

FALCONHURST SCHOOL

Safer Recruitment Policy

KCSIE and EYFS compliant

Safeguarding begins before appointment

Robust recruitment, proportionate checks and a vigilant safeguarding culture protect every child.



Policy owner	Headteacher
Monitoring responsibility	Full Governing Body
Approved by	Full Governing Body
Date adopted	September 2026
Next review	September 2027
Review cycle	Annual, or sooner if guidance changes
Key guidance	KCSIE 2026 and EYFS statutory framework 2026

1. Purpose and scope

Falconhurst School is committed to safeguarding and promoting the welfare of children. Safer recruitment is a continuous process designed to deter, identify and reject people who may be unsuitable to work or volunteer with children, while ensuring fair, lawful and inclusive recruitment.

This policy applies to the recruitment and engagement of employees, agency and third-party staff, contractors, self-employed workers, trainee teachers, students, volunteers and governors. It should be read with the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-level Concerns Policy, Whistleblowing Policy, Equality Policy, Data Protection Policy and policy on employing ex-offenders.

2. Legal and statutory framework

The school will comply with current legislation and statutory guidance, including:

- Keeping Children Safe in Education 2026 (KCSIE), particularly Part three;
- the Early Years Foundation Stage statutory framework for group and school-based providers, effective 1 September 2026;
- the School Staffing (England) Regulations 2009;
- the Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026;
- the Childcare Act 2006 and Childcare (Disqualification) and Early Years Provision Regulations 2018;
- the Rehabilitation of Offenders Act 1974 and Exceptions Order, as amended;
- the Equality Act 2010, including the Public Sector Equality Duty; and
- UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

Critical 2026 EYFS rule

No employee or volunteer may begin working in the school's EYFS provision until Falconhurst has received their enhanced DBS certificate including children's barred-list information. Supervision does not provide an exemption from this requirement.

3. Principles

- The child's welfare is paramount throughout recruitment and employment.
- At least one member of every maintained-school interview panel will have completed appropriate safer recruitment training; all panel members will understand their safeguarding responsibilities.
- Recruitment decisions will be evidence-based, properly recorded and free from unlawful discrimination.
- Information will be handled confidentially and only for legitimate recruitment and safeguarding purposes.
- The school will not allow operational pressure to dilute required checks or permit an unsafe start.

4. Recruitment planning and advertising

Before advertising, the recruiting manager will confirm the role, whether it involves regulated activity, the required checks, selection criteria and panel membership. Job

descriptions and person specifications will state the safeguarding responsibilities and the skills, experience, attitude and behaviours required.

Advertisements will state:

- Falconhurst School's commitment to safeguarding and promoting children's welfare;
- that safeguarding and pre-employment checks will be undertaken;
- the safeguarding responsibilities of the post and whether it involves regulated activity; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974, explaining that protected convictions and cautions do not need to be disclosed and cannot be taken into account.

5. Applications and shortlisting

5.1 Application form

The school will use a structured application form. A curriculum vitae will be accepted only alongside a completed application form. Applicants will be required to provide personal and former names, address and National Insurance number; complete employment, education and voluntary-work history since leaving school; reasons for gaps and leaving posts; qualifications; referees; and a statement demonstrating suitability.

Where the role involves regulated activity, applicant information will state that it is an offence for a barred person to apply. The application pack will include, or link to, the safeguarding policy and ex-offenders policy.

5.2 Shortlisting and self-declaration

At least two people will shortlist against the published criteria. They will compare applications, identify inconsistencies, gaps, frequent changes of employment or location, and record how potential concerns will be explored.

Only shortlisted candidates will be asked to complete and sign a self-declaration covering relevant criminal history, children's barred-list status, teaching prohibition, relevant overseas information, whether they are known to police or children's social care, childcare disqualification and any other information affecting suitability. Electronic declarations will be signed in hard copy at interview.

5.3 Online searches

The school will consider a proportionate online search of publicly available information for shortlisted candidates as part of due diligence. Candidates will be told this may happen. Searches will focus on information relevant to suitability to work with children; findings will be verified, handled fairly and discussed at interview where appropriate. Protected characteristics and irrelevant private information will not influence the decision.

6. References and employment history

References will normally be obtained before interview so concerns can be explored. The school will not accept open references, references supplied by the applicant or references from family members. It will verify that electronic references come from a legitimate source and contact referees directly if information is vague, contradictory or insufficient.

References will normally be from the current employer and completed by a senior person with appropriate authority. For a school-based referee, the school will seek confirmation by the headteacher or principal of information relating to disciplinary investigations. If the

applicant is not currently employed, Falconhurst will verify the most recent relevant employment and seek a reference from the last employer where the person worked with children.

The school will compare each reference with the application, establish the reason for leaving the current or most recent post and resolve discrepancies before confirming appointment.

EYFS reference requirement

For any person recruited to work or volunteer in EYFS - including staff, students and volunteers - Falconhurst must obtain at least one written reference before recruitment. References supplied by Falconhurst will be timely, factual and confirm whether the school is satisfied that the person is suitable to work with children; substantiated safeguarding concerns that met the harm threshold will be included, but unfounded, unsubstantiated, false or malicious allegations will not.

7. Interview and selection

Interview questions and any selection task will test competence, motivation, values, safeguarding understanding and suitability to work with children. The panel will:

- verify identity against original documentation;
- probe gaps, discrepancies, changes of employment or location and reasons for leaving;
- explore the self-declaration and any relevant reference or online-search information;
- ask safeguarding questions appropriate to the role, including professional boundaries and responding to concerns;
- make reasonable adjustments where required; and
- record evidence, scoring, concerns, explanations and the reasons for the decision.

8. Conditional offer and pre-appointment checks

Every offer is conditional on satisfactory completion of all checks relevant to the role. The school will verify:

- identity, using current official guidance;
- the right to work in the UK;
- mental and physical fitness to carry out the role, without unlawful disability discrimination;
- required qualifications and professional status;
- teaching prohibition through DfE Check a teacher's record, where applicable;
- an enhanced DBS certificate and children's barred-list information for regulated activity;
- childcare disqualification status for relevant staff and managers; and
- any appropriate overseas checks and professional-regulator information where the person has lived or worked outside the UK.

The school will assess any disclosed or returned information fairly, considering relevance, seriousness, time elapsed, pattern, circumstances, explanation and the responsibilities of the post. Advice will be sought where necessary. A criminal record will not automatically bar appointment unless the law requires it.

8.1 DBS, barred-list and start arrangements

For non-EYFS work, where KCSIE permits a person to start regulated activity before the enhanced DBS certificate is available, the school will first complete all other relevant checks,

obtain a separate barred-list check, complete and record a written risk assessment, and ensure appropriate supervision until the certificate is seen.

For EYFS work, no staff member or volunteer may start working or volunteering in the EYFS setting until the enhanced DBS certificate including barred-list information has been received. No person whose suitability has not been checked may have unsupervised contact with children.

Separate barred-list checks will be requested only where legally permitted, including for a newly appointed person entering regulated activity while an enhanced certificate is pending outside EYFS, or where the permitted three-month previous-employment exception applies. The DBS Update Service may be used with the individual's consent; applicants may join when applying or within 30 calendar days of the certificate issue date.

8.2 Regulated activity and the 2026 change

The Crime and Policing Act 2026 removed the previous supervision exemption for unpaid activity. Teaching, training, instructing, caring for or supervising children can therefore be regulated activity whether paid or unpaid when it is carried out frequently, on more than three days in a 30-day period, overnight, or involves specified personal care. The school will determine each role by reference to the current statutory definition and will not request barred-list information where the activity is not regulated activity.

8.3 Overseas checks

People who have lived or worked outside the UK will undergo the same checks as other candidates. Falconhurst will also make further checks it considers appropriate so that relevant overseas events can be considered. For teaching posts this may include information from the relevant professional regulator. The scope, evidence obtained and decision will be recorded.

8.4 Childcare disqualification

For staff who work in childcare provision for children aged five and under, including Reception, and relevant wraparound care for children up to age eight, or who directly manage that provision, the school will comply with the Childcare Disqualification Regulations 2018 and statutory guidance. Relevant staff will be informed of their ongoing duty to disclose information. Where a person is assessed as outside scope, the rationale, risks, controls and advice obtained will be recorded.

9. Single Central Record and document retention

The school will maintain a Single Central Record (SCR) covering all staff, salaried trainee teachers and agency or third-party supply staff, including those attending for one day. The SCR will indicate whether required checks or certificates have been completed and the date, including:

- identity; standalone barred-list check where lawful and required;
- enhanced DBS certificate, including barred-list information where required;
- prohibition from teaching; overseas checks; professional qualifications; and right to work in the UK;
- for agency/third-party staff, written confirmation that required checks and certificates were completed, the date confirmation was received and whether DBS details were supplied.

The school may also record checks on volunteers and governors, childcare-disqualification declarations, safer recruitment training dates and the person completing each check. EYFS records will include staff qualifications, identity checks, vetting processes, references, the criminal-records-check reference number, date obtained and the checker's details.

Copies of DBS certificates or criminal-record information will be retained only where there is a valid reason and normally for no longer than six months. The school may retain a record that vetting occurred, the outcome and recruitment decision. Right-to-work evidence will be retained for the period required by current Home Office guidance. Records will be secure, access controlled and retained or destroyed in line with data-protection requirements and the retention schedule.

10. Agency and third-party staff

Before an agency or third-party worker starts, Falconhurst will obtain written confirmation that the supplying organisation completed the checks the school would otherwise have performed and obtained the appropriate certificates. Where information is disclosed on an enhanced DBS certificate, the school will obtain a copy from the agency. The school will verify the person's identity on arrival and that they are the person to whom the checks relate.

11. Contractors and self-employed workers

The school will ensure that contractors working at the school have the appropriate DBS level. A contractor in regulated activity requires an enhanced DBS check with barred-list information. A contractor not in regulated activity but with opportunity for regular contact with children will normally require an enhanced DBS check without barred-list information. Barred-list information will not be requested unlawfully.

For self-employed workers, the school will either obtain the appropriate DBS check or inspect a certificate obtained by the individual, ensuring it is at the level required. Identity will always be checked on arrival. A person without appropriate checks will not work unsupervised or undertake regulated activity.

12. Trainee teachers, students and work experience

For salaried trainee teachers, the school will complete all necessary checks, including an enhanced DBS check with barred-list information. For fee-funded trainees, Falconhurst will obtain written confirmation from the training provider that all required checks were completed and the trainee was judged suitable. Fee-funded trainees are not required on the SCR, though the school may record them.

Students and work-experience arrangements will be risk assessed. Checks will reflect the person's age, role, frequency, contact and whether the activity is regulated activity. In EYFS, students recruited to the setting require at least one written reference, and nobody may begin working or volunteering until the enhanced DBS certificate with barred-list information has been received where the framework requires it.

13. Volunteers

The school will define each volunteer role before appointment and decide whether it is regulated activity. The 2026 removal of the supervision exemption means that regular supervised unpaid teaching, training, instructing, caring for or supervising may now be regulated activity.

- Volunteers in regulated activity will have an enhanced DBS check with children's barred-list information.
- Volunteers not in regulated activity will be subject to a written risk assessment; where appropriate and lawful, an enhanced DBS check without barred-list information will be obtained.
- An unchecked volunteer will never be left unsupervised or permitted to undertake regulated activity.
- Occasional supervised helpers, such as a parent assisting on a day trip, are considered individually; this exception does not cover overnight activity or personal care.
- All EYFS volunteers require at least one written reference before recruitment and may not start until the required enhanced DBS certificate with barred-list information is received.

14. Governors

All governors will have an enhanced DBS check without barred-list information unless their duties amount to regulated activity, when barred-list information will also be required. The school will complete a section 128 check because a person subject to a section 128 direction is disqualified from being a maintained-school governor. Identity will be verified and checks recorded appropriately.

15. Visitors

Visitors include professionals, educational visitors, relatives attending events and others connected with the site. The school will identify, sign in, supervise and manage visitors according to purpose and risk. It will not request DBS or barred-list checks for ordinary visitors such as relatives attending a sports day. Third-party professionals will be managed through the relevant agency or contractor assurance process. Visiting speakers and educational visitors will be checked and supervised in line with safeguarding and Prevent procedures.

16. Alternative provision

Before placing a pupil with an alternative provision provider, the school will obtain written confirmation that appropriate safeguarding checks have been completed on people working at the setting. Leaders will satisfy themselves that the placement is suitable, safe and able to meet the pupil's needs, and will maintain oversight of attendance, welfare and progress.

17. Existing staff and volunteers

New checks on an existing member of staff or volunteer will be completed where the person moves from activity that is not regulated activity into regulated activity, has a break in service of 12 weeks or more, or there are concerns about suitability to work with children. The school may repeat a check where it considers this proportionate following a safeguarding concern or change in circumstances.

18. Ongoing safeguarding and induction

Safer recruitment continues after appointment. New staff and volunteers will receive role-appropriate induction covering the safeguarding policy, staff code of conduct, low-level concerns, allegations, whistleblowing, professional boundaries, online safety and the identity of the DSL and deputies. Probation, supervision, appraisal, training, conduct and welfare concerns will be managed promptly. EYFS staff will receive the induction, safeguarding training and ongoing supervision required by the statutory framework.

19. Allegations, low-level concerns and referrals

Concerns or allegations about staff, supply staff, trainee teachers, volunteers or contractors will be managed under KCSIE Part four and the school's safeguarding procedures. The headteacher, chair of governors and Local Authority Designated Officer will be involved as appropriate. Low-level concerns will be recorded and reviewed so that patterns can be identified.

The school has a legal duty to refer a person to the DBS where the statutory criteria are met, including where it removes an employee or volunteer from regulated activity - or would have removed them had they not left - because of relevant conduct, a relevant offence or satisfaction of the harm test. A referral to the Teaching Regulation Agency will also be considered where applicable. Settlement agreements, resignation or the end of a volunteer arrangement will not prevent required investigation or referral.

20. Equality, data protection and complaints

Recruitment will comply with the Equality Act 2010 and the Public Sector Equality Duty. Reasonable adjustments will be made for disabled applicants. Protected characteristics, trade-union activity and irrelevant personal information will not be used unlawfully. Criminal-record and online-search information will be processed lawfully, fairly, securely and only by those who need it.

Applicants may raise concerns through the school's complaints arrangements. Safeguarding concerns about the recruitment process must be reported promptly to the headteacher or, where the concern relates to the headteacher, to the chair of governors.

21. Monitoring and review

The headteacher is responsible for implementation and for ensuring that recruitment documentation, panel training, risk assessments and the SCR are accurate. The Governing Body will monitor compliance through appropriate safeguarding oversight and audit. This policy will be reviewed annually and sooner following changes to legislation or statutory guidance, a safeguarding incident, audit findings or identified weakness.

Reference framework

Department for Education: Keeping Children Safe in Education 2026; EYFS statutory framework for group and school-based providers (effective 1 September 2026); and Disqualification under the Childcare Act 2006. Disclosure and Barring Service guidance on eligibility, the Update Service and barring referrals. Home Office right-to-work checks guidance. Equality Act 2010 and the Public Sector Equality Duty.