

The Willows School **Academy Trust**



Safer Recruitment and **Selection Policy**

Reviewed: September 2026
Next Review: September 2027

1. Introduction

This policy provides a framework for the safe, fair and effective recruitment and selection of employees, supply staff, agency and third-party staff, contractors, trainee teachers, volunteers, trustees, governors and any other adults engaged by The Willows School Academy Trust.

The Academy Trust is committed to safeguarding and promoting the welfare of children and expects everyone who works or volunteers at the school to share that commitment.

Safeguarding is embedded throughout recruitment, selection, appointment, induction and ongoing employment. The welfare of children is paramount.

This policy has regard to Keeping Children Safe in Education 2026 (KCSIE), particularly Part Three; the Education (Independent School Standards) Regulations 2014; the Equality Act 2010; the Rehabilitation of Offenders Act 1974 and Exceptions Order; the Safeguarding Vulnerable Groups Act 2006 as amended, including changes made by the Crime and Policing Act 2026; the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018; UK GDPR and the Data Protection Act 2018; and current DBS, Home Office and Teaching Regulation Agency guidance.

This policy must be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-Level Concerns Policy, Managing Allegations Against Staff Policy, Whistleblowing Policy, Equality Policy and Data Protection Policy.

2. Aims

The aims of this policy are to:

- appoint people with the qualifications, experience, knowledge, skills, values and behaviours required for the role;
- deter, reject or identify people who may pose a risk of harm to children or who are otherwise unsuitable to work with them;
- operate a consistent, transparent, proportionate and non-discriminatory process;
- meet all statutory pre-appointment checking and recording requirements;
- make reasonable adjustments for disabled applicants and comply with the Equality Act 2010 and the public sector equality duty; and
- maintain an ongoing culture of safeguarding after appointment.

3. Responsibilities

The Academy Trust, as proprietor, has overall responsibility for ensuring that recruitment arrangements comply with statutory requirements. The Governing Body will exercise its delegated responsibilities, approve this policy and monitor its implementation.

The Headteacher is responsible for implementing this policy, ensuring that appropriate checks are completed before a person starts work, maintaining effective recruitment records and the single central record (SCR), and ensuring that concerns are acted upon.

A selection panel of at least two people will normally undertake shortlisting and interview. At least one member of an appointment panel must have completed appropriate safer recruitment training. Panel members must declare actual or potential conflicts of interest and withdraw where necessary. Recruitment decisions and their rationale will be recorded.

For appointments to the Headteacher role, the Trust will follow its articles, scheme of delegation and applicable legal requirements. No individual will make an appointment decision alone.

4. Recruitment Planning and Role Information

Before advertising, the school will review the need for the post, job description and person specification. These documents will set out the skills, experience, attitude and behaviours required, the role's safeguarding responsibilities, the extent of contact with children and whether the work amounts to regulated activity relating to children.

Every job description will state the postholder's responsibility to safeguard and promote children's welfare. The person specification will state that suitability to work with children is essential and explain how each criterion will be assessed.

Recruitment documentation will be checked for unnecessary or discriminatory requirements.

Reasonable adjustments will be offered throughout the process. Health or disability questions will not be asked before an offer except where permitted by section 60 of the Equality Act 2010, including to establish whether an adjustment is needed or whether an applicant can carry out a function intrinsic to the role.

5. Advertising

Advertisements will include:

- the Trust's commitment to safeguarding and promoting the welfare of children and confirmation that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post;
- whether the post involves regulated activity relating to children;
- where applicable, that the post is exempt from the Rehabilitation of Offenders Act 1974, subject to the statutory filtering rules; and
- a statement promoting equality of opportunity.

Where a vacancy is not advertised, the reason and decision-making process will be documented. The same safer recruitment and pre-appointment checks will apply.

6. Applications and Self-Disclosure

The Trust will use a standard application form and will not accept a curriculum vitae in place of a completed form. A CV may be accepted only as additional information. The application form will obtain full identifying details, current and former names, a full chronological education and employment history with explanations for gaps, qualifications, professional memberships, referees and a signed declaration that the information is true and complete.

For a role involving regulated activity, applicant information will state that it is an offence for a barred person to apply for the role. False or omitted material information may lead to rejection, withdrawal of an offer, disciplinary action or dismissal and, where appropriate, referral to the police and/or DBS.

Only shortlisted candidates will be asked to complete a confidential self-declaration about relevant criminal history and other information that may make them unsuitable to work with children, in accordance with Ministry of Justice disclosure and filtering rules. This may include relevant overseas information, prohibition from teaching, a section 128 direction, childcare disqualification where applicable, inclusion on the children's barred list, and whether they are known to police or children's social care. Protected convictions and cautions must not be requested or considered.

A shortlisted candidate will confirm that their application and self-declaration are accurate. If an electronic signature has been used, a hard copy will be signed at interview.

7. Shortlisting and Online Searches

At least two people will shortlist consistently against the person specification; wherever practicable, they will also form part of the interview panel. The panel will scrutinise applications for gaps, inconsistencies, repeated changes of employment or location, incomplete information and any other potential concern. All concerns will be explored and recorded.

As part of due diligence, the school will consider an online search for each shortlisted candidate using publicly available information. Candidates will be told that searches may be undertaken. Searches will be proportionate, relevant to suitability to work with children, applied consistently and conducted in accordance with data protection and equality law. Any potentially relevant matter will be verified and put to the candidate at interview; decisions will not be based on protected characteristics or irrelevant private-life information.

8. References

References should be obtained before interview where possible so that concerns can be explored with the candidate. They will be requested directly from the referee; open references or testimonials supplied by the applicant will not be accepted. Electronic references will be checked to confirm that they come from a legitimate source.

At least two satisfactory references will normally be obtained. One must be from the current or most recent employer. Where the applicant has worked with children, a reference will be sought from the employer where they most recently worked with children; if this is not the current employer, both will be contacted. For school-based employment, the reference should be confirmed by the headteacher or principal. References from relatives or friends are not acceptable.

Requests will ask for objective, relevant information, dates of employment, role, reason for leaving, suitability for the post and to work with children, any substantiated safeguarding allegations that meet the harm threshold, and relevant disciplinary history. Information about allegations that are false, unfounded, unsubstantiated or malicious will not be included.

References will be compared with the application, verified with the referee where necessary, and discrepancies resolved before appointment.

The school will not ask about health or sickness absence before an offer unless a statutory exception applies. Any reference not received before interview must be obtained, scrutinised and resolved before the offer becomes unconditional.

9. Interview and Selection

Candidates will be given information about the selection process and invited to request reasonable adjustments. Selection may include interview, observed work, a teaching activity, presentation, written exercise or appropriately supervised interaction with pupils. Pupils may be meaningfully involved where appropriate, but responsibility for appointment remains with the panel.

The panel will assess each candidate consistently against the person specification and will explore:

- motivation for working with children and understanding of safeguarding;
- attitudes towards children, including their vulnerability, voice, dignity and best interests;
- professional boundaries, behaviour management and appropriate use of authority;
- gaps, discrepancies, concerns arising from references, self-declaration or online searches, and past disciplinary action or substantiated allegations; and
- values and behaviours relevant to the Trust, including respect for equality and the fundamental
- British values and preventing children from being drawn into terrorism.

Interview notes, scores, evidence considered and the reasons for the decision will be retained in accordance with the Trust's retention schedule.

10. Conditional Offers and Pre-Appointment Checks

All offers will be conditional until the school is satisfied that every mandatory and relevant check has been completed. No check is a substitute for professional judgement or the wider safer recruitment process.

For employees, the school will, as applicable:

- verify identity, including previous names and, where available, checking the name on the birth certificate;
- verify the right to work in the UK and retain evidence in accordance with Home Office requirements;
- obtain the appropriate DBS certificate: normally an enhanced DBS check and, for regulated activity, children's barred list information;
- check the original DBS certificate, including when using the DBS Update Service, and resolve any discrepancy;
- carry out a separate children's barred list check if a person will start regulated activity before the enhanced DBS certificate is available, alongside a documented risk assessment and safeguards;
- verify mental and physical fitness to carry out the role after conditional offer, with reasonable adjustments considered;
- verify professional qualifications and status, including QTS/QTLS and statutory induction where required;
- use DfE's Check a teacher's record service to check any teaching prohibition, interim prohibition or relevant historic restriction;
- complete a section 128 direction check for trustees, governors and any role that constitutes management of an academy;
- complete childcare disqualification checks only for individuals and work to which the 2018 Regulations apply; and
- undertake any appropriate overseas checks.

A barred-list check will be undertaken only where the person is eligible for it. The level of DBS check will be determined by the role and the legal definition of regulated activity. Where an existing DBS certificate is accepted under the permitted portability rules or the Update Service is used, the original certificate and identity will still be checked and the decision recorded.

Where a person begins work before every check is complete, this will occur only where legally permissible, the Headteacher has approved a written risk assessment, all available checks including a separate barred-list check where required have been completed, appropriate supervision and safeguards are in place, and outstanding checks are followed up. A person must not begin EYFS work until the enhanced DBS certificate including barred-list information has been received where the EYFS requirements apply.

11. Regulated Activity and Volunteers

Regulated activity will be assessed under the current statutory definition. From 1 September 2026, a volunteer teaching, training, instructing or supervising children frequently, on more than three days in any 30-day period, or overnight is in regulated activity; the former supervision exemption no longer applies. Intimate or personal care, relevant healthcare and specified overnight activity may be regulated activity even if carried out once.

For a volunteer in regulated activity, the school should obtain an enhanced DBS check with children's barred-list information. Existing volunteers who became regulated activity because of the 2026 change will have their barred-list status checked in accordance with KCSIE 2026. For volunteers who are not in regulated activity, the school will undertake a written risk assessment considering the role, frequency, supervision, setting, information known about the person and the vulnerability of pupils. It will decide whether an enhanced DBS check without barred-list information is appropriate and legally available. A barred-list check must not be requested where the role is not eligible. Volunteers without appropriate checks will not work unsupervised or undertake regulated activity. Volunteer identity, references where appropriate, induction, safeguarding training, supervision and conduct will be managed proportionately to the role and recorded. A volunteer undertaking personal care will be checked at the level required for regulated activity.

12. People Who Have Lived or Worked Outside the UK

Applicants who have lived or worked outside the UK will undergo the same checks as other applicants, including an enhanced DBS certificate and children's barred-list information where the role is regulated activity. The school will also make any further checks it considers appropriate so that relevant overseas events can be considered, regardless of whether the country was within the EEA.

Checks may include overseas criminal-record information, a letter of professional standing or confirmation of sanctions from a relevant teaching or regulatory authority, additional references, verification of qualifications and UK ENIC comparison where relevant. Certified translations will be obtained where necessary. If information cannot reasonably be obtained, the school will record its attempts and undertake a documented risk assessment, considering alternative evidence and safeguards before deciding whether appointment is safe.

13. Agency Staff, Contractors and Trainee Teachers

Before an agency or third-party worker starts, the school will obtain written confirmation that the supplier has completed the same checks the school would otherwise undertake, that those checks are satisfactory, and that the appropriate DBS certificate has been obtained. Where the certificate contains disclosed information, or the supplier has provided information to the school, the school will obtain a copy from the agency. The school will check that the person presenting for work is the person on whom the checks were made and record the required confirmation on the SCR.

Safeguarding requirements will be included in contracts. A contractor in regulated activity requires an enhanced DBS check with children's barred-list information. A contractor not in regulated activity but with opportunity for regular contact with children requires an enhanced DBS check without barred-list information. Where there is no opportunity for regular contact, the school will decide whether a basic check is appropriate. A contractor without appropriate checks will never work unsupervised or undertake regulated activity. Identity will be verified on arrival. For salaried trainee teachers, the school will ensure the required checks are completed and recorded. For fee-funded trainees, written confirmation will be obtained from the provider that it has carried out the necessary checks. Where the school is the employer, it will complete the checks itself.

14. Trustees and Governors

The Trust will complete all checks required for academy trustees, members and governors. This includes an enhanced DBS check; a children's barred-list check only where the individual will engage in regulated activity; identity and right-to-work checks where relevant; a section 128

direction check; and any further checks required because the person has lived or worked outside the UK. Required details will be recorded on the SCR.

15. Single Central Record and Recruitment Records

The Trust will maintain an accurate SCR in accordance with KCSIE 2026 and the Independent School Standards. It will cover all staff, including salaried trainee teachers, agency and third-party supply staff even if they work for one day, and all members and trustees of the Academy Trust. The school may also record volunteers, governors, contractors and other checks where this supports oversight.

For employees, the SCR will show whether each required check was carried out or certificate obtained and the date, including identity, barred-list information where applicable, enhanced DBS, teaching prohibition, section 128 where applicable, overseas checks, professional qualifications, right to work and childcare disqualification where applicable. For agency staff it will include the required written confirmation, the date received and whether DBS certificate details were supplied. The school will also verify identity on arrival.

The SCR will be quality-assured regularly by an appropriately senior person and monitored by the governing body. Entries will be supported by evidence and discrepancies corrected promptly. Copies of DBS certificates are not required for SCR compliance and, if retained, will normally be destroyed securely within six months, with the check, result and recruitment decision recorded. Other recruitment records will be retained securely in accordance with the Trust's retention schedule and data protection obligations.

16. Induction, Probation and Ongoing Safeguarding

All new staff, supply staff, volunteers and relevant contractors will receive role-appropriate safeguarding induction before or as soon as they begin. This will include the Child Protection and Safeguarding Policy, Staff Code of Conduct, behaviour expectations, low-level concerns and allegations procedures, whistleblowing, online safety, the identity of the DSL and deputies, and Part One of KCSIE 2026.

Probation, supervision and appraisal will be used to reinforce professional standards and identify concerns. The school will consider whether new information, a change in role or concerns about conduct require further checks. Existing staff and volunteers will not routinely be rechecked simply because time has passed, but the school may obtain a new DBS check where concerns arise or where it considers this appropriate and lawful.

17. Reporting Duties

The Trust will refer to the DBS any person, including a volunteer, where the legal referral conditions are met; broadly, where the person has been removed from regulated activity (or would have been removed had they not left) because they harmed or posed a risk of harm to a child, or satisfied the harm test. This is a legal duty and will not be compromised by a settlement agreement.

Where a teacher is dismissed, or would have been dismissed had they not resigned, for serious misconduct, the school will consider referral to the Teaching Regulation Agency. Suspected criminal offences will be referred to the police as appropriate. Safeguarding allegations and low-level concerns will be managed under the relevant Trust policies and KCSIE Part Four.

18. Data Protection, Equality and Retention

Personal information will be processed lawfully, fairly, transparently and securely, limited to what is necessary, accurate and retained only for as long as required. Access will be restricted to those who need it. Applicants will receive appropriate privacy information. Criminal-offence data will be processed only where a lawful basis and condition apply and in accordance with the Trust's data protection arrangements.

Recruitment decisions will not unlawfully discriminate because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation. The Trust will have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

Records for unsuccessful candidates will normally be retained for six months after the process ends, unless a longer period is justified and notified. Records for successful candidates will be retained on the personnel file in accordance with the retention schedule. DBS information will be handled in line with the DBS Code of Practice.

19. Monitoring and Review

The Headteacher will monitor implementation, recruitment outcomes, compliance with pre-appointment checks and the accuracy of the SCR. The Governing Body will receive appropriate assurance at least annually. Any breach or missed check will be reported promptly, risk assessed and remedied, with safeguarding advice obtained where necessary.

This policy will be reviewed at least annually and sooner following a relevant change in legislation or statutory guidance, a safeguarding incident, an audit finding or a material change in Trust arrangements.

Key guidance and linked policies

Keeping Children Safe in Education 2026; Disqualification under the Childcare Act 2006 statutory guidance; DBS eligibility and filtering guidance; Check a teacher's record; Home Office right-to-work and overseas criminal-record guidance; Child Protection and Safeguarding Policy; Staff Code of Conduct; Managing Allegations Against Staff Policy; Low-Level Concerns Policy; Whistleblowing Policy; Equality Policy; Data Protection Policy; and Records Retention Schedule.

Signed: M. Shaw
Headteacher

September 2026