Safer Recruitment Policy

2026-27

St Bartholomew's CE MAT

7 October 2027

DATE

Autumn 2027 or on updates (e.g. KCSIE)

NEXT REVIEW DATE

St Bartholomew's CE Multi Academy Trust is a private company limited by guarantee, with charitable status, registered in England and Wales company number: 10312858 and whose registered office address is at St Bartholomew's Church of England Primary School, Sedgley Road, Penn, Wolverhampton WV4 5LG.

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1. Introduction

St Bartholomew's CE MAT ("the Trust") and its constituent schools are committed to providing the best possible care and education to its pupils and recognises the importance of recruiting and retaining staff of the highest quality. To make sure we recruit suitable people, we will ensure that at least one person involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

The purpose of this policy is to set out the requirements for the recruitment of staff to the Trust and its constituent schools. In carrying out our recruitment processes we are committed to the creation of a safe environment for our pupils by operating safer recruitment practices in line with the statutory requirements and guidance.

We will comply with applicable data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025, as amended from time to time.

We will set out how we comply with data protection law within the Trust Data Protection Policy and associated privacy notices.

All decisions on recruitment will be made with regard to curriculum needs and financial circumstances. Recruitment will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, knowledge, experience and skills will be assessed at the level that is relevant to the job.

This policy has regard to Keeping Children Safe in Education 2026 (KCSIE 2026), including Part three on safer recruitment.

The Trust will comply with the requirements of the Equality Act (2010) and are committed to ensuring that throughout our recruitment and selection processes no applicant is disadvantaged or discriminated against because of the protected characteristics of age, disability, gender, gender re-assignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief and sexual orientation.

If an applicant makes the Trust/School aware, at any stage of the recruitment process, that they have a disability then reasonable adjustments must be considered to ensure the applicant is not disadvantaged by the process.

The Trust will promote equality in all aspects of school life, including the recruitment of staff, as detailed in our trust wide Equality Policy.

For the purposes of this policy, the individual leading in the recruitment of the new role will be referred to as the "Lead Recruiter".

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There may be instances where the steps taken during a recruitment exercise need to change due to the nature of the post; for example, if the Trust needed to recruit a new CEO. Where this might mean that operational steps need to change (e.g. the nominated officer to complete a given task), it does not mean that any safeguarding/safer recruitment-related steps will be missed. All relevant checks would therefore be undertaken, but the person completing the checks may change.

2. Safer Recruitment

All recruitment must be in line with this policy to ensure that we identify, deter and prevent people who pose a risk of harm from working with our pupils.

The recruitment of all applicants and volunteers to our Trust must, without exception, follow the processes of safer recruitment. All offers of employment will be subject to us being satisfied that the applicant or volunteer is a suitable person to work with children and young people.

Any person involved in recruitment must be familiar with the relevant requirements of Keeping Children Safe in Education 2026, particularly Part three, and must read and follow the Trust's Safeguarding and Child Protection Policy.

All recruitment must be planned to ensure that there is adequate time available to recruit safely.
Any person who becomes aware that this policy is not being followed during recruitment must inform the Trust immediately.

Prior to the process for any appointment or contractual change (e.g., increase or decrease in hours) being started, discussions should take place with the Director of Operations and an Internal Reference must be obtained.

3. Recruitment Panel

St Bartholomew's CE MAT ("the Trust") and its constituent schools are committed to providing the best possible care and education to its pupils and recognises the importance of recruiting and retaining staff of the highest quality. To make sure we recruit suitable people, we will ensure that at least one person involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

The purpose of this policy is to set out the requirements for the recruitment of staff to the Trust and its constituent schools. In carrying out our recruitment processes the following will be adhered to.

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All recruitment must be in line with this policy to ensure that we identify, deter and prevent people who pose a risk of harm from working with our pupils.

Any panel required during the recruitment process must have regard to the Appointment of Staff Grid. The Trust have an Appointment of Staff Grid which provides guidance on the individuals that must be involved in the different stages of recruitment depending on the job level that is being recruited. This Appointment of Staff Grid must be followed for all recruitment across the Trust and its constituent schools.

In accordance with statutory guidance, the Trust and its constituent schools must ensure that at least one person on any panel (required during the recruitment process) has successfully completed Safer Recruitment training. Safer Recruitment training should be refreshed every three years.

The recruitment panels must not comprise any individual who is a close family member or close friend of any candidate.

For the purposes of this policy, a close family member is defined as one of the following:

- A parent, sibling or child;
- A spouse, civil partner, or partner;
- An aunt, uncle, nephew, or niece;
- A grandparent;
- A sibling's or child's spouse, civil partner, or partner; or

A person who has lived with, and been part of, the candidate's family for more than two years but does not fall within any of the categories listed above.

4. Advertising and Inviting Candidates

The PA to the CEO, in conjunction with school office staff and the school's Headteacher (HT)/Head of School (HOS), is responsible for advertising any new role within the Trust.

To facilitate this responsibility, the Lead Recruiter must complete and submit the following forms to the PA to the CEO prior to any advert being placed, this will enable the advert to contain all relevant Safeguarding wording/statement:

- Job advert form;
- Job description and person specification
- To avoid the duplication on work, where a job description and person specification template exists for a particular role these templates should be used. Contact the PA to the CEO for confirmation of whether any such templates exist for the role in question.

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Advertisements must specify:

- The job reference number;
- A brief description of the role, and where a teaching role, the main subjects to be taught and/or the nature of any leadership allowance;
- The start date of the appointment;
- Whether the post is permanent or fixed term and, in the case if fixed term contracts, the end date of the contract;
- Working pattern i.e. weeks per year, hours per week;
- The remuneration for the post will be expressed in terms of the applicable pay scales;
- GDPR disclaimer relating to the use of data;
- Return email address of jobs@stbartsmat.co.uk and for candidates to include job references in the subject line;
- The closing date for applications.

The following documents and information **must** be available in the vacancy area of the website:

- Job advertisement;
- Job description and person specification;
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children;
- Whether the role is regulated activity relating to children and the level of criminal record check that will be required; where applicable, that the successful applicant will be required to complete an enhanced DBS check with children's barred list information;
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account;
- A statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity);
- Application form;
- Equality and Diversity Monitoring Form; and
- A copy of – or link to – our Safeguarding and Child Protection Policy and our policy on the employment of ex-offenders (see appendices A and B).

Advertisements for external vacancies will normally be placed on the Trust website (with links to this from the individual school websites) and in any suitable relevant media.

In cases where a member of staff is employed on a fixed term contract, for less than two years, for a post which then becomes available as a permanent post, this post must be internally advertised. The existing member of staff can then apply for the permanent post if interested and if they are the only candidate they

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can then, subject to approval by the Headteacher/Head of School, be offered the permanent post without further advertising.

Where there is a reasonable expectation that there are sufficient, suitably qualified internal candidates, or staff are at risk of redundancy, vacancies may be advertised internally before an external advertisement is placed. Any internal recruitment process must follow the procedures set out in this policy.

The PA to the CEO must remove or action the removal of the advertisement from all sources immediately after the closing date.

5. Applications

All candidates for externally advertised posts must complete the Trust Application Form and submit it to jobs@stbartsmat.co.uk. A curriculum vitae may be accepted only alongside a fully completed application form and must not be accepted on its own. An automatic acknowledgement will be issued from the inbox.

The PA to the CEO is responsible for managing the jobs@stbartsmat.co.uk mail account and for organising applications into the relevant sub-folder which should be job reference order.

Applications can also be received by post or hand delivered but email is the preferred route. Any applications not received by email must not be looked at and must be forwarded onto the PA to the CEO. This is to ensure that all applications are only reviewed after the closing date and as part of the shortlisting process to ensure a safe and fair recruitment selection.

Upon a role's closing date, the PA to the CEO must send all applications received onto the relevant individual for shortlisting.

The application form must obtain: personal details and current and former names; current address and National Insurance number; current or most recent employment and reason for leaving; a full history since leaving school, including education, employment and voluntary work, with reasons for gaps; qualifications and awarding bodies; referee details; and a statement addressing suitability and the person specification.

Applications received after the closing date will not normally be considered unless there is proof of a postal delay. Candidates are advised to submit their application via email to avoid late arrival.

6. Shortlisting and References

All offers of employment will be conditional upon receipt of at least two satisfactory written references.

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The Lead Recruiter is responsible for organising the shortlisting process and deciding upon how many candidates will be interviewed following this process.

The shortlisting process **must** adhere to the processes set out in the relevant Appointment of Staff Grid. At least one person involved in shortlisting must have completed safer recruitment training.

Applications must be shortlisted against the criteria in the person specification. Our shortlisting process will involve at least 2 people and will:

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

Shortlisted candidates will need to complete and sign a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Information about criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

As part of shortlisting due diligence, the Trust will consider carrying out a proportionate online search using an online search engine for each shortlisted candidate. The purpose is limited to identifying publicly available incidents or issues that may need to be explored at interview. Shortlisted candidates will be informed in advance that an online search may be undertaken. Searches and any resulting discussion will be documented, relevant to suitability for the role, and handled in accordance with data protection and equality law.

The Lead Recruiter, supported by school office staff, is responsible for informing candidates that they have been shortlisted, the format of the recruitment day and what documentation they are required to bring to the recruitment day.

Where the post is for a teaching role, the candidate must be informed that they will be required to be observed teaching, and where successful, will then be invited for interview.

The Lead Recruiter must also inform the unsuccessful candidates with feedback if applicable.

References should be obtained before interview for all posts where possible, so that any concerns can be explored with the referee and the candidate at interview. All offers of employment remain conditional upon receipt of at least two satisfactory written references. One reference should normally be from the candidate's current or most recent employer and, where the candidate has worked with children, a

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reference should be obtained from the relevant employer. Any concern or discrepancy must be resolved before the appointment is confirmed.

The Trust have a Reference Request template which must be used for all reference requests and this template can be obtained from school office staff.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure that references are obtained from the candidate's current employer and completed by a senior member of staff. If the referee is school based, we will request confirmation from the Headteacher to verify the accuracy of any information relating to disciplinary investigations. This service is free to access via the DfE web page. A DfE Sign-in account is required to log in and use the service.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

In order to comply with the Equality Act 2010, information relating to sickness absence will only be requested after a conditional offer of employment has been made and only if necessary (see advice from HR if this is the case).

References should be sought and obtained directly from the referee. References or testimonials provided by the candidate must not be accepted, nor letters that are addressed 'to whom it may concern'.

Where necessary, previous employers who have not been named as referees may be contacted to clarify any such anomalies or discrepancies. Detailed records must be kept of such exchanges.

If a candidate for a teaching post is not currently employed as a teacher, checks should be made with their most recent school to confirm details of employment and reasons for leaving.

Employees are entitled, if requested, to view their employment references.

7. Selection Process

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Applicants will be short-listed against the requirements of the person specification. The same people should carry out the short-listing and the interviews wherever possible.

The equal opportunities monitoring form must be removed from the application and not provided to the short-listing panel.

The Lead Recruiter is responsible for choosing the most appropriate selection techniques applicable to the nature and duties of the post. However, the final stage of the selection process must be an interview with the make-up of the interview panel adhering to Section 3 Recruitment Panel. The panel are responsible for scrutinising the application forms and identifying any gaps in employment or other areas that may affect an applicant's suitability to work with children and young people. A satisfactory explanation for any concerns must be obtained from the applicant during the interview process.

All candidates for teaching posts must be observed teaching and, if appropriate, complete professional tasks.

Candidates who are successful in the initial stages of the selection process, such as a lesson observation and professional tasks, will be invited to attend for interview. Unsuccessful candidates will be informed by the Lead Recruiter that they have been unsuccessful and feedback provided if applicable.

The interview should use the Trust's Interview Questions Template relevant to the role. These templates consist of a number of pre-defined questions that aim to ensure a safe, fair and effective recruitment process as well as the ability for the Lead Recruiter to choose their own questions beyond these. Interview notes must be signed on completion by the interviewer.

Interviews should always be face to face. In rare circumstances e.g. if the candidate is abroad this may be conducted via a visual electronic link. Candidates must always be required to:

- Explain satisfactorily any gaps in employment;
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel;
- Declare any information that is likely to appear on a DBS disclosure (candidates will be asked about disclosures prior to interview, and the interview panel will not know the outcome of this discussion. Any potential disclosures will be discussed with a DSL from within the Trust. Candidates will be directed to advice prior to interview of any offences which need to be disclosed);
- Demonstrate their capacity to safeguard and protect the welfare of children and young people.
- Declare any adjustments they would need to work safely with us.

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

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- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Where an offer of appointment is to be made, the Lead Recruiter is responsible for informing that candidate and for informing the unsuccessful candidates along with providing professional and constructive feedback, if requested.

The offer of employment and acceptance by the candidate is binding on both parties, subject to satisfactory completion of the pre-employment checks and satisfactory references. Upon verbal acceptance of the offer from the candidate the Lead Recruiter **must** inform the CBT Admin Manager who will then liaise with the school's office staff to ensure that a written offer, which includes a reference to the offer being conditional to satisfactory completion of pre-employment checks, is sent to the candidate.

The Lead Recruiter **must** also inform, and support, the school office staff in completing the Appointment Notification Form and completing all necessary documents and administering the DBS.

Once the Appointment Notification Form has been completed this must be signed and submitted to CBT Admin Manager.

8. Level of Language Proficiency

Under the 'fluency duty' (Part 7 of the Immigration Act 2016), public authorities are required to ensure that workers in public facing roles are fluent in English (or Welsh in Wales). Public facing roles are those members of teaching and support staff who, as a regular and intrinsic part of their role, are required to speak to members of the public (including students in schools).

The Trust will accept a range of evidence of spoken English language ability as follows:

- Competently answering interview questions in English;
- Possessing a relevant qualification for the role attained as part of education in the UK if fully taught in English by a recognised institution abroad.
- Passing an English spoken language competency test or possessing a relevant spoken English qualification, taught by a recognised institution abroad.

9. Pre-Employment vetting checks

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

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All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. All successful candidates must undergo the pre-employment checks listed below where the check required is applicable to the role:

- Receipt of at least two satisfactory written references for all teaching posts; schools will obtain references before interview. For support staff posts it is at the discretion of the Lead Recruiter as to whether references are obtained before or after interview. For clarity, all offers of employment will be conditional to two satisfactory references, one of which, for all references, should be the existing employer and proceeding employer where applicable.
- Verification of the applicant's identity, preferably from current photographic ID and proof of address.
- Verification of the applicant's mental and physical fitness to carry out their work responsibilities.
- Verification of qualifications where relevant.
- Verification of professional status where applicable. For teachers, this will include checking that the individual has the required teaching qualification and has successfully completed any statutory induction, if required, through the Teacher Services System https://teacherservices.education.gov.uk/.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- For management positions (Applicable to Governors/Trustees, HT/HOS, members of the Senior Leadership Team and Departmental Heads), verification that they are not subject to a Section 128 direction or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012 by checking GOV.UK Using GOV.UK Schools can check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction. There is no requirement for schools to record this information on the single central record, but they can if they choose to.
- For teachers and other employees who hold QTS who are working in non-teaching roles, verification that they are not subject to a prohibition order by checking the Teacher Services System https://teacherservice.education.gov.uk/.
- For teachers, satisfactory check to determine any restrictions/sanctions that have been imposed in other EEA member states, through the provision of a letter of professional standing from the professional regulating authority in the country that they qualified.
- Verification of right to work in the United Kingdom (we will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards).
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: **https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants**

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- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Confirmation that the applicant is not disqualified from providing childcare This will apply where the school undertakes any of the following:
    - Runs its own before or after school clubs or activities for children up to the age of 8
    - Provides education for children up to the age of 5

At any of our Schools with pupils aged under 8: We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

All checks **must** be:

- Documented and retained on the personnel file;
- Recorded on the school's Single Central Record (or for any staff employed within the MAT central business support team or central leadership, on the MAT Single Central Record);
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received;
- Completed prior to the candidate starting their employment with the Trust and its constituent schools.

The Trust Admin Manager is responsible for ensuring all pre-employment checks are completed where applicable and for keeping the candidate informed of the progress.

Where a delay in the completion of the pre-employment checks is likely to cause a delay in the candidate's start date, the Trust Admin Manager **must** inform the candidate and the Lead Recruiter as soon as possible.

Where pre-employment checks may delay the candidate's start date, exceptions may only be made in circumstances where the Trust's risk assessment form has been completed by the Lead Recruiter and this has been signed by the CEO, prior to their employment. Exceptions **must not** be made in the case of the Barred List and Teacher Prohibition checks.

The Trust reserves the right not to proceed with or terminate employment with immediate effect if the DBS check reveals relevant unspent convictions which have not been declared on the application form or if any of the documents referred to above have been falsified in any way. Please see Appendices A-C for further details on pre-employment checks required and the Trust's policy on the recruitment of ex-offenders.

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10. Agency Staff

In the case of agency staff, the Trust must ensure that the arrangement with the agency imposes an obligation on the agency to carry out all recruitment checks, including DBS and children's barred list checks, that the Trust would otherwise complete for its staff. The Trust must obtain written confirmation from the agency that these checks have been carried out and are satisfactory. This must be recorded in the SCR.

Upon the engagement of an agency worked, the agency must be supplied with a copy of the Trust's Managing Allegations Against Staff Procedure unless they have previously been provided with the most recent version of this procedure.

11. Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

At any of our Schools with pupils aged under 8: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

12. Contractors

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

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

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

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

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

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

At any of our Schools with pupils aged under 8: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

13. Issue of Contract and Personnel File

The Trust produces contracts of employment.

The CBT Administrator Manager will forward the contract on to the school's office staff for review prior to it being issued to the candidate.

14. Induction

All new staff must confirm they have received, read and understood the following documents:

Staff Code of Conduct and Safeguarding and Child Protection Policy (which includes the Children Missing in Education procedures);

Digital Safeguarding Policy (which includes Acceptable Use of ICT and Mobile Phone Policy);

Once the starting date has been agreed, a local induction programme should be arranged at school level.

15. Record Keeping

Each of the Trust's constituent schools **must** maintain a Single Central Record collating when and by whom checks on identity, qualifications and outcomes of Barred List and DBS checks on staff were made. There is also a central MAT Single Central Record for centrally employed administrative and leadership positions.

There is a requirement to request full details of DBS checks carried out on staff through an agency and the need for the Trust to keep a record that checks have been verified, when and by whom.

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A copy of all documents used to verify the successful candidate's identity and qualifications will be retained on the personnel file. All files within the personnel file **must** be password protected or access **must** be restricted to appropriate individuals.

All other documents obtained or used during the recruitment process for both successful and unsuccessful candidates **must** be retained. Under the Data Protection Act, applicants have the right to request access to notes written about them during the recruitment process and therefore interview notes must be retained. After 6 months, school office staff **must** securely destroy all information about unsuccessful candidates.

Information disclosed as part of a DBS check will be treated as confidential.

16. Breaches of the Policy

Any instances of this policy not being adhered to will be taken very seriously and appropriate disciplinary action will be taken.

Any complaint in relation to this policy, including its application will be managed through the Trust's complaints policy or grievance policy (for existing employees).

17. Other Policies

This policy should be read in conjunction with the Trust Safeguarding and Child Protection Policy and the Equality Policy.

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Appendix A: Disclosure and Barring Service DBS checks – new employees and volunteers (including Governors/Trustees/Members)

Before a volunteer begins, the Trust will conduct an enhanced DBS check and barred list check and will record a role-specific risk assessment. From 1 September 2026, the former supervision exemption must not be relied upon to treat otherwise regulated activity as non-regulated activity. A volunteer undertaking regulated activity must have an enhanced DBS check with children's barred list information.

DBS certificates will only be issued to the applicant. All applicants must produce the disclosure when requested to do so. The disclosure will be scrutinised to ensure it is authentic and to detect any fraud. The DBS disclosure number and date of the check must be recorded in the SCR. We are not required to take a copy of the DBS certificates; however, we may choose to do so for decision making purposes. Any copy will be held for no longer than necessary, and up to a period of six months and be processed in line with Data Protection Legislation.

Any applicant who refuses to produce their DBS disclosure will not be able to start work at the Trust and the conditional offer will be withdrawn as satisfactory checks are not in place. Any volunteer who refuses to produce their disclosure will not be able to volunteer in any of our schools.

Applicants will only be asked to declare convictions and cautions that are not protected under the amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020).

For volunteers, where a school has pupils under 8 years old:

We will ensure that the appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Information relating to an individual's criminal record will only be shared with the relevant people to enable the Trust to make a decision about their suitability to work with children and young people.

In relation to Governors/Trustees/Members:

a. All Governors/Trustees/Members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.
b. A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
c. Identity (non-statutory to record on SCR)
d. Other checks deemed necessary if they have lived or worked outside the UK

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Disclosure and Barring Service (DBS) checks – existing employees and volunteers

Where the duties of existing staff or volunteers change, the Trust will reassess whether the role constitutes regulated activity and whether a further enhanced DBS check, including children's barred list information where legally permitted and required, is necessary. The assessment and decision must be recorded.

Where the Trust has concerns about an employee's or volunteer's suitability to work with children, it will act under the appropriate safeguarding and employment procedures and will consider whether a new enhanced DBS check is lawful and proportionate. Supervision alone will not be used to determine eligibility for a barred list check.

DBS certificates will only be issued to the applicant. The Trust expects all applicants to produce the disclosure when requested to do so. Any existing employee who does not produce their DBS disclosure will be managed through the disciplinary procedure.

All existing employees are required to inform the Trust of any change in their criminal record. This includes convictions, cautions, arrests and police investigations which are not protected under the amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1075 (2013 and 2020). The Trust requires all employees to sign a declaration on an annual basis that there has been no change in their criminal record. Action may be taken as a result of any change or any failure to inform the Trust of any change.

Staff working in alternative provision settings:

- When a school places a pupil with an alternative provision provider, it remains responsible for the safeguarding of that pupil. The school must obtain written confirmation from the provider that all appropriate safeguarding checks have been completed for individuals working at the setting, equivalent to those the school would carry out for its own staff. The provider must also confirm in writing that it will notify the commissioning school of any changes, such as new staff appointments, that could affect pupil safety, enabling the school to ensure appropriate checks are carried out on new personnel.

Verification of Identity and Address (completed at interview)

All candidates **must** provide evidence of identity, address and qualifications, examples of which are set out below:

- Original birth certificate
- Current driving licence (including photograph) or passport or full birth certificate; and
- Two utility bills or statements (from different sources) which are less than three months old showing their name and home address; and
- Documentation confirming their National Insurance number (P45, P60 or National Insurance card).

Where a candidate claims to have changed his/her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) they **must** provide documentary evidence of the change.
In all cases original (not photocopy) documents **must** be provided.

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Verification of Qualifications (completed at interview where possible)

All candidates **must** provide actual certificates that evidence they have obtained any qualifications required legally or otherwise for the role. Qualifications legally required including QTS for teachers (there are times when this is not possible at interview stage; for example, for new teachers, they don't have qualification evidence until they finish their degree which is often after they are appointed).

Prohibition Order Check

A Prohibition Order Check **must** be carried out on all candidates to be employed as teachers. Schools can use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the DfE's web page. Users will require a DfE Sign-in account to log onto the service.

Section 128 Direction

A check against the 128 Barring List **must** be carried out for candidates for management positions.

Asylum and Immigration

Before anyone starts work with the Trust, there is a legal obligation to confirm that they are eligible to work in the United Kingdom. This check **must** be carried out on every potential new employee, regardless of their nationality. Failure to confirm someone's asylum and immigration status due of their nationality would be contrary to the Asylum and Nationality Act 2006.

Medical Fitness

It is a statutory requirement under the Education (Health Standards (England) Regulations 2003 that anyone appointed to work with children or young people **must** be medically fit. It is the Trust's responsibility to be satisfied that the candidate has the appropriate level of physical and mental fitness before the appointment can be confirmed.
All prospective employees **must** complete a pre-employment health questionnaire.

Information provided will remain confidential to the Occupational Health provider and will be used to match the candidate's fitness to the proposed duties. Management will only receive an opinion of the candidate's fitness for the duties outlined.
In some cases candidates may be asked to attend for a health assessment. Failure to disclose or giving false information could lead to termination of employment.

EEA Check – changes with effect from 1 January 2021

Prior to 1 January 2021, a European Economic Area (EEA) check was completed if required to check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed. From 1 January 2021, Teachers will be requested to provide proof of their past conduct as a

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teacher. This should be a letter of professional standing issued by the professional regulating authority in the country in which they worked.

Key changes in the DBS ID-checking guidance effective from 22nd April 2025, with a transition period until 1st November 2025:

Scope and applicability:

- Applies to **Standard and Enhanced** DBS checks.
- Prior guidelines remain valid until **1st November 2025** for transition. ID checking guidelines for Standard/Enhanced DBS check applications from 22nd April 2025.

Unified ID-checking process:

- No separate route for non-UK nationals; **all applicants follow the same three-route process.** Changes to checking ID guidance

Relaxed address documentation:

- **Current-address proof is no longer mandatory**, providing flexibility for applicants with changing residences. EPM Changes to checking ID guidance

Expanded acceptable documents:
Group 1 (Primary ID): now includes

- e-Visa via View & Prove,
- Biometric Residence Permit (BRP),
- Home Office Application Registration Card (ARC)
- **Group 2b (Secondary ID – financial/social):** new options added
- HMRC self-assessment or tax demand letters,
- European/Global Health Insurance Card (EHIC/GHIC)

Strengthened document verification guidance:

- Clear guidance on **fraud detection**, including document security features (watermarks, holograms).
- Three ID-checking options clarified:
    1. **In-person** (default),
    2. **Video with physical documents** (must hold originals in advance),
    3. **Video without originals**, with in-person verification within first day of employment.

Mandatory record keeping:

- Retain **detailed records** of verified documents (type, country, expiry, reference numbers, discrepancies) for **at least two years.**
- Right-to-work documents must be retained for the duration of employment plus two years.

- **Digital Identity verification encouraged:**
- Digital ID verification recommended **before considering remote checks**, offering faster, secure validation for passports or licences.

Inclusive guidance update features:

- **Transgender applicants** can follow a confidential route to declare previous names/sexes
- **Adopted individuals** adopted before age 10 do not need to disclose birth surname.

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Safeguarding responsibilities for pupils in Alternative Provision

When our school places a pupil with an Alternative Provision (AP) provider, we retain full responsibility for the safeguarding and welfare of that pupil. We ensure that the placement is appropriate and meets the individual's needs, particularly given that pupils accessing AP often have more complex or additional vulnerabilities.

Before any placement is made, we obtain written confirmation from the AP provider that all necessary safeguarding checks have been carried out on staff who will be working with our pupils. This includes confirmation that the provider will inform us immediately of any staffing changes or other arrangements that may present a safeguarding risk, so we can be assured that appropriate checks have been completed.

We maintain a clear record of where each pupil is based during the school day, including the address of the AP setting and any satellite or subcontracted locations the pupil may attend. We regularly monitor and review all placements, at least once every half term, to confirm that pupils are attending consistently, are safe, and that the provision continues to meet their needs.

Where any safeguarding concerns arise in relation to an AP placement, we act swiftly to review the placement and take appropriate action. This may include terminating the placement if concerns cannot be resolved to our satisfaction.

Our approach aligns with the statutory guidance set out in:

- Alternative Provision: Statutory Guidance for Local Authorities (DfE)
- Education for Children with Health Needs Who Cannot Attend School (DfE)

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Appendix B: Recruitment of Ex-Offenders Policy & Procedure

St Bartholomew's CE MAT and its schools will not unfairly discriminate against any applicant for employment based on conviction or other details disclosed. We make appointment decisions based on merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the Trust. Each case will be decided on its merits in accordance with the objective assessment criteria.

All positions within the Trust are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.
A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the Trust 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 the Trust.

The Trust will make a report to the Police and / or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

Assessment criteria

If 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 Trust will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the Trust's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:
murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or serious class A drug related offences, robbery, burglary, theft, deception or fraud. If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the Trust's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving [within the last ten years].

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Assessment procedure

If 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 Trust will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the HT/HOS/CEO 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 Trust 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.

Retention and security of disclosure information

The Trust's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, the Trust will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months.
- The Trust will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding; and prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

If a DBS Certificate reveals any convictions, the person concerned will be invited to attend an interview with the HT/HOS to discuss the conviction(s) and circumstances. Following this meeting a risk assessment will be carried out and a decision made and communicated back to the person concerned. For safer recruitment purposes, until this decision has been made the applicant should not commence employment.

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Appendix C: Policy Statement on the Recruitment of Ex-offenders

This policy is available to all DBS applicants from the outset of the recruitment process.

- As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), this Trust and its schools comply fully with the Code of Practice and undertake to treat all applicants for positions fairly.
- The Trust undertake not to discriminate unfairly against any subject of a DBS check based on a conviction or other information revealed.
- The Trust can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- The Trust and its schools will only ask about convictions and cautions that are not protected.
- This Trust and its schools are committed to the fair treatment of its staff, potential staff and users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.
- This Trust and its schools actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
- The Trust ensures that all those in the Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
- The Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, the Trust ensures that an open and measured discussion takes place about any offences or other matter that might be relevant to the position.
- Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- The Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.
- We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.

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