



HERITAGE HOUSE SCHOOL

SAFER RECRUITMENT POLICY

Approved by: [Full Governing Board] **Date:** [September 2025]

Last reviewed on: [September 2025]

Next review due by: [September 2026]

This policy includes information from The Key (last updated 21.7.25) and Buckinghamshire Council Minimum Safer Recruitment Standards

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

Our school's commitment to safeguarding and promoting the welfare of children

That safeguarding checks will be undertaken

That as part of recruitment process online searches may be carried out on shortlisted candidates

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

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.

Include Buckinghamshire Council Self Declaration form for all applicants to complete (appendix A)

Application forms

Wherever possible, Buckinghamshire Council practice is for a Buckinghamshire Council application form to be completed for all applicants to employed and/or volunteer posts. If a CV is submitted, then the declaration sections of the Buckinghamshire Council application must be completed and signed to ensure that all required information is completed and confirmed.

Our application forms will:

- Include 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)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete 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
 - Whether they are prohibited from teaching

Commented [KK1]: The BCC application form does not state this therefore needs to be added to the generic BCC application forms that the school uses

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- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the police and children's local authority social care and
- If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. If there is a good reason not to undertake online searches, the school should have a written rationale for this. Any information found which may make the applicant unsuitable to work with children should be given to the interview panel so that it can be discussed with the applicant at interview (taking into account the criminal record filtering rules).

Seeking references and checking employment history

A minimum of two written references including one from an existing employer, covering a minimum period of 5 continuous years are required (where reasonably practicable) for all roles. References are obtained directly from the referee and received prior to interview wherever possible. Any concerns raised will be explored further with referees and taken up with the candidate at interview. Where a candidate expressly refuses permission to obtain references prior to interview, an explanation is obtained and fully considered.

Referees are asked to state any known reason why an applicant would not be suitable to work with children/ young people and include details of any concerns or allegations made against an applicant including any disciplinary records currently held on file.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Ensure electronic references originate from a legitimate source
- 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

Interview and selection

When interviewing candidates, including volunteers, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Include appropriate safeguarding interview questions (e.g. checking a candidate's motivation to work with children, young people and vulnerable adults).
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment 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.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity (original documentation will be witnessed, photocopied and signed as evidenced).
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). 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. (An applicant will not be able to commence work prior to DBS Check clearance without the appropriate authorization and completion of a Risk Assessment).
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- For roles where professional or minimum qualifications are required, original certificates will be witnessed, photocopied and signed as evidenced. Registration with professional bodies should be confirmed.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher (qualified and unqualified).
- 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 who have lived abroad in one country for six or more months within the last 5 years: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter (via the applicant) 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

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.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

A DBS recheck will also be considered after 3 years where an applicant had originally had to obtain an overseas certificate of good conduct.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

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.

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

For self-employed contractors such as music teachers or sports coaches and therapists, 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.

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.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- 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

Governors

All governors 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.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

Where we place a learner with an alternative provision provider, we continue to be responsible for the safeguarding of that learner. We obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise learners on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Contract of Employment

Where required for a job role (and using statutory eligibility requirements) a contractual requirement for a DBS Check will be clarified as part of any job specification at the outset of a recruitment process as well as at any subsequent selection stage as deemed necessary.

There is a contractual requirement (whether explicitly stated or not - e.g. including a relevant volunteer) for any employee or other person employed or working in a job role where a DBS Check is required to notify his / her line manager immediately of any criminal matter or police investigation involving that employee or person arising whilst in employment or work. A line manager must then notify the relevant Head of Service/Service Director, as appropriate.

Appendix A



BUCKINGHAMSHIRE COUNCIL SELF DECLARATION FORM

Congratulations on being shortlisted. Please return this disclosure at least one day prior to interview. If we have not received this, we reserve the right to withdraw the offer of interview.

PLEASE COMPLETE USING BLACK INK OR TYPE.

APPLICATION FOR THE POST OF:	
SERVICE/SCHOOL:	JOB REF. NUMBER: (where available)
SURNAME:	FORENAME(S):
TITLE:	
E-MAIL ADDRESS:	MOBILE:

Criminal information - Rehabilitation of Offenders Act 1974

Having a criminal record will not necessarily bar you from employment as the Council will take account of the relevance, the circumstances and the background of your offence(s). The Council has a Policy on the Recruitment of Ex-Offenders which meets the Disclosure & Barring Service (DBS) Code of Practice and complies with the requirements in respect of exempted questions under the Rehabilitation of Offenders Act 1974. The DBS Code of Practice is available at <https://www.gov.uk/government/publications/dbs-code-of-practice>

If the post you are applying for is 'exempt' from the Rehabilitation of Offenders Act 1974 you are required to declare any convictions, cautions, reprimands and final warnings that are not "protected" (i.e. filtered out) as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013). Please refer to the job summary to check whether this requirement applies for the post you are applying for. The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice website.

If the post you are applying for brings you into contact with children, young people or vulnerable adults or for certain positions within the legal and financial fields you may be required to undergo a DBS Standard, Enhanced or Enhanced (including Barred List) Check before taking up your role. Those Checks will include details of convictions, cautions, reprimands and warnings which you may have received, even if they are regarded as 'spent' under the Rehabilitation of Offenders Act 1974. You must also (where appropriate) let us know immediately of any changes in your circumstances which will have an impact on your criminal record.

Please refer to the role profile to confirm the level of DBS Check that may be required to be undertaken as part of the application and selection process and please answer the question below on that basis.

Standard / Enhanced DBS Checks required for the post:

Do you have any convictions or cautions (excluding youth cautions, reprimands or warnings) that are not 'protected' as defined by the [Ministry of Justice](#)? **Yes** **No**

If you have answered yes: Please provide details of your criminal record in the space below.

- 1) Are you the subject of any sanctions by the Teaching Regulation Agency (e.g. Prohibition Order Check)? **Yes** **No**
- 2) Have you been disqualified under the terms of the Childcare (Disqualification) Regulations 2009 as amended in 2018 (this declaration is relevant only for employees who will be caring for children under age 8 as defined in the above legislation)?
Yes **No**
- 3) The following declarations are required as you are applying to undertake Regulated Activity with either children or adults. If you are in doubt about this requirement, please refer to the role profile.
 - (a) Declaration for applicants into Regulated Activity with Children and Young People:
Have you been barred from working with children by the DBS, Independent Safeguarding Authority (ISA) or any other organisation? **Yes** **No**
 - (b) Declaration for applicants into Regulated Activity with Adults (for posts within Special Schools only):
Have you been barred from working with adults by the DBS, ISA or any other organisation? **Yes** **No**

Failure to disclose any of the above information which is relevant or required could result in disciplinary action (including dismissal) by the Council.

Signed:

Date: