OneSchool Global

# Safer Recruitment Policy (Recruitment and Selection)

Authorisation Date: 09/2026
OSG Document Code: POL_UK_PC_ Safer Recruitment Policy_V10
Region: UK

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| **OSG Document Code**<br>POL_UK_PC_ Safer Recruitment Policy_V10 | **Authorisation date:**<br>09/2026 | **Next review date:**<br>09/2027 |
| **Policy author**<br>Jennifer Yaqub, Regional Director, People and Culture | **Reviewed by:**<br>People and Culture Team | **Approved by:** OneSchool Global UK Board on 09/2026 |
| **Enquiries contact:**<br><br>support@uk.oneschoolglobal.com | **Associated documents**<br>Safeguarding & Child Protection Policy<br>Teachers Induction Guidance<br>Induction of Support Staff Guidance<br>Rehabilitation of Offenders/Recruitment of Ex-Offenders Policy<br>SCR Guidance<br>Equality of Opportunity Policy<br>Probation Policy<br>OSG Staff Code of Conduct | |

## 1. INTRODUCTION/POLICY STATEMENT

1.1 Safeguarding and promoting the welfare of children and young people is an integral factor in recruitment and selection, essential in providing a safe environment for children and young people.

1.2 This Safer Recruitment Policy has been produced in line with Part 3 of the Department for Education (DfE) guidance, Keeping Children Safe in Education 2026 and applies to all sections of the Campuses.

## 2. PURPOSE

2.1 Our aim is to ensure the safe recruitment of staff, ensuring the process is conducted in afair, effective, and economic manner. Furthermore, to ensure that the members of staff responsible for each stage of the recruitment process are aware of their responsibilities and demonstrate a professional approach by dealing honestly, efficiently and fairly with all internal and external applicants.

2.2 The aim of this policy is to ensure that the safeguarding and welfare of children and young people is delivered at each stage of the recruitment and selection process. The procedures within this policy will deter and prevent people who are unsuitable to work withchildren from applying for or obtaining employment at OSG UK.

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2.3 This policy ensures that all relevant equal opportunities legislation is adhered to, that appointees are not discriminated against, and that arrangements comply with the requirements set out in Part 4 of the Government issued Independent Schools Standards.

2.4 The recruitment and selection procedures will be reviewed on a regular basis to ensure that applicants are not discriminated against on the grounds of race, gender, religion, age, disability, marital status, sexual orientation, gender, pregnancy and maternity.

## 3. SCOPE

3.1 This policy outlines the procedures by which staff are recruited to work in schools, including recruitment of staff by agencies into permanent employment, the process of engaging agency workers into temporary supply roles, and internal recruitment process.

## 4. DEFINITIONS

| Term | Definition |
|---|---|
| KCSIE | Refers to the latest version of "Keeping Children Safe in Education' statutory guidance |
| DfE | Department for Education |
| SCR | Single Central Record of pre-employment checks |
| DBS | Disclosure and Barring Service |
| REMT | Regional Education Management Team |
| RP | Regional Principal |
| CP | Campus Principal |

## 5. PRE-EMPLOYMENT CHECKS

5.1 Barred List Check

5.1.1 A separate barred list check can only be carried out on staff who will be working in regulated activity. A separate barred list check must only be carried out in situations where either:

5.1.1.1 OSG UK is pending receipt of an Enhanced DBS Certificate with Barred List information for a newly appointed member of staff who will be engaging in regulated activity, and where all other relevant checks have been carried out; or

5.1.1.2 Where an individual has worked in a school or college in a role that brought them into regular contact with children or young people, which ended not more than three months prior to that person's intended appointment to again, where all other relevant pre-employment checks have been carried out. In this latter case a separate DBS check should also be applied for in order for the individual to join the DBS online update service.

5.1.1.3 The employee does not need to have a Teacher Reference Number in order to carry out this check.

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5.1.2 It is illegal for an employer to knowingly allow someone to carry out regulated activity with the group from which they are barred, and it is an offence for a barred person to work or seek to work in regulated activity within a group from which they are barred.

5.1.3 The check should be completed via an enhanced DBS check application where this needs to be requested in advance of the candidate starting in post, or, the Barred List can be checked separately via the GOV.UK website (DfE login required): https://check-the-childrens-barred-list.education.gov.uk/sign-in

5.1.4 Evidence of a Barred list check being undertaken, and its outcome, must be kept on the employee's file and details entered onto the SCR.

5.2 Criminal Record checks and disclosures

5.2.1 All campus employees are in regulated activity and therefore a new enhanced DBS Disclosure (or appropriate PVG or AccessNI check whichever is applicable) which includes a children's barred list check will be required prior to the start of employment. Any campus employee who is absent from work for a period of 3 months or more would also require a new enhanced DBS check therefore Campus Principals are obliged to carry out zoom or face to face "Keeping in Touch" meetings with absent employees (sickness, maternity, sabbatical) at least once every 3 months during their absence. This is detailed in the Managing Absence procedure and the Maternity Policy.

5.2.2 An application for an enhanced DBS check will still be carried out even if the person is not/has not been a resident in the UK prior to starting employment.

5.3 Use of Previous DBS

5.3.1 Where the post is in England and Wales and an Enhanced DBS check with a check of the Children's Barred list was in place at their previous employer and there has been a gap in employment of no more than three months, the employee may be able to start their employment using this previous DBS check. The candidate must be able to provide the original certificate for the campus to verify. However, a new Barred List check is a mandatory requirement and must be carried out prior to the start of employment. The offer of employment remains conditional until the new DBS certificate is returned and the certificate verified by the campus.

5.3.2 If the candidate does not have an appropriate level DBS check in place at their current employment that can be used (which would be under the three-month rule in England and Wales with a separate barred list check undertaken) and they are not a member of the DBS update service (and a suitable check including barred list is available), a new criminal record disclosure is required in order to commence work. The successful candidate will be informed of the arrangements for such a check.

5.3.3 The DBS checking process must be initiated before the applicant's start date but no earlier than three months before employment commences.

5.3.4 The Campus Principal must have sight of the enhanced DBS (with Children's Barred list) certificate (or other official original copy of an appropriate criminal record check in Scotland and Northern Ireland) and verify that the certificate belongs to the candidate, that the DBS check has included a check of the Children's Barred list, is of an appropriate date and has been undertaken by an appropriate organisation.

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5.3.5 A record of the check being verified must be entered onto the SCR and appropriate evidence kept on the staff file using the appropriate DBS/PVG overlay sheet and appendix 2 of this policy. Copies of criminal record certificates must not otherwise be retained on the staff file beyond six months.

5.4 Using a DBS from the DBS Update Service

5.4.1 Where a new starter subscribes to the DBS update service and their membership of the service relates to a DBS check for the same level and type of workforce as their new role requires, and it contains a check of the Children's Barred list, the DBS can be used to start their employment. Their consent must be obtained before their DBS is checked online.

5.4.2 Please use Appendix 3 to document the consent. Checks on the DBS update service is completed here: https://secure.crbonline.gov.uk/crsc/check?execution=e1s1

5.4.3 Where the DBS is enhanced but it does not contain a Children's Barred list check, a separate check of the Children's Barred list must be undertaken, and the result recorded on the SCR and in the employee file.

5.4.4 The candidate's identity must be checked to ensure it matches the DBS certificate, and the original certificate must be seen to ensure that it is valid for employment in the children's workforce, and is at the level of check required for the role (e.g. enhanced with barred list check).

5.4.5 The original DBS certificate corresponding to their updated service membership must be seen and the outcome of the check must be recorded on the SCR in the normal manner. A printout of the online check result should be retained as evidence along with a copy of the top section (showing the DBS certificate number) of the original certificate using the DBS overlay sheet. Appendix 3 can be used to document that an online DBS check has been carried out. This form must be completed and inserted in the staff file.

5.4.6 Where a check of the DBS update service identifies that the information on the candidate's certificate has changed since the date that the certificate was issued, advice should be sought from the People and Culture team and a new enhanced DBS applied for which includes a check of the Children's Barred list.

5.4.7 It is OSGUK policy to re-check employee's DBS certificates for any employee that has a break in service of more than three months (e.g. unpaid career breaks etc.). In such cases employees must be re-checked before they return to work. Parallel entries of subsequent DBS checks will be recorded on the SCR, with clear notes on the SCR to explain the timeline of events, and recorded on the staff file, along with a file note to explain the need for the additional DBS.

5.4.8 Members of staff at the Campus should be made aware of their contractual obligation to inform the Campus Principal, or Regional Principal of any cautions or convictions that arise between these checks taking place, or indeed at any time during their employment as per the Code of Conduct and contractual requirements.

5.4.9 Campuses have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from

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working (paid or unpaid) in regulated activity or would have been removed had they not resigned.

5.5 Starting work before DBS clearance has been obtained.

5.5.1 Staff will not start employment until their DBS check (or equivalent in Scotland and Northern Ireland) has been received and deemed satisfactory by the Campus, unless as per section 5.3.2.2, whereby a DBS is being used from a previous employment.

5.5.2 Exceptions to the above may need to be made very occasionally to teaching staff, but only if all other pre-recruitment checks have been completed, a risk assessment is in place which details the supervision arrangements of the new starter and the Regional Director of People and Culture and the Regional Principal deem this to be satisfactory. In these cases, the risk assessment will be carried out to determine (a) whether it is safe for that individual to start work before his or her criminal record check has been verified; and (b) the level of supervision required.

5.5.3 The individual will not be allowed to attend trips or to be alone with a pupil until the criminal record check has been received. A record of the risk assessment and supervision deemed necessary will always be made in the notes section of the SCR, and a copy of the risk assessment should be retained on the staff file.

5.6 Rehabilitation of offenders and 'positive' criminal record disclosures

5.6.1 The Campus is exempt from the Rehabilitation of Offenders Act 1974 via the Exemptions Order and therefore candidates are required to declare all cautions and convictions both unspent and spent in their application unless any spent conviction or caution is classed as 'protected'.

5.6.2 Where 'protected' convictions and cautions are declared the Campus cannot take these into account when establishing the suitability of a candidate.

5.6.3 It is the candidate's responsibility to ensure that they know whether any convictions and/or cautions are classed as 'protected' and what they must declare. Candidates are encouraged to seek legal or professional advice in relation to what they should declare. Further guidance can be found at: https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide

5.6.4 If an applicant has a criminal record this will not automatically debar them from employment. Each case will be assessed fairly and objectively.

5.6.5 Any employee who is convicted of, or cautioned for, any offence during their employment with OSGUK is contractually obliged to immediately notify in writing the Campus Principal or the Regional Principal, as appropriate, of the offence, the circumstances and any penalty.

5.6.6 The Campus Principal, with support from the Regional Director of People and Culture and the Regional Principal, will decide if an adverse DBS is acceptable or whether they have a concern about the applicant's suitability to work with children.

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5.7 Candidates who have lived or worked outside the UK (Criminal Record; Professional Standing; Prohibitions on Teaching)

5.7.1 Since 1st January 2021 overseas checks apply for any individual who has lived or worked outside the UK regardless of whether this was in or not in, an EEA country or the rest of the world.

5.7.2 The requirement for overseas checks applies for any period of living or working or volunteering abroad of over 3 months in the previous 10 years, from the date of the application being submitted.

5.7.3 Candidates who have lived or worked outside the UK must undergo the same checks as all other staff. This includes having an appropriate DBS check or, for Scotland, an appropriate criminal record check, even where the individual has never been in the UK before.

5.7.4 In addition to the usual pre-employment checks and an appropriate DBS check, the Campus must make further checks which they deem appropriate so that any relevant events that occurred outside the UK can be considered. The additional checks may include where they are available:

5.7.4.1 Criminal record checks for overseas applicants from the countries where they lived and/or worked.

5.7.4.2 And in the case of teaching roles, the applicant should obtain a letter from the professional regulating authority in the country/countries in which they have worked confirming that they have not imposed any sanctions or restrictions, and that they are not aware of any reason why the applicant may be unsuitable to teach. Overseas sanctions and restrictions may not necessarily prevent an applicant working in a UK school but the information that led to any such sanction must be considered in making the recruitment decision. Further information can be found in the DfE Guidance: Recruit teachers from overseas.

5.7.5 Advice for candidates on how to obtain overseas criminal record checks can be found via Overseas Applicants Criminal Record Checks; candidates are responsible for applying for, and meeting the cost of, any such checks and official translations.

5.7.6 For letters from Professional Regulating Authorities, applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Where the above information is available, the evidence should be considered alongside the information obtained through the other pre-appointment checks to help assess a candidate's suitability.

5.7.7 Where the above information is not available, or where OSGUK deems that the available information does not facilitate thorough consideration of a person's suitability, additional references may also be required for any applicant, and/or a risk assessment may occur to review the overall information available. A Regional Principal and the Regional Director of People & Culture must be involved in signing off any such risk assessment and decision.

5.7.8 Where additional references are requested, they should aim to provide information about the candidate's conduct at the time they were overseas, in addition to the two

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references usually received. When identifying the additional references to be sought, the education history, employment history and the referees already provided should be reviewed. Once suitable additional references have been identified, explicit consent to request the additional references should be sought from the candidate and the references requested. References should be requested via the process set out in the procedures section of this policy. A note should be made on the SCR and a file note placed upon the candidate's file within the pre- employment checks. Campuses must not rely solely on evidence of an applicant having a professional teaching qualification from overseas as them being suitable to teach in the UK; information regarding their criminal record – or lack of – must also be sought.

5.7.9 Staff should not commence employment until the relevant overseas checks are obtained and verified. The checks should be recorded on the SCR of pre-employment checks.

5.8 Identity checks and right to work

5.8.1 All applicants invited to attend an interview at the Campus are required to bring original copies of their identification documents with them, plus evidence of any name change.

5.8.2 Identification documents must include their birth certificate – to both evidence their right to work in the UK (e.g. passport; birth certificate) (see 5.3.7) and documents to prove their identity (e.g. birth certificate, driver license) in accordance with the stipulations set out in the Immigration, Asylum and Nationality Act 2006, and as required by the Disclosure and Barring Service ('DBS') (England and Wales), or as by the Protecting Vulnerable Groups ('PVG') Scheme (Scotland), or by the AccessNI (Northern Ireland) Codes of Practice, whichever apply to the role.

5.8.3 At the interview copies of original documents which provide proof of identity must be taken, verified, dated and signed by the verifier. The verifier should write on each of the photocopies that the 'original was seen and copied on [date] by [their name]' followed by the verifier's signature.

5.8.4 The Campus Principal must countersign the copies to validate that the originals have been seen, and these signed copies should be retained on personnel files for successful candidates. Evidence from unsuccessful candidates should be retained on the recruitment file and then confidentially destroyed after 6 months.

5.9 Right to work check

5.9.1 All candidates will be asked to evidence their right to work in the UK. Updated information and guidance on checking an individual's right to work can be found here, along with the ability to perform an online right to work check using a candidate's share code (where applicable) or a check using the candidate's original documents: Checking a job applicant's right to work – GOV.UK (www.gov.uk)

5.9.2 Candidates who have worked in a regulated role in the EEA where they have been required to register with a regulatory body should contact that regulatory body to request a letter confirming their professional status (Letter of Professional Standing).

5.9.3 Campuses should undertake a right to work check using the appropriate option available via the above weblink. A copy of the result should be printed off, dated,

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signed by the person completing the check, countersigned by the Campus Principal and placed on the employee's staff file along with verified copies of the identification used for the check.

5.9.4 Biometric residence cards or permits cannot be accepted alone as evidence of right to work; copies of original documents must be seen, copied, verified, dated and kept on file where applicable.

5.9.5 In checking right to work documents campuses must see original copies with the candidate present. The following checks must be performed:

5.9.5.1 A check that the documents are genuine, original and unchanged and belong to the candidate who has provided them.

5.9.5.2 Ensure photos are the same across all documents and look like the candidate.

5.9.5.3 Check that the dates of birth are the same across all documents.

5.9.5.4 Where two documents give different names, ensure the candidate has supporting documents showing why the names are different (e.g. a marriage certificate or divorce decree).

5.9.6 If the candidate is not a British or Irish citizen, the campus must also check that:

5.9.6.1 the dates for the candidate's right to work in the UK have not expired.

5.9.6.2 the candidate has permission to do the type of work available/being offered (including any limit on the number of hours they can work).

5.9.6.3 and for students that the campus receives evidence of their relevant study and vacation times.

5.9.7 Time Limited entitlement to live and work in the UK:

5.9.7.1 Where a campus is considering making an offer of employment to a candidate who has time limited entitlement to work in the UK, they must notify the Regional Director of People and Culture prior to making an offer of employment. This ensures that an appropriate contract of employment is provided, and a re-check of the documents is undertaken at the point of renewal or extension of the right to work.

5.9.8 Taking copies of right to work documents:

5.9.8.1 make a copy that cannot be changed, for example a photocopy.

5.9.8.2 make sure the copy is clear enough to read.

5.9.8.3 for passports, copy any page with the expiry date and applicant's details (for example nationality, date of birth and photograph) including endorsements, for example a work visa.

5.9.8.4 for all other documents a complete copy must be made.

5.9.8.5 keep copies during the candidate's employment and for 2 years after they stop working for you.

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5.9.8.6 on the copy documents ensure that the Campus Principal/Line Manager records the date the check was made and signs to confirm the original documents have been seen.

5.9.9 Where candidates cannot show their documents or provide evidence of their immigration status, the campus must notify the Regional Director of People and Culture, and advice must be taken from the Home Office. Where a 'Positive Verification Notice' is issued in such circumstances, this must be retained on the employee's personnel file.

5.9.10 The Campus Principal must countersign the copies to validate that the originals have been seen, and these signed copies should be retained on personnel files for successful candidates. Evidence from unsuccessful candidates should be retained on the recruitment file and then confidentially destroyed after 6 months.

5.9.11 Verified copies of documents that have been used for checking the Right to Work, and to check ID, should be retained on the staff file. Any excess information provided that has not been used as part of the ID checking process and therefore is not evidence of right to work, identity or qualification, should be confidentially destroyed. As such, copies of passports, birth certificates, marriage certificates and any other document that has been used in the ID checking process should be copied, verified and retained on the file. Campuses should use the staff file checklist at Appendix 1 and then retain the online check outcome on the file as proof of checks being completed.

5.10 Medical fitness

5.10.1 Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness to perform the duties outlined in the job description before employment can commence.

5.10.2 OSG UK is required to verify a candidate's mental and physical fitness is satisfactory to the point they can carry out their work responsibilities.

5.10.3 All successful applicants are required to complete a confidential medical questionnaire and, where appropriate, a doctor's medical report may also be required. Failure to complete the medical questionnaire on time may delay an employee's start date and may lead to an offer of employment being withdrawn.

5.10.4 The Campus Principal/Line Manager must review and validate all documentation received.

5.10.5 No employment can commence until the confidential medical fitness to work certificate and, where appropriate, a doctor's medical report are in receipt.

5.11 Qualifications

5.11.1 Qualifications should be checked prior to appointment. Where qualifications are listed in the Person Specification for the role, candidates will be required to bring in to interview the original documents or certificates of relevant registration, training or qualifications so that originals can be copied, verified and copies can be lodged retained on their personnel file.

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5.11.2 Where candidates have detailed on their application form that they possess further qualifications not necessarily required by the Person Specification for the role, but these qualifications have been taken into account in making the decision to appoint the individual, these qualifications must also be checked prior to appointment, preferably at interview, with original copies being seen, and photocopies being made and verified for the employee file.

5.11.3 The person taking a copy of the original certificates should detail on the copied version that the 'original was seen and copied on [date] by [their name]. Verified copies of required qualifications should be retained on the employee file.

5.11.4 For teachers a check of QTS, QTLS and the satisfactory completion of the teacher induction or probation will be checked via the GOV.UK website (DfE login required): https://check-a- teachers-record.education.gov.uk/check-records/sign-in

5.11.5 All qualifications should be checked and verified prior to the employee's start date.

5.11.6 All evidence of qualifications must be cross referenced with the application form submitted by the successful candidate and any discrepancies followed up by the Campus Principal prior to employment.

5.11.7 For those staff members who have gained qualifications from overseas, since December 2023, OSGUK has been unable to request information from the UK Centre for Professional Qualifications. However, a Statement of Comparability is a certificate that shows how international qualifications compare to the UK education systems. The UK's education systems include England, Scotland, Wales and Northern Ireland. The Statement gives international qualifications context when applying for jobs, studies or professional registration in the UK. Show the Statement of Comparability with your original qualifications. For further information: https://www.enic.org.uk/individuals/statement-of- comparability

5.12 Prohibition Checks: Prohibition from Teaching

5.12.1 A new starter who is being offered a role to carry out teaching work will require an additional check to establish whether they are prohibited from teaching by the Secretary of State, or any sanction or restriction imposed by the GTCE prior to its abolition in March 2012. Where an individual is prohibited, they must not be appointed to a role that involves teaching work.

5.12.2 A 'Prohibition from Teaching' check indicates whether there are any permanent or interim prohibitions, sanctions and/or restrictions that might prevent the candidate from being employed in certain roles.

5.12.3 This check should be undertaken for all staff with an assigned teacher reference number who are involved in teaching work in relation to children or supervising classes.

5.12.4 The teacher should be 'claimed' via the Check a Teachers Record link: https://check-a- teachers-record.education.gov.uk/ using the teacher reference number assigned to the teacher and the teacher report printed.

5.12.5 A record of the check being undertaken must be entered on the SCR and evidence of the check should be retained on the staff file.

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5.13 Section 128 Prohibition from the Management of Independent Schools Check

5.13.1 The Section 128 check (of the Education and Skills Act 2008) checks whether an individual has been prohibited from or restricted in the management of independent schools.

5.13.2 This check should be carried out and recorded on the SCR for all staff employed externally or internally in roles where they are considered as having management responsibilities. Such roles include members of the Campus Support Team, Campus Principals, Associate Principals, Regional Principals, Senior Leadership Team members, Curriculum and department Leaders and those roles with a managerial responsibility or a national remit, amongst others.

5.13.3 In relation to OSGUK, where an individual is subject to a Section 128 direction, they may not undertake a management role in an independent school as an employee, they may not be a governor or a member of a proprietor body of an independent school, and they may not be a governing body of an independent school that retains or has been delegated any management responsibilities.

5.13.4 A Section 128 check can be carried out via an enhanced DBS application where the individual with management responsibility will be working in regulated activity. The DBS application must detail that the check is for the 'child workforce independent schools'.

5.13.5 If the employee will be working in a management role that does not require a check of the children's barred list, the check can be made using the GOV.UK website (DfE login required): https://www.gov.uk/government/collections/individuals-prohibited-from-managing-or-governing-schools. A copy should be made of the list of individuals who have a S.128 direction as evidence that the employee is not on it.

5.13.6 Where a current employee changes their role to one that involves management responsibility and a S.128 check was previously not required, if a repeat DBS is not appropriate, the S.128 check should be carried out via the GOV.UK website.

5.13.7 The SCR should be updated to record the check however it is triggered and however it is performed.

5.14 Induction

5.14.1 All new staff will be required to undertake induction training. This will include:

5.14.1.1 Safeguarding & Child Protection Policy (including role of the DSL and Children Missing Education (CME) guidance),

5.14.1.2 Ethos, Values and Guiding Principles,

5.14.1.3 ICT & E-Safety Policy,

5.14.1.4 KCSIE part one (all staff),

5.14.1.5 KCSIE Annex A (leaders and those who work directly with children),

5.14.1.6 Behaviour Management Policy,

5.14.1.7 Mental Health & Wellbeing Policy,

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5.14.1.8 OSG Staff Code of Conduct,

5.14.1.9 Information covering whistleblowing, acceptable use of IT, staff/student relationships and guidance on social media usage,

5.14.1.10 Staff Handbook,

5.14.1.11 All other appropriate policies and procedures for OSG UK in line with those set out in the OSG UK Probation Policy and process,

5.14.1.12 In addition, staff will also receive health and safety training.

5.14.2 A personal HR file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment guidelines. This checklist will be retained on personal files (Appendix 1).

5.14.3 A written induction checklist(s) for each role an employee undertakes should be completed and retained on file. New staff will be enrolled on the appropriate induction.

5.14.4 An appropriate manager will be allocated to oversee the probation process and documentation with the new starter within the first few days of employment. This will be the Campus` Principal or other Senior Leader delegated to this duty.

5.15 Probationary Period

5.15.1 All staff will be subject to a probationary period at the start of their employment. The purpose of the probation is for the employee and the employer to decide if the recruitment is the best fit. The criteria for passing the probation period are generally that the employee is completing the duties of the job description to a satisfactory level.

5.15.2 Further information can be found in the Probation Policy: POL_UK_PC_Probation Policy.

5.16 Record retention & data protection

5.16.1 Interview notes on unsuccessful applicants will be retained for a period of 6 months after which time the notes will be destroyed via confidential shredding. The 6-month retention period is in accordance with the Data Protection Act 2018 (DPA 2018) and will also allow the Campus to deal with any data access requests, recruitment complaints or to respond to any complaints made to an employment tribunal.

5.16.2 Interview notes, assessments and evidence of pre-employment checks will be retained on the employee's file in accordance with DPA 2018.

5.17 Ongoing employment

5.17.1 It is recognised that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. The Campus will therefore provide ongoing training and support for all staff, as identified through the annual review/appraisal procedure, Continuing Professional Development programme, and through ongoing staff training.

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5.18 Monitoring

5.18.1 The Regional Safeguarding and Central Recruitment and People and Culture team are responsible for ensuring that this policy is monitored and evaluated throughout the Campus.

5.19 Provision of references

5.19.1 When asked to provide references, OSG UK will ensure that the information supplied confirms whether they are satisfied with the applicant's suitability to work with children. Where there have been substantiated safeguarding concerns or allegations that meet the harm threshold during employment OSG UK will provide factual information only regarding such matters.

5.19.2 References provided should not include information about concerns or allegations which are unsubstantiated, unfounded, false, or malicious. Where there have been repeated concerns or allegations which do not meet the harm threshold which have all been found to be either false, unfounded, unsubstantiated or malicious, these will not be included in any reference.

5.19.3 OSG UK recognises that references are an important part of the recruitment process and will endeavour to respond to any request in a timely manner.

5.20 Leaving employment

5.20.1 Staff leaving employment may be invited to complete an online exit interview.

5.20.2 The information provided will be used for monitoring purposes; where a review of exit questionnaire data is used the information provided would be reported upon anonymously.

5.21 Contractors

5.21.1 Where OSG UK engages self-employed staff or contractors, or staff employed by contractors, the safeguarding requirements should be set out in the contract for services or service level agreement between OSG UK and the contractor. Any self-employed staff or staff employed by contractors, which may include catering and cleaning staff, must have been subject, by their employer, to all pre-employment checks as per safer recruitment requirements in relation to working within the school setting.

5.21.2 This confirmation should be from the employer of the contractor/s, should be in writing and should be retained for inspection purposes.

5.21.3 All contractors undertaking work for a campus must have an appropriate level of DBS check. Contractors, or their employees working in regulated activity with children must have an enhanced DBS check which includes children's barred list information.

5.21.4 Where contractors, or their employees are not working in regulated activity, but their work provides the opportunity for regular contact with children, an enhanced DBS check which includes children's barred list information will be required. (Eligibility for Enhanced with Barred List DBS checks with children - GOV.UK)

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5.21.5 Where a contractor does not have the opportunity for regular contact with children, a basic DBS disclosure may be appropriate.

5.21.6 The Campus Principal is responsible for deciding the level of supervision that a contractor may require, subject to the role to be undertaken, the level of DBS check undertaken and the opportunity for contact with children.

5.22 Alternative Provision

5.22.1 Where OSG UK places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, (further information provided in part 2 Keeping Children Safe In Education 2026).

5.22.2 OSG UK should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that OSG UK would otherwise perform in respect of its own staff.

5.22.3 Where OSG UK engages with an alternative provider, the Campus ensures that safeguarding arrangements are robust. Written confirmation of safeguarding policies and procedures is obtained from the provider, including in respect of whether appropriate safeguarding checks have been carried out on the individuals working at the relevant establishment and regular liaison is maintained to monitor student welfare. This includes written confirmation that the alternative provider will inform the commissioning Campus of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning Campus can ensure itself that appropriate safeguarding checks have been carried out on new staff.

5.22.4 Arrangements will be regularly reviewed, and, in the event, any safeguarding concern arises, an immediate review will be undertaken, and arrangements will be terminated if necessary.

5.22.5 All alternative providers must have an appropriate level of DBS check, for their employees working in regulated activity with children and must have an enhanced DBS check which includes children's barred list information.

5.22.6 Where alternative providers and or their employees are not working in regulated activity, but their work provides the opportunity for regular contact with children, an enhanced DBS check which includes children's barred list information will be required. Eligibility for Enhanced with Barred List DBS checks with children - GOV.UK

5.22.7 Where an alternative provider does not have the opportunity for regular contact with children, a basic DBS disclosure may be appropriate.

5.23 Trainee or student teachers

5.23.1 Where OSG UK pays a salary for a trainee or student teacher, OSG UK will ensure that all necessary checks are carried out, including an enhanced DBS check with children's barred list information.

5.23.2 In cases where a trainee teacher working at a campus is fee-funded, the initial teacher training provider is responsible for undertaking the necessary checks and should provide the campus with written confirmation that all pre-appointment checks

that the campus would otherwise be required to perform, have been undertaken. The provider must also confirm to OSG UK or the campus that from the pre-appointment checks, the trainee is confirmed suitable to work with children.

5.24 Volunteers

5.24.1 Where volunteers are recruited or engaged with to work with OSGUK, campuses should follow the guidance within the OSGUK Volunteers policy.

5.25 Agency workers as temporary supply staff

5.25.1 The template letter of assurance at Appendix 5 of this policy should be used at the outset of engaging with the employment agency, in some cases the central People and Culture team will have copies of the completed letters of assurance. The letter of assurance is different to the 'written confirmation of checks' that agencies must provide for each agency worker.

5.25.2 The letter of assurance provides the campus with evidence that the agency performs the necessary pre-employment checks on the agency workers it provides for work in school settings. Letters of assurance should be completed by each agency that the Campus uses for temporary and 'temporary-to-permanent' staffing.

5.25.3 Prior to the placement of any agency worker at the Campus written confirmation is required from the supply agency that it has undertaken the same safer recruitment checks that the campus would undertake.

5.25.4 The agency must confirm that the checks were deemed satisfactory and that they were completed to the level required for the post that the agency worker is to work in. This must include confirmation that an appropriate level of enhanced DBS/criminal record check with Children's Barred List check has been carried out if the work is regulated activity; and confirmation of whether the DBS contains a disclosure, or any information, must also be provided.

5.25.5 The agency must confirm that where the online update service has been used, the DBS certificate corresponded to membership of the DBS update service, or the certificate was not more than three months old by the date that the worker is due to begin to work at the Campus Appendix 6 can be used to document that the agency worker has been assessed as suitable for the placement.

5.25.6 The agency must provide to the Campus the following documents ahead of commencement:

5.25.6.1 written/email confirmation that all relevant recruitment paperwork and pre-employment checks are in place for the agency worker, with the checks and their outcomes clearly listed and evidence of those checks should also be provided.

5.25.6.2 copy of the DBS certificate (or the equivalent where the agency work is conducted in Scotland or Northern Ireland).

5.25.6.3 copy of the worker's photographic identification.

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5.25.6.4 copy of the worker's right to work documentation or confirmation that RTW check has been completed by agency via letter of assurance.

5.25.7 The written confirmation should document detail of the following checks that have been undertaken for the particular agency worker and whether the outcomes were suitable or satisfactory:

5.25.7.1 Confirmation that an appropriate DBS/criminal record check has been undertaken, including the date of the check, the authority requesting the check, confirmation that the check was at an enhanced level and whether a check of the Children's Barred list was included. Alternatively, where the agency worker subscribes to the DBS online update service the agency should confirm that they have seen the corresponding enhanced DBS certificate, they have checked the update service, and the agency should detail whether there were any changes to the certificate indicated by the online update. Where there were changes a new DBS should be applied for by the agency. Any DBS provided by an employment business should not be more than 3 months old at the date the work is due to start, unless the DBS being reported upon is linked to an active subscription of the DBS online update service. Where an agency worker is being presented for work by an agency and their DBS does not meet these criteria, advice must be sought from HR.

5.25.7.2 That a Children's Barred list check has been undertaken (where the DBS has not been requested by the same agency).

5.25.7.3 That where the worker has lived outside the United Kingdom, and obtaining a DBS/appropriate criminal record certificate is not sufficient to establish the person's suitability to work in a school the agency must have obtained such further checks as appropriate, having regard to any guidance issued by the Secretary of State and where relevant guidance from the National Assembly for Wales.

5.25.7.4 That the worker's identity was checked, which included their birth certificate and evidence of any name change.

5.25.7.5 The worker's right to work in the UK has been checked and confirmed.

5.25.7.6 That a check was made to establish whether the worker was prohibited from being involved in the management of an independent school under Section 128 where applicable to the work to be undertaken.

5.25.7.7 That a check was made to establish whether the worker has/is prohibited from teaching, has a disqualification, or has a restriction placed upon them, including any overseas records of such.

5.25.7.8 That the worker has been checked for any prohibition order or interim prohibition order, and the outcome and the date that this check was made, including any overseas record of such.

5.25.7.9 That, where applicable, a criminal record check has been undertaken regarding any time spent overseas.

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5.25.7.10 That the worker's qualifications have been checked.

5.25.7.11 That the worker's employment history has been checked with at least two suitable references having been requested and received.

5.25.7.12 That the worker's physical and mental fitness for the role has been confirmed.

5.25.8 The agency worker on their first day should provide original copies of their criminal record check that corresponds to that which the agency has reported upon, and their photographic identification document. The Campus should record on the SCR that these original items have been seen and note that appropriate written confirmation was received from the agency.

5.25.9 A record of the checks for supply staff will be included in the SCR and a copy of the written confirmation from the agency, along with Appendix 6 completed, should be kept on file for an appropriate and proportionate amount of time. Any such information would be treated as confidential.

5.25.10 Identity checks must be carried out to confirm that an individual arriving at the Campus is the individual whom the agency has referred and to whom the checks are related.

5.25.11 Where a worker's DBS or criminal record check has disclosed information or where the worker has made a declaration, a copy of the certificate and any additional detail of the declaration must be provided by the agency. The decision on suitability of the worker will be taken by the Campus Principal, the Regional Principal and the Regional Director of People and Culture. Any such information would be treated as confidential, and a documented risk assessment conducted where necessary in the event of a positive disclosure and or other declaration.

5.26 Recruiting Agency Workers into paid employment

5.26.1 Whether agency workers have worked on supply at the Campus, or whether they have been put forward as a candidate for a vacant role, they must go through the same interview and assessment process as if they were a direct applicant.

5.26.2 When employing agency workers who have been working in a supply role, or where employment agencies have put forward candidates for vacancies which lead to a conditional offer of employment being made, the Campus must undertake its own pre-employment checks as outlined in section 5.3 of this policy. Prior to the start date of employment and prior to the offer of employment becoming 'unconditional', satisfactory results for each of the checks must be received by the Campus, and the Campus must have carried out any risk assessments deemed necessary in relation to any of the pre-employment checks (e.g. any adverse results of any pre-employment checks).

5.26.3 Where staff are being recruited directly from an agency, prior advice should be sought from the People and Culture team in relation to the candidate placement terms and conditions which the agency put forward, prior to the discussion of any offer of employment.

5.27 Reasonable adjustments for the Recruitment and Selection process

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5.27.1 The Equality Act 2010 makes it a requirement to make reasonable adjustments to the recruitment process if an applicant makes the employer aware that they have a disability. This applies to the entire recruitment process.

## 6. PROCEDURES

The following procedures and practices are in place to ensure the safe recruitment of staff and to ensure equality of opportunity.

6.1 Advertising and the initial process of recruiting

6.1.1 The Campus will generally advertise vacant posts to encourage as wide a field of applicants as possible. This can involve internal and external advertisement in relevant local and national publications or websites, including the OSGUK website and the Campus' own website. Any advertisement will include a clear statement of the OSGUK commitment to safeguarding and promoting the welfare of children.

6.1.2 Where an advert contains an informal contact point, this shall be for the purpose of expanding on the job details and requirements; it is not an informal selection procedure.

6.2 Job Description & Person Specification

6.2.1 The job description outlines the general nature of the post including the main duties and responsibilities. The person specification outlines the qualifications, knowledge, attributes and skills required to undertake the role and it is these criteria that are scrutinised at the short-listing stage and during the interview process.

6.3 Application pack

6.3.1 Prospective applicants are supplied with:

6.3.1.1 acknowledging covering email or letter,

6.3.1.2 application form,

6.3.1.3 job description and person specification,

6.3.1.4 access to a copy of the Rehabilitation of Offenders/Recruitment of ex-Offenders Policy.

6.3.2 Where candidates apply for any of the Campus vacancies online (e.g. via TES) the above items are made available electronically.

6.3.3 All applicants for employment are required to complete the Campus application form (or the online application form via TES) before their application can be considered. All applicants are required to account for any gaps or discrepancies in employment history and provide reasons for moving between posts. CVs without an application form will not be accepted.

6.3.4 The application form notifies applicants that posts in campus settings are exempt from the provisions of the Rehabilitation of Offenders Act 1974. Candidates are notified that upon being shortlisted for an interview they will be sent a declaration (see 6.5.2) and

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required to return this by the day before the interview, at the latest. Candidates should seek legal or professional advice on whether and what they need to declare.

6.3.5 Where application forms are completed and submitted electronically, in the event of being invited to interview, candidates will be asked to sign their application form at interview.

6.4 Received applications and short-listing

Handling applications & gaps in employment history

6.4.1 The central Recruitment team will be responsible for acknowledging received applications and collating a list of all applications as they are received by OSG UK.

6.4.2 All applications should be initially screened by a member of the central Recruitment team who has completed safer recruitment training. Once applications are screened, they are sent on to the Campus from central Recruitment.

6.4.3 All those involved in the short-listing process have a responsibility to scrutinise the application forms carefully to check for any inconsistencies, gaps in employment and the reason for these, to identify any potential concerns, in addition to judging the application against the criteria for the post. The individual noticing an anomaly, query or concern should make a written note to that effect.

6.4.4 Any gaps in employment noted within the short-listing process need to be raised with the candidate during the formal interview and their response recorded formally.

6.5 Shortlisting

6.5.1 Shortlisting should be carried out by the interview panel members wherever possible, to ensure a consistent approach. Shortlisting panels will consist of at least two if not three individuals, who have appropriate authority, at least one of whom should have successfully completed ‘Safer Recruitment’ training within the last two years.

6.5.2 The shortlisting panel will independently scrutinise applications further using a selection matrix when necessary (a simple format, objectively cross-referencing candidates against the criteria in the job description and the person specification).

6.5.3 Where a panel member knows any of the applicants who have applied this should be declared before or during the shortlisting process.

6.5.4 In addition to judging the application form against the person specification criteria for the post, anyone noticing an anomaly in the information provided will make a written note to that effect to be followed up at interview if applicable.

6.5.5 The final shortlist will be drawn up by the panel at a shortlisting meeting. In the case of a teaching vacancy this meeting will normally be chaired by the Campus Principal, or the Regional Principal and include the relevant line manager or Regional Partner – People and Culture.

6.5.6 The shortlisting meeting normally takes place within five days of the closing deadline. All those involved in the interview process should attend this meeting whenever

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possible. Those unable to do so should send written recommendations to this meeting on the selection matrix.

6.5.7 Unsuccessful shortlisted candidates are generally not contacted, and this is stated at the time of application.

6.6 Shortlist of candidates

6.6.1 Online searches

6.6.1.1 As part of the shortlisting process OSG UK may conduct online searches as part of the due diligence checks on shortlisted candidates.

6.6.1.2 Online searches may only be conducted once the shortlist of candidates has been identified.

6.6.1.3 Shortlisted candidates may be subject to an online search to check for public records of relevant incidents. If such incidents are identified, these should be explored with the candidate at interview unless they pertain to a matter so serious that it warrants exclusion from the process.

6.6.1.4 A record of the online searches conducted will be retained on the recruitment file for a period of six months past the advert closing date.

6.6.2 Self-Declaration

6.6.2.1 At the point of being shortlisted for interview candidates will be asked to complete and return a self-declaration detailing their criminal record or other information that would make them unsuitable to work with children including (KCSIE 2026 para 296):

a. If they have a criminal history,

b. If they are included on the Children's Barred list,

c. If they are prohibited from teaching,

d. If they are prohibited from taking part in the management of an independent school,

e. Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted,

f. If they are known to the police and children's local authority social care,

g. if they have been disqualified from providing childcare, and,

h. any relevant overseas information.

6.6.2.2 The declaration must be returned no later than the day prior to interview. This supports candidates in seeking legal or professional advice prior to interview on whether they should declare any matters or not.

6.6.2.3 Candidates will need to sign a copy of the declaration at interview where it has been submitted electronically.

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6.6.2.4 All applicants will be made aware that providing false information may result in a conditional offer of employment being withdrawn or summary dismissal if the applicant has commenced in post. It may result in possible referral to the Police and/or other professional regulatory bodies.

6.6.2.5 Where candidates have made a disclosure, this will be discussed in a confidential manner at interview in order to understand the nature and the seriousness of concerns that led to the matter/s being declared, the timescales of the incident/s, and any resulting action taken by the candidate or required by another organisation.

6.6.2.6 Such information will be discussed with the Regional Director of People and Culture, the Regional Principal, the Regional Director of Safeguarding and a member of the Regional Education Management Team.

6.7 References

6.7.1 References for shortlisted applicants will be requested by the central People and Culture team, before interview. Open references (e.g. to whom it may concern' format) or references that are solely character references from close family members or friends are not acceptable.

6.7.2 A minimum of two references are required, including the most recent employer. Where the candidate is not currently working with children, a reference must be sought from the most recent employer who has known the candidate working with children.

6.7.3 In accordance with statutory safeguarding guidance, including Keeping Children Safe in Education (KCSIE), and to meet our duty to safeguard and promote the welfare of children, we reserve the right to obtain additional references, employment checks or other relevant information from current or previous employers and other appropriate sources, regardless of whether they have been identified by the applicant. Such enquiries may be made where considered necessary to verify employment history, investigate gaps in employment, assess suitability for the role or satisfy safer recruitment requirements.

6.7.4 References should be received and scrutinised prior to the interview date. No employment can commence until all references relating to the successful candidate have been received and validated.

6.7.5 Prospective Referees should be sent the following:

6.7.5.1 standard reference request letter,

6.7.5.2 a copy of the job description,

6.7.5.3 template reference form, which should be completed in addition to any written reference provided.

6.7.6 All references received from educational establishments must be signed or countersigned by the Head Teacher of the issuing organisation.

6.7.7 All references received must be checked and verified by the Campus Principal through contacting the referee directly to ensure that there is no incomplete or contradictory

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information. Records of the discussion/s should be retained, and any discrepancies or anomalies should be clarified where possible. Should there be outstanding concerns following the verification conversation, advice should be sought from the Regional Principal and the Regional Partner – People & Culture.

6.7.8 Where the information provided within the reference is incompatible with that provided by the candidate, queries should also be raised with the candidate at the earliest opportunity.

6.7.9 In cases where information has been disclosed by the candidate on the self-declaration form advice should be sought from the People and Culture team in making the objective assessment and a decision made regarding the candidate's suitability for the role. The Regional Education Management Ream (REMT) must approve any decision regarding the offer of employment.

6.7.10 Any detail of previous allegations or disciplinary action, along with any other information from pre-employment checks, will be objectively assessed and will inform any decision made regarding the candidate's suitability for the role.

6.7.11 The SCR must be used to record the receipt of references and the references plus any verification must be retained on file.

6.8 Interview process

6.8.1 All short-listed candidates should be contacted by the Campus by telephone and/or email to invite them to attend an interview. The campus is responsible for sending shortlisted candidates the Self-Declaration form to complete, sign and return.

6.8.2 Where candidates have detailed that they require any 'reasonable adjustments' or 'access requirements' to support them in participating in the recruitment and selection process, this should be discussed in advance of the interview and any assessment. Advice can be sought from the People and Culture team on this matter as required.

6.9 Invite to Interview pack

6.9.1 The 'Invite to Interview' pack should contain:

- interview email or letter, detailing identification paperwork required, qualification certificates that should be provided on the day of interview.
- the interview day itinerary, including any information about any lesson to be taught (teaching positions) and details of any test or assessment.
- Campus site map, directions and parking details
- Candidate Self Declaration form

6.9.2 The Campus does not generally offer telephone interviews, although video conference may be appropriate in exceptional circumstances.

6.9.3 Interview Expenses

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6.9.3.1 It is not OSGUK practice to reimburse travel, accommodation or other expenses and costs incurred by candidates who are attending assessment and interview.

6.10 Interview programme

6.10.1 All shortlisted candidates should undergo a screening zoom interview conducted by the Talent Requisition Team. This should be completed as soon as possible, and successful candidates invited to attend the campus face to face for a formal interview programme.

6.10.2 Where the interview is for a senior member of staff, a member of the REMT must be present.

6.10.3 Where a panel member knows any of the candidates being interviewed, this should be declared prior to interview.

6.10.4 The interview process should objectively explore the applicant's suitability for the role and their ability to carry out the job description and meet the person specification.

6.10.5 The programme normally includes:

6.10.5.1 tour of the department or area that the individual is going to work within,

6.10.5.2 lesson observation (for teaching posts, usually observed by an appropriate CLT member, Head of Department or Campus Principal),

6.10.5.3 a test relevant to the post (usually for support staff),

6.10.5.4 a student panel,

6.10.5.5 ideally 'meet and greet' from the Campus Principal and Campus Support Team,

6.10.5.6 For senior posts, further specific assessment activities will usually be set,

6.10.5.7 For senior campus leadership posts or national leadership roles a separate safeguarding interview will usually take place.

6.10.6 Teaching a lesson is an essential aspect of the process for making a teaching appointment. Information will be supplied to the teaching candidate ahead of the interview day providing the context and content of the lesson to be taught. Candidates are given the opportunity to ask any questions they may have about this aspect of the interview process.

6.10.7 Each interview process must include at least one person who has successfully undergone Safer Recruitment training (e.g. the Campus Principal, RP, member of the Campus Support Team) within the last two years.

6.10.8 Interviews will be conducted in a professional manner. Interviewers should ensure that they are familiar with the Job Description and Person Specification for the post.

6.10.9 Core questions to assess the suitability of the candidate to undertake the role will be asked of all candidates. These questions will be agreed by the panel prior to interview, as well as any specific questions relating to an individual's application. The panel

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should be careful not to ask discriminatory questions or questions about a person's personal circumstances which are not related to the post.

6.10.10 As part of the selection process candidates will be questioned to assess their suitability to work with children

6.11 During the interview

6.11.1 The interview panel will always require that candidates:

6.11.1.1 have completed, returned and signed a self-declaration form and that any disclosure made are discussed in confidence at interview,

6.11.1.2 explain satisfactorily any gaps in employment, any significant periods of time working or living abroad, or any frequent changes in employment or location,

6.11.1.3 explain satisfactorily any anomalies or discrepancies in the information available to the interview panel,

6.11.1.4 explain satisfactorily the circumstance for any previous disciplinary action or substantiated allegations relating to conduct and/or performance,

6.11.1.5 demonstrate their capacity to safeguard and protect the welfare of children and young people,

6.11.1.6 demonstrate their attitude towards children and young people.

6.11.2 The template questions and answer sheet should be used to make notes of responses and of any questions asked by the interviewee during the interview. As a minimum, at least one question should assess candidate's understanding and application of School Safeguarding legislation relating to the region of their school and their role.

6.11.3 Candidates should be made aware that if successful any offer of employment would be conditional until satisfactory results of the pre-employment checks are received and the probation period passed.

6.11.4 During the interview process relevant qualifications and forms of identification etc. will be scrutinised and checked by the panel. Copies of relevant documents will be taken, and they will be verified, dated and initialled by the Chair of the Panel to show that originals have been seen and copied.

6.11.5 Any information regarding declared past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstances of the individual case at the end of the interview process (see 6.5.2). This information will be used to objectively risk assess to establish the suitability of a candidate for the role available.

6.12 Candidate selection

Final selection meeting/discussion

6.12.1 This is held by the panel members as soon as possible after the interviews have ended. A record of the decision-making to appoint should be noted, to ensure that there is a record to provide feedback to the unsuccessful candidate/s if required.

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6.12.2 Panel members must bring any notes they have made with them (including lesson observations if applicable); these are collected and stored with the recruitment file at the end of the process. All notes should be retained for a minimum of six months.

6.12.3 Notes, observations, question and answer sheets regarding the successful candidate are transferred to their personnel file.

6.13 Communicating the outcome

6.13.1 Once the panel has agreed on the outcome and successful candidate a T6 needs to be raised by the Campus Principal. The Campus Principal should gain confirmation of the salary to offer from the Regional Partner – People and Culture.

6.13.2 The Campus Principal sends the completed T6 form to the Regional Principal, which is forwarded to the People & Culture team for authorisation from the Regional Director of People and Culture on behalf of the REMT.

6.13.3 Once signed off, a draft conditional offer letter and contract of employment will be prepared and sent to the campus for final approval.

6.13.4 Only after approval to make the conditional offer has been received can the Campus Principal or designated person with authority, make a verbal offer of employment to the successful candidate.

6.13.5 Any verbal and/or written offers must state that it is a conditional offer of employment and remains subject to the receipt of all satisfactory pre- employment checks and therefore compliance with safer recruitment protocol, and that the offer remains conditional until the satisfactory completion of the probationary period.

6.13.6 When the successful candidate has accepted the role, regrets will be given to candidates who were unsuccessful at interview by the campus.

6.13.7 Should the successful candidate decline the offer of employment, the interview panel must reconvene to consider any reserve candidates.

6.14 Unconditional Offer of employment

6.14.1 The offer of employment only becomes unconditional at the point where all pre-employment checks have been received, verified and deemed satisfactory, and the employee has had written confirmation that they have passed their probation period. Prior to this stage the offer remains conditional.

## 7. LEGISLATION/GUIDELINES

7.1 Keeping Children Safe in Education 2026

7.2 Department for Education: Staffing and employment advice for schools – September 2025

7.3 Parts 3 and 4 of The Education (Independent School Standards) Regulations 2026

7.4 The Equality Act 2010

7.5 Crime and Policing Act 2026

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## 8. APPENDICES

8.1 Appendix 1 – Staff Pre-employment Checks Record

8.2 Appendix 2 – Record of Criminal Record Check

8.3 Appendix 3 – Record of Online DBS check completed

8.4 Appendix 4 – Contractor Checklist

8.5 Appendix 5 – Agency template letter of assurance

8.6 Appendix 6 – Agency Worker Checklist

## 9. VERSION CONTROL

| Document Code | Date | Version No. | Nature of change |
|---|---|---|---|
| **QSC/41** | September 2020 | 5.0 | Updated Policy |
| **QSC/41** | January 2021 | 5.1 | Minor updates clarifying various details surrounding ID checks, references & qualifications.<br>Removal of EEA checks following Brexit<br>Clarification about communicating the outcome of an interview |
| **QSC/41** | March 2021 | 5.2 | Clarification that original certificate must be shown if existing DBS is used.<br>Overseas checks now include EU nationals |
| | | | Added Mental Health & Wellbeing Policy into Induction.<br>Clarification that a risk assessment is carried out on volunteers and retained on files. |
| **QSC/41** | September 2021 | 6.0 | Updated regarding requirement for birth certificates to be seen.<br>Clarity of when separate barred list checks should be performed, on Section 128 checks and rehabilitation of offenders.<br>Update on overseas checks and further checks. |

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|---|---|---|---|
| **QSC/41** | August 2022 | 7.0 | Reference to KCSIE 2022. Addition of online searches of public records for shortlisted candidates. |
| **QSC/41** | January 2023 | 7.1 | 6.9.1 Added the requirement of a screening telephone interview |
| **QSC/41** | August 2024 | 8.0 | Review of policy, minor format changes.<br>Revision on right to work checks; addition of candidate self- declaration form; additional guidance regarding contractors, student teachers.<br>Clarification on DBS risk assessment for teaching staff only, keeping in touch meetings for persons on long term absence and letters of professional standing for staff from EEA where relevant. The 'UK Centre for Professional Qualifications' no longer provide an advisory service on behalf of the UK Government in regard to regulated professions and recognition of professional qualifications. |
| **QSC/41** | September 2025 | 9.0 | Review of policy, minor format and wording changes.<br>Updated in relation to KCSIE 2025.<br>Appendices added to document |
| POL_UK_PC_ Safer Recruitment Policy_V10 | September 2026 | 10.0 | Review of policy, minor format and wording changes.<br>Updated in relation to KCSIE 2026 |

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## APPENDIX 1 - STAFF HR FILE RECORD AND CONTENT CHECKLIST

| Staff Name: | Campus: | Start Date: |
|---|---|---|
| | | |

| Safer Recruitment Documents *(as per SCR Tracker)* | Date checked | Initial of checker |
|---|---|---|
| Application form *(signed and checked for gaps in employment)* | | |
| ID Check *(proof of name – signed and dated)* | | |
| ID Check *(proof of address – signed and dated)* | | |
| Right to Work Check *(with checklist)* | | |
| Qualifications Check *(signed and dated)* | | |
| Disclosure Check certificate (DBS/PVG/Access NI) – top part of certificate kept on file<br>Plus, a completed Appendix 2 or 3 of Safer Recruitment Policy *(DBS only)* | | |
| Separate Barred List Check *(if applicable)* | | |
| Prohibition Against Teaching Check | | |
| EWC Wales/GTCS Scotland/GTCNI N. Ireland *(if applicable)* | | |
| Section 128 (Management) Check *(if applicable)* | | |
| Reference 1 *(current or most recent employer – signed and verified)* | | |
| Reference 2 *(previous employer or character reference – signed and verified)* | | |
| Reference 3 *(if required – signed and verified)* | | |
| Medical Check *(along with risk assessment if required)* | | |
| Overseas Check *(if required - along with letter of professional standing if teaching role)* | | |
| Social Media Check *(manual check or online results)* | | |

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| Interview and Employment Documents | x / ✓ |
|---|---|
| Self-Declaration Form *(originally sent with interview invite letter)* | |
| Job Advert | |
| Job Description/Person Specification (T1) | |
| Recruitment Request Form (T2) | |
| Shortlisting Grid (T4) | |
| Interview Notes (T5a and T5) | |
| Interview Outcome (T6) | |
| Offer Letter and Signed Contract | |

| ADMIN OFFICE USE: Induction / Probation / New Starter Documents | x / ✓ |
|---|---|
| Welcome Letter / Policies *(sent to new starter)* | |
| Induction Checklist *(started)* | |
| Probation Policy *(started)* | |
| Payroll Form *(sent to payroll)* | |
| HR Code of Conduct *(signed)* | |
| Acceptable use of IT Agreement *(signed)* | |
| Declaration of Interests Form *(signed)* | |

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## APPENDIX 2 - EVIDENCE OF CRIMINAL RECORD CHECK

Use this form to document the type of criminal record check performed and to document whether the result of the check was satisfactory.

**Section A**

Is the role classed as regulated activity? Yes/No*

Method of obtaining the Criminal Record Check:

- DBS online update service (complete Appendix 3 of the Safer Recruitment policy)
- DBS used from previous employer (complete to section B and then C)
- DBS certificate applied for by the Campus (complete to section C)
- Criminal Record check certificate issued by AccessNI (complete to section C)
- Criminal Record Check issued by PVG (Scotland) (complete to section C)

Are any Overseas Police Checks required? Yes/No*

If 'Yes' detail here what country the check/s are required from, and for what time period/s:

You should also record the evidence of the check seen upon receipt.

| **Country where check is required** | **Time spent abroad** | | **Evidence Seen** | |
|---|---|---|---|---|
| | **From** | **To** | **Type** | **Date seen** |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Section B – complete where a criminal record check is being used from a previous employer.

| | |
|---|---|
| **Criminal Record (DBS) Certificate Number:** | |
| **Date Certificate Issued:** | (DD/MM/YYYY) |
| **Level of Check**<br><br>*N.B. the certificate must be the same level as that required in the role being recruited to* | Enhanced with Children's Barred ListCheck<br>Enhanced Check<br>Standard Check |
| **Workforce the Certificate relates to:**<br>*N.B. the certificate must relate to the same type of workforce as the role the person is being recruited to* | Child<br>Adult<br>Other |
| **Authority requesting the record check:** | |
| **Date of Birth listed on criminal record certificate:** | (DD/MM/YYYY) |
| **Do the details on the certificate match the ID checked?** | **Yes / No** |
| **Is the criminal record considered to be 'satisfactory'?** | **Yes / No** |
| **If 'no' above will an adverse Criminal record risk assessment be required?** | **Yes / No** |
| **Date and method of Children's Barred list being checked:** | **Date:**<br>**Method:** |
| **Has the employee declared that any other convictions, cautions etc. have occurred since the certificate was printed?** | Yes – no other convictions<br>Yes – other convictions have occurred<br>No |
| **Original criminal record certificate seen and verified on:** (DD/MM/YYYY)<br>…….<br>**By:** (name of checker) ……<br>**Signed:** (signature of checker) ……<br>**Date of signing:** (DD/MM/YYYY) …… | |

Affix a copy of the Criminal Record Certificate (top part only): Yes / No*

A copy of the top part of the criminal record certificate can be taken and affixed to this record sheet. The copy should show the above details, be in black and white and it must be verified as an original and signed and dated by the checker.

The checker should detail on the copy the following statement ‘original seen, copied and verified by [name of checker] on [date]’ and then the checker signs after the verification.

No information regarding the results of the checks should be part of the copy of the check retained on file.

New Criminal Record Check - A new criminal record certificate should be applied for even where the employee has had a gap of less than 3 months between their new appointment and their previous similar employment ended. As such Section C should be completed upon receipt of the new criminal record check.

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Section C – Record of a new Criminal Record Certificate

| | |
|---|---|
| **DBS/Criminal Record Check Application Number:** *(optional)* | |
| **Criminal Record (DBS) Certificate Number:** | |
| **Date Certificate Issued:** | (DD/MM/YYYY) |
| **Level of Check** | Enhanced with Children's Barred ListCheck<br>Enhanced Check<br>Standard Check<br>Enhanced Check (*NI and Scotlandonly*)<br>(PVG) Scheme (*Scotland only*) |
| **Authority requesting the record check:** | |
| **Date of Birth Listed on criminal record certificate:** | (DD/MM/YYYY) |
| **Do the details on the certificate match the ID checked?** | **Yes / No** |
| **Is the criminal record considered to be 'satisfactory'?** | **Yes / No** |
| **If 'no' above will an adverse Criminal record risk assessment be required?** | **Yes / No** |
| **Original criminal record certificate seen and verified on:** (date – DD/MM/YYYY)<br>…….<br>**By:** (Name of checker)<br>……...<br><br>**Signed:** (signature of checker)<br>……<br>**Date of signing:** (DD/MM/YYYY) …… | |

Affix a copy of the Criminal Record Check (top part only): Yes / No*

A copy of the top part of the DBS/PVG/AccessNI certificate should be taken and affixed to this record sheet.

The copy should show the above details, be in black and white and it must be verified as an original and signed and dated by the checker. The checker should detail on the copy the following statement ‘original seen, copied and verified by [name of checker] on [date]’ and then the checker signs after the verification.

No information regarding the results of the checks should be part of the copy of the check retained on file.

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## APPENDIX 3 - RECORD OF DBS UPDATE SERVICE (CRIMINAL RECORD) CHECK

The Update Service enables employers to check the status of an existing DBS certificate, if it is for the same workforce where the same type and level of criminal record check is required and you have permission of the individual.

Where an employee subscribes to the online DBS Update Service this form should be used to document where a check of the update service is been made.

When checking the DBS update service, the original copy of the DBS certificate which corresponds to the candidate's membership of the DBS update service must be seen.

For Candidate completion:

| | |
|---|---|
| I hereby give my consent for the OSG UK Colchester Campus to perform a check of the online DBS update service against the copy of the DBS Certificate that I have provided. I understand that once this document is completed it will be retained on my staff file as evidence of a DBS check being made, as well as the details of the check being entered onto the Campus 'Single Central Register'. | |
| Candidate signature: | |
| Candidate Name:<br>(block capitals) | |
| Date consent provided: | |
| Date of signing: | |

For the Checker to complete:

| | |
|---|---|
| Has the candidate given their explicit consent for the employer to view the status of their DBS check on the Update Service by signing to confirm their consent above? | Yes / No* |
| Have you seen the original DBS certificate? | Yes / No* |
| Have you taken a copy of the top part of the DBS certificate provided, and verified it? | Yes / No* |
| What form of photo ID have you seen to verify the candidate's identity? (Detail type of photo ID and the date of its issue) | |
| Does the DBS certificate correspond to the candidate's membership of the DBS update service? | Yes / No* |
| DBS Certificate Number: | |

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| | |
|---|---|
| Date Certificate Issued: | |
| Is the Certificate for the same workforce and at the same level as the original certificate? | Same Workforce (Child/Adult/Other) – Yes / No*<br>Same level of check required by the Campus (Standard / Enhanced) – Yes / No* |
| Will the candidate be working in 'regulated activity'? | Yes / No* |
| If 'yes', does the certificate and the online check include a check of the Children's Barred list? | Yes / No* |
| Type of Check: | Standard DBS<br>Enhanced DBS<br>Enhanced DBS with Children's Barred List check<br>Enhanced DBS with Vulnerable Adults Barred List check |
| Please select the outcome of DBS update service check: | This DBS certificate did not reveal any information and remains current as no further information has been identified since its issue.<br>This DBS certificate remains current as no further information has been identified since its issue.<br>This DBS certificate is no longer current. Please apply for a new DBS check to get the most up-to-date information. |
| **Update Service Accessed by:** (Name in block capitals) | |
| **Date accessed:** | |
| **Signed:** | |

A copy of the top part of the criminal record certificate should be taken and affixed to this record sheet. The copy should show the above details, be in black and white and it must be verified as an original and signed and dated by the checker. The checker should detail on the copy the following statement 'original seen, copied and verified by [name of checker] on [date]' and then the checker signs after the verification.

No information regarding the results of the checks should be part of the copy of the check retained on file.

The DBS details should be entered onto the SCR and a copy of this completed form and a copy of the top part of the DBS certificate should be put on file.

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## APPENDIX 4 - CONTRACTOR CHECK SHEET

Please note that the organisation or business supplying the contractor should have confirmed to the Campus in advance of the work starting that the pre-employment checks have been completed as per safer recruitment requirements.

Where the work is related to Health and Safety, additional risk assessments may be required and additional evidence being required (e.g. hot works certificates)

Section A – to be completed prior to the contractor working on site.

| | |
|---|---|
| Is the Contractor self-employed or employed by a supplier organisation? | Self – employed<br>Employed by a supplier |
| Has the business supplying the contractor confirmed that the contractor is suitable to work in a school setting? | Yes / No |
| Type of contracting work to be completed: | |
| Date Starting: | End Date: |
| Is the work to be completed by the contractor considered as regulated activity (*See section C*)? | Yes / No |
| If yes, the contractor will need to have been subject to an enhanced DBS certificate which includes a check of the barred list information.<br>If the activity is not regulated activity, but there is an opportunity for the contractor to have regular contact with children, an enhanced certificate without a barred list check will be required. | |
| Period of work expected: | |
| Frequency of work to be undertaken at this Campus or another site (for examples see Section C): | |
| Opportunity for contact with children: | Yes / No |

Where supervision is required, the Campus Principal is responsible for deciding upon the appropriate level of supervision depending on the circumstances.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

Where the contractor is self-employed, the Campus can consider applying for a DBS certificate for the contractor.

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Section B - to be completed on the contractor's first day on site.

| | |
|---|---|
| DBS seen: | Photo ID seen: |
| Is the DBS at an appropriate level and type for a school setting? | Yes – Enhanced DBS with Barred List check<br>Yes – Enhanced DBSNo |
| Does the Photo ID match the DBS certificate detail? Yes / No | Is the Photo ID a true likeness of the individual?<br>Yes / No |
| Name of person checking the ID and DBS: | Position: |
| Date checked: | |
| Campus Principal Countersignature: | Date: |

Section C – the below section can be used to help identify if the work is 'Regulated Activity'.

| | |
|---|---|
| Does the role involve teaching, training, instructing, caring for or supervising children?<br>Yes / No | Will the work be subject to day-to-day supervision? *Note: Under KCSIE 2026, supervision does not remove regulated activity status where the individual is teaching, training, instructing, caring for or supervising children in a school or college.*<br>Yes / No |
| Who will supervise the work? | |
| Will the employee be carrying out the work frequently? (defined as once a week or more often, or on 4 or more days in a 30-day period, or overnight in the same establishment) | Yes / No<br>Once a week or more<br>4 or more days in a 30-day period<br>Overnight in the same establishment |
| Will the work involve the provision of Health Care or Personal Care to a child? (this does not have to be done frequently asdefined above) | Yes / No<br>Health Care<br>Personal Care<br>Both |

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## APPENDIX 5 - TEMPLATE LETTER OF ASSURANCE

This letter should be amended, signed and supplied on headed paper by each staffing agency used to supply school staff (whether for short term supply and cover, or for longer term placements). Once these completed letters are received from an agency they should be retained on file.

Dear [OSGUK contact],

RE: Assurance and Confirmation of Safer Recruitment Checks

I confirm that [Agency/Contractor name] complies fully with the Disclosure and Barring Service (DBS) code of practice.

We adhere to our Policy & Procedure on Vetting which dictates that all Workers supplied by [Agency/Contractor name] are appropriately vetted in terms of their background history (application form), enhanced DBS/PVG/Access NI clearance, appropriate Barred List checks, identity, 'Right to work in the UK', references and qualifications, Prohibition from Teaching check, Section 128 Prohibition checks, further checks on people who have worked or lived outside the UK for any duration, and medical fitness check. Prior to their placement we will provide confirmation of the checks performed on our Workers and confirm whether the outcomes were satisfactory. We check every candidate's birth certificate and enquire about name changes and evidence to support this where applicable.

Upon commencing a placement, all Workers are required to bring photographic identification and a copy of their enhanced DBS certificate (which includes appropriate Barred List check) as evidence for the Single Central Record held by the placement organisation.

It is AGENCY/CONTRACTOR NAME policy that the OSGUK [Campus name] Campus also receives copies of the references held on file for the Worker.

Yours sincerely

Name

Position in Agency/Contractor Organisation

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## APPENDIX 6 - AGENCY WORKER CHECK SHEET

Please note that prior to the placement of the agency worker the employment business / agency supplying the agency worker should have confirmed to the campus that the pre-employment checks have been completed as per safer recruitment requirements. The campus should have received evidence of this.

The agency should also have supplied a 'letter of assurance' to confirm that they follow safer recruitment principles when hiring their workers.

Section A - to be completed in advance of an agency worker commencing in post.

| | |
|---|---|
| Name of the Agency worker: | |
| Agency/Employment Business: | |
| Start Date at the Campus: | |
| Start Date with the Agency/Employment Business: | |

| | |
|---|---|
| Has the evidence of the safer recruitment checks been received from the agency? This should include confirmation of a completed Right to Work check | Yes / No |
| *Has the Campus/Regional Principal verified the information? This should be received and verified prior to the agency worker starting work.* | Yes / No |
| Is the work to be completed by the contractor considered as regulated activity? | Yes / No |
| Specifically, has the agency supplied evidence of the DBS certificate being checked? | Yes / No |
| Is the DBS of a relevant level and for the correct workforce for the work to be performed? | Yes / No |
| Have they confirmed whether the DBS contained any information relevant to the role to be performed? | Yes / No |
| Will a Positive DBS risk assessment be required? | Yes / No |
| Has agency provided copy of photo ID and a copy of the DBS prior to the worker starting? | Photo ID<br>DBS<br>Both |

Section B – to be completed on the agency worker's first day on site.

| | |
|---|---|
| DBS/Criminal Record Certificate seen: | Yes / No |
| Certificate Number: | Date of Issue: |
| Type of Workforce:<br>Child<br>Adult<br>Child and Adult<br>Other | Level of Check:<br>Enhanced<br>Enhanced with Children's Barred List check<br>Enhanced with Adult's Barred list check<br>Standard<br>Basic (PVG Scotland only) |
| Is the DBS satisfactory? | Yes / No |
| Form of Photo ID seen: | |
| Does the photo ID match the DBS? Yes / No | Is the photo ID a true likeness of the individual? Yes / No |
| Name of person checking the ID and DBS: | |
| Position: | Date: |
| Campus Principal countersignature: | Date: |

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