SAFER RECRUITMENT POLICY

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Safeguarding is Everyone's Responsibility

Safer Recruitment Policy

Introduction

The safe recruitment of staff (employed, freelance) in the organisation is the first step to safeguarding and promoting the welfare of children in education. Next Steps Education Ltd is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, the organisation expects all staff and volunteers to share this commitment. 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 safer recruitment training.

Aims and objectives

The aims of the Safer Recruitment Policy are to help deter, reject or identify people who might abuse pupils or who are otherwise unsuited to working with them, by having robust staff appointment processes and procedures in place. The aims of the organisation's Safer Recruitment Policy are as follows:

- to ensure that the organisation meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2025 (KCSIE), the Prevent Duty Guidance for England and Wales 2023 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

The organisation has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the organisation based on the applicant’s abilities, qualifications, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, relevant safeguarding legislation and statutory guidance.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision making process.

The organisation aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies.

Roles and responsibilities

It is the responsibility of the Directors to:

- ensure the organisation has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements and to monitor the organisation's compliance with them

It is the responsibility of Next Steps Education's staff involved in recruitment to:

- ensure that the organisation operates safe recruitment procedures and ensures all appropriate checks are carried out on all staff and volunteers who work at the organisation
- promote the welfare of children and young people at every stage of the procedure
- monitor contractors' and agencies' compliance within safeguarding
- ensure that at least one member of the recruitment panel is in receipt of up-to date safer recruitment training (compliance – training to be updated every three years)

The Directors have delegated responsibility to the organisation's Recruitment Team to lead on all appointments.

Definition of Regulated Activity

Regulated activity means a person who will be:

- responsible, on a regular basis in Next Steps Education Ltd, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in an organisation 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.

The organisation is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The organisation is required to carry out an enhanced DBS check for all staff and personnel who will be engaging in regulated activity. However, the organisation can also carry out an enhanced DBS check on a

person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by the organisation in order to decide which checks are appropriate. It is, however, likely that in nearly all cases the organisation will be able to carry out an enhanced DBS check and a Children's Barred List check.

Existing Staff

If the organisation has concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- 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

Recruitment and selection

Advertising

To ensure equality of opportunity, the organisation will advertise all vacant posts to encourage as wide a field of applicant as possible; normally this entails an external advertisement, or a general enquiry via the website. Any advertisement will make clear the organisation's commitment to safeguarding and promoting the welfare of children and that safeguarding checks will be carried out.

All documentation relating to applicants will be treated confidentially in accordance with General Data Protection Regulations (GDPR).

Advertised roles will make clear the safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.

Advertised roles will make it clear that whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments of the Exceptions Order 1975, 2013 and 2020. If the role is exempt, the advert will make clear that certain spent convictions and cautions are 'protected', so they do not need to be disclosed to the organisation, and if they are disclosed, the organisation will not take them into account.

Application Forms

Next Steps Education Ltd uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role. In addition, all applicants are required to account for any gaps or discrepancies in employment history. Incomplete application forms will not be shortlisted. CVs will not be accepted as a standalone overview of employment history.

The application form will include the applicant's declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position within Next Steps Education Ltd.

It is unlawful for the organisation to employ anyone who is barred from working with children. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

The application pack will include a copy of, or a link to the organisation's Safeguarding and Child Protection Policy.

Applicants will be required to provide the following information:

- Personal details, current and former names, current address and national insurance number;
- Details of their present (or last) employment and reason for leaving;
- Full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- Qualifications, the awarding body and date of award;
- Details of referees/references (see below for further information); and
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

Next Steps Education Ltd will not accept copies of a CV in place of an application form.

Candidates are asked to sign a declaration confirming the information they have given provided is true. If the declaration is signed electronically, the candidate may be asked to physically sign a hard copy of the application form at the point of interview.

Job Descriptions and Person Specifications

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

Online searches

Following updated guidance in Keeping Children Safe in Education, the organisation will undertake an online check. See supporting document 'Safer Recruitment Information Pack'.

References

We will seek references on all candidates whom we invite to interview, including internal candidates, before interview. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after interview before appointment

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the organisation. One of the references must be from the applicant's current or most recent employer and be completed by a senior person with appropriate authority. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children.

Any discrepancies or anomalies will be followed up and direct contact by phone will be undertaken to verify references.

If a candidate is not currently in employment – verification of the individual's most recent employment will be obtained.

The organisation does not accept references from relatives.

The organisation will also:

- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- Always verify any information with the person who provided the reference;
- Ensure electronic references originate from a legitimate source;
- Contact referees to clarify content where information is vague or insufficient information is provided;
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate;
- Establish the reason for the candidate leaving their current or most recent post; and,
- Ensure any concerns are resolved satisfactorily before appointment is confirmed.

Interviews

There will be a face-to-face or online interview, with a panel of two interviewers, one member of which has undertaken formal Safer Recruitment Training. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps which have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training), find out the candidate's motivation for working with children and discuss relevant experience.

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has not been disclosed on the application form.

All information considered and decisions made will be recorded. The organisation will retain all interview notes on all unsuccessful candidates for a period of 6 months, after which time the notes will be confidentially destroyed (i.e. shredded). The 6- month retention period is in accordance with the General Data Protection Regulations (GDPR)

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Only original documents will be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

Offer of Employment (including freelance work) and Pre-Employment Vetting Checks

In accordance with the recommendations set out in KCSIE 2025, the organisation carries out a number of pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the organisation's standard terms and conditions of employment (including for freelance tutors and mentors);
- verification of the applicant's identity;
- the receipt of two references (one of which must be from the applicant's most recent employer) which the organisation considers to be satisfactory;
- confirmation that candidates are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.
- confirmation that candidates are not subject to a prohibition order if they are to be employed in a teaching or mentor role;
- Confirmation that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State which prohibits, disqualifies or restricts them from being involved in working with the organisation;
- where the position amounts to "regulated activity" the receipt of a satisfactory enhanced disclosure from the DBS, including Barred List information. Note: candidates will not work unsupervised until a satisfactory DBS has been received;
- verification of the applicant's right to work in the UK. Note: Next Steps Education Ltd will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- any further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulated authority, and criminal records checks or their equivalent;
- verification of professional qualifications which the organisation deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).
- review period (opportunity to review after 6 weeks of first contract).

A personnel file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personnel files.

DBS (Disclosure and Barring Service) Certificate

All personnel need to have an enhanced DBS certificate no more than two years old. The organisation can apply for an enhanced disclosure from the DBS which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006. The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

It is the organisation's general policy that the DBS disclosure must be obtained before the commencement of employment of any new employee (including freelance workers).

Members of staff (including freelance) at the organisation are aware of their obligation to inform the Directors or the DSL of any cautions or convictions that arise between these checks taking place. DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. If there are concerns about an existing member of staff's suitability to work with children all relevant check will be carried out as if they were a new member of staff. 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 offence under the Safeguarding Vulnerable Groups Act 2006 Regulations 2009, or
- We believe the "harm test" is satisfied in respect of the individual (ie they may harm a child or a 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 had they not left.

Portability of DBS Certificates Checks

Staff may wish to join the DBS Update Service if they are likely to require another check in the future.

DBS certificate will be accepted if undertaken within two years of the start of a contract.

DBS Certificate

The DBS no longer issue Disclosure Certificates to employers but organisations are able to download a snapshot of the required information which contains information

required for the Single Central Record. The snapshot DBS result should be held on the individual's personnel file together with verified copies of ID.

Dealing with convictions

The organisation operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence
- how long ago the offence occurred
- one-off or history of offences
- changes in circumstances
- decriminalisation and remorse

A formal meeting will take place face-to-face to establish the facts with the Directors. A decision will be made following this meeting. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Directors will evaluate all of the risk factors above before a position is offered or confirmed. If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the organisation may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Proof of identity, Right to Work in the UK & Verification of Qualifications and/or Professional Status

All applicants invited to attend an interview at Next Steps Education Ltd will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS identity checking guidelines. The organisation does not discriminate on the grounds of age.

Where an applicant claims to have changed their name by deed poll or any other means (e.g., marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change, including proof of original birth certificate.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

Overseas checks

The organisation will carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by the organisation.

The checks could include:

- Criminal records checks for overseas applicants;
- Obtaining a letter form the professional regulating authority in the countries in which the applicant has worked confirming that they have not imposed sanctions or restrictions and that they are not aware of any reasons as to why the applicant might be unsuitable
- Any other checks the organisation deems necessary

Induction Programme

All new employees (including freelance) will be given an induction programme which will clearly identify the organisation's policies and procedures, including the Child Protection Policy, the Code of Conduct and Part One of KCSIE 2025, and make clear the expectations which will govern how staff carry out their roles and responsibilities. Training will also be provided in Prevent, FGM, CSE. Employees will also have to provide a safeguarding certificate at an appropriate Level (Level 2 or equivalent).

Single Central Record

In addition to the various staff records kept in Next Steps Education Ltd and on individual personnel files, containing details of the following:

- all employees who are employed to work at the organisation;
- all others who have been chosen by the organisation to work in regular contact with children.

The organisation will undertake ID checks on all individuals who visit The Home Rooms and record details on the Single Central Record for individuals who visit regularly.

Record Retention / Data Protection

The organisation is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the organisation will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK and qualifications. Medical information may be used to help the organisation to discharge its obligations as an employer e.g. so that the organisation may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by Next Steps Education Ltd for the duration of the successful applicant's employment with the organisation. All information retained on employees is kept centrally at the Next Step's homerooms and is stored securely within the online cloud.

The organisation will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (i.e. shredded). The 6-month retention period is in accordance with the General Data Protection Regulations (GDPR).

Leaving Employment of Next Steps Education

Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed.

Whilst these are pre-employment checks, the organisation also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position at the organisation despite being barred from working with children; or
- has been removed by the organisation from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to a child.

If the individual referred to the DBS is a teacher, the organisation may also decide to make a referral to the Teaching Regulation Agency.

Visitors and Visiting Speakers (and Prevent Duty)

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

Duty Guidance requires the organisation to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

The organisation will use judgment as to whether there is a need to escort or supervise visitors. The organisation is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the organisation or perform any other regular duties for or on behalf of the organisation.

All visiting speakers will be subject to the organisation's usual visitors signing in protocol. This will include signing in and out at Reception, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments. The organisation will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the organisation.

In doing so the organisation will always have regard to the the Prevent Duty Guidance and the definitions of "extremism" and “radicalisation” set out in KCSIE 2025 which state:

“Extremism” is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

“Radicalisation” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

In fulfilling its Prevent Duty obligations the organisation does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

Monitoring and Evaluation

The Directors will be responsible for ensuring that this policy is monitored and evaluated throughout the organisation.