Wolsey House Primary School

Safer Recruitment Policy

Policy date: October 2026

Policy review date: October 2027

Together we grow, achieve and thrive.

Overview

Safer recruitment is an essential part of the school's wider responsibility to safeguard and promote the welfare of children. Wolsey House Primary School is committed to recruiting suitable people and maintaining a culture of ongoing safeguarding vigilance in accordance with *Keeping Children Safe in Education 2026*.

The school expects all employees, governors, agency workers, contractors and volunteers to share this commitment and to uphold the school's safeguarding standards, professional expectations and ethos.

Aims and objectives

The aim of Wolsey House Primary School's Safer Recruitment Policy is to help deter, reject or identify people who may pose a risk of harm to children or who are otherwise unsuitable to work with them. The school will maintain robust and proportionate procedures for recruiting and appointing employees, agency workers, contractors, volunteers and other adults who may work with or have access to pupils.

The school aims to:

- recruit the best available candidate for each role, based on their merit, abilities, experience, qualifications and suitability;
- ensure that safeguarding and promoting the welfare of children are central to every stage of the recruitment and selection process;
- ensure that all applicants are considered fairly, consistently and against the requirements set out in the job description and person specification;
- prevent unlawful discrimination because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation;
- make reasonable adjustments for disabled applicants throughout the recruitment and selection process;
- ensure compliance with relevant legislation and statutory guidance, including *Keeping Children Safe in Education 2026*, *Working Together to Safeguard Children 2026*, the *Prevent Duty Guidance: England and Wales 2023*, the Equality Act 2010 and relevant guidance issued by the Disclosure and Barring Service;
- discourage unsuitable individuals from applying by clearly communicating the school's commitment to safeguarding; and
- complete all required identity, criminal-record, barred-list, right-to-work, qualification, prohibition, reference and other pre-appointment checks appropriate to the role.

Employees and governors involved in recruitment and selection are responsible for familiarising themselves with this policy and following the school's agreed procedures. At least one member of any interview panel will have completed appropriate safer-recruitment training.

The school operates a principle of fair and open competition. Selection decisions will be based on the extent to which each applicant demonstrates that they meet the published requirements of the role. Safeguarding suitability will be explored throughout the process and will not be treated solely as a matter of completing pre-employment checks.

Recruitment and selection will be conducted professionally, consistently and without unnecessary delay, in accordance with current employment and equality legislation, safeguarding legislation and statutory guidance. The school will maintain an appropriate written record of the recruitment process and the reasons for appointment decisions.

Anyone involved in recruitment who has a close personal, professional or family relationship with an applicant, or another actual or potential conflict of interest, must declare this as soon as they become aware of the application. They will not take part in shortlisting, interviewing or appointment decisions unless the conflict has been considered and an appropriate arrangement has been formally agreed and recorded.

Wolsey House Primary School will apply these procedures consistently and thoroughly when obtaining, verifying, considering and recording information about applicants. Information will be handled securely, confidentially and in accordance with the school's data-protection obligations.

Roles and responsibilities

The governing body

The governing body is responsible for ensuring that:

- the school has effective safer-recruitment policies and procedures that comply with *Keeping Children Safe in Education 2026*, the School Staffing (England) Regulations 2009 and other relevant legal requirements;
- appropriate arrangements are in place to prevent people who pose a risk of harm from working with children;
- the school's safer-recruitment procedures are implemented consistently and their effectiveness is monitored;
- appropriate responsibilities for recruitment and appointment are delegated to the headteacher and senior leaders, while retaining responsibility for appointments that cannot legally be delegated;
- at least one person conducting any interview has completed appropriate safer-recruitment training;
- appropriate checks and assurances are obtained for employees, agency and supply staff, contractors, volunteers, governors and other adults working in the school;
- the school maintains an accurate and compliant single central record;
- recruitment information and monitoring reports provide suitable assurance about compliance, without disclosing confidential personal information; and
- any weaknesses identified through monitoring, audit or safeguarding review are addressed promptly.

Before a person is appointed or elected as a governor, the governing body will ensure that:

- their identity is verified;
- an enhanced DBS check is obtained;
- a section 128 direction check is completed; and
- any other eligibility or disqualification requirements are considered.

Governance is not, by itself, regulated activity relating to children. Children's barred-list information will therefore only be requested where the governor will also undertake separate duties that amount to regulated activity.

Governor checks may be recorded on the single central record as non-statutory information. Governors will receive safeguarding information and training appropriate to their responsibilities.

The headteacher and senior leadership team

The headteacher and senior leadership team are responsible for:

- implementing this policy and the school's safer-recruitment procedures;
- ensuring that safeguarding and promoting the welfare of children remain central throughout recruitment and selection;
- ensuring that job descriptions, person specifications and advertisements clearly set out the school's commitment to safeguarding and the safeguarding responsibilities of the role;
- ensuring that recruitment panels include at least one person who has completed appropriate safer-recruitment training;
- ensuring that shortlisting, interviews, references, online searches and all required pre-appointment checks are completed, considered and recorded appropriately;
- ensuring that reasonable adjustments are made for disabled applicants;
- ensuring that no person begins work without the required checks or, where an exceptional risk-assessed arrangement is permitted, that it is authorised, recorded, supervised and reviewed;
- obtaining and checking the required written confirmation from agencies and third-party organisations concerning staff supplied to the school;
- ensuring that contractors and their employees are subject to the checks and supervision arrangements required by *Keeping Children Safe in Education*;
- ensuring that the single central record and supporting recruitment records are accurate, secure and kept up to date;
- ensuring that staff involved in recruitment understand their responsibilities and receive appropriate training and updates; and
- reporting relevant compliance information and any significant concerns to the governing body.

Recruitment panel members

Everyone involved in shortlisting, interviewing or appointment decisions must:

- follow this policy and the school's agreed recruitment procedures;
- act fairly, consistently and without unlawful discrimination;
- maintain confidentiality;
- declare any actual or potential conflict of interest;
- assess applicants against the published job description and person specification;
- explore safeguarding suitability appropriately; and
- record the evidence supporting recruitment decisions.

Recruitment and selection procedure

Advertising

Vacancies will normally be advertised in a manner designed to attract a suitable and sufficiently diverse field of applicants. The school may use external, internal or local-authority recruitment arrangements according to the nature of the post, while ensuring that recruitment is fair, transparent and based on merit.

Advertisements will include:

- the school's commitment to safeguarding and promoting the welfare of children;
- the safeguarding responsibilities of the post;
- whether the role involves engaging in regulated activity with children;
- the safeguarding checks that will be undertaken;
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, where applicable; and
- a statement that an online search may be undertaken for shortlisted candidates as part of the school's safeguarding due diligence.

Applicant information will be processed securely, confidentially and in accordance with the UK GDPR, the Data Protection Act 2018 and the school's privacy notice and records-retention arrangements.

Job descriptions and person specifications

A current job description and person specification will be approved before a vacancy is advertised.

The job description will clearly set out:

- the duties and responsibilities of the role;
- the individual's responsibility for safeguarding and promoting the welfare of children; and
- whether the role involves regulated activity with children.

The person specification will identify the qualifications, skills, knowledge, experience and competencies required. It will also describe the personal qualities and safeguarding suitability required to work with children at Wolsey House Primary School.

The criteria contained in the person specification will be used consistently when shortlisting and selecting candidates.

Application forms

All applicants will be required to complete the school's application form. The form will require:

- personal and contact details;
- a full chronological education and employment history;
- explanations for gaps in employment;
- details of relevant qualifications and experience;
- details of referees;
- a statement explaining how the applicant meets the person specification; and
- a declaration that the information provided is complete and accurate.

Incomplete applications will not normally be shortlisted unless the omission is clarified satisfactorily before the shortlisting decision is made.

A curriculum vitae may be submitted alongside the application form but will not be accepted instead of a completed application form.

Applicants completing an electronic application will be required to confirm that the information is true. Where appropriate, the shortlisted applicant may be asked to sign a copy of the application at interview.

Shortlisting and self-declaration

At least two people will undertake the shortlisting exercise wherever practicable. It is recommended that the same people are involved in both shortlisting and interviewing to promote consistency.

Candidates will be assessed against the published person specification. The shortlisting panel will:

- identify and consider any inconsistencies;
- examine gaps in employment and the reasons provided for them;
- consider frequent changes in employment or location;
- identify matters requiring clarification at interview; and
- record the evidence and reasons for its decisions.

After shortlisting, candidates will be asked to complete an appropriate self-declaration regarding their suitability to work with children. This will include information about relevant criminal history and any other information they are legally required to disclose. Such information will not be requested or used to determine who should be shortlisted.

The school will make clear that:

- relevant posts may be exempt from the provisions concerning protected convictions and cautions under the Rehabilitation of Offenders Act 1974;
- applicants must disclose only the information that they are legally required to disclose;
- it is a criminal offence for a person who is barred from regulated activity with children to seek to engage in that regulated activity; and
- deliberately providing false information or omitting relevant information may result in withdrawal of an offer, disciplinary action or dismissal and, where appropriate, referral to the police or Disclosure and Barring Service.

Self-declaration information will be considered only by those who need to know it and will be discussed with the candidate where relevant.

Online searches

As part of its safeguarding due diligence, the school will normally undertake a proportionate online search of shortlisted candidates using a publicly available search engine.

Shortlisted candidates will be informed that an online search may be undertaken. Searches will be conducted consistently and will focus only on publicly available information that may be relevant to the candidate's suitability to work with children or to the role.

Where practicable, the search will be completed by a person who is not making the final selection decision. The interview panel will be informed only of relevant information requiring further exploration. Information relating solely to a protected characteristic, private life or another matter with no bearing on suitability will not influence the appointment decision.

The school will not use online searches to conduct general or intrusive surveillance of applicants. Any potentially relevant concern will be discussed with the candidate and considered fairly and in context before a decision is made. The search undertaken, relevant findings, discussion with the candidate and resulting decision will be recorded.

References

References will normally be obtained directly from the referee before interview, where possible, so that any concerns, inconsistencies or gaps can be explored with the referee and the candidate.

Appointments will normally be subject to the receipt of two satisfactory references. One reference must be from the applicant's current employer or, if they are not currently employed, their most recent employer. Where the applicant is not currently working with children but has previously done so, a reference will also be sought from the employer for whom they most recently worked with children.

References must:

- be completed by a senior person with appropriate authority;
- be confirmed by the headteacher or principal where the referee is employed in a school or college but is not the headteacher or principal;
- provide factual information relevant to the applicant's suitability and appointment;
- confirm employment dates, role and reason for leaving;
- confirm whether the referee is satisfied that the applicant is suitable to work with children;
- provide factual details of any substantiated safeguarding concerns or allegations that met the harm threshold; and
- not include concerns or allegations that were found to be false, unfounded, unsubstantiated or malicious.

The school will:

- obtain references directly from referees and not rely on the applicant to provide them;
- not accept open references, testimonials or references from relatives or personal friends;
- ensure that electronic references originate from a legitimate source;
- compare references with the application form;
- clarify any vague, incomplete or inconsistent information;
- verify the reference directly with the person who provided it; and
- resolve concerns satisfactorily before confirming an appointment.

Where a candidate asks that their current employer is not contacted before interview, the school will discuss the reason with them. Any appointment will remain conditional upon receipt and satisfactory consideration of that reference before employment is confirmed.

Selection and interview

The selection process will be structured, transparent and appropriate to the role. It may include an interview, observed activity, written or practical task and appropriately supervised interaction with pupils.

An interview will normally be conducted in person wherever reasonably practicable. Where a remote interview is necessary, the school will maintain the same safeguarding and identity-verification standards and will complete any necessary original-document checks before employment begins.

There will normally be at least two interviewers. At least one panel member must have completed appropriate safer-recruitment training.

All candidates will be asked the same core questions, with appropriate follow-up questions based on their application, references, self-declaration, online search and responses. The panel will explore:

- the candidate's ability to undertake the role;
- their motivation for working with children;
- their understanding of safeguarding and professional boundaries;
- their attitudes towards children and their vulnerability;
- gaps, discrepancies or repeated changes in employment;
- relevant concerns arising from references or online searches;
- any past disciplinary action or substantiated allegations where it is lawful and appropriate to consider them; and
- relevant information disclosed through the self-declaration process.

The panel will not ask discriminatory questions or seek information about health or disability except where permitted by law, including to identify reasonable adjustments or establish whether an intrinsic requirement of the role can be met.

Information considered, decisions reached and the reasons for those decisions will be recorded.

The school will maintain a separate and current record of staff and governors who have completed safer-recruitment training rather than naming individuals in this policy.

Identity, qualification and document checks

Candidates invited to interview will be informed which original documents they must provide. These may include evidence of:

- identity;
- address;
- right to work in the United Kingdom; and
- qualifications that are legally or operationally required for the role.

Original documents will be examined and their authenticity checked. Where an interview takes place remotely, the original documents will be checked at the earliest appropriate opportunity and before the applicant begins work.

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be retained securely on their personnel file in accordance with the school's retention schedule.

Documents relating to unsuccessful candidates will be retained only for the period set out in the school's recruitment privacy notice and retention schedule, normally six months after the recruitment process has concluded, and will then be securely destroyed unless there is a lawful reason to retain them for longer.

DBS certificate information will be handled and retained in accordance with the DBS Code of Practice, statutory guidance and the school's records-retention arrangements.

Offer of employment and pre-appointment checks

All offers of employment will be conditional upon the satisfactory completion of the checks required by *Keeping Children Safe in Education 2026*, relevant legislation and the requirements of the role.

A conditional offer may include:

- agreement of a start date;
- acceptance of the school's terms and conditions of employment;
- verification of the applicant's identity, including any evidence relating to a change of name;
- receipt and satisfactory consideration of references;
- verification of the applicant's right to work in the United Kingdom;
- verification of the applicant's mental and physical fitness to carry out the responsibilities of the role, following a conditional offer and in accordance with the Equality Act 2010;
- verification of qualifications and professional status required for the role;
- confirmation of qualified teacher status and completion of statutory induction, where applicable;
- confirmation that a person undertaking teaching work is not subject to a prohibition order, interim prohibition order, relevant historic sanction or restriction;
- an enhanced DBS check, with children's barred-list information where the person will engage in regulated activity;
- a separate children's barred-list check where this is legally permitted and required;
- appropriate checks under the Childcare Disqualification Regulations 2018 where the role includes relevant childcare provision;
- a section 128 direction check where applicable, including for prospective maintained-school governors;
- appropriate additional checks where the applicant has lived or worked outside the United Kingdom; and
- any other check required by legislation, statutory guidance or the particular responsibilities of the role.

The school will determine the appropriate checks by considering the duties of the post and whether they constitute regulated activity with children. Barred-list information will not be requested for an individual who is not legally eligible for that check.

No appointment will be confirmed until all mandatory checks have been completed and considered satisfactory.

A new employee will not normally begin regulated activity until the enhanced DBS certificate, including children's barred-list information where required, has been obtained. Exceptionally, where current guidance permits a person to start before the DBS certificate is available, the headteacher must:

- ensure that all other required checks have been completed;
- obtain a separate children's barred-list check where the school is legally permitted to do so;
- complete and approve a written risk assessment;
- put appropriate supervision arrangements in place;
- record the decision and its reasons; and
- review the arrangements until the DBS certificate has been received and considered.

A person will not be permitted to begin regulated activity within provision covered by the Early Years Foundation Stage where current statutory requirements prohibit this before receipt of the appropriate DBS check.

A recruitment checklist will be completed for every appointment. Evidence of the required checks will be retained securely on the personnel file and recorded on the single central record where required.

Rehabilitation of Offenders Act 1974 and self-declaration

Many roles within the school are exempt from certain provisions of the Rehabilitation of Offenders Act 1974. This allows the school to ask shortlisted candidates to disclose specified convictions and cautions that are not protected under the current filtering rules.

Applicants will not be required to disclose protected convictions or cautions. Protected information will not be requested, taken into account or used as the basis for an employment decision.

Shortlisted candidates will be given clear information explaining:

- why the post is eligible for a criminal-record check;
- the level of DBS check that may be undertaken;
- which criminal-record information must be disclosed;
- that protected convictions and cautions do not need to be disclosed; and
- how the information will be used and protected.

A criminal record will not automatically prevent appointment. Any disclosed information will be considered fairly, proportionately and in relation to the responsibilities and safeguarding risks of the role.

It is a criminal offence for a barred individual to seek or undertake regulated activity from which they are barred.

Disclosure and Barring Service checks

The school will obtain the level of DBS check for which the role is legally eligible.

Most employees working in a school will engage in regulated activity and will therefore require an enhanced DBS check including children's barred-list information. Where a person will have regular contact with children but will not engage in regulated activity, an enhanced DBS check without barred-list information may be appropriate.

The school will:

- ensure that the DBS application is made for the correct workforce and level of check;
- examine the applicant's original DBS certificate;
- verify that the certificate relates to the applicant;
- consider any information disclosed fairly and in accordance with this policy;
- record the required information on the single central record; and
- handle certificate information in accordance with the DBS Code of Practice, the UK GDPR and the Data Protection Act 2018.

The school does not routinely retain copies of DBS certificates. Where a copy is retained, there must be a lawful and documented reason, and it will not normally be kept for longer than six months. The school may retain a record that the check was completed, its outcome and the recruitment decision.

Where an applicant has lived or worked outside the United Kingdom, an enhanced DBS check will still be obtained where required. The school will also undertake such additional checks as it considers appropriate so that relevant events occurring outside the United Kingdom can be considered. This approach applies regardless of the country in which the applicant lived or worked.

Existing employees and repeat checks

The school will maintain ongoing safeguarding vigilance and expects employees to report any relevant change in circumstances, criminal investigation, caution, conviction, order, restriction or other matter that may affect their suitability to work with children, in accordance with the Staff Code of Conduct.

A new DBS check or other appropriate check will be undertaken where:

- an employee or volunteer moves from a role that is not regulated activity into regulated activity;
- there has been an actual break in service of 12 weeks or more;
- statutory guidance or legislation requires a further check; or
- the school has concerns about the person's suitability to work with children.

Ordinary authorised absence during continuing employment, including maternity, adoption, shared-parental or long-term sickness absence, will not automatically be treated as a break in service. The school may nevertheless undertake appropriate checks where legislation, local-authority requirements, the nature of a changed role or a specific safeguarding concern makes this necessary.

The school will not operate routine periodic DBS rechecking unless this is required by legislation or an adopted local-authority employment procedure. It may use the DBS Update Service, with the individual's consent, where an ongoing status check is appropriate.

DBS Update Service

An individual may subscribe to the DBS Update Service. Subscription is free for eligible volunteers, while other applicants are responsible for the current annual fee.

Before relying on an Update Service status check, the school will:

- obtain the individual's consent;
- examine the original DBS certificate;
- confirm that the certificate belongs to the individual;
- ensure that it is for the correct workforce;
- ensure that it is at the same level and type required for the new role, including barred-list information where applicable;
- check the individual's identity;
- complete an online status check; and
- record the check and its outcome in accordance with statutory requirements.

If the Update Service reports that the certificate is no longer current, or if the certificate does not match the workforce or level required, the school will obtain a new DBS check.

DBS certificates

The DBS normally issues the certificate directly to the applicant. The applicant must present the original certificate to the school before beginning work, unless an exceptional arrangement expressly permitted by statutory guidance has been approved and recorded.

A DBS certificate alone does not determine a person's suitability. It will be considered alongside the application, interview, references, self-declaration, online search, employment history and other required checks.

Considering criminal-record and other suitability information

Where a DBS certificate or self-declaration contains information, the school will undertake an individual, fair and proportionate assessment. Relevant factors may include:

- the nature and seriousness of the conduct or offence;
- its relevance to the post and the opportunity for contact with children;
- how long ago it occurred;
- the individual's age at the time;
- whether it was an isolated incident or part of a pattern;
- the circumstances and explanation provided;
- evidence of rehabilitation or changes in circumstances;
- the accuracy and completeness of the applicant's disclosure;
- any legal or regulatory restriction;
- the potential risk to pupils, staff and the school community; and
- whether any risk could be managed through reasonable and sustainable safeguards.

The applicant will normally be given an opportunity to explain relevant information before a final decision is made. The assessment and reasons for the decision will be recorded securely.

Where information may indicate that a person is barred from regulated activity or subject to a legal prohibition, the school will not permit them to undertake work from which they are barred or prohibited.

If an applicant disputes information contained in a DBS certificate, they may use the DBS dispute process. Where appropriate and practicable, the school may defer its final decision for a reasonable period while the dispute is considered. This will not require the school to allow the applicant to begin work.

Teaching prohibition and professional-status checks

Before appointing anyone to undertake teaching work, the school will use the DfE's **Check a teacher's record** service to confirm that the person:

- is not subject to a prohibition order or interim prohibition order;
- is not subject to a relevant current sanction or restriction;
- is not subject to a relevant historic General Teaching Council for England sanction; and
- holds qualified teacher status and has completed statutory induction where these are required for the role.

A person who is prohibited from teaching will not be appointed to undertake teaching work.

Where an applicant has taught or trained as a teacher outside the United Kingdom, the school will consider whether additional professional-standing, criminal-record or other checks are available and appropriate. An overseas teaching qualification alone will not be treated as evidence of safeguarding suitability.

A section 128 direction prevents or restricts an individual from participating in the management of an independent school, including an academy or free school. It also disqualifies a person from serving as a governor of a maintained school. Wolsey House Primary School will therefore undertake a section 128 check for prospective governors and in any other circumstances in which the check is legally required.

Proof of identity, right to work and qualifications

Applicants will be required to provide original documents, or use an authorised digital verification process where legally permitted, to establish their identity and right to work in the United Kingdom.

Checks will be completed in accordance with:

- Home Office right-to-work guidance;
- DBS identity-checking requirements; and
- the school's duties under the Equality Act 2010.

Where an applicant has changed their name, they will be asked to provide appropriate evidence linking their current and previous identities. Best practice is to check the name on the applicant's birth certificate where this is available.

The school will verify any qualification or professional status that is legally required for the role. It may also verify qualifications that are material to the appointment decision. For teaching appointments, the DfE's **Check a teacher's record** service will be used to verify qualified teacher status and completion of statutory induction or probation where applicable.

Copies of documents used to verify the successful applicant's identity, right to work and required qualifications will be retained securely on their personnel file in accordance with the school's retention schedule.

Medical fitness

Following a conditional offer of employment, the school will verify that the successful applicant has the mental and physical fitness required to carry out the responsibilities of the role.

The applicant may be asked to complete an appropriate health declaration or occupational-health questionnaire. Where necessary, and with the applicant's knowledge, further occupational-health or medical advice may be obtained.

Health information will be considered only in relation to:

- the intrinsic requirements of the role;
- the applicant's ability to undertake the duties safely;
- any reasonable adjustments that may be required; and
- the school's health, safety and employment responsibilities.

The school will comply with the Equality Act 2010. It will not ask health or disability questions before making an offer except where legally permitted, such as to identify adjustments required for the recruitment process or to determine whether an applicant can undertake an intrinsic function of the role.

A conditional offer will not be withdrawn on medical grounds without consultation with the applicant, consideration of relevant professional advice and full consideration of reasonable adjustments. The reasons for any decision will be recorded.

The school will normally retain only the occupational-health outcome and information necessary to implement agreed adjustments. Detailed medical information will be held securely with access restricted to those who genuinely need it.

Checks for people who have lived or worked outside the United Kingdom

Applicants who have lived or worked outside the United Kingdom will undergo the same pre-appointment checks as other applicants, including an enhanced DBS check with children's barred-list information where required.

The school will also undertake such additional checks as it considers appropriate to identify relevant events that may have occurred overseas. These may include:

- an overseas criminal-record certificate or certificate of good conduct;
- confirmation from an overseas professional or teaching regulator that no relevant sanctions or restrictions have been imposed;
- additional employment references;
- verification of overseas qualifications and professional status; and
- further identity or employment-history checks.

The extent of additional checks will be determined proportionately, taking account of the country concerned, length and recency of residence or employment, the nature of the role and the information already available. Any threshold adopted by the school will reflect current local-authority requirements.

Where overseas information cannot be obtained, the school will seek alternative evidence and complete a written risk assessment before deciding whether the appointment can proceed. The assessment, evidence considered, decision and any additional safeguards will be recorded.

Overseas checks do not replace the required UK checks.

Where the school wishes to sponsor a worker under the immigration system, it will do so only where it holds the appropriate sponsor licence and will comply with the relevant UK Visas and Immigration requirements.

Induction programme

All new employees, agency staff, relevant contractors and volunteers will receive safeguarding information appropriate to their role before, or as soon as practicable after, beginning work.

Employees will receive an induction that includes:

- the Safeguarding and Child Protection Policy;
- Part One of *Keeping Children Safe in Education 2026*;
- the Staff Code of Conduct, including professional boundaries and low-level concerns;
- the Behaviour Policy;
- the school's safeguarding response to children who are absent from education;
- the identity and role of the designated safeguarding lead and deputies;
- procedures for reporting concerns about a child;
- procedures for allegations and low-level concerns about adults;
- whistleblowing arrangements;
- online-safety responsibilities, including filtering and monitoring;
- the Prevent duty and recognising possible susceptibility to radicalisation;
- health and safety, emergency and site-security arrangements; and
- any role-specific safeguarding responsibilities.

Safeguarding and child-protection training, including online safety, will be provided at induction and regularly updated. Staff will also receive safeguarding updates as required and at least annually.

Completion of induction, receipt of the required policies and confirmation that they have been read and understood will be recorded using the Staff Induction Checklist and Staff Safeguarding Induction Checklist.

Single central record

Wolsey House Primary School will maintain an accurate single central record of pre-appointment checks in accordance with the School Staffing (England) Regulations 2009, as amended, and *Keeping Children Safe in Education 2026*.

The statutory section of the single central record will include:

- all staff employed to work at the school, including salaried trainee teachers; and
- agency and third-party supply staff, even where they work at the school for only one day.

For staff, the record will indicate whether the following checks have been completed or certificates obtained, together with the relevant date:

- identity;
- enhanced DBS and children's barred-list information, where required;
- any separate children's barred-list check;
- prohibition from teaching, where applicable;
- further checks for individuals who have lived or worked outside the United Kingdom;
- professional qualifications, where required; and
- right to work in the United Kingdom.

For agency and third-party staff, the record will show:

- whether written confirmation has been received that the required checks have been completed and the appropriate certificates obtained;
- the date that confirmation was received; and
- whether the agency has provided details of information disclosed on an enhanced DBS certificate.

The school may also record non-statutory information, including:

- checks completed for volunteers and governors;
- childcare-disqualification declarations or checks where applicable;
- section 128 checks;
- safeguarding and safer-recruitment training dates; and
- the name or initials of the person completing each check.

The Business Manager will maintain the single central record. The headteacher retains operational oversight and the governing body retains strategic oversight.

The record will be checked regularly and formally audited at least annually by an appropriately knowledgeable person who is not solely responsible for its day-to-day maintenance. The outcome and any required actions will be reported to the headteacher and governing body without disclosing confidential personal information.

Details will be removed from the statutory record when the person no longer works at the school, subject to any local-authority arrangements for retaining archived employment information.

Record retention and data protection

Recruitment and vetting information will be collected, processed, stored and destroyed in accordance with:

- the UK GDPR;
- the Data Protection Act 2018;
- the DBS Code of Practice;
- the school's recruitment privacy notice;
- the school's records-retention schedule; and
- relevant local-authority requirements.

For successful applicants, the school will retain on the personnel file the information necessary to demonstrate that recruitment and pre-appointment checks were completed. This will include copies of documents used to verify identity, right to work and required qualifications.

The school will not routinely retain a copy of the DBS certificate. If a copy is retained for a specific and lawful reason, it will be held securely and will not normally be retained for longer than six months. The school may retain a record that the check was completed, its outcome and the recruitment decision.

Medical information will be treated as special-category personal data. Only information necessary to confirm fitness for the role, implement reasonable adjustments or meet legal obligations will be retained and access will be strictly limited.

Personnel information may be held securely in paper or electronic form. Paper records will be kept in locked storage and electronic records will be protected through appropriate access controls.

Records relating to unsuccessful applicants will normally be retained for six months after the recruitment process has concluded and then securely destroyed, unless the school has a documented lawful reason to retain them for longer. The six-month period is the school's retention decision and will be stated in its recruitment privacy notice; it is not a period prescribed directly by UK GDPR.

Suitability information relating to volunteers will be retained only where necessary and proportionate, in accordance with the school's retention schedule.

Ongoing employment and safeguarding vigilance

Safer recruitment does not end when a person is appointed. The school will maintain a culture of ongoing safeguarding vigilance through:

- induction, supervision, appraisal and professional development;
- regular safeguarding and online-safety training and updates;
- clear expectations within the Staff Code of Conduct;
- procedures for reporting allegations and low-level concerns;
- whistleblowing arrangements;
- appropriate management of disciplinary, conduct and capability concerns;
- consideration of transferable risk arising from behaviour outside work;
- appropriate repeat checks where required by legislation or statutory guidance; and
- prompt action where information raises a concern about an adult's suitability to work with children.

Employees and volunteers must inform the headteacher or other designated senior leader promptly of any relevant change in circumstances that may affect their suitability to work with children.

Leaving employment and statutory referrals

The school will follow its Managing Allegations and Low-Level Concerns procedures where a safeguarding concern or allegation is raised about an employee, supply worker, contractor or volunteer. Departure from the school will not prevent the school from concluding a safeguarding investigation or fulfilling its referral duties.

The school has a legal duty to make a referral to the Disclosure and Barring Service where it removes an individual from regulated activity, or would have removed them had they not resigned, retired or otherwise ceased working, and it believes that the person has:

- engaged in relevant conduct;
- satisfied the harm test; or
- received a caution or conviction for a relevant automatic-barring offence.

This duty applies to paid staff and volunteers engaged in regulated activity. A referral will be made as soon as possible once the referral criteria are met.

Where the school becomes aware that a person who is barred has applied to engage in regulated activity, it will seek appropriate advice and consider reporting the matter to the police and DBS.

Where a teacher is dismissed or the school ceases to use their services because of serious misconduct, or would have done so had the teacher not left first, the school must consider whether a referral should be made to the Teaching Regulation Agency.

Settlement or compromise agreements will not be used to prevent the school from completing safeguarding enquiries or meeting its legal referral duties.

Agency and third-party staff

Before an agency or third-party worker begins work, the school will obtain written confirmation that the supplying organisation has:

- carried out the same checks that the school would otherwise be required to undertake;
- obtained the appropriate certificates;
- completed an enhanced DBS check with children's barred-list information where the role involves regulated activity;
- checked the person's identity, right to work, qualifications and professional status as applicable; and
- considered any information disclosed through those checks.

The school will record the required confirmation on the single central record and will verify that the person who presents for work is the person on whom the checks were completed.

The school will not routinely ask an agency worker to present their original DBS certificate. Where the agency's enhanced DBS check disclosed any matter or other relevant information was supplied to the agency, the school will obtain a copy of the certificate from the agency and consider the information before the individual begins work.

Trainee and student teachers

Where a trainee teacher is employed by the school through a salaried training route, the school will complete the same pre-appointment checks required for other employees, including an enhanced DBS check with children's barred-list information where the trainee will engage in regulated activity.

Where a trainee teacher is undertaking a fee-funded placement, the initial teacher-training provider is responsible for completing the required checks. Before the placement begins, the school will obtain written confirmation that the provider has:

- completed the pre-appointment checks that the school would otherwise be required to undertake;
- obtained the appropriate DBS certificate;
- confirmed that the trainee is suitable to work with children; and
- considered any information disclosed through the checks.

The school will verify the trainee's identity when they arrive and provide appropriate safeguarding induction. Fee-funded trainees do not have to be included on the statutory single central record, although the school may record the assurance received as non-statutory information.

Contractors

The school will set out its safeguarding requirements in contracts with external organisations.

The school will ensure that contractors and their employees have undergone the level of DBS check appropriate to their role:

- an enhanced DBS check including children's barred-list information where the person will engage in regulated activity;
- an enhanced DBS check without barred-list information where the person will have regular contact with children but will not engage in regulated activity; or
- consideration of a basic DBS check where appropriate for other contractors who may have access to children.

Barred-list information will not be requested where the person is not eligible for that check.

A contractor for whom the required checks have not been obtained will not work unsupervised or engage in regulated activity. The school will check the identity of contractors when they arrive on site and will determine the supervision arrangements required.

For a self-employed contractor, the school will obtain or verify the appropriate check directly, because the individual cannot normally submit an eligible standard or enhanced DBS application on their own behalf.

Alternative provision

Where the school places a pupil with an alternative-provision provider, Wolsey House Primary School retains responsibility for safeguarding that pupil.

Before the placement begins, the school will obtain written confirmation that the provider has completed appropriate safeguarding and pre-employment checks on those working at the provision. The provider will also be required to inform the school of relevant staffing changes or other arrangements that may affect the pupil's safety so that the school can obtain further assurance that appropriate checks have been completed.

The school will undertake proportionate due diligence on the provider, including any subcontracted provision or satellite sites, and will ensure that it knows where the pupil is being educated during school hours.

The placement will be reviewed at least half-termly to provide assurance that:

- the pupil is attending;
- the placement remains safe;
- the provision continues to meet the pupil's needs; and
- agreed safeguarding arrangements remain effective.

Any safeguarding concern will prompt an immediate review of the placement. The placement will be suspended or ended where necessary unless and until the concern has been satisfactorily addressed.

Visiting speakers and external organisations

The school values appropriate contributions from visiting speakers and external organisations. Before confirming a visit, it will consider:

- the educational purpose and value of the proposed activity;
- the suitability and reputation of the speaker or organisation;
- the age-appropriateness of the content;
- whether the content supports safeguarding and the school's statutory duties;
- whether there is a risk of extremist, discriminatory or otherwise harmful material being presented;
- whether additional checks or information are required; and
- the level of supervision needed.

The school will undertake proportionate background checks using publicly available information where appropriate. Any decision to cancel or restrict a visit will be based on reasonable and documented safeguarding, educational or legal grounds.

A visiting speaker who is not undertaking regulated activity will not be subject to a children's barred-list check. The school will not request a DBS check merely because a person is visiting to speak at an event where they are appropriately supervised.

Visiting speakers will:

- sign in and out at reception;
- provide appropriate identification;
- wear a visitor badge;
- follow the school's safeguarding and site-security requirements; and
- remain appropriately supervised unless the school has confirmed that different arrangements are suitable.

In fulfilling the Prevent duty, the school will have due regard to the need to prevent people from being drawn into terrorism. For the purposes of safeguarding, extremism includes vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

The school will exercise its Prevent responsibilities lawfully and proportionately and will not discriminate unlawfully because of a protected characteristic.

Volunteers

The school will assess each volunteer role before appointment to determine:

- the duties the volunteer will undertake;
- the frequency and duration of the activity;
- the level and nature of contact with children;

- whether the role constitutes regulated activity;
- what checks are legally required or appropriate; and
- what supervision and induction arrangements are needed.

Volunteers undertaking regulated activity

A volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight will be engaging in regulated activity.

For volunteers engaging in regulated activity, the school will obtain an enhanced DBS check including children's barred-list information.

Where an existing volunteer became engaged in regulated activity from 1 September 2026 because of changes made by the Crime and Policing Act 2026, the school will ensure that their children's barred-list status is checked in accordance with *Keeping Children Safe in Education 2026*.

Where legally permitted, a separate children's barred-list check may be undertaken while an enhanced DBS certificate is awaited. However, a volunteer will not begin work in provision covered by the Early Years Foundation Stage until the school has received the enhanced DBS certificate including barred-list information.

Volunteers not undertaking regulated activity

For volunteers who will not engage in regulated activity, the school will complete and record a written risk assessment. This will consider:

- the nature of the activity;
- the frequency of the volunteering;
- the volunteer's contact with children;
- the level of supervision;
- information already known about the volunteer;
- whether appropriate references are available; and
- whether a basic or enhanced DBS check without barred-list information is lawful, appropriate and proportionate.

A volunteer on whom no checks have been obtained will never be left unsupervised or permitted to undertake regulated activity.

Depending upon the role, the school may also obtain references, conduct an informal or formal suitability discussion and verify identity and relevant qualifications.

Where a volunteer uses a certificate registered with the DBS Update Service, the school will follow the Update Service procedure set out in this policy.

Where there has been a break in service of 12 weeks or more, or concerns arise about the volunteer's suitability, the school will undertake the further checks required by current statutory guidance.

All volunteers will receive appropriate safeguarding information, understand how to report concerns and agree to follow the Staff Code of Conduct and relevant school policies.

Monitoring and evaluation

The headteacher has operational responsibility for implementing and monitoring this policy. The Business Manager will oversee the administration of pre-appointment checks, recruitment records and the single central record.

The safeguarding governor will provide appropriate strategic challenge and assurance on behalf of the governing body. This may include reviewing anonymised recruitment information, checking that appropriate audits have taken place and monitoring completion of identified actions.

The single central record and a sample of supporting recruitment records will be formally audited at least annually by a suitably knowledgeable person who is not solely responsible for their day-to-day maintenance.

The governing body will review this policy annually, or sooner following changes to legislation, statutory guidance, local-authority requirements or school practice.

Related policies and documents

This policy should be read alongside the school's:

- Safeguarding and Child Protection Policy;
- Staff Code of Conduct;
- Managing Allegations and Low-Level Concerns procedures;
- Whistleblowing Policy;
- Equality and Diversity Policy;
- Data Protection Policy and recruitment privacy notice;
- Records-Retention Schedule;
- Volunteers Policy or procedures;
- Visitors and Site Security procedures; and
- Staff Induction and Safeguarding Induction checklists.

Approval and review

This policy will be reviewed annually, or sooner where legislation, statutory guidance, local-authority requirements or school practice changes.