THAMES FEDERATION
HIGH EXPECTATIONS | ENRICHMENT | EXCELLENCE

# SAFER RECRUITMENT POLICY

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| **Reviewed by:** | **HR/EHT** |
| **Approved by** | **Curriculum Committee \| 30th April 2026** |
| **Approved by:** | **FGB \| 9th July 2026** |
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**INTRODUCTION**

The Thames Federation are committed to ensuring every child has the opportunity to achieve high outcomes. We provide a broad, balanced curriculum and maintain high expectations for all pupils. Their achievement, attitude, and well-being remain central to our work.

Safer recruitment is a vital part of safeguarding and promoting children's welfare. All schools within the Thames Federation are dedicated to protecting every pupil in our care, and we expect all staff and volunteers to share this commitment.

**AIMS AND OBJECTIVES**

The aim of the Safer Recruitment Policy is to help deter, reject or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

Our specific aims are to:

- **Safeguard children** by ensuring that every stage of our recruitment process prioritises child protection and prevents unsuitable individuals from gaining access to pupils
- **Recruit the best possible staff** on the basis of merit, abilities, qualifications, experience and suitability for the role, ensuring we attract and retain high-quality professionals who share our commitment to safeguarding
- **Ensure fair and consistent treatment** of all job applicants, ensuring no applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex, sexual orientation, marital or civil partner status, disability or age
- **Maintain full compliance** with all relevant legislation, statutory guidance and best practice, including:
  - Keeping Children Safe in Education (KCSIE)
  - The Prevent Duty Guidance for England and Wales
  - Disclosure and Barring Service (DBS) guidance and codes of practice
  - The Equality Act 2010
  - The Education (Independent School Standards) Regulations 2014
- **Create a culture of vigilance** where all staff involved in recruitment understand their safeguarding responsibilities and are equipped with the knowledge and training to identify potential risks
- **Ensure transparency and accountability** through robust record-keeping, including maintaining an accurate single central record (SCR) and retaining appropriate documentation of our recruitment decisions
- **Promote continuous improvement** by regularly reviewing our recruitment practices to ensure they remain effective, up-to-date and aligned with emerging safeguarding risks and best practice

**Scope**

This policy applies to the recruitment and selection of all staff, volunteers, governors, contractors and any other adults who will have contact with children in the Thames Federation. It should be read alongside our Safeguarding and Child Protection Policy.

**Commitment**

All employees and governors involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy. The recruitment and selection process will be conducted in a professional, timely and responsive manner, ensuring that safeguarding considerations are embedded at every stage.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and remove themselves from the process.

**Roles and Responsibilities**
It is the responsibility of the Governing Body to:

Ensure the Federation has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
Monitor the Federation's compliance with them.

It is the responsibility of the Executive Head Teacher to:

- Ensure that the Federation operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the Federation
- Monitor contractors' and agencies' compliance with this document
- Promote welfare of the children at every stage of the procedure

## Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

## Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

## Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a link to, our child protection and safeguarding policy

**Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the policy and children's local authority social care and
- If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

**Seeking references and checking employment history**

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.
When seeking references we will:

- Not accept open references (e.g. 'to whom it may concern')
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees

- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (if appropriate, via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or

- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

**Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

**Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

- We will obtain the DBS check for self-employed contractors.

- We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. If trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Obtain references for volunteers before they are recruited
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought
- The Thames Federation will request sight of the original valid Enhanced DBS certificate with Children's Barred List information for any staff member or volunteer undertaking regulated activity with children in accordance with KCSIE requirements. This includes volunteers who teach, train, instruct, care for, or supervise children and do so on more than three days in a 30-day period or overnight, including where such activity is supervised.

## Governors

All governors will have an enhanced DBS check without barred list information.
They will have an enhanced DBS check with barred list information if working in regulated activity.

## Maintained schools

- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be

carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.