



## SAFER RECRUITMENT POLICY – (Non-school Alternative Provision)

Policy title	Safer Recruitment Policy (Non-school Alternative Provision)
Applies to	Staff
Policy owner	Directors
Approved on	October 2025
Next Review	October 2026

### PURPOSE

The purpose of this policy is to safeguard and promote the welfare of children and young people by preventing unsuitable individuals from gaining access to them through employment or volunteering roles.

### SCOPE

This policy applies to Applewood Learning Ltd; this includes all employees who work within Applewood Learning Ltd as well as contractors, volunteers and visitors. Visitors follow site-safety rules but are not permitted to undertake unsupervised work with children.

### SAFEGUARDING COMMITMENT

As an organisation that prioritises the safeguarding of children and all vulnerable people, Applewood Learning Ltd is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

### RESPONSIBILITIES

**Provision Lead** - ultimate responsibility for ensuring the rigorous application of this Safer Recruitment Policy, guaranteeing that all recruitment and vetting processes comply with statutory guidance and best practice.

**Designated Safeguarding Lead (DSL)** – provides expert advice on safeguarding matters within recruitment and ensuring the currency of all pre-employment checks.

**Staff involved in the recruitment and selection process** - responsible for understanding and diligently adhering to the policy's procedures, maintaining confidentiality, and raising any concerns about a candidate's suitability.

**Candidates** - responsible for providing accurate and complete information throughout the application and vetting stages.

### DEFINITIONS

For the purpose of this policy, safer recruitment refers to the set of practices and procedures designed to ensure that all individuals appointed to work or volunteer at the provision are suitable for working with children. This includes, but is not limited to, conducting comprehensive pre-employment checks. A regulated activity is work with children which an individual is not permitted to do if they are a 'barred person' (as defined by the Safeguarding Vulnerable Groups Act 2006). A DBS check (Disclosure and Barring Service check) is a criminal record check used to identify any criminal convictions, cautions, reprimands, and warnings an individual may have, helping to assess their suitability for working with children.



## **POLICY**

### **GENERAL PRINCIPLES**

#### **Recruitment and selection process**

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 commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- 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

#### **Application forms**

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.

#### **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
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- 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. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process and will use any results only to explore potential safeguarding/role-related risks.



## **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

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/principal 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
- 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, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- 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 Applewood Learning Ltd's central vetting record (SCR-equivalent, maintained to KCSIE Part 3 expectations for audit/commissioners). 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  
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. Applewood Learning Ltd does not retain images/copies of DBS certificates. We record the date, level, unique reference and decision only. If a copy is exceptionally required, it is held for ≤6 months then securely destroyed (see Data Protection Policy).
- 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. Other vetting documents are retained only where necessary and in line with our retention schedule; we keep a clear audit trail in the central vetting record
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- 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: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
  - Section 128 checks are not required for Applewood Learning Ltd roles as a non-school AP. They apply to management of registered independent schools, academies and free schools. Applewood Learning Ltd will only undertake a s.128 check where a role also includes management within a registered school (confirmed by the commissioner)
  - We will consider the **availability/limitations** of overseas criminal checks and document risk-based decisions where information is unavailable.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school college or alternative provision, 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
- For volunteers, we apply the supervision test (regular, day-to-day, and reasonable in all the circumstances). Supervised volunteers are not in regulated activity; unsupervised/regular volunteers in specified places are in regulated activity.

## 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

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



Managers must review the DBS referral guidance to confirm thresholds and record rationale when a referral is/is not made.

### **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. We verify photo ID on arrival and ensure the person presenting is the same individual cleared by the agency.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at any Applewood Learning Ltd site 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

Contractors without checks will not work unsupervised or in regulated activity. Identity is verified on arrival.

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.

### **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
- Record supervision arrangements and retain the volunteer risk assessment with the central vetting record.

### **Adults who supervise pupils 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. For pupils under 16, we consider whether supervisors meet regulated activity thresholds and, where they do, complete barred-list checks.

## POLICY CONTEXT

AP context (non-school AP): Applewood Learning Ltd operates as a non-school Alternative Provision (AP). We adopt KCSIE 2025 Part 3 as benchmark safer-recruitment practice and maintain an SCR-equivalent central vetting record to evidence checks for commissioners (schools/LAs) and quality assurance. Barred-list checks are completed only where the role is in regulated activity; enhanced DBS without barred-list may be used where roles are not regulated but involve regular contact.

This policy/procedure relates to the following legislative requirements, standards and internal documents:

Legislation/Standards	<ul style="list-style-type: none"><li>• Keeping Children Safe in Education (KCSIE) (Department for Education statutory guidance)</li><li>• KCSIE 2025 Part 3 (adopted as benchmark for non-school AP)</li><li>• DBS guidance</li><li>• Equality Act 2010</li><li>• Data Protection Act 2018/UK GDPR</li><li>• Rehabilitation of Offenders Act 1974 (and the Exceptions Order 1975)</li><li>• Safeguarding Vulnerable Groups Act 2006</li><li>• Disclosure and Barring Service (DBS) guidance</li><li>• Equality Act 2010</li><li>• Data Protection Act 2018 / UK GDPR</li></ul>
Related Forms & Documents	<ul style="list-style-type: none"><li>• Safeguarding and Child Protection Policy</li></ul>

## VERSION CONTROL

We will review our documentation regularly and we reserve the right to amend our policies and procedures at any time.