

Riverstone Academy

Safer Recruitment Policy

Date of Review: September 2026

Date of Next Review: September 2027

Signed: K Bowe

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Statement of intent

Riverstone Academy is committed to safeguarding and promoting the welfare of every pupil. The school applies safer recruitment principles at every stage of recruitment and selection so that people who are unsuitable to work with children are deterred from applying, identified through proportionate checks and assessment, and prevented from taking up roles where they do not meet the required safeguarding standards.

As an independent special primary school, Riverstone Academy recognises that pupils with SEND may be particularly vulnerable to abuse and may communicate distress, disclosure or discomfort in non-verbal or highly individual ways. Recruitment therefore gives particular attention to candidates' understanding of safeguarding, professional boundaries, behaviour as communication, intimate and personal care, communication differences, and the increased vulnerability of some pupils with SEND.

This policy applies to the recruitment and appointment of employees, supply and agency staff, contractors, volunteers, trainee teachers and other adults working at the school, and to relevant suitability checks for members of the proprietor body.

1. **Legal framework**

This policy has due regard to relevant legislation and statutory guidance, including:

- Rehabilitation of Offenders Act 1974 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended
- Children Act 1989 and Children Act 2004
- Education Act 2002
- Education and Skills Act 2008
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006, as amended
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, where applicable
- Education (Independent School Standards) Regulations 2014, particularly Part 4
- UK General Data Protection Regulation (UK GDPR)

- Data Protection Act 2018
- Immigration, Asylum and Nationality Act 2006 and current Home Office right to work requirements
- DfE Keeping Children Safe in Education 2026 (KCSIE)
- Current Disclosure and Barring Service guidance on eligibility, regulated activity and barred list checks
- Current Home Office Employer's Guide to Right to Work Checks

This policy operates alongside the following school documents:

- Child Protection and Safeguarding Policy
- Allegations Against Staff Policy
- Staff Code of Conduct
- Single Central Record (SCR)
- Records Management Policy
- Data Protection Policy
- Staff Equality, Equity, Diversity and Inclusion Policy
- Whistleblowing Policy

2. **Definitions**

For the purposes of this policy:

“Regulated activity with children” includes activities and work that fall within the statutory definition in the Safeguarding Vulnerable Groups Act 2006, as amended. This includes relevant teaching, training, instruction, care or supervision of children where the statutory conditions are met, together with specified healthcare, personal care and overnight activities. From 1 September 2026, the former supervision exemption for specified activities with children no longer applies; a person may therefore be in regulated activity even where their work or volunteering is supervised.

“Enhanced DBS check with Children’s Barred List information” means the level of criminal record check available where the role is eligible and the individual will engage in regulated activity with children.

“Section 128 direction” means a direction prohibiting or restricting a person from taking part in the management of an independent school. The school will complete section 128 checks for those whose role falls within the relevant management provisions.

“Teaching work” has the meaning used in relevant education legislation and KCSIE. Where a person will carry out teaching work, the school will check that they are not subject to a prohibition order issued by the Secretary of State.

3. **3. Roles and responsibilities**

The Directors/proprietor are responsible for:

- Ensuring that recruitment arrangements comply with Part 4 of the Independent School Standards and KCSIE 2026.
- Ensuring effective safer recruitment policies, procedures and oversight arrangements are in place and implemented.
- Ensuring appropriate checks are undertaken for staff, supply staff, volunteers, contractors and members of the proprietor body as applicable.
- Ensuring the SCR is complete, accurate and subject to regular oversight.
- Ensuring recruitment decisions are fair, evidence-based and compliant with equality legislation.
- Ensuring the recruitment of a Headteacher is undertaken with appropriate proprietor involvement and independent challenge.
- Receiving assurance on safer recruitment practice, including SCR audits, training, exceptions, risk assessments and any identified weaknesses.

The Headteacher is responsible for:

- Implementing this policy on a day-to-day basis.
- Ensuring recruitment panels understand and apply safer recruitment requirements.

- Ensuring all required pre-appointment checks are satisfactorily completed before employment begins, except where a lawful and documented risk-managed arrangement is permitted.
- Ensuring recruitment records are maintained securely and accurately.
- Ensuring safeguarding concerns arising during recruitment are considered before appointment and referred appropriately where necessary.

The recruitment panel is responsible for:

- Agreeing selection criteria in advance and applying them consistently.
- Scrutinising applications, employment history, references, self-declarations and online search information where relevant.
- Exploring gaps, inconsistencies and safeguarding concerns at interview.
- Assessing each candidate's motivation, values, professional boundaries and suitability to work with children, including pupils with SEND.
- Recording the reasons for recruitment decisions.

At least one person involved in the recruitment process will have completed appropriate safer recruitment training. The school will ensure that panel members understand their roles and the current requirements of Part 3 of KCSIE.

4. **4. Planning, advertising and shortlisting**

Before advertising a vacancy, the school will review the role, job description and person specification and identify the safeguarding responsibilities, required qualifications, level of DBS check, whether barred list information is required, whether teaching prohibition or section 128 checks apply, and any other role-specific checks.

Advertisements and recruitment information will make clear:

- The school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- That the post is exempt from the Rehabilitation of Offenders Act 1974 where applicable and that relevant convictions and cautions are subject to the applicable disclosure rules.

- That it is an offence to apply for regulated activity with children if the applicant is barred from doing so.
- The skills, experience, qualifications, values and behaviours required for the role.

The school will use a standard application form and will not accept a CV alone. A CV may be accepted only alongside a fully completed application form.

Application forms will require a full employment history, with explanations for gaps, details of qualifications and referees, and information sufficient to assess the candidate against the person specification.

Shortlisting will be undertaken against criteria agreed before applications are considered. Shortlisted candidates will be asked to complete an appropriate self-declaration of relevant criminal record and suitability information in accordance with KCSIE and current disclosure rules.

As part of due diligence, the school will consider carrying out an online search on shortlisted candidates. Candidates will be informed that publicly available online information may be reviewed and relevant matters may be explored at interview. Online searching will be proportionate and focused on information relevant to suitability to work with children and the role.

5. **5. Invitation to interview**

Shortlisted candidates will receive sufficient information to understand the role and recruitment process, normally including the job description, person specification, safeguarding information, interview arrangements and details of any selection activity. Candidates will be asked to advise the school of any reasonable adjustments required for the selection process.

The invitation will explain that identity, qualifications and other relevant documentation will need to be verified as part of the recruitment process and that appointment is subject to satisfactory pre-appointment checks.

6. **6. Pre-interview checks**

Before interview, the recruitment panel will scrutinise the application and available information to identify matters requiring exploration. This will include:

- Gaps or inconsistencies in employment or education history.
- Reasons for leaving current or previous employment.

- Frequent changes of employment or location where relevant.
- Any disclosed criminal record, prohibition, disqualification or safeguarding information.
- Qualifications and experience relevant to the role.
- Any concerns identified through references or proportionate online searches.

References will be obtained before interview where possible so that any issues can be explored with the candidate at interview. Where this is not possible, references must be obtained, scrutinised and any concerns resolved before an appointment is confirmed.

7. **7. Requesting references**

The school will obtain appropriate references directly from referees and will not rely on open references or references supplied by the applicant. References will normally include the candidate's current employer and, where relevant, the employer from the last time the candidate worked with children.

References will be requested from a senior person with appropriate authority. Where the referee is school-based, the school will seek confirmation from the Headteacher or equivalent that the reference is accurate, where appropriate.

Reference requests will ask for factual information relevant to suitability, including employment dates, role, reason for leaving, relevant disciplinary or safeguarding concerns, and whether the referee is satisfied that the applicant is suitable to work with children. For teaching posts, the school will request relevant information about capability procedures where required by current guidance.

8. **8. Checking references**

All references will be scrutinised and compared with the application form. The school will verify that electronic references originate from a legitimate source and will contact the referee where information is vague, incomplete, contradictory or gives rise to concern.

Any discrepancy or safeguarding concern will be explored with the candidate and, where necessary, with the referee before appointment. The school will not confirm an appointment until material concerns have been satisfactorily resolved and the recruitment panel is satisfied as to the candidate's suitability.

9. **9. Providing references**

References provided by Riverstone Academy will be fair, accurate and not misleading. They will normally be provided by the Headteacher or another authorised senior person. Personal references must be clearly identified as personal and must not purport to be given on behalf of the school.

Where a safeguarding concern, allegation or low-level concern is relevant to a reference, the school will act in accordance with KCSIE 2026, its safeguarding procedures, data protection law and any applicable settlement terms. Information that is false, unfounded, unsubstantiated or malicious will not be included simply because it was raised.

10. **10. Content of references**

References will contain factual, objective and verifiable information. They will not deliberately omit material information where doing so would create a misleading impression about an individual's suitability to work with children.

Any information about health, special category personal data or criminal offence data will only be processed and disclosed where there is an appropriate lawful basis and the disclosure is necessary and proportionate.

11. **11. Previous disciplinary action**

Information about previous disciplinary action or allegations will be considered in context and in accordance with KCSIE 2026. The school will distinguish between findings, unresolved matters, unsubstantiated concerns and matters found to be false, unfounded or malicious.

Where an allegation is outstanding or an investigation is incomplete, the school will seek appropriate HR or legal advice before deciding what information may lawfully and fairly be taken into account or provided in a reference.

12. **12. Use of data and confidentiality**

Recruitment information will be processed in accordance with the Data Protection Policy, privacy information and Records Management Policy. Access will be restricted to those who require the information for recruitment, safeguarding, legal or employment purposes.

The school will retain recruitment records only for as long as required by law, safeguarding obligations and the school's retention schedule. DBS certificates will not normally be retained for

longer than necessary to make a recruitment decision and, where a copy is retained, this will generally not exceed six months unless there is a documented lawful reason.

13. **13. The interview**

A face-to-face interview will normally form part of the selection process. Where an interview is conducted remotely, the safeguards in section 15 will apply. Interviews will assess competence for the role and suitability to work with children.

Safeguarding questioning will explore, as appropriate:

- The candidate's motivation for working with children and for applying to Riverstone Academy.
- Understanding of professional boundaries and safe working practice.
- How the candidate would respond to a safeguarding disclosure or concern.
- Understanding that behaviour may communicate distress, particularly for pupils with SEND or limited verbal communication.
- Approaches to dignity, intimate or personal care where relevant to the role.
- Any gaps, discrepancies, online search matters, reference issues or self-declaration information requiring clarification.

Selection activities may include a presentation, pupil interaction, lesson or observed task, written/data task or other role-relevant exercise. Pupils will not be placed at risk or used as the sole determinant of appointment.

14. **14. After the interview**

The panel will assess candidates against the agreed criteria and record the reasons for its decision. Any offer of employment will be conditional on satisfactory completion of all required pre-appointment checks.

Unsuccessful candidates will be informed appropriately. Recruitment information will be retained and disposed of in accordance with the Records Management Policy and privacy information.

15. **15. Remote recruitment**

Where any part of the recruitment process is conducted remotely, the school will maintain the same safeguarding standards as for in-person recruitment. Remote recruitment will not reduce or replace required pre-appointment checks.

- The identity of candidates will be verified using an appropriate lawful process and original or digital evidence will be checked as required by the relevant checking route.
- Safeguarding questions, employment history and discrepancies will be explored to the same standard as an in-person interview.
- Where a physical document check is required, it will be completed before the individual starts work unless a lawful alternative checking route applies.
- The school will ensure the person who presents for work is the same person who completed the recruitment process and on whom the checks were undertaken.

16. **16. Pre-appointment checks**

All appointments are conditional on satisfactory completion of the checks required by KCSIE 2026, Part 4 of the Independent School Standards and other applicable legislation. The exact checks will depend on the role.

For employees, the school will, as applicable:

- Verify identity and any relevant name changes.
- Obtain an enhanced DBS check and, where the role is regulated activity, Children's Barred List information.
- Where permitted and necessary because the individual is due to start regulated activity before the enhanced DBS certificate is available, obtain a separate barred list check and complete a written risk assessment and supervision arrangements.
- Check that a person appointed to carry out teaching work is not subject to a prohibition order.
- Complete a section 128 check for individuals taking part in the management of the independent school where applicable.
- Verify professional qualifications required for the post.

- Verify the person's right to work in the UK.
- Make such additional checks as are appropriate where the individual has lived or worked outside the UK, so that relevant events can be considered.
- Verify the individual's mental and physical fitness to carry out the work after an offer has been made, in a lawful and proportionate way and with reasonable adjustments considered.
- Complete childcare disqualification checks where the 2018 Regulations apply.

Volunteers

All volunteers will be assessed under current KCSIE and DBS requirements. The school will determine whether the volunteer's activity is regulated activity, what level of DBS check is legally available and required, and what other checks or supervision arrangements are appropriate. Following the change to regulated activity from 1 September 2026, supervision does not itself remove specified volunteer activity from regulated activity. The school will record the decision and checks undertaken.

Agency and third-party staff

For agency or third-party staff, the school will obtain written confirmation that the supplying organisation has completed the checks the school would otherwise be required to undertake, together with any additional information required by KCSIE. The school will verify the identity of the individual on arrival and, where required, obtain or inspect the enhanced DBS certificate.

Contractors

Contractors and contractor employees will be subject to the appropriate level of DBS check according to their activity and opportunity for contact with children. No unchecked contractor will be permitted to engage in regulated activity or work unsupervised where required checks have not been obtained. Identity will be checked on arrival.

Trainee teachers

The school will obtain assurance that the appropriate checks have been completed for trainee teachers. Responsibility will depend on whether the trainee is salaried or fee-funded and on the arrangements with the training provider.

Existing staff

Where an existing employee moves into a role that changes the checks required, the school will complete any additional checks before the new duties begin. New safeguarding information about an existing employee will be managed under the Child Protection and Safeguarding Policy and Allegations Against Staff Policy rather than as a recruitment investigation.

17. **17. Right to work checks**

The school will establish every employee's right to work in the UK before employment begins using a checking route permitted by current Home Office guidance. This may include a manual document check, the Home Office online right to work service or an approved digital identity service provider where eligible.

The school will not make assumptions about immigration status based on race, nationality, accent, name, length of residence or any other protected characteristic. Time-limited permission to work will be monitored and follow-up checks completed where required.

The school will retain evidence of the right to work check for the period required by Home Office guidance and the Records Management Policy.

18. **18. Identification checking process**

Identity will be verified using the route applicable to the check being undertaken. The school will follow current DBS and Home Office identity-checking guidance rather than relying on a single process for all checks.

- Documents will be checked for consistency with the application and the person presenting them.
- Photographic identity will be compared with the candidate.
- Previous names and material name changes will be declared and evidenced where reasonably possible.
- Any discrepancy or concern about identity will be resolved before appointment.
- Copies of identity evidence will be retained only where necessary and for the period required by law or the school's retention schedule.

19. **19. After the pre-appointment checks**

Once all required checks have been completed satisfactorily, the school will confirm the appointment, agree a start date and ensure the required information is entered accurately on the SCR.

If an exceptional circumstance means a person is permitted to start before a particular check has been completed, this will only occur where lawful. The Headteacher will complete a written risk assessment, obtain any available separate barred list information where required and legally available, put appropriate supervision in place, and record the decision and review arrangements. No person will undertake regulated activity if the school is not legally permitted to allow them to do so.

The school will retain evidence of recruitment checks and decisions in accordance with its Records Management Policy. Self-declaration and sensitive recruitment information will be stored and disposed of securely.

20. **20. Single central record (SCR)**

Riverstone Academy will maintain an accurate Single Central Record in accordance with Part 4 of the Independent School Standards and KCSIE 2026. The SCR will cover the categories of people required by those provisions, including staff, relevant supply staff and members of the proprietor body.

The SCR will indicate, as applicable, whether required checks have been carried out or certificates obtained and the date on which each check was completed. This includes:

- Identity checks.
- Enhanced DBS checks.
- Children's Barred List checks where required.
- Prohibition from teaching checks where applicable.
- Section 128 checks where applicable.
- Checks of professional qualifications where required.
- Right to work checks.
- Further checks on people who have lived or worked outside the UK where applicable.

- Written confirmation from agencies or third parties of required checks on supply staff.

The school may use the KCSIE SCR template or checklist as an assurance tool. The live SCR will be updated when individuals leave, while underlying recruitment and vetting records will be retained for the appropriate period under the Records Management Policy.

The SCR will be audited regularly by the Headteacher or delegated competent person, with proprietor oversight. Any omission or discrepancy will be investigated and corrected promptly.

21. **21. Safer recruitment training**

The Directors will ensure that at least one person involved in each recruitment process has completed appropriate safer recruitment training and that those involved understand the relevant content of Part 3 of KCSIE 2026.

Training will be refreshed at intervals determined by the school's training needs and when significant statutory or guidance changes occur. The school will not rely solely on the passage of time; recruitment staff must remain competent and up to date.

22. **22. Safeguarding**

Safer recruitment is one part of the school's wider safeguarding system. Appointment checks do not remove the need for ongoing professional vigilance, induction, supervision, staff conduct expectations and prompt action when concerns arise.

Candidates for roles at Riverstone Academy must demonstrate an understanding that pupils with SEND may communicate abuse, distress or unsafe experiences through changes in behaviour, emotional presentation, communication, attendance or regulation. Candidates must understand the importance of dignity, professional boundaries, safe touch, intimate and personal care procedures where relevant, and immediate reporting of safeguarding concerns.

Any safeguarding information identified during recruitment will be considered by the Headteacher and, where appropriate, the DSL before an appointment is confirmed. Concerns about a current or former employee will be managed in accordance with KCSIE 2026, the Allegations Against Staff Policy and any legal duty to refer to the Disclosure and Barring Service or Teaching Regulation Agency.

Where the statutory DBS referral conditions are met, the school will make a referral promptly. A person's resignation, settlement agreement or departure will not prevent a referral where the legal criteria are met.

23. **23. Monitoring and review**

The Headteacher and Directors will monitor implementation of this policy through recruitment file checks, SCR audits, review of any exceptions or risk assessments, and oversight of safer recruitment training.

This policy will be reviewed annually and sooner where there is a relevant change in legislation, statutory guidance, DBS requirements or the Independent School Standards, or where an incident or audit identifies a need for revision.

A summary of the school's commitment to safer recruitment and safeguarding will be made available to parents and carers on request.