



Horsham  
Learning Alliance

# Safer Recruitment Policy

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May 2026

Reviewed by Executive Team:	[May 2026]
Endorsed by [committee]:	[N/A]
Approved by Board:	[19 May 2026]
Next review	[Summer 2027]

## 1. Introduction

- 1.1. Horsham Learning Alliance (HLA) is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, contractors Trustees and Local Governors to share this commitment. Safer recruitment is a key element of our safeguarding framework and plays a critical role in preventing unsuitable people from working with children and young people.
- 1.2. HLA seeks to recruit staff who share our values, demonstrate appropriate professional behaviours, and are committed to creating safe, inclusive and respectful learning environments. We are committed to equality of opportunity and to operating recruitment processes that are fair, transparent, systematic and compliant with relevant legislation.

## 2. Legislative Framework

- 2.1. This policy should be read and applied in the context of the following legislation, statutory guidance and regulatory frameworks (as amended from time to time):
  - Data Protection Act 2018 and UK GDPR
  - Education Inspection Framework
  - Equality Act 2010
  - Keeping Children Safe in Education 2025 (DfE)
  - Police Act 1997 (Part V)
  - Rehabilitation of Offenders Act 1974
  - Safeguarding Vulnerable Groups Act 2006

## 3. Scope

- 3.1. This policy applies to:
  - All permanent, temporary and fixed term employees
  - Volunteers including Trustees and Local Governors
  - Agency, supply and third-party staff
  - Contractors and self-employed individuals
  - Trainee and student teachers
  - Peripatetic staff

3.2. All recruitment carried out on behalf the Trust must comply with this policy. Whilst recruitment is delegated locally, the Executive Principal/Headteachers remains accountable for ensuring compliance. External agencies must provide written assurance that their practices meet safer recruitment requirements.

## 4. Definitions

- 4.1. For the purposes of this policy:
  - **Safer Recruitment**  
A set of practices designed to deter, identify and reject individuals who may pose a risk to children or young people, and to ensure that suitable individuals are appointed.

- **Regulated Activity**  
Work which provides close, unsupervised access to students as defined in safeguarding legislation.
- **Single Central Record (SCR)**  
A statutory record of recruitment and vetting checks for staff and others who work regularly with students.

## 5. Aims

5.1. The aims of this policy are to:

- Protect children and young people from harm
- Deter unsuitable applicants from applying
- Identify and reject candidates who are unsuitable to work with children
- Promote safe, fair and consistent recruitment practices across HLA
- Ensure compliance with statutory safeguarding requirements

## 6. Objectives

6.1. This policy seeks to:

- Embed safeguarding at every stage of recruitment
- Require at least one safer recruitment trained person on selection panels
- Conduct robust pre-employment and identity checks
- Use structured shortlisting and interview processes
- Maintain accurate recruitment records and a compliant SCR
- Ensure staff understand safeguarding expectations from induction onwards

## 7. Responsibilities

7.1. The Trust Board

The Board is responsible for approving this policy and ensuring effective safeguarding governance across the Trust.

7.2. Management

The Executive Team and Senior Leadership Teams including the Designated Safeguarding Lead (DSL) are responsible for ensuring implementation and compliance across the Trust, safer recruitment practices are followed locally and that the SCR is compliant.

7.3. HR

The Human Resources Team (and local administrators) are responsible for providing guidance and oversight on recruitment processes, carrying out pre-employment checks and maintaining individual College/School and Trust-wide SCR arrangements.

7.4. All Staff

All Staff are responsible for upholding safeguarding responsibilities and reporting any concerns to the DSL regarding recruitment or suitability.

## 8. Safer Recruitment

8.1. 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 students.

- 8.2. The recruitment of all applicants and volunteers to our Trust is expected to follow safer recruitment processes. All offers of employment will be subject to the Trust being satisfied that the applicant or volunteer is a suitable person to work with children and young people, based on the checks required for the role and any risk assessment undertaken.
- 8.3. Any person involved in recruiting to our Trust should be familiar with the “Keeping Children Safe in Education” (2025) guidance (or updated statutory guidance) produced by the DfE and the College/School Child Protection and Safeguarding Policy as relevant to their role. These can be obtained from the intranet.
- 8.4. Recruitment should be planned to ensure that there is adequate time available to recruit safely.
- 8.5. Any person who becomes aware that this policy is not being followed during recruitment should raise this promptly with the Executive Principal/Headteachers.
- 8.6. The checks in Section 9.5 should normally be completed and assessed as satisfactory before an applicant starts employment in the Trust. In exceptional circumstances, an individual may start before all checks are fully confirmed, where this is permitted by statutory guidance for the role, and subject to a written risk assessment and appropriate safeguards being put in place and kept under review until checks are completed.

## 9. Safer Recruitment Procedures

### 9.1 Advertising and Applications

- 9.1.1 All job adverts and role profiles/person specifications must include a safeguarding statement.
- 9.1.2 All applicants must complete an application form (CV's alone are not accepted).
- 9.1.3 Two appropriate referees should be provided, with one being the current or most recent employer. Family members or friends cannot be used as referees.
- 9.1.3 Candidates must complete a self-declaration regarding criminal history and suitability.
- 9.1.4 An online search will be undertaken for shortlisted applicants, with findings recorded and explored appropriately at interview.

### 9.2 Shortlisting

- 9.2.1 The shortlisting process should be conducted by at least two people, and the outcome will be recorded and retained.
- 9.2.2 The shortlisting panel are responsible for scrutinising the application form and identifying any gaps and anomalies in employment which may affect an applicant's suitability to work with children and young people. A satisfactory explanation for concerns must be obtained from the applicant during the interview process.
- 9.2.3 Shortlisted candidates will complete a self-declaration of their criminal record or information that would make them unsuitable to work with

children. Applicants will only be asked to disclose and discuss criminal convictions and/or cautions which are not protected under the amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013, 2020 and 2023) that may deem them unsuitable. Where this is provided electronically, the shortlisted candidate will be asked to physically sign a hard copy at the point of the interview.

### 9.3 Interviews

- 9.3.1 An interview must take place for candidates to all posts.
- 9.3.2 Interviews should be conducted with a minimum of two interviewers on the panel. At least one panel member must be safer recruitment trained with training being completed every 3 years.
- 9.3.3 Prior to embarking on the interview process and on point of arrival, candidates selected for interview will have to provide:
  - Proof of identity
  - Actual certificates of qualifications
  - Eligibility to live and work in the UK
- 9.3.4 Before the interview commences, the interview panel should have prepared appropriate questions to explore the applicant's attitude and suitability to work with children and young people.
- 9.3.5 Candidates will be required to:
  - Explain satisfactorily any gaps in employment
  - Explain satisfactorily any anomalies or discrepancies in the information available to interviewers
  - Declare any information that is likely to appear on a DBS certificate
  - Demonstrate their capacity to safeguard and protect the welfare of children and young people
- 9.3.6 Candidates will be asked when they are invited for interview if they require any reasonable adjustments to enable them to participate.
- 9.3.7 The interview process will involve young people in the process where possible and appropriate to observe their interaction with children and young people and to involve them in the decision-making process.

### 9.4 References

- 9.4.1 All appointments are subject to a minimum of two satisfactory references. A reference from the current employer will always be sought and completed by a senior person. Where the most recent employer is not an educational establishment then a reference will also be taken from the relevant employer from the last time the candidate worked with children. For teaching staff and any other appropriate posts, references for those shortlisted are taken up before the interviews. References may be scrutinised and probed during the interview.
- 9.4.2 Only where an applicant has not given consent for a reference to be obtained from their current employer prior to interview, will a reference be requested after interview for the preferred candidate.
- 9.4.3 Written references will be taken up directly from the referee. References or testimonials provided by the candidate are never accepted and open references referenced 'To whom it may concern' will not be accepted.

- 9.4.4 References will be verified and referees will be contacted to clarify any anomalies or discrepancies.
- 9.4.5 Ensure any references from the candidate's current employer is completed by a senior position. Where the referee is school based, we will ask for the reference to be confirmed by the Executive Principal/Headteacher.

## 9.5 Pre-Employment Checks

- 9.5.1 The following pre-employment checks will be undertaken for the successful candidate:
- Receipt of 2 satisfactory references
  - Verification of the candidate's identity preferably from photographic ID and proof of address
  - A satisfactory Enhanced DBS certificate
  - Verification of the candidate's medical fitness (via a confidential online health questionnaire)
  - Production of evidence of the right to work in the UK
  - Production of evidence of change of name
  - Verification of qualifications (where required)
  - Verifications of professional status e.g. QTS or QTLS (where required) and has successfully completed any statutory induction, if required, through the DfE's check a teachers record
  - Certificate of good conduct for applicants who have lived/worked overseas within the last five years (where applicable)
  - Section 128 or prohibition checks (where relevant)
- 9.5.2 All checks must be confirmed in writing, retained on the personnel file and recorded in the single central record (SCR).
- 9.5.3 Where the successful applicants DBS certificate contains information, a meeting will be held and noted between the individual and the Executive Principal/Headteacher to consider the explanation from the applicant before deciding on whether the offer of employment remains open or is withdrawn. The following will be explored:
- The seriousness of the offence and relevance to the post applied for
  - How long ago the offence occurred
  - Whether it was a one-off incident or a history of incidents
  - The circumstances around the incident
  - Whether the individual accepted responsibility for their actions
- 9.5.4 In exceptional circumstances a new employee may be able to start before the enhanced DBS certificate has been received. In all cases, the following safeguards must apply:
- A risk assessment will be completed and approved by the DSL and a copy passed to the line manager.
  - The new employee should not be left unsupervised with young people or vulnerable adults
  - No one to one working with students
  - No working in isolated parts of the building where the activities with students cannot be overseen by a third party (it may be decided for example to insist that the door to the teaching room is kept ajar)
  - No accompanying students on a residential visit or be the sole/prime member of staff in charge of an off-site activity

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

## 9.6 Disclosure and Barring Service checks

9.6.1 DBS certificates will only be issued to the applicant. All applicants must produce the disclosure when requested to do so. The DBS certificate will be cross-referenced with the applicant's signed self-declaration and the interview notes to ensure the information disclosed has been assessed correctly. 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 single central record (SCR). We are not required to take a copy of an applicant's DBS certificate; however, we may choose to do so for decision-making purposes. Any copy will be held for no longer than necessary, up to a period of six months, and be processed in line with data protection legislation.

9.6.2 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 the Trust.

9.6.3 Applicants (free for volunteers) can have their DBS certificate kept up-to-date and take it with them from role to role where the same type and level of check is required by subscribing to the DBS update service. Applicants or volunteers should be asked if they have subscribed to this service. Where the applicant or volunteer has subscribed, they should provide the College/School with the original disclosure document to be verified, and the College/School will check the online update for any changes.

9.6.4 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, 2020 and 2023).

9.6.5 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.

## 9.7 Agency, supply and other third-party staff

9.7.1 Where the Trust engages agency/supply staff, contractors (including self-employed individuals) or staff provided by a third party (e.g. sports coaches, peripatetic staff, catering, cleaners, therapists or other commissioned services) who will work on site, or have regular contact with students, the Trust will ensure that robust safer recruitment and vetting arrangements are in place before the individual starts.

9.7.2 The Trust will only use agencies, contractors and third parties that can provide written confirmation that, as a minimum, they have completed the pre-engagement checks that the Trust would otherwise complete, appropriate to the role and level of contact with students. Where an individual is self-

employed, the Trust will obtain the necessary evidence directly from the individual (and/or the contracting organisation) before work starts. This includes (where applicable):

- Verification of identity (including right to work in the UK) and, where relevant, evidence of name changes
- Enhanced DBS certificate, and a children's barred list check where the role constitutes regulated activity
- Prohibition from teaching check (where the individual will carry out teaching work) and Section 128 check (where applicable)
- Verification of relevant qualifications and professional status (where required for the role)
- Overseas checks/certificates of good conduct where the person has lived or worked overseas (as applicable)
- Any additional checks required by statutory guidance, or which the Trust reasonably deems necessary based on risk

9.7.3 The Trust must obtain written confirmation of the above checks and the date each check was completed. Where required to support decision-making, the Trust may also request sight of relevant documentation (e.g. DBS certificate number and date, and confirmation of barred list check). The required information must be recorded on the SCR in accordance with statutory requirements.

9.7.4 On arrival at site, agency, third-party staff and contractors must:

- Provide photographic ID
- Sign in and display appropriate identification at all times
- Be informed of site-specific arrangements, including supervision expectations, restricted areas and emergency procedures

9.7.5 Where an agency worker, third-party worker or contractor is engaged before all checks are fully confirmed (exceptional circumstances only), a written risk assessment must be completed and approved by the Executive Principal/Headteacher (and DSL where relevant). Appropriate supervision must be in place, and the individual must not be left unsupervised with students or undertake one-to-one work until the Trust is satisfied that all required checks are complete.

9.7.6 Any safeguarding concern, conduct concern or allegation relating to an agency worker, third-party worker or contractor must be managed in line with the College/School Safeguarding and Child Protection Policy and reported immediately to the Executive Principal/Headteacher and DSL (and LADO where required). The agency/third party/contracting organisation (or the individual, where self-employed) must be informed as appropriate and required to cooperate with any investigation and any subsequent actions, including referrals to the DBS and/or Teaching Regulation Agency where relevant.

## 9.8 Trainee and student teachers

- 9.8.1 Trainee and student teachers (including those on ITT placements) must be subject to appropriate safer recruitment and vetting checks before they begin a placement. The Trust will confirm, in writing, the arrangements in place with the training provider and/or employing school.
- 9.8.2 The Trust will obtain written confirmation from the provider/employer of the checks completed (and the date each check was completed), appropriate to the role and level of contact with students. This will include, where applicable: identity checks; right to work; enhanced DBS (and barred list check where the trainee will be in regulated activity); checks for prohibition from teaching and Section 128 (where required); and any overseas checks/certificates of good conduct where relevant.
- 9.8.3 Trainee and student teachers must receive an induction appropriate to their placement, including safeguarding/child protection arrangements, the staff code of conduct, acceptable use of technology, and how to report concerns. They must be appropriately supervised in line with the placement agreement and must not be given unsupervised responsibility for students unless the Trust is satisfied that all required checks are complete and the placement arrangements support this.
- 9.8.4 Details of the required checks and written assurance must be recorded on the SCR in accordance with statutory requirements. Any safeguarding concern, conduct concern or allegation relating to a trainee/student teacher must be reported and managed in line with the Trust's managing allegations procedure, and the training provider/employer must be informed as appropriate.

## 9.9 Volunteers

- 9.9.1 The Trust values the contribution of volunteers and will ensure that safer recruitment principles are applied to all volunteers, including (where relevant) parent/carers helpers and Trustees/Local Governors when undertaking volunteering activity in College/Schools.
- 9.9.2 The level of pre-engagement checks will be proportionate to the role and the level of contact with students. Where a volunteer will be in regulated activity, an enhanced DBS with a children's barred list check will be obtained. Where a volunteer is not in regulated activity and is appropriately supervised, an enhanced DBS may be obtained following a risk assessment and in line with statutory guidance.
- 9.9.3 The Trust will verify identity and, where applicable, the right to work in the UK. References may be sought where this is appropriate to the nature of the volunteering role (for example, where a volunteer will be in College/Schools frequently, supporting learning, or working closely with students).
- 9.9.4 Volunteers must receive an appropriate induction (including safeguarding/child protection arrangements and how to report concerns), be made aware of expected standards of behaviour and the staff/volunteer code of conduct and sign in and wear identification when on site. Volunteers must not be left unsupervised with students unless the Trust is satisfied that

the role is appropriately checked and approved, and supervision arrangements are clear.

- 9.9.5 Checks and decisions (including any risk assessment and supervision arrangements) must be recorded on the SCR as required. Any safeguarding concern, conduct concern or allegation relating to a volunteer must be reported immediately and managed in line with the College/Schools Safeguarding and Child Protection Policy.

## 9.10 Peripatetic staff

- 9.10.1 Peripatetic staff are individuals who provide specialist tuition or services (for example music, instrumental teaching, speech and language therapy, counselling, sports coaching or other curriculum/enrichment provision), typically working with students on a regular basis and often in small groups or one-to-one.
- 9.10.2 Peripatetic staff may be engaged as Trust employees, through an agency/third party, or as contractors/self-employed individuals. The Trust will ensure that appropriate safer recruitment checks are completed (or confirmed in writing by the provider) before the individual begins work, and that the arrangements are proportionate to the nature of the role and the level of contact with students.
- 9.10.3 Checks will be completed in line with statutory guidance and the Trust's pre-employment requirements and will include (as applicable): verification of identity; right to work in the UK; enhanced DBS, including a children's barred list check where the role is regulated activity; verification of qualifications/professional status where required; relevant references where appropriate; and overseas checks/certificates of good conduct where relevant.
- 9.10.4 Where peripatetic staff work one-to-one or in small groups, the Trust will ensure appropriate safeguards are in place, including: clear timetabling and rooming arrangements; adherence to expected professional conduct; and supervision/monitoring that is proportionate to risk. Where any required checks are outstanding (exceptional circumstances only), a written risk assessment must be completed, and the individual must not be left unsupervised with students until checks are confirmed as complete.
- 9.10.5 Peripatetic staff must receive a safeguarding briefing/induction (including how to report concerns, who the DSL/Deputy Designated Safeguarding Lead (DDSL) are, site procedures and the code of conduct) and must sign in and wear identification when on site. The required checks/written assurance must be recorded on the SCR as required. Any safeguarding concern, conduct concern or allegation relating to a peripatetic member of staff must be reported immediately and managed in line with the College/Schools Safeguarding and Child Protection policy.

## 9.11 Governance checks

- 9.11.1 Trustees, Local Governors and Members will be subject to appropriate pre-appointment checks in line with KCSIE and the Trust's legal requirements for these roles (including right to work in the UK and checks for any disqualification or prohibition, where applicable). This will include an enhanced DBS check.
- 9.11.2 The Trust will ensure that the appropriate person/role within the Trust is responsible for obtaining and verifying the required checks for Trustees, Local Governors and Members, and for recording the relevant information on the SCR (or equivalent Trust record) in line with statutory guidance.
- 9.11.3 All Trustees, Local Governors and Members will also have the following checks:
- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008)
  - Identity
  - Right to work in the UK
  - Other checks deemed necessary if they have lived or worked outside the UK
- 9.11.4 All Trustees, Local Governors and Members are expected to register with the DBS update service and maintain annual registration.

## 9.12 Single Central Record (SCR)

- 9.12.1 The Trust will maintain a SCR for each College/School (and/or a Trust-wide SCR where used) as a statutory record of the pre-engagement recruitment and vetting checks for staff and other adults who work regularly with students.
- 9.12.2 The SCR will include, as applicable to the setting and role, employees (including supply/temporary staff), agency/supply staff, contractors, volunteers, trainee/student teachers and peripatetic staff who work regularly on site. The Trust will ensure that written assurances obtained from third parties and agencies are reflected on the SCR as required.
- 9.12.3 The SCR will record the checks required by statutory guidance for the role, and the date (and/or outcome) of completion. This will typically include identity; right to work in the UK; enhanced DBS (including barred list check where required); prohibition from teaching (where relevant); Section 128 check (where relevant); qualification/professional status checks (where required); and overseas checks/certificates of good conduct where applicable.
- 9.12.4 The Executive Principal/Headteachers is accountable for ensuring the SCR is accurate and up to date. Day-to-day administration may be delegated to local administrators/HR, but checks must not be marked as complete until the appropriate evidence has been seen/verified (or written assurance received where permitted). Where a concern is identified, this must be escalated immediately to the Executive Principal/Headteacher and HR.

- 9.12.5 The SCR must be reviewed regularly to ensure ongoing compliance. The Trust will undertake periodic compliance checks/audits and support College/Schools to address any gaps identified. Actions arising from reviews/audits must be completed promptly and recorded.
- 9.11.6 Information recorded on the SCR and supporting evidence will be processed in accordance with data protection legislation. Access to the SCR will be restricted to authorised staff, and information will be retained and disposed of in line with the Trust's retention arrangements and statutory requirements.
- 9.12.7 For agency/supply and other third-party staff, the SCR will record the organisation providing the individual and the date written assurance was received confirming that the required checks have been completed. Where appropriate, the Trust will also record the DBS certificate number and date (and confirmation of barred list check where required) as provided by the agency/third party.
- 9.12.8 Contractors who do not work regularly on site and who are always supervised, with no opportunity for unsupervised contact with students, will normally be managed through site controls (for example: signing in/out, wearing identification and supervision) rather than being recorded on the SCR. Where a contractor works regularly on site, or may have unsupervised contact with students, they must be subject to the appropriate checks and recorded on the SCR.
- 9.12.9 Where the SCR records a check as complete, this means the check has been verified by an authorised member of staff. The SCR should record, as a minimum, the date the evidence was seen/verified (or assurance received) and the outcome. Where the DBS Update Service is used, the date of the online status check and its outcome must be recorded. Any discrepancies or gaps identified must be escalated immediately and rectified before the individual undertakes unsupervised work with students.

### 9.13 Induction

- 9.13.1 All new starters (including fixed-term staff, agency/supply staff, contractors, volunteers, trainee/student teachers and peripatetic staff, where applicable) must receive an induction that is proportionate to their role and includes a safeguarding and child protection briefing before they begin work with students.
- 9.13.2 Induction must include (as a minimum) the College/School Safeguarding and Child Protection Policy, the identity of the Designated Safeguarding Lead (DSL) and any deputies, the staff code of conduct, and how to report safeguarding concerns (including low-level concerns) and allegations. New starters will also be directed to the relevant sections of statutory guidance (including Keeping Children Safe in Education) as required for their role.
- 9.13.3 Induction will reinforce expected professional behaviours and boundaries, including acceptable use of technology and online safety expectations. Staff will be made aware of the Trust's Whistleblowing arrangements and the

requirement to report any concerns about the conduct or suitability of adults working with students.

- 9.13.4 Role-specific induction/training will be provided as required. Where staff work one-to-one or in small groups (including peripatetic provision), supervision and safeguarding expectations must be clear and proportionate to risk.
- 9.13.5 Induction will cover site procedures, including signing-in requirements, wearing identification, supervision arrangements, emergency procedures, and relevant data protection/confidentiality expectations. Where access to Trust IT systems is provided, users must be briefed on acceptable use, passwords and information security requirements.
- 9.13.6 Completion of induction must be recorded locally (for example, by an induction checklist and signed confirmation that key policies have been read and understood). Where additional training is required, this must be scheduled and monitored to completion.

## 10. Monitoring

- 10.1 The Executive Team and Executive Principal/Headteachers are responsible for monitoring implementation of this policy across the Trust. Monitoring activities will be proportionate to risk and will provide assurance that safer recruitment practices and record keeping (including the SCR) remain compliant.
- 10.2 Each College/School will ensure the SCR is kept up to date and is reviewed regularly (including after new starters, changes in role, and when adults begin/cease working on site).
- 10.3 The Trust will undertake termly compliance checks of the SCRs and will agree actions and timescales to address any gaps identified.
- 10.4 Outcomes of monitoring and audits will be reported to the Executive Team and, where appropriate, the Trust Board/committee to provide safeguarding assurance.
- 10.5 Actions arising from monitoring will be tracked to completion, with escalation where actions are overdue or risks are identified.
- 10.6 This policy will be reviewed in line with statutory guidance and at least annually, or sooner where changes in legislation/statutory guidance require.

## 11. Related Documentation

This policy links to the following Trust policies and procedures:

- Behaviour Policy/Behaviour for Learning Policy
- Data Protection Policy
- Data Retention Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Staff ICT Acceptable Use Policy
- Whistleblowing Policy