Federation of
Westminster Special Schools
& Bi-Borough Inclusion Service

Safer Recruitment Policy

Approved by Full Governing Board: October 2026

Renew date: October 2027, or earlier if statutory guidance changes

1. INTRODUCTION

The Federation is committed to safeguarding and promoting the welfare of all learners and expects all staff and volunteers to share this commitment. It is recognised that this can only be achieved through sound procedures, good inter-agency cooperation and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in the roles they undertake.

This policy is based on statutory legislation including the Children Act 1989 (and 2004 amendment), the Safeguarding Vulnerable Groups Act 2006, the Crime and Policing Act 2026, the Department for Education's statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026), the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025, together with relevant governance guidance.

2. AIMS AND OBJECTIVES

The aim of this policy is to ensure a fair and legal recruitment procedure operates across the Federation. Reference should also be made to our Safeguarding and Child Protection policy.

The Federation recognises the value of a diverse workforce and seeks to include people from different backgrounds with different skills and abilities. The Federation is committed to ensuring that the recruitment and selection of all who work within the Federation is conducted in a manner that is systematic, efficient and effective and promotes equality of opportunity. The Federation will uphold its obligations under law and national collective agreements not to discriminate against applicants for employment on the grounds of age, sex, sexual orientation, marital status, disability, race, colour, nationality, ethnic origin, religion or creed.

This document provides a good practice framework to comply with the principles set down in the Federation’s Equality Policy – Information and action plan.

All posts within Federation are exempt from the Rehabilitation of Offenders Act 1974 and therefore all applicants will be required to declare spent and unspent convictions, cautions and bind-overs, and to obtain an enhanced Disclosure and Barring Service (DBS) certificate. The Federation is committed to ensuring people who have been convicted are treated fairly and given every opportunity to establish their suitability for positions. Having a criminal record will not necessarily be a bar to obtaining a position.

3. ROLES AND RESPONISBILITIES

The Governing Board, in agreement with the Executive Headteacher, has delegated the following staffing decisions to the school's Headteachers or the Head of the Bi-Borough Inclusion Service under the School Staffing (England) Regulations 2009:

- The Executive Headteacher/School Headteachers and Head of Service will lead in determining all staff appointments outside of the Senior Leadership Team. The Executive Headteacher/Headteachers/Head of Service will involve the Governing Board in individual selected processes as described below. However, in all decisions with the exception of those in the Senior Leadership Team, the Executive Headteacher/School Headteacher's/Head of Service decision will be final.

It is the responsibility of the Governing Board to:

- ensure the Federation has effective policies and procedures in place for the recruitment of all staff and volunteers in accordance with DfE and legal requirements;
- monitor each school and BIS compliance with them.

It is the responsibility of the Executive Headteacher and School Headteachers/Head of Service to:

- ensure that the Federation operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the school;
- monitor contractors' and agencies' compliance with this document;
- promote the welfare of children and young people at every stage of the Procedure.

It is the responsibility of all potential and existing staff, including volunteers to comply with this document.

It is the responsibility of all contractors and agencies to comply with safer recruitment pre-employment checks.

It is the responsibility of the HR Administrator at each school to:

- deal with the administration of the disclosure system for the Federation. In accordance with the School Staffing (England) Regulations. The Governing Board has delegated responsibility to the Executive Headteacher/School Headteachers/Head of Service to lead in all appointments outside of the Federation senior leadership team.

Governors may be involved in staff appointments, but the final decision will rest with the Executive Headteacher/School Headteachers/Head of Service. The Executive Headteacher/Headteachers/Head of Service may delegate the selection process of staff outside of the senior leadership team to other Federation senior leaders but remains responsible for the decision to appoint.

Any person involved in recruiting to our Federation must read the Department for Education's Keeping Children Safe in Education (2026), or any updated statutory guidance, and the Federation's Safeguarding and Child Protection Policy. These are available through the Federation's agreed document systems.

This policy should be used in conjunction with the Child Protection and safeguarding policy.

4. RECRUITMENT AND VETTING CHECKS

Safer Recruitment Training

The Federation will:

- ensure that appropriate staff who undertake recruitment have received safer recruitment training and successfully completed the safer recruitment training assessment;
- ensure every appointment panel includes one member who has received safer recruitment training;
- implement robust recruitment procedures and checks for appointing staff and volunteers to ensure that reasonable steps are taken not to appoint a person who is unsuitable to work with children or who is disqualified from working with children or does not have the suitable skills and experience for the intended role;
- keep and maintain a single central record (SCR) of recruitment and vetting checks in line with DfE requirements;
- ensure that the terms of any contract with a contractor or agency requires them to adopt and implement measures described in this procedure. The Federation will monitor the compliance with these measures;
- require staff who are convicted or cautioned for any criminal offence during their employment with the school to notify the school, in writing of the offence and the penalty.

Pre-employment checks

Checks to be undertaken in accordance with what is stipulated in the Recruitment and Selection policy:

References

Two professional/character references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies or anomalies will be followed up. Direct contact, either by telephone or face-to face, may be made with each referee to verify the reference.

Previous employment history

Complete information about previous employment must be provided along with satisfactory explanations for any gaps in employment.

Identity checks

These will be carried out on all appointments to the Federation's workforce before an appointment is made. Acceptable proofs of identity may include birth certificate, driving licence or passport, combined with evidence of proof of address.

Medical fitness
Anyone appointed to a post involving regular contact with CYP must possesses the appropriate level of physical and mental fitness before any appointment offer is confirmed. All applicants are requested to complete a medical questionnaire as part of their contract and where appropriate a doctor's medical report may be required**.**

Qualification requirements
Candidates must be able to demonstrate they have actually obtained any academic or vocational qualifications legally required for the post and claimed in their application.

Overseas checks
All new appointments, where persons have lived outside the UK, are subject to additional checks to verify their right to work in the UK.

In addition to the above and as part of a broader approach to best practice in safer recruitment the Federation will, whenever possible, ensure the following procedures are followed.

- Any advertisement will make clear the Federation's commitment to safeguarding and promoting the welfare of children.
- The 'person specification' will include a specific reference to suitability to work with children.
- Other than in exceptional circumstances, face-to-face interviews will form part of the recruitment process

Proof of identity and right to work in the UK & verification of qualifications and/or professional status:
Shortlisted applicants for all posts will be required to provide proof of identity by producing documents on the day of interview in line with those set out in The Immigration, Asylum and Nationality Act 2006. Similar information is also required to obtain a DBS enhanced disclosure check on the preferred candidate.

Short-listed candidates will also be required to provide proof of their qualifications and professional status by producing documentation on the day of interview. The school will verify that candidates have actually obtained any qualifications legally required or deemed essential for the job and claimed in their application by asking to see the relevant certificate, or a letter of confirmation from the awarding body / institution. If the original documents are not available, the school will require sight of a properly certified copy. Where candidates have obtained qualifications abroad, a certified comparability check by NARIC will also be required. Proof of identity and other documentation will be verified by the School HR Administrator.

Social media checks are completed by an external company www.socialmediacheck.com

Shortlisted candidates will be sent a link to complete and the report will be sent to the headteacher.

Record Retention / Data Protection
All written records of interviews, application forms and reasons for appointment or non-appointment will be kept by the Federation for six months, unless a longer period can be justified by the Executive Headteacher/School Headteachers/Head of Service. Records will be treated as confidential and kept for no longer than necessary in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025. After this period the documents will be disposed of through confidential waste. The 6-month retention period will allow the Federation to deal with any data access requests, recruitment complaints or to respond to any complaints made to the Employment tribunal. Under GDPR, applicants have a right to request access to notes written about them during the recruitment process. Applicants who wish to access their interview notes must make a subject access request in writing to the chair of the panel / Executive Headteacher/School Headteacher/Head of BIS within 6 months of the interview date.

Personal File Records
Each school and the BIS will retain the following information which will make up part of the personal file, for the successful candidate:

- Application form
- References
- Disclosure of convictions form
- Proof of identification
- Proof of academic qualifications
- Proof of registration with General Teaching Council (for teaching staff)
- Certificate of Good Conduct (where applicable)
- Evidence of medical clearance from Occupational Health (where applicable)
- Evidence of the enhanced DBS clearance (i.e.: the notification form from SPS or the DBS certificate reference number, NOT the actual DBS form or certificate)

Single Central Record of recruitment vetting checks
In line with DfE requirements, the Federation will keep and maintain a single central record of recruitment and vetting checks. The central list will record all staff who are employed at the school, including casual staff, supply agency staff whether employed directly or through an agency, volunteers, governors, and those who provide additional teaching or instruction for pupils but who are not staff members, e.g.: specialist sports coach or artist.

The Single Central Record will indicate whether or not the following have been completed:

- Identity checks
- Qualification checks for any qualifications legally required for the job
- Additionally, for those applying for teaching posts, registration check with the GTC where appropriate
- Checks of right to work in the United Kingdom
- Children's Barred List & List 99 checks
- DBS Enhanced Disclosure
- Section 128 checks

- Further overseas records where appropriate. It shall also indicate who undertook the check and the date on which the check was completed or the relevant certificate obtained.

In order to record supply staff provided through an agency on the record, the school will require written confirmation from the supply agency that it has satisfactorily completed the checks described above. The school does not need to carry out checks itself except where there is information contained within the disclosure. However, identity checks must be carried out by the school to check the person arriving is the person the agency intends to refer to them.

Disclosure and Barring Service (DBS) checks – New employees and volunteers
The Federation will obtain enhanced DBS checks as follows for new appointments, before the employee or volunteer starts work:

In exceptional circumstances, a new employee may start before the enhanced DBS certificate has been received, but not before the appropriate children's barred list check and a written risk assessment have been completed. A volunteer must not undertake regulated activity until the required enhanced DBS check with children's barred list information has been completed. Appropriate supervision must remain in place until all required checks are confirmed.

DBS certificates will only be issued to the applicant. All applicants must produce the disclosure when requested to do so. The disclosure will be scrutinised to ensure it is authentic and to detect any fraud. The DBS disclosure number and date of the check must be recorded in the Single Central Record (SCR).

Any applicant who refuses to produce their DBS disclosure will not be able to start work at the Federation and the conditional offer will be withdrawn as satisfactory checks are not in place. Any volunteer who refuses to produce their disclosure will not be able to volunteer in Federation.

Information relating to an individual’s criminal record will only be shared with the relevant people to enable the Federation to make a decision about their suitability to work with children and young people. It will be held for no longer than is necessary and will be processed in line with the Data Protection Act 2018.

Disclosure and Barring Service (DBS) checks - existing employees and volunteers
The Federation will ensure that existing staff and volunteers have the level of DBS and children's barred list check required for their role. From 1st September 2026, the supervision exemption no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children frequently, or otherwise meets the statutory period condition, is in regulated activity and must have an enhanced DBS check with children's barred list information.

The Federation may undertake further checks where there are concerns about an employee's or volunteer's suitability to work with children and young people, in accordance with legal eligibility and statutory guidance. DBS certificates are issued to the applicant, who

must produce the certificate when requested. Any existing employee who does not produce a required DBS disclosure will be managed through the appropriate employment procedure.

All existing employees are required to inform the Federation of any change in their criminal record. This includes convictions, cautions, arrests and police investigations. The Federation may require all employees to sign a declaration on an annual basis that there has been no change in their criminal record. Action may be taken as a result of any change or any failure to inform the Federation of any change.

Equal opportunities
When any appointment is made full reference will be made to the Federation's Equality Policy

Ensuring the safety of learners (safeguarding)
It is important that the following checks are carried out during the recruitment process for all groups of staff.

The advert placed advises all potential applicants that the Federation rigorously promotes the safety, welfare and safeguarding of all CYP.

i) That all sections of the application form are completed. Special attention should be given to the Career History (there should be no breaks in service), that referees are given and the disclosure section is signed appropriately by the candidate.

ii) At least two satisfactory references must be provided by previous employers. These must be approved by the Executive Headteacher or Headteacher/Head of Service.

iii) All teaching staff will be checked on the DfE Barred teachers list and every member of permanent staff and volunteers will be checked for DBS records. This check is performed in conjunction with the Enhanced DBS Disclosure and information and logged on to the schools Single Central Record. Staff are also asked to disclose any information that might disqualify them from working with children.

iv) Enhanced DBS checks must be carried out and must be clear before any member of staff takes up post. These must be checked by the School's HR Administrator.

v) In the case of teachers, checks must be carried out to ensure they have Qualified Teacher Status, have completed their NQT/ECT induction assessment satisfactorily and that their certification is valid.

vi) All interviewees will be asked appropriate questions at interview to ensure that potential staff are aware of the culture of the school and the Federation with regard to safeguarding and so that risks to pupils are minimised.

vii) All visiting staff from an agency or working on an SLA or contractual basis will also be checked for a current DBS with their own employers or by the school/service before they commence working within the school or service.

Checks

No appointment for any post will be confirmed until satisfactory references, proof of qualifications, satisfactory medical advice, documentation confirming the individual's right to work in the UK, and the appropriate safeguarding checks are in place.

Access to Work Employees

The BIS currently have an employee who uses the service funded by the government "Access to Work" programme for employing a BSL Interpreter as part of her role within BIS.

Although not directly a BIS employee, the service follows specific procedures to ensure that the principles are carefully followed. See Appendix 2 for details of the process followed.

Appendix 1: Disclosure and Barring Service (DBS) checks – new employees and volunteers

Who?	Definition	Type of check
Employees who will be engaging in regulated activity	As an educational institution which is exclusively or mainly for the provision of fulltime education to CYP the Federation is an establishment specified in the relevant legislation. Activity carried out in this establishment will therefore be regulated activity relating to CYP if it meets the definition in the relevant legislation, including that it is carried out: (a) Frequently (for example once a week or more); or (b) On more than three days in any period of 30 days. Note – personal care of a CYP because of age, illness or disability including physical help with eating, toileting, washing, bathing or dressing is always regulated activity regardless of how frequently it is carried out.	An enhanced DBS check with children's barred list check will always be obtained
All volunteers who teach, train, instruct, care for or supervise children and meet the frequency or period condition	From 1st September 2026, the supervision exemption has been removed. A volunteer is in regulated activity where the relevant activity is carried out frequently or on more than three days in any 30-day period, or overnight in the circumstances set out in legislation. Personal care remains regulated activity regardless of frequency.	An enhanced DBS check with children's barred list information will always be obtained before the volunteer

Who?	Definition	Type of check
Volunteers who do not meet the regulated activity threshold	Volunteers whose activity does not meet the frequency or period condition and who do not provide personal care. The Federation will complete a written, role-specific risk assessment, considering the nature of the work, the level of contact with children, supervision arrangements and any other relevant safeguarding factors.	An enhanced DBS check without children's barred list information may be obtained where legally eligible and appropriate following the risk assessment. A barred list check must not be requested unless the role is regulated activity or another lawful basis applies.

Important update from 1st September 2026: the Crime and Policing Act 2026 removed the supervision exemption. Supervision no longer prevents a volunteer from being in regulated activity. Any volunteer whose duties and frequency meet the regulated activity criteria must have an enhanced DBS check with children's barred list information before undertaking that activity.

Appendix 2: Process Relating to British Sign Language Interpreters via "Access to Work" provision.

A BIS employee currently uses British Sign Language (BSL) interpreters to facilitate her work in schools.

The following protocol has been agreed following advice from safeguarding colleagues.

1. Check Physical DBS Copies:
    - Always see a physical copy of the DBS and ID card to ensure interpreters are not on the Child Barred List and there are no outstanding disclosures.
    - Confirm the physical copy has been seen by sending a quick email to line manager before attending visits with the interpreter.

2. Record Regular Interpreters:
    - For regular interpreters (e.g., more than 3 times a month), fill in their DBS information in the provided document: DBS Numbers for Support Staff kept on Sharepoint and accessible by Head of BIS.

3. Handle Disclosures:
    - If there are any disclosures, fill in the attached Positive Disclosure Risk Assessment.
    - Also, complete the attached risk assessment if the interpreter hasn't been checked on the Child-Barred List.
    - Send to Line Manager

4. Risk Assessment for Non-Checked Interpreters:
    - For those not checked on the Child-Barred List, fill out the attached risk assessment.
    - Keep a copy for personal records and email a copy to line manager.

5. Supply Interpreters Without DBS:
    - Fill out the risk assessment for all interpreters without a DBS (only supply interpreters).
    - Note that schools may not accept non-DBS-checked interpreters, but the risk assessment can be shown to schools if needed.

6. Request DBS-Checked Interpreters:
    - Always ask Remark to send interpreters with DBS checks.

7. Confirm Steps Taken:

    - Confirm that these steps have been taken for any new interpreters on visits.
    - Ensure the physical copy of their DBS has been seen or the outlined steps have been completed.