SAFER RECRUITMENT POLICY AND PROCEDURES

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INTRODUCTION & STATEMENT

Gloverspiece Minifarm & School is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is a fundamental part of the school's safeguarding arrangements and is designed to deter, identify and prevent the appointment of individuals who may be unsuitable to work with children.

The school operates a rigorous, fair and proportionate recruitment process which considers an individual's qualifications, experience, conduct, professional suitability and safeguarding suitability. No single recruitment check is considered in isolation; the school considers the totality of information available before confirming an appointment.

The school has regard to Keeping Children Safe in Education 2026, the Education (Independent School Standards) Regulations 2014 (as amended), the Safeguarding Vulnerable Groups Act 2006 (as amended), relevant Disclosure and Barring Service guidance, the Prevent duty guidance and other applicable legislation and statutory guidance.

The policy applies to employees, volunteers, agency and supply staff, contractors, governors/proprietors, trainees, apprentices, students on placement and other adults working in or on behalf of the school, with the level of checking determined by the nature of the role and the individual's contact with children.

Safer recruitment does not end when an individual is appointed. The school maintains arrangements for ongoing suitability, safeguarding training, supervision, professional conduct, reporting of concerns and appropriate action where new information becomes available.

AIMS AND OBJECTIVES

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

The aims of the recruitment policy are as follows:

- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- To ensure that all job applicants are considered equally and consistently;
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- To ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (KCSIE) September 2026, the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and

- To ensure that Gloverspiece meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks for anyone working in the organisation.

ROLES AND RESPONSIBILTIES

It is the responsibility of the Proprietor as Head teacher to:

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

It is the responsibility of the Head teacher and other members of the Senior Leadership Team involved in recruitment to:

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

The Head teacher & SLT are to lead in all appointments.

Definition of Regulated Activity and Frequency

The school will determine whether a role constitutes regulated activity relating to children in accordance with the Safeguarding Vulnerable Groups Act 2006 (as amended), relevant DBS guidance and KCSIE. The level and type of DBS check requested will be determined by the duties, frequency, nature of contact and degree of supervision associated with the role.

The school will not request Children's Barred List information unless the role is eligible for such a check. Where a role constitutes regulated activity with children, an enhanced DBS check with Children's Barred List information will normally be required.

When considering whether an individual's role or position at Gloverspiece consititutes regulated activity or not, the guidance from Keeping Children Safe in Education (KCSiE) (2026) is applied:

"Regulated activity includes;

a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.
Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight. Some activities are always regulated activities, regardless of frequency. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- *personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;*
- *health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.*

Regulated activity will not be:

- *paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above. "*

Gloverspiece is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". Gloverspiece is required to carry out an enhanced DBS check for all staff who will be engaging in regulated activity. However, the organisation can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

RECRUITMENT AND SELECTION PROCEDURE/PRE-EMPLOYMENT CHECKS

Application Forms

Gloverspiece uses its own application form. All applicants for employment will be required to complete an application form requesting: personal details (name, address, date of birth, etc, academic qualifications, full employment history and their suitability for the role.

In addition, all applicants are required to account for any gaps or discrepancies in their employment history. *Incomplete application forms will not be shortlisted.*

It is unlawful for Gloverspiece to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at Gloverspiece. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

The application form will include the applicant's declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

Job Descriptions

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

References

Where reasonably practicable, reference will be obtained before interview, as this his enables any concerns, discrepancies or safeguarding matters identified within a reference to be explored with the candidate during interview. However, where this is not possible, references for short-listed and will be sent for immediately after interview. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage.

The school will normally seek a minimum of two satisfactory references and all offers of employment will be subject to the receipt of these by the organisation. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children.

The school will normally seek references directly from the candidate's current employer and, where appropriate, the employer from the most recent period during which the candidate worked with children.

References must be obtained directly from the referee and should be provided by a person with appropriate authority to provide employment references. Open references, testimonials and references provided by relatives will not normally be accepted.

References will be scrutinised for:

- confirmation of employment dates and role;
- reason for leaving;
- suitability for the role;
- suitability to work with children;
- disciplinary matters where relevant;
- safeguarding concerns;
- allegations or concerns that may affect suitability; and
- discrepancies between the reference and information provided by the applicant.

Any concerns or discrepancies will be followed up and resolved to the school's satisfaction before an appointment is confirmed.

References will be verified by the school to ensure that it is coming from a legitimate source. This involves only accepting references from professional/organisation emai addresses and verifying the details of the most recent employment reference via telephone call.

Interviews

There will be a face-to-face interview wherever possible and where possible two interviewers will see the applicants for the vacant position. The interview process will explore the applicant’s ability to carry out the job description. It will enable the interviewers to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has not been disclosed on the application form. At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents will only be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

Shortlisting

Shortlisting will be undertaken by at least two people. Shortlisting decisions will be based on the published person specification and job requirements. Those undertaking shortlisting will consider the applicant's employment history, explanations for gaps, qualifications, experience and any inconsistencies or information that may raise safeguarding or suitability concerns.

Any concerns identified during shortlisting will be explored appropriately before a final appointment decision is made.

Self-declaration

All shortlisted candidates will be required to complete the school's safer recruitment self-declaration. This will provide an opportunity for candidates to disclose information relevant to their suitability to work with children, including criminal convictions or cautions, information relating to barring, prohibition from teaching, prohibition from participating in the management of an independent school, relevant overseas information and, where applicable, childcare disqualification.

The self-declaration will be considered alongside the application form, references, interview, online search and formal pre-employment checks.

OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

In accordance with the recommendations set out in Keeping Children Safe in Education (KCSIE) September 2026 and the requirements of the Education (Independent School Standards) Regulations 2014, the school carries out a number of pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- The agreement of a mutually acceptable start date and the signing of a contract incorporating the organisation’s standard terms and conditions of employment;
- Verification of the applicant's identity (where that has not previously been verified);
- The receipt of two references (one of which must be from the applicant's most recent employer) which the Gloverspiece considers to be satisfactory;
- For positions which involve "teaching work":
    i. Gloverspiece being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching

Regulations Agency (DfE), or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at the school or which, in the Gloverspiece's opinion, renders the applicant unsuitable to work at the organisationl; and

ii. Gloverspiece being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at the organisation or which, in Gloverspiece's opinion, renders the applicant unsuitable to work at the organisation;

- Where the position amounts to "regulated activity the receipt of an enhanced disclosure from the DBS which the Gloverspiece considers to be satisfactory;
- Where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List*;
- Confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children;
- The school will undertake a Section 128 direction check for individuals whose role involves participation in the management of the independent school, including members of the proprietor body where applicable.
- Confirmation that the applicate is not subject to a childcare disqualification (Childcare (Disqualification) Regulations 2009).
- Verification of the applicant's medical fitness for the role;
- Verification of the applicant's right to work in the UK; and
- Any further checks which are necessary as a result of the applicant having lived or worked outside of the UK; and
- Verification of professional qualifications which the school deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

*Gloverspiece is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The school is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, Gloverspiece can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by the organisation in order to decide which checks are appropriate. It is however likely that in nearly all cases Gloverspiece will be able to carry out an enhanced DBS check and a Children's Barred List check.

Details of the dates on which each of the above checks were completed and who by, are recorded on our single central register (further information below)

The school will ensure that all required suitability checks are completed in respect of the proprietor and, where the proprietor is a body of individuals, the relevant members of that body, in accordance with the Education (Independent School Standards) Regulations 2014 and KCSIE.

This will include the required enhanced DBS and identity checks and checks for any applicable Section 128 direction. Where an individual has lived outside the UK, additional checks will be undertaken where required to establish suitability.

The school will maintain appropriate records of these checks in accordance with the statutory requirements.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' **must be** declared when applying for any position at Gloverspiece.

Online Search Checks

As part of its safer recruitment due diligence, the school will undertake an online search of shortlisted candidates using publicly available information. Candidates will be informed during the recruitment process that such a search may be undertaken.

The purpose of the search is to identify publicly available information that may raise safeguarding, suitability or professional-conduct concerns. The search will not be used to investigate or assess protected characteristics or other information that is irrelevant to the applicant's suitability for employment.

Where potentially relevant information is identified, it will be considered fairly and proportionately and, where appropriate, explored with the candidate before any recruitment decision is made.

DBS (Disclosure and Barring Service)

Gloverspiece applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced DBS check with Children's Barred List information) in respect of all positions at the organisation which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced DBS check with Children's Barred List information is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

Gloverspiece will normally obtain the required DBS certificate before an individual commences employment. An individual will not undertake regulated activity before the required DBS and Children's Barred List checks have been completed.

Where exceptional circumstances mean that a DBS certificate has not yet been received, Gloverspiece will only permit the individual to commence where this is lawful and appropriate, after

completing all other required checks and implementing a documented risk assessment and appropriate supervision arrangements.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

DBS Update Service
Gloverspiece may conduct an appropriate DBS certificate check via the DBS update service for new appointees who are subscribed to this service. In these circumstances, they are still required to present their physical DBS certificate and this will be checked to ensure that the correct workforce (child workforce) is indicated on this certificate.

Copies of DBS Checks
The Disclosure and Barring Service no longer issue Disclosure Certificates to employers; therefore employees/applicants should bring their certificate to be seen by an appropriate member of staff as soon as available/practicable.

Dealing with Convictions
The school operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- The nature, seriousness and relevance of the offence;
- How long ago the offence occurred;
- One-off or history of offences;
- Changes in circumstances,
- Decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Head teacher and a decision will be made following this meeting. In the event that relevant information

(whether in relation to previous convictions or otherwise) is volunteered by an applicant

during the recruitment process or obtained through a disclosure check, the Head teacher will evaluate all of the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the school may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status
Gloverspiece will verify the identity of every person appointed and will take reasonable steps to ensure that the person presenting for work is the same person on whom the pre-employment checks were undertaken.

The school will complete the required right-to-work check in accordance with Home Office requirements before employment commences.

Medical Fitness
Short-listed candidates are requested to confirm their physical and mental capacity for the specific role they have applied for.

Following a conditional offer, the school may obtain information necessary to establish whether the successful candidate is medically fit to undertake the duties of the post, where this is relevant and lawful. Any health-related questions will be targeted to the intrinsic requirements of the role and will be handled in accordance with the Equality Act 2010 and data protection requirements.

Where a disability is identified, the school will consider reasonable adjustments before making any decision about suitability or appointment.

Overseas Checks
Gloverspiece, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals (see Certificate of Sponsorship section).

In addition, where a candidate has lived or worked outside the United Kingdom, the school will consider whether additional checks are required to establish the individual's suitability to work with children.

The nature and extent of additional checks will be determined on a case-by-case basis, having regard to the countries in which the individual has lived or worked, the nature and duration of their residence or employment, the role applied for and the information available from UK and overseas authorities.

Where an overseas criminal record check or certificate of good conduct is available, the school will seek and consider it. Where such a check is unavailable or cannot reasonably be obtained, the school will undertake appropriate alternative checks and document the rationale and risk assessment supporting the recruitment decision.

An overseas criminal record check will not be treated as a substitute for the required UK DBS check.

Induction Program
All new employees will be given an induction program which will clearly identify Gloverspiece's policies and procedures, including the Child Protection Policy, the Code of Conduct and Part One of Keeping Children Safe in Education (KCSIE) 2026 and make clear the expectations which will govern how staff carry out their roles and responsibilities.

Single Centralised Register of Members of Staff
Gloverspiece will maintain a Single Central Record (SCR) in accordance with KCSIE and the Education (Independent School Standards) Regulations 2014.

The SCR will record the required pre-appointment checks for relevant staff and, where applicable, volunteers, agency/third-party supply staff and members of the proprietor body.

The SCR will record, among other details as applicable:

- identity verification;
- Children's Barred List check;
- enhanced DBS check;
- prohibition from teaching check;
- relevant overseas checks;
- verification of professional qualifications;
- right-to-work check; and Section 128 direction check for relevant management positions in an independent school.

The school may record additional information where this assists with effective safeguarding oversight, such as the date and person responsible for completing each check and relevant safer recruitment training.

The SCR will be regularly audited by the designated responsible person and reviewed as part of the school's safeguarding audit program.

Record Retention / Data Protection
Gloverspiece is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the organisation will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help Gloverspiece to discharge its obligations as an employer e.g. so that the organisation may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by Gloverspiece for the duration of the successful applicant's employment with the organisation. All information retained on employees is kept centrally in a locked and secure cabinet.

The same policy applies to any suitability information obtained about volunteers involved with organisation’s activities.

Ongoing Suitability
Safer recruitment is an ongoing safeguarding process and does not end when an individual is appointed.

Gloverspiece will maintain arrangements to identify concerns about staff suitability throughout employment. These include effective induction, safeguarding training, supervision, performance management, disciplinary procedures, low-level concerns procedures, management of allegations and appropriate action where new information becomes available.

Staff are required to disclose relevant changes in circumstances that may affect their suitability to work with children and must cooperate with any further checks required by law or school procedure.

Where concerns arise about an individual's suitability, the school will act promptly and proportionately in accordance with safeguarding, disciplinary and managing-allegations procedures.

Safer Recruitment Decisions & Risk Assessment
No single recruitment check will be treated as determinative of suitability.

Gloverspiece will consider the totality of information available, including the application form, employment history, references, interview, online due diligence, self-declaration, DBS information, qualifications, professional status, overseas checks and any other relevant information.

Where concerns arise, the school will undertake appropriate further enquiries and risk assessment before reaching a recruitment decision.

Where information relevant to suitability is identified but does not automatically prevent appointment, the school will undertake a documented, proportionate risk assessment before making a final decision.

The assessment will consider, as appropriate:

- the nature and seriousness of the information;
- its relevance to the role;
- the age and circumstances of the matter;
- patterns or repeated concerns;
- evidence of insight, remediation and changed circumstances;
- the individual's explanation;
- the level of contact with pupils;
- the needs and vulnerabilities of pupils who may be affected;
- any safeguards or supervision available; and
- any relevant legal or regulatory restrictions.

Leaving Employment at Gloverspiece School
Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed.

Whilst these are pre-employment checks Gloverspiece also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position at Gloverspiece despite being barred from working with children;

or

- Has been removed by Gloverspiece from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, the school may also decide to make a referral to the National College for Teaching and Leadership.

Contractors

The school will assess contractors and contractor employees according to the nature of their work, the frequency of their access to the school and pupils, and whether their duties constitute regulated activity. The appropriate level of DBS and other safeguarding checks will be determined accordingly.

Contractors must not undertake regulated activity unless the required checks have been completed. Contractors who have not undergone the required checks will be appropriately supervised and will not be permitted unsupervised access to pupils.

The school will obtain appropriate assurance from contractors regarding the checks undertaken on their employees and will retain evidence where required.

Agency and supply staff

No agency or third-party supply worker will commence work at the school until the school has received the required written confirmation from the supplying organisation that the appropriate pre-employment checks have been completed.

The school will verify the identity of the individual presenting for work and will satisfy itself that the individual is suitable for the role.

Where the role requires an enhanced DBS check, the school will obtain and consider the information required by KCSIE and the ISSR. Where a Children's Barred List check is required, this must have been completed before the individual undertakes regulated activity.

The school will ensure that its contracts or arrangements with employment businesses require the provision of the necessary written confirmations and information.

EYFS and Childcare Suitability

Where staff work in or are directly concerned with the management of relevant childcare provision, the school will undertake the checks required under the Childcare (Disqualification) Regulations 2009 and associated statutory guidance.

Relevant staff will be required to make the declarations required by the school's procedures and will be informed of their ongoing duty to notify the school of any relevant change in circumstances.

The school will maintain appropriate records of childcare disqualification checks and declarations.

Visiting Speakers

The school will undertake proportionate safeguarding and suitability checks before inviting external speakers, trainers or contributors to work with pupils.

The level of checking and supervision will reflect the nature of the activity and the individual's access to pupils. Visitors who have not undergone the school's required checks will be appropriately supervised.

All visiting speakers must comply with the school's expectations regarding safeguarding, equality, professional conduct and the promotion of fundamental British values.

Volunteers

The level of checking required for volunteers will be determined by the nature, frequency and supervision of their activities. A volunteer undertaking regulated activity will be subject to the appropriate enhanced DBS and Children's Barred List checks.

The school will undertake a risk assessment where a volunteer is not subject to a DBS check and will ensure that an unchecked volunteer is appropriately supervised and does not undertake regulated activity.

Monitoring and Evaluation

The Headteacher/Designated Safeguarding Lead or other nominated senior leader will undertake regular audits of safer recruitment records. This will include sampling recruitment files, the SCR, agency/supply records and evidence of safer recruitment checks.

The school will review whether recruitment procedures are being applied consistently and whether any weaknesses, omissions or trends have been identified.

Findings will be reported to the proprietor and used to inform safeguarding improvement planning and staff training.