



SAFER RECRUITMENT POLICY

'This policy will be implemented in a way which honours the vision that every FCJ school is a community of persons - students, staff, governors - bound together in mutual respect and ready to rely on each other in fulfilling their privileged task as educators in a Catholic school.'

Contents

1. Introduction	0
2. Scope and Purpose	1
3. Responsibilities	1
3.1 Named Personnel Responsibilities	1
4. Safer Recruitment Training	2
5. Advertising Posts	2
6. Applications	3
7. Shortlisting and References	3
8. Interviews and Selection	4
9. Pre-Employment Checks	4
10. Offer of Employment	5
11. Induction	5
12. Single Central Record (SCR)	5
13. Adults Not Directly Employed	5
13.1 Visitors	5
13.2 Volunteers	6
13.3 Trainee Teachers	6
13.4 Work Experience	6
13.5 Contractors	7
13.6 Alternative Provision	7
14. Ongoing vigilance and repeat checks	7
15. DBS and TRA referral duties	8
16. Confidentiality and Retention	8
17. Monitoring and Review	8

1. Introduction

Upton Hall School FCJ is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The school follows robust safer recruitment procedures to help deter, identify and reject individuals who are unsuitable to work with children. This policy outlines our procedures and responsibilities to ensure a culture of vigilance in all recruitment activity.

This policy should be read alongside:

- Safeguarding and Child Protection Policy

- Keeping Children Safe in Education 2026
- Equality and Diversity Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Working Together to Safeguard Children 2026
- School Staffing (England) Regulations 2009
- Education (Independent School Standards) Regulations 2014
- Safeguarding Vulnerable Groups Act 2006, as amended
- Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, as amended
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Crime and Policing Act 2026
- DBS Code of Practice

2. Scope and Purpose

This policy sets out the principles and procedures for recruitment at Upton Hall School FCJ.

The aim is to:

- Attract high-quality applicants.
- Deter and prevent unsuitable individuals from working with children.
- Ensure consistency, transparency and compliance with statutory guidance.

All decisions concerning recruitment, including the need to recruit and remuneration, are delegated to the Headmistress by the Board of Governors.

This policy does not form part of any employee's contract of employment.

3. Responsibilities

The Headmistress has overall responsibility for ensuring that no person begins work unless the school is satisfied that all required checks have been completed or, where exceptionally permitted, an appropriate written risk assessment and supervision arrangements have been authorised.

The Single Central Record is administered by Stacey Clerke under the oversight of the Designated Safeguarding Lead. Individual checks may be undertaken by the named officers identified in this policy. The person completing each check must record the date on which it was completed and their identity. The Headmistress, or an appropriately authorised senior leader, gives final approval for an appointment to be confirmed.

3.1 Named Personnel Responsibilities

Task	Responsible Person
Safeguarding statement in adverts and application packs	Cath Howell
Administration of DBS, Barred List, Prohibition from Teaching and Overseas checks	Anne Darroch
Section 128 checks	Kerrie Spiby
Identity and right to work in the UK	Debbie Davies, Stacey Clerke

Professional qualification checks	Cath Howell
Checking for gaps in employment history	Cath Howell
Managing references	Cath Howell
Online/social media checks	Philip Jones (teaching staff/volunteers), Laura Griffiths (non-regulated support), Kerrie Spiby (regulated support)
Confirmation of checks for agency staff	Helen Whitehurst
Volunteer risk assessments and oversight	Philip Jones with staff supervisor
Safeguarding induction	Philip Jones

4. Safer Recruitment Training

Everyone involved in recruitment will receive appropriate safer recruitment training. The substance of this training will cover, as a minimum, Part Three of Keeping Children Safe in Education.

Every interview panel will include at least one person who has completed appropriate safer recruitment training. The school will maintain a record of trained personnel and the dates on which training and subsequent updates were completed.

The following staff completed Safer Recruitment training in Spring 2025/Summer 2026*:

- Andrea Gaunt (Headmistress)
- Paul McAleese (Deputy Headteacher)
- Cath Howell (PA to the Headmistress)
- Philip Jones (DSL)
- Patricia Young (Chair of Governors)
- Kerrie Spiby (Director of Business and Finance)*
- Anne Murphy (Deputy Headteacher)*

5. Advertising Posts

Job descriptions and person specifications will identify the safeguarding responsibilities of the post, the extent of contact with children and whether the role constitutes regulated activity relating to children.

Every advertisement will:

- state the school's commitment to safeguarding and promoting the welfare of children
- make clear that appropriate safeguarding and pre-employment checks will be undertaken
- identify the safeguarding responsibilities associated with the post
- state whether the role involves regulated activity
- state whether the post is exempt from the Rehabilitation of Offenders Act 1974

Posts will usually be advertised externally, unless internal redeployment or redundancy makes internal-only recruitment appropriate.

6. Applications

All applicants must complete the appropriate CES application form. A curriculum vitae may be submitted as supplementary information but will not be accepted instead of a completed application form.

Applications must account for all gaps in employment history.

False information may lead to disqualification, dismissal and potential police and/or TRA referral.

For roles involving regulated activity, the application information will make clear that it is an offence for a person who is barred from regulated activity relating to children to apply for the role.

Applicants must provide their current and former names, current address, National Insurance number, complete education and employment history since leaving school, voluntary work, reasons for leaving employment and explanations for all gaps.

7. Shortlisting and References

Candidates are shortlisted based on essential/desirable criteria.

Shortlisted applicants complete a self-declaration regarding suitability to work with children.

Two references will be sought in advance (including current/most recent employer).

The school will:

- obtain references directly and not rely on references supplied by the applicant
- obtain a reference from the current employer completed by a senior person with authority
- have a school-based reference confirmed by the Headteacher as accurate regarding disciplinary investigations
- obtain a reference from the last employer where the person worked with children, if this is not their current employment
- verify electronic references originate from a legitimate source
- contact the referee to verify the reference
- clarify vague or insufficient information
- compare references with the application and resolve discrepancies
- establish the reason for leaving the current or most recent post
- resolve concerns satisfactorily before confirming appointment

Generic, open references or those from friends/relatives are not accepted.

As part of its due diligence, the school will consider conducting an online search of publicly available information about each shortlisted candidate. Candidates will be informed in advance that this may take place. Searches will be proportionate, relevant to suitability to work with children and conducted consistently. Any concerns identified will be explored with the candidate at interview. Online searches are not a substitute for the other checks required by this policy.

Shortlisting will be undertaken by at least two people. Wherever practicable, the same people will remain involved through shortlisting and interview.

The shortlisting panel will consider inconsistencies, unexplained gaps, frequent changes of employment or location and any other potential safeguarding concerns. All concerns will be explored and the outcome recorded.

8. Interviews and Selection

Candidates will be informed of selection methods in advance.

Reasonable adjustments will be made for candidates with disabilities.

Interviews must be face-to-face or in very rare cases via secure video link.

Interview panels will use a consistent structure but explore safeguarding understanding and employment gaps.

Candidates may be asked about:

- relevant criminal history
- inclusion on the children's barred list
- prohibition from teaching
- prohibition from management under section 128
- relevant offences committed overseas
- whether the candidate is known to the police or children's social care
- childcare disqualification, where applicable
- other relevant overseas information

Selection will normally involve more than an interview and may include a work-related task, lesson observation, presentation or appropriately supervised interaction with pupils. Pupils will be involved meaningfully where this is appropriate to the role.

Interview questions will explore the candidate's motivation for working with children, understanding of safeguarding, professional boundaries and relevant experience. Panels will probe any indication of inappropriate attitudes, including a failure to recognise children's vulnerability, inappropriate idealisation of children or an inadequate understanding of boundaries.

All information considered, decisions reached and reasons for those decisions will be recorded.

9. Pre-Employment Checks

All appointments are conditional until the following are completed, depending on role:

Check	When required
Identity and former names	All appointments
Right to work	All employees
Enhanced DBS	Staff and others eligible because of the role
Children's barred-list information	Only for regulated activity
Teaching prohibition	Anyone employed to undertake teaching work
Section 128	Governors, trustees and relevant academy management positions
Qualifications and QTS/induction	Where required for the role
Physical and mental fitness	All employees, limited to fitness for the work
Overseas checks	Where a person has lived or worked overseas
Childcare disqualification	Where legally applicable
Online search	Considered for shortlisted candidates as due diligence

10. Offer of Employment

All offers are conditional upon satisfactory completion of the checks required for the role. The successful candidate will not normally begin work until all required checks have been completed and recorded.

Exceptionally, where a person is permitted to start before receipt of an enhanced DBS certificate, the school must first have obtained any legally required separate barred-list check, completed and authorised a written risk assessment and put appropriate supervision arrangements in place. The decision, reasons and review arrangements will be recorded. A person must never be permitted to undertake regulated activity if their barred-list status has not been established.

11. Induction

All new starters will receive:

- Safeguarding and Child Protection training
- Staff Handbook and Code of Conduct
- Whistleblowing arrangements
- Keeping Children Safe in Education Part One in full
- Behaviour policy
- Safeguarding response to children absent from education
- Staff code of conduct, including low-level concerns
- Identity of the DSL and deputies
- Online safety and acceptable use
- Allegations and concerns about adults

Induction will include supervision arrangements and review of training needs.

12. Single Central Record (SCR)

Maintained by Philip Jones, supported by Stacey Clerke.

Includes checks for:

- Employees
- Supply/agency staff
- Volunteers in regulated activity
- Trustees and governors
- Fee-funded trainees
- Contractors

Reviewed termly by the Headmistress and DSL.

13. Adults Not Directly Employed

13.1 Visitors

The school will distinguish between visitors attending a public or family event, professional visitors, educational visitors such as speakers or performers and contractors or third-party staff.

The school will not request DBS information from pupils' relatives or other visitors merely attending events such as performances or sports days. The Headmistress, or delegated member of staff, will determine appropriate supervision arrangements.

For professional visitors, the school will check identity and obtain assurance from the relevant employer that appropriate checks have been completed for the activity being undertaken. The school will not normally ask to see the professional visitor's DBS certificate.

External speakers and organisations will be assessed for suitability, educational value, age appropriateness and safeguarding risk.

13.2 Volunteers

The school will determine whether a volunteer's role constitutes regulated activity before the person begins volunteering.

From 1 September 2026, a volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in any 30-day period or overnight is engaged in regulated activity. The previous exemption based on the volunteer being supervised no longer applies. Such volunteers require an enhanced DBS check including children's barred-list information.

Where a volunteer meets the frequency threshold through volunteering across more than one setting, the school will work with the other settings to determine who will obtain the enhanced DBS check with barred-list information.

The school will review all existing volunteer roles before 1 September 2026. Where an existing volunteer falls within the revised definition of regulated activity, the school must establish their children's barred-list status and obtain the appropriate enhanced DBS check.

Where a volunteer is not engaged in regulated activity, the school will complete and retain a written risk assessment to determine what checks and supervision are appropriate. The assessment will consider the nature and frequency of the work, contact with children, information already known about the volunteer, available references and whether a basic or enhanced DBS check without barred-list information is legally available and proportionate.

A volunteer for whom no checks have been obtained must never be left unsupervised or permitted to engage in regulated activity.

13.3 Trainee Teachers

Where a trainee teacher is employed and salaried by the school, the school will undertake the same checks as for other employees, including an enhanced DBS check with children's barred-list information.

For a fee-funded trainee, the initial teacher training provider is responsible for completing the required checks. The school will obtain written confirmation that the provider has completed all checks the school would otherwise be required to undertake and has judged the trainee suitable to work with children.

Fee-funded trainees do not have to be entered on the SCR, although the school may record them as non-statutory information.

13.4 Work Experience

Where the school arranges an external work-experience placement, it will satisfy itself that the provider has suitable policies and procedures to protect pupils from harm.

A person who teaches, trains, instructs, cares for or supervises a pupil on work experience frequently, on more than three days in a 30-day period or overnight is engaged in regulated activity. The school and placement

provider will determine the checks legally available and required, taking account of the pupil's age and the nature of the activity.

The school cannot require a work-experience provider to obtain an enhanced DBS check with barred-list information for a person supervising a pupil aged 16 or 17 merely because of that supervision.

Other employees in the workplace who do not teach, train, instruct, care for or supervise the pupil are not engaged in regulated activity solely because a pupil is present.

A person aged 16 or over undertaking work experience within the school may themselves be eligible for an enhanced DBS check if their activity meets the relevant regulated-activity criteria. A DBS check cannot be obtained for a person under 16.

Work-experience students placed at Upton Hall will receive an appropriate safeguarding induction, be subject to a written risk assessment and be supervised according to their age, role and contact with pupils.

13.5 Contractors

Safeguarding requirements will be included in contracts for services.

A contractor engaged in regulated activity requires an enhanced DBS check including children's barred-list information. A contractor who is not in regulated activity but has the opportunity for regular contact with children requires an enhanced DBS check without barred-list information. Where there is no opportunity for regular contact, the school will determine whether a basic DBS check is appropriate.

A contractor for whom appropriate checks have not been obtained must not work unsupervised or engage in regulated activity. The school will determine and record suitable supervision arrangements.

Where a contractor is self-employed, the school will either obtain the appropriate DBS check or inspect a certificate obtained by the self-employed person, ensuring that it is at the level required for the role.

The identity of every contractor will be checked on arrival.

13.6 Alternative Provision

Where the school commissions alternative provision, it remains responsible for safeguarding the pupil. Before a placement begins, the school will obtain written confirmation that the provider has completed appropriate safeguarding checks on relevant adults.

The provider must also confirm that it will notify the school promptly of changes, including staffing changes, which could affect the pupil's safety. The school will assure itself that appropriate checks have been completed for replacement or additional staff.

14. Ongoing vigilance and repeat checks

Safer recruitment does not end when an appointment is made. The school will maintain a culture in which concerns about adults can be raised, inappropriate behaviour is challenged and staff understand the allegations, low-level concerns and whistleblowing procedures.

New checks will be undertaken for an existing member of staff or volunteer where:

- the person moves from a role that is not regulated activity into regulated activity
- there has been a break in service of 12 weeks or more
- concerns arise about the person's suitability to work with children

Existing volunteers whose activities become regulated activity because of the Crime and Policing Act 2026 will be checked in accordance with section 13.2.

15. DBS and TRA referral duties

The school will make a referral to the Disclosure and Barring Service where it removes a person from regulated activity or would have removed them had they not resigned or ceased volunteering, and believes the statutory referral criteria are met. This duty applies to both paid staff and volunteers.

Referrals will be made as soon as possible and will include all relevant information held by the school.

Where the school dismisses a teacher, ceases to use their services or might have done so had they not left because of serious misconduct, it will consider whether referral to the Teaching Regulation Agency is required.

These duties apply separately from any referral to the local authority designated officer, police or children's social care.

16. Confidentiality and Retention

Recruitment information will be processed in accordance with the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Information will be retained only for as long as it is required in accordance with the school's retention schedule.

Copies of documents used to verify identity, right to work and required qualifications will be retained on the personnel file.

The school is not required to retain a copy of a DBS certificate. Where a copy is retained, there must be a valid reason and it will normally be destroyed within six months. The school may retain a record that the check was undertaken, its outcome and the recruitment decision.

Health information will be stored securely with access limited to those who require it. It should not simply be treated as ordinary recruitment documentation.

Interview and unsuccessful-candidate records will be retained in accordance with the school's recruitment retention schedule and then securely destroyed.

Recruitment records will be securely retained in the individual's personnel file, including:

- Application form
- Interview notes
- ID and qualification documentation
- Checks undertaken
- References
- Offer letter and contract
- Health declaration
- Safeguarding induction record

The SCR will be updated accordingly, and the individual removed once they leave employment.

17. Monitoring and Review

This policy is reviewed annually by the DSL and Headmistress, approved by the Board of Governors, and updated in line with changes to statutory guidance.