



## Safer Recruitment Policy

### 1. Introduction and Regulatory Framework

Elmley Dray School is committed to safeguarding and promoting the welfare of children and vulnerable adults, and expects all staff, volunteers, and third parties to share this absolute commitment.

This policy defines our rigorous safer recruitment and selection procedures, designed to deter, reject, or identify people who might abuse children or vulnerable adults, or are otherwise unsuited to work within our school community. This policy complies directly with the statutory guidance **Keeping Children Safe in Education (KCSIE)**, the Independent School Standards, and relevant data protection legislation.

To ensure the integrity of our selection processes, Elmley Dray School guarantees that all managers, governors, and individuals involved in the recruitment, shortlisting, and employment of staff have completed certified, up-to-date Safer Recruitment training. At least one member of any interview panel will hold this mandatory certification.

### 2. Advertising and Attracting Candidates

When advertising vacancies at Elmley Dray School, all job advertisements, application packs, and role profiles will explicitly state:

- The school's robust commitment to safeguarding and promoting the welfare of children and vulnerable adults.
- That comprehensive pre-employment vetting checks, including Enhanced DBS and online background searches, are mandatory for all successful applicants.
- The specific safeguarding responsibilities inherent to the post, including the precise nature and extent of contact the role involves regarding children and vulnerable adults.
- Whether the role is legally exempt from the Rehabilitation of Offenders Act

1974 and its subsequent amendments (the Exceptions Order 1975, 2013, and 2020). Candidates will be clearly advised that certain spent convictions and cautions are "protected", meaning they do not need to be disclosed, and if disclosed, cannot be factored into the school's recruitment decisions.

All advertisements and applications are via Kent Teach.

### 3. Application Phase

All applicants must complete the school's official, standardised application form. Curriculum Vitae (CVs) will not be accepted in isolation. Our application forms strictly require:

- A prominent notification stating that it is a criminal offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children or vulnerable adults (where the role involves such activity).
- A complete, chronological history of employment, education, and voluntary work since leaving school.
- Clear provision of a copy of, or an active digital link to, the school's *Safeguarding, Child and Vulnerable Adult Protection Policy* and our *Policy on the Employment of Ex-Offenders*.

## 4. Shortlisting and Online Due Diligence

### 4.1 Shortlisting Process

The shortlisting process is consistently conducted by a minimum of two designated panel members. The panel will systematically:

- Review the application form for any chronological gaps, inconsistencies, or frequent changes in employment or location, documenting the specific reasons provided.
- Identify and flag any potential areas of concern to be rigorously explored during the interview.

### 4.2 Candidate Self-Declaration

Once a shortlist has been finalized, candidates are required to complete and sign a confidential self-declaration form regarding their criminal record and any other factors affecting their suitability. This gives candidates a transparent opportunity to share and discuss relevant context at the interview stage. This declaration mandates the disclosure of:

- Full criminal history (excluding protected cautions or convictions).
- Inclusion on any relevant barred list.

- Any active prohibitions from teaching or management.
- Criminal offences committed in any country outside the UK, in line with applicable law in England and Wales.
- Any relevant overseas investigations or sanctions.

### 4.3 Online Background Searches

In line with KCSIE guidelines, Elmley Dray School conducts an online background search (including public social media profiles and general internet searches) on all shortlisted candidates prior to their interview.

- **Purpose:** This search is executed as part of our safeguarding due diligence to identify any historical incidents, behaviors, or public concerns that could affect a candidate's suitability to work with children or vulnerable adults, or that could bring the school into disrepute.
- **Process:** Candidates are notified of this check within their application materials. To ensure fairness and eliminate unconscious bias, these searches are conducted by a designated individual who is independent of the direct interview panel, whenever operationally viable.

## 5. Seeking References and Checking Employment History

The school obtains references directly from the referees for all shortlisted candidates **prior to the interview**. This ensures that any concerns raised can be explored with the referee and addressed directly with the candidate during the selection process.

When managing references, Elmley Dray School strictly adheres to the following standards:

- **No Open References:** Open or generic references (such as "To whom it may concern") are never accepted.
- **Direct Verification:** The school communicates directly with referees to verify the authenticity of the reference and cross-reference information.
- **Authoritative Authorship:** References must be obtained from the candidate's current or most recent employer and completed by an appropriately senior professional. Where a referee is school-based, the reference must be confirmed by the Headteacher or Principal as an accurate reflection of the candidate's history, specifically regarding disciplinary investigations or substantiated safeguarding allegations.
- **Unemployed Candidates:** If the candidate is not currently employed, the school will secure formal verification of their most recent relevant period of employment.
- **Past Contact with Children:** If the candidate is not currently working with children or vulnerable adults, a reference will be secured from the last employer where they did work with children or vulnerable adults.

- **Consistency Mapping:** The school systematically cross-checks reference information against the application form. Any discrepancies, anomalies, or concerns must be fully resolved with the candidate and referee before an appointment can be formally confirmed.

## 6. Interview and Selection

All formal interviews are conducted face-to-face as a standard protocol. Secure video conferencing may be utilized only under exceptional, verified circumstances. During the interview, the panel will:

- Explicitly probe any identified gaps in employment history, frequent shifts in location, or changes in career path, requiring the candidate to account for these periods fully.
- Explore the candidate's attitudes, emotional resilience, and professional boundary-setting regarding children and vulnerable adults to evaluate their suitability.
- Formally record and retain a comprehensive written record of all information considered, questions asked, and selection decisions made.

## 7. Pre-Appointment Vetting Checks

All offers of employment at Elmley Dray School remain strictly conditional upon the satisfactory completion of mandatory pre-employment checks. Every check must be recorded on the school's Single Central Record (SCR), and verified documentation will be securely held in individual personnel files.

### 7.1 New Staff Check Requirements

When appointing new staff, the school will systematically execute the following checks:

- **Identity Verification:** Confirm identity through the inspection of **original** photographic ID and proof of address.
- **Enhanced DBS and Barred List:** Obtain an Enhanced DBS certificate, including barred list information for all individuals engaging in regulated activity. The **original** physical certificate must be presented to and verified by an authorized staff member. In strict compliance with data protection laws and KCSIE, physical copies of DBS certificates will not be retained in files for longer than **6 months**. The SCR will permanently record the certificate number, check level, date verified, and final recruitment decision.
- **Positive Disclosures:** Where a DBS certificate contains disclosures, a rigorous risk assessment must be completed by the DSL or Director and a formal management decision documented before an appointment can proceed.

- **Separate Barred List Check:** If an individual is legally permitted to start work before their full Enhanced DBS certificate returns, a separate Barred List check must be completed. The individual must remain under strict, documented supervision at all times until full clearance is confirmed.
- **Fitness to Work:** Formally verify the candidate's physical and mental fitness to fulfill the specific responsibilities of the role.
- **Right to Work:** Inspect and verify the candidate's **original** Right to Work in the UK documentation. Copies of this verification are retained for the duration of employment and for 2 years post-employment.
- **Qualifications:** Verify **original** certificates for all mandatory professional qualifications.
- **Teacher Prohibitions:** Ensure the applicant is not subject to a teacher prohibition order or interim prohibition order via the Teaching Regulation Agency (TRA) portal.
- **Overseas Checks:** Conduct additional vetting on candidates who have lived or worked outside the UK for 3 months or more within the past 5 years. This includes securing criminal record certificates from the relevant countries and, for teachers, a letter of professional standing from the regulating authority in that jurisdiction.
- **Section 128 Management Check:** Verify that candidates taking up a management position are not subject to a Section 128 prohibition direction. At Elmley Dray School, management positions include the Proprietor, Directors, Headteachers, Assistant/Deputy Heads, and middle management positions with specific departmental oversight.
- **Childcare Disqualification:** Ensure checks or documented assessments are completed in line with the Childcare Disqualification Regulations 2018 and Childcare Act 2006 for relevant staff working with learners under the age of 8. If an individual is deemed outside the scope of these regulations, a formal record of this assessment and risk evaluation will be retained in their personnel file.

**Regulated Activity Definition:** A person is deemed to be in regulated activity if they are responsible, on a regular basis within the school, for teaching, training, instructing, caring for, or supervising children or vulnerable adults; or carrying out unsupervised work regularly where the role provides an opportunity for contact; or engaging in intimate/personal care or overnight activity even if this occurs only once.

## 7.2 Existing Staff Vetting

The school will re-execute full safer recruitment vetting checks on existing staff members if:

- A concern is raised regarding their ongoing suitability to work with children or vulnerable adults.

- An individual transitions from a non-regulated post into a role designated as regulated activity.
- There has been a formal break in service of 12 weeks or longer.

### 7.3 Statutory DBS Referrals

The school will fulfill its statutory obligation to make a formal referral to the DBS within 48 hours of any instance where a member of staff or volunteer has been removed from regulated activity (or would have been removed had they not resigned) because they harmed, or posed a risk of harm, to a child or vulnerable adult.

## 8. Specific Staffing and Provision Categories

### 8.1 Agency and Third-Party Staff

The school will secure written notification from the supplying agency or third-party organisation confirming that it has successfully executed all safer recruitment and vetting checks to the exact standard required by Elmley Dray School and KCSIE. On their first day of placement, the school will verify the individual's original photographic identity to confirm they match the notification data.

### 8.2 Contractors

The school ensures that all contractors, or employees of contractors, working on-site undergo appropriate vetting checks:

- **Regulated Activity:** Contractors engaging in regulated activity must have an Enhanced DBS with barred list information.
- **Non-Regulated Contact:** Contractors who are not in regulated activity but whose work provides an opportunity for regular contact with learners must hold an Enhanced DBS without barred list information.
- **Supervision:** Unchecked or basic-checked contractors will not be permitted to work unsupervised or engage in regulated activity under any circumstances.
- **Identity:** The identity of all contractors and their personnel will be verified against official photographic ID upon arrival at the school.
- **Retention:** Physical copies of contractor DBS certificates will not be retained by the school for longer than 6 months.
- **Childcare Disqualification:** Self-employed contractors (such as music tutors or sports coaches) working with learners under 8 will be checked or risk-assessed against the Childcare Disqualification Regulations 2018.

### 8.3 Trainee and Student Teachers

- **Salaried Trainees:** The school will directly execute all mandatory pre-employment and safer recruitment checks, including childcare

disqualification compliance where relevant.

- **Fee-Funded Trainees:** The school must receive written confirmation from the initial teacher training provider verifying that all relevant checks have been completed satisfactorily, and that the trainee has been formally judged as suitable to work with children/vulnerable adults.

## 8.4 Volunteers

- **Regulated Activity:** New volunteers engaging in unsupervised, regular volunteer work that constitutes regulated activity will undergo an Enhanced DBS check with barred list information.
- **Non-Regulated Activity:** For volunteers not in regulated activity (e.g., supervised volunteers), the school will complete a documented risk assessment to determine whether an Enhanced DBS check without barred list information is required.
- **Supervision:** Unchecked volunteers will never be left unsupervised or allowed to work within a capacity that constitutes regulated activity.
- **Childcare Disqualification:** Volunteers working with learners under 8 will undergo a documented compliance assessment against the Childcare Disqualification Regulations 2018.

## 8.5 Governors / Proprietors (PAT)

All members of the governance, proprietorship, and local advisory structures must undergo the following mandatory checks before or upon appointment, with results recorded on the SCR:

- An Enhanced DBS check (with barred list information if they engage in regulated activity).
- A Section 128 prohibition check.
- Identity and Right to Work in the UK verification.
- Overseas checks, where applicable.
- The Chair of Governors will have their Enhanced DBS certificate countersigned directly by the Secretary of State for Education.

## 8.6 Staff Working in Alternative Provision (AP) Settings

Where Elmley Dray School places a learner with an external alternative provision provider, we will secure written confirmation from the AP management confirming that all staff working with our learners have undergone complete, compliant safer recruitment and safeguarding checks.

## 8.7 Adults Who Supervise Learners on Work Experience

When organising external work experience placements for learners, the school will

assess the placement environment. We will review whether it is necessary to request a barred list check for the primary adult supervising a learner under the age of 16, depending on the frequency, location, and level of exposure/unsupervised contact involved.

## 8.8 Learners Staying with Host Families

Where the school coordinates home-stay or host-family arrangements (such as foreign exchange programs or residential care accommodation), an Enhanced DBS check with barred list information will be required for all adults residing within the host household. For international hosting arrangements where UK checks are impossible, the school will collaborate with international partner entities to secure verified equivalent assurances before travel.

## 9. Induction and Quality Assurance

- **Safeguarding Induction:** All newly appointed staff, agency workers, and volunteers will undergo a comprehensive safeguarding induction on Day One. This induction covers Part 1 of KCSIE, the school's Safeguarding Policy, Whistleblowing Procedures, and the Staff Code of Conduct.
- **Ongoing Supervision:** All new staff remain subject to robust probationary supervision and regular performance management appraisals.
- **Quality Assurance Audits:** The Single Central Record and safer recruitment processes will be formally audited and quality-assured termly by the Headteacher and monitored annually by the Director and Chair of Governors to maintain absolute regulatory compliance.

### Version control - Approval and review

| Version No. | Reviewed By         | Approved By    | Approval Date | Main Change                                   | Review Period |
|-------------|---------------------|----------------|---------------|-----------------------------------------------|---------------|
| 1           | Emily Hollis<br>MBE | Hayley Furnell | August 2024   | Initial policy approved                       | Annually      |
| 2           | Emily Hollis<br>MBE | Hayley Furnell | August 2025   | Annual review in line with KCSIE 2025 updates | Annually      |
| 3           | Emily Hollis<br>MBE | Hayley Furnell | January 2026  | Update to retainment of DBS processes         | Annually      |

|   |                     |                   |                  |                                                      |          |
|---|---------------------|-------------------|------------------|------------------------------------------------------|----------|
| 4 | Emily Hollis<br>MBE | Hayley<br>Furnell | 5 August<br>2026 | Full policy<br>rewrite in<br>line with<br>KCSIE 2026 | Annually |
|---|---------------------|-------------------|------------------|------------------------------------------------------|----------|



Hayley Furnell, Director,  
on behalf of Elmley Dray School

Dated: 5 August 2026

Next review: 5 August 2027