requires an enhanced DBS certificate with children's barred list information. Volunteers may join the DBS Update Service when they apply, which is free for volunteers. Where a volunteer works at more than one setting, the settings will agree which of them arranges the check. An existing volunteer who is in regulated activity will have a children's barred list check, and the school will record that it has been done.

21.4 A volunteer in Reception or any other early years provision will not start until the enhanced certificate with barred list information has been received. For any other volunteer in regulated activity, an early start is permitted only on the conditions in Section 17.12. A volunteer on whom no checks have been obtained will never be left unsupervised.

21.5 For a volunteer who is not in regulated activity, the Headteacher will complete a written risk assessment. It will consider the nature of the work with children, what the school already knows about the volunteer, whether referees can vouch for them, and whether a different level of DBS check (an enhanced check without barred list information, or a basic check) is appropriate. The risk assessment will be recorded.

21.6 All volunteers will receive safeguarding induction appropriate to their role. This will include:

- safeguarding expectations;
- reporting procedures;
- professional boundaries;
- confidentiality;
- staff code of conduct.

21.7 Volunteers will always know who to report safeguarding concerns to and will be supervised appropriately according to the nature of their role.

22. Contractors

22.1 The school recognises that contractors may have access to children during the course of their work. Appropriate safeguarding arrangements will therefore be implemented before work begins.

22.2 The level of safeguarding checks required will depend upon:

- the nature of the work;
- frequency of attendance;
- opportunity for contact with children;
- level of supervision.

22.3 Contractors working regularly within school or undertaking regulated activity will be subject to appropriate safeguarding checks.

22.4 Visitors and contractors who have not undergone appropriate checks will always be appropriately supervised whilst on site.

22.5 The Headteacher retains responsibility for ensuring appropriate safeguarding arrangements are in place for all contractors.

22.6 Where statutory guidance permits, and a self-employed contractor holds their own enhanced DBS certificate obtained through a registered umbrella body, the school may verify that check (including its currency and, where applicable, Update Service status) as an alternative to commissioning a new application. The verification will be recorded on the recruitment file and the Single Central Record.

22.7 Contractors engaged in regulated activity relating to children require an enhanced DBS certificate with children's barred list information. The school will always check the identity of contractors on arrival, and will seek written confirmation from a contractor's employer or agency that the appropriate checks have been completed.

23. Governors

23.1 The Governing Board has a strategic responsibility for safeguarding and safer recruitment.

23.2 Governors involved in recruitment will receive appropriate safeguarding and safer recruitment training.

23.3 The governing body will apply for an enhanced DBS certificate for every governor within 21 days of the governor's appointment or election, in accordance with the School Governance (Constitution) (England) Regulations 2012 as amended. Governance is not regulated activity, so a children's barred list check will be obtained only where a governor also carries out regulated activity. A section 128 check will be undertaken for every governor.

23.4 Governors participating in interview panels will comply with this policy and contribute to safeguarding-based recruitment decisions.

24. Visitors

24.1 All visitors will report to the school office on arrival.

24.2 Visitors will:

- sign in;
- wear a visitor lanyard, which shows whether the visitor must be escorted;
- receive safeguarding information where appropriate;
- be informed of safeguarding reporting procedures.

24.3 Visitors who have not been checked will be escorted or supervised where the Headteacher judges this necessary. The school does not request DBS or barred list checks, or ask to see certificates, for visitors such as parents and other relatives. For professional visitors, the school will check identity and be assured that the visitor has had the appropriate checks.

25. Staff Induction

25.1 Safer recruitment does not end when an appointment is made. Every newly appointed member of staff will complete a comprehensive safeguarding induction before or within one month upon commencing employment.

25.2 Induction will include:

- Child Protection & Safeguarding Policy;
- Staff Code of Conduct;
- Behaviour Policy;
- Whistleblowing Policy;
- Low Level Concerns Policy;
- Keeping Children Safe in Education Part One, read in full by every member of staff (including site, catering and administrative staff);
- identity of the Designated Safeguarding Lead and Deputy DSLs;
- safeguarding reporting procedures;
- online safety expectations;
- Prevent Duty;
- acceptable use of technology;
- confidentiality and information sharing.

25.3 Staff will sign to confirm they have:

- read relevant safeguarding documentation;
- understood safeguarding responsibilities;
- know how to report concerns;
- understand professional expectations.

These records will be retained on personnel files.

26. Probationary Period

26.1 All newly appointed employees will normally complete a probationary period in accordance with school procedures.

26.2 During probation the school will assess:

- professional competence;
- conduct;
- attendance;
- safeguarding practice;
- relationships with pupils;
- professional judgement;
- adherence to school policies.

26.3 Any safeguarding concerns arising during probation will be addressed immediately in accordance with safeguarding and employment procedures.

27. Ongoing Suitability to Work with Children

27.1 Feniscowles Primary School recognises that safeguarding is an ongoing responsibility. Appointment following safer recruitment checks does not remove the responsibility to continually assess an individual's suitability to work with children.

27.2 The school promotes a culture of continual vigilance. Leaders, governors and staff will maintain an attitude of **"it could happen here"**, recognising that safeguarding concerns may arise at any point during employment.

27.3 All staff are expected to:

- maintain high professional standards;
- act in accordance with the Staff Code of Conduct;
- disclose relevant changes in circumstances that may affect their suitability to work with children;
- report safeguarding concerns promptly;
- participate in safeguarding training;
- demonstrate professional curiosity where appropriate.

27.4 Where concerns arise regarding an employee's ongoing suitability to work with children, these will be managed promptly in accordance with:

- the Child Protection & Safeguarding Policy;
- the Low Level Concerns Policy;
- Managing Allegations Against Staff procedures;
- disciplinary procedures where appropriate.

27.5 Where the legal threshold is met, the school will fulfil its statutory duty to make referrals to:

- the Disclosure and Barring Service (DBS), in respect of staff and volunteers;

- the Teaching Regulation Agency (TRA);
- the Local Authority Designated Officer (LADO),

in accordance with statutory guidance.

28. Monitoring, Compliance and Quality Assurance

28.1 The Governing Board is responsible for ensuring that robust safer recruitment procedures are implemented and monitored across the school.

28.2 The Headteacher will monitor compliance with this policy through:

- regular recruitment file audits;
- monitoring of pre-employment checks;
- quality assurance of recruitment documentation;
- review of interview records;
- monitoring completion of safeguarding training;
- regular audits of the Single Central Record.

28.3 The Safeguarding Governor will undertake periodic monitoring activities to provide assurance that recruitment procedures remain compliant with statutory guidance. Monitoring may include:

- sampling recruitment files;
- reviewing the Single Central Record;
- discussing recruitment practice with leaders;
- confirming that safer recruitment training remains current;
- reviewing safeguarding risk assessments where appropriate.

28.4 Findings from monitoring activities will be reported to the Governing Board and any identified actions will be addressed promptly.

29. Record Keeping

29.1 The school will maintain accurate recruitment records in accordance with statutory guidance and data protection legislation.

29.2 Recruitment records may include:

- application forms;
- interview notes;
- scoring matrices;
- references;
- identity verification;
- qualification checks;
- DBS documentation (where permitted);
- overseas check documentation;
- safeguarding risk assessments;

- appointment decisions.

29.3 Records will be stored securely and access restricted to authorised personnel.

29.4 Recruitment documentation will be retained and disposed of in accordance with the school's Data Retention Schedule. Unless a longer period is specified in that schedule, the records of unsuccessful candidates will normally be retained for no longer than 12 months from the date of the recruitment decision, to allow for the resolution of any grievance, discrimination or tribunal time limits, after which they will be securely disposed of.

29.5 DBS certificate information itself (as distinct from the record that a check was completed) will not be retained for longer than six months from the recruitment decision, in accordance with the DBS Code of Practice, unless a longer period is justified by a specific, documented safeguarding reason. Where retained longer, the reason will be recorded on the recruitment file.

30. Equality, Diversity and Inclusion

30.1 Feniscowles Primary School is committed to equality of opportunity throughout recruitment.

30.2 The school will ensure recruitment processes are:

- fair;
- transparent;
- objective;
- evidence-based;
- free from unlawful discrimination.

30.3 Reasonable adjustments will be made throughout recruitment for applicants with disabilities in accordance with the Equality Act 2010.

30.4 Safeguarding requirements remain paramount and all statutory safeguarding checks will be applied consistently regardless of protected characteristics.

31. Review of this Policy

31.1 This policy will be reviewed annually by the Governing Board.

31.2 The policy may also be reviewed earlier where:

- statutory guidance changes;
- legislation changes;
- local safeguarding arrangements change;
- significant recruitment issues arise;
- following safeguarding reviews or inspections.

32. Related Policies

This policy should be read alongside:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Behaviour Policy
- Managing Allegations Against Staff Policy
- Low Level Concerns Policy
- Whistleblowing Policy
- Equality Policy
- Data Protection Policy
- Online Safety Policy
- Health and Safety Policy

33. Statutory Guidance

This policy has been prepared with reference to:

- Keeping Children Safe in Education (September 2026)
- Working Together to Safeguard Children (2026)
- Early Years Foundation Stage statutory framework (2026)
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Crime and Policing Act 2026 (regulated activity: removal of the supervision exemption)
- Childcare (Disqualification) Regulations 2018
- School Staffing (England) Regulations 2009
- School Governance (Constitution) (England) Regulations 2012, as amended by SI 2016/204
- Children Act 1989
- Children Act 2004
- Equality Act 2010
- Rehabilitation of Offenders Act 1974
- Police Act 1997
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025
- DBS Code of Practice
- Blackburn with Darwen Borough Council Recruitment and Selection Policy
- DfE Guidance: Criminal records checks for overseas applicants
- DfE Guidance: Teacher misconduct and prohibition orders
- DfE Check a teacher's record service