The Federation of Annunciation Catholic Schools

SAFER RECRUITMENT POLICY

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Introduction

The Federation of The Annunciation Catholic schools (hence forth referred to as The Federation) is committed to promoting and safeguarding the welfare of children and young people and expects all staff and volunteers to share this commitment. The Federation recognises that the effectiveness and safety of its recruitment policy and procedures make a major contribution to child protection by helping to deter, reject or identify people who might be unsuitable for working with children.

With regard to the provisions we make for safeguarding and safer recruitment, the Federation takes into account the nature, age range and other significant features of the **schools**, **including pupils in the EYFS**.

The Recruitment Policy and Procedures are based on and conform to statutory and non-statutory guidance contained in 'Keeping Children Safe in Education', the EYFS Framework 2026, the 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings', The Crime and Policing Act 2026 and any other relevant guidance. This policy also has due regard for Prevent Duty Guidance for England and Wales.

Throughout the selection and recruitment procedure, the **Federation** will have regard to the guidance as set out in the aforementioned documents as well as, for free schools and academies, **the Independent Schools Standards Regulations (ISSRs),** together with any associated guidance from the DfE its inspectorates. The **Federation** is committed to ensuring that no-one will be appointed unless they have a clear understanding of the specific issues regarding safeguarding that apply generally across the school, **as well as specifically to children in the EYFS**.

This will involve:

- Including the **Federation's** Safeguarding and Child Protection policy statement in any job advertisements
- Requiring applicants to complete an application form, requesting information as set out in the 'Application' section, below
- Providing a Job Description and Person Specification, which contains the School's Safeguarding and Child Protection policy statement
- Ensuring all recruitment documents also clearly state "applicants must be willing to undergo safeguarding and child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service"
- Asking candidates appropriate questions at interview relating both to their skills and their reasons for wanting to work with children

Staff

The **Federation** follows DfE's definition of "staff", which is as follows:

"Any person working at the school, whether under a contract of employment, under a contract for services or otherwise than under a contract but does not include supply staff or a volunteer".

For clarification:

'Under a contract of employment' – this covers every employee, no matter what sort of work they do.

'*Under a contract for services*' – this includes self-employed people arranged and/or paid direct by the school. It does not include those in a contract for services with others, subject to the exception immediately below.

'Otherwise than under a contract' – this covers self-employed people who are arranged by the school, for the purposes of the school but, for example, paid by parents, such as peripatetic teacher and therapists. It does not include, for example, private employees of parents permitted to enter the school by agreement.

All appointments must be pre-approved by a member of the Board of The School.

Application

All applicants for employment will be required to complete an Application Form asking for the following:

- Full, identifying details of the applicant, including current and former names, current address and National Insurance Number
- A full, chronological career history since leaving secondary education. The applicant will be asked to clarify any gaps
- Any academic and/or vocational qualifications that are required by or relevant to the position for which he/she is applying
- A declaration of any existing contacts in the Federation.
- Details of two referees; (references will be taken up before interview for shortlisted candidates)
- If invited for interview, in accordance with the DBS filtering guidance, as updated in October 2023, a declaration of any convictions, cautions, reprimands or final warnings, except for those protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order1975 (as amended 2013 and 2020)
- A self-declaration of physical and mental fitness to undertake the role advertised.

Filtering guidance is published to candidates in the document entitled 'The Application and Recruitment Process'. Candidates will be asked to complete any incomplete forms. A curriculum vitae will not be accepted in place of the completed application form. Along with the application form, applicants will receive the following:

- A job description
- A person specification
- A statement of the terms and conditions relating to the post
- The school's Safeguarding and Child Protection Policy statement
- An introduction to the School

Required Evidence and Further Checks

If invited to interview, candidates will be asked to complete the Federation's 'Pre-interview vetting disclosure form' (Appendix 4) to provide details of any convictions or cautions in line with the exemptions to the Rehabilitation of Offenders order, and to return the completed form, not later than the day prior to the interview.

Candidates will be asked, usually at interview, to provide documentary evidence of the following

- Identity (original documents, not a photocopy) consistent with those required to undertake a DBS application and fulfil safer recruitment requirements
- Right to work in the UK
- Passport or, in the absence of a passport, birth or adoption certificate
- Original documents (not photocopies) confirming any educational, professional or other qualifications that are required by or relevant to the position

- Overseas criminal records check, if required, and if from a country where this must be obtained by the applicant.

For shortlisted candidates, the school will undertake a Social Media Check (also known as Online Vetting Check)

The following checks, as applicable, will be undertaken in respect of the successful candidate

- Overseas criminal records check and a 'letter of professional standing'
- A check on Prohibition from Teaching
- A check on Prohibition from Management (also known as a Section 128 check)
- Childcare Disqualification (for those who provide childcare to children aged under 8).

Further details of these recruitment checks can be found in the 'appointment procedure for staff' section, below.

If a member of staff transfers into the school's employment under a TUPE arrangement, in line with regulatory requirements, recruitment information will be passed to the new employer and a note made on the single central register that details have been accepted under TUPE.

Appointment Procedure for Staff

The Federation follows the requirements of KCSIE **and the EYFS Framework Statutory Requirements** with regard to the recruitment of staff by undertaking the following checks prior to the first day at work:

Career/Employment History

Candidates are asked for a full, chronological career history since leaving secondary school. They will be asked to provide reasons for any gaps in the Career History section of the Application Form. The resolution of any unexplained gaps in employment history is required as part of having regard to KCSIE.

References

- The Federation will request two references for each candidate, which must include the candidate's current, or if not currently working, most recent employer and the most recent instance of working with children. Ideally, these should cover roughly five years in a person's career history. References should be taken up directly from the referee before interview and all references must be followed up to verify that they are genuine.
- Referees will be asked to state, as a minimum, the following in the Federation's reference form:
    - Where the referee is a current or previous employer, the period of employment
    - Any disciplinary or child protection issues
    - Any concerns about the candidate not being suitable to work with children
    - The candidate's reasons for leaving
- Referees will also be asked to write a general reference as part of the reference form, in order to provide a better picture of the candidate
- In situations where a written reference has not yet been received by the new employee's intended start date, alongside all other checks being completed, the employee may commence work if a telephone reference has been received, providing that the telephone reference is subsequently confirmed in writing. The person providing a telephone reference must be of appropriate seniority. If a reference is taken over the telephone, detailed notes will be taken, dated and signed. Notes on a telephone reference must include
    - Date and time of the call
    - The name and post of the referee

    - A detailed summary of the information provided
- The school/college will not accept references from relatives or referees writing solely in the capacity of friends
- References should be from a senior person with 'appropriate authority'. Normally, 'open references' or 'testimonials' will not be accepted. However, this is standard practice in some countries. Therefore, it may be necessary to make some adjustments for candidates applying from overseas. Information provided directly by the candidate should be verified.
- The Federation must verify that electronic references originate from a legitimate source.
- Further advice on references can be found on the ACAS website.
- References are not obligatory for people taking up voluntary positions. Instead, the Federation must evaluate whether a references are expected due to the nature of the role. For example, if a volunteer has responsibility for a group of children, such as running an after-school activity or driving a school minibus. The Federation should take steps to ascertain whether there are any objections within the local community.

Identity Check

KCSIE expects that a birth or adoption certificate is one of the documents seen (and a copy taken) as part of the identity check. If the Federation does not see a birth or adoption certificate, there must be a justifiable reason why this is the case, which should be recorded. For persons to be employed as staff, this check is carried out in line with DBS requirements. For the purposes of a DBS application, in addition to the birth or adoption certificate, candidates will be asked to provide the following:

- Passport
- Driving Licence (photocard)
- Utility bill or bank statement which is less than three months' old
- Any evidence of a change of name

If the candidate cannot provide any of the above, guidance issued from the DBS will be followed. Copies will be taken and kept on the candidate's file.

DBS Check

By default, in accordance with the Crime and Policing Act 2026, all regular positions (whether voluntary or paid) will fall within the definition of 'Regulated Activity' and will therefore require an Enhanced DBS check. DBS Checks for volunteers are free. A check against the barred list will be undertaken on all staff, either within the enhanced DBS disclosure or, only when required, separately. Until the Federation has had sight of the original disclosure certificate, the candidate will be treated as unchecked. Some companies who provide a DBS service, supply a scan or email confirmation of the DBS certificate to the **Federation** when the certificate is posted to the candidate's home address. Whilst this may offer reassurance as to the content of the DBS certificate, it can not to be considered as a substitute for seeing the original document.

The Disclosure may be obtained either by asking the individual to apply for a new DBS Certificate, or by them producing a DBS Certificate which has been registered on the DBS Update Service. For additional information on undertaking a check using the DBS Update service, refer to Appendix 3.

Except in the case of staff and volunteers who work with children in the EYFS*, if the DBS is delayed, the Head may allow the member of staff to start work, on the following conditions:

- The appointment is not yet confirmed

- The DBS application has been made in advance
- A Risk Assessment is written and kept on file; the risk assessment includes an assessment of the extent to which the new appointment must be supervised in order to enable work to start
- A supervision agreement is signed by both the new employee and the person(s) appointed to supervise him/her
- A separate barred list check is made and kept with the risk assessment
- All other required recruitment checks have been completed successfully
- The risk assessment is reviewed every two weeks until the disclosure certificate arrives
- The member of staff is informed as to what these safeguards are.

In cases where the head wishes a new employee to commence work prior to the return of a DBS certificate, the **Federation** will use the 'DBS Risk Assessment Checklist' (Appendix 1) to complete the risk assessment and record the process. This document will be retained in the employee's file.

*** The EYFS statutory Framework from September 2026 now requires all people who work with children in the EYFS or who work or live on the premises where the EYFS is provided to have a completed DBS check prior to work starting. Therefore, in these circumstances, the facility for someone to start under a risk assessment cannot be used.**

The Disclosure and Barring Service requires that employers have a policy on the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information. This can be found at Appendix 6. This policy should also be read in conjunction with the DBS Disclosure and Recruitment Policy, found at Appendix 7.

The **Federation** has regard to the DBS Filtering Guide. In this respect, candidates will not be asked to declare warnings, reprimands and youth cautions. On the application form, candidates will be alerted to the **Federation's** requirement for applicants who are invited to interview to declare all relevant convictions. Questions about convictions are not permitted to be asked prior to shortlisting and must not be included in the application form. Candidates who are invited to interview will then be asked to declare any relevant convictions by completing and returning the 'Pre-interview vetting disclosure form' (Appendix 4) by the day prior to the interview. Such information will, therefore, be requested prior to interview, and not for the first time at interview, to meet the statutory requirement of enabling applicants who may have a conviction sufficient time to take professional advice on which convictions need to be disclosed. Candidates are invited to consult the Ministry of Justice website, or the charities 'Nacro' or 'Unlock' for further advice.

Barred List Check

The barred list check is undertaken in relation to people who will or may be involved in regulated activity to determine whether they are prohibited from taking up the post. In most cases, the barred list check will be obtained as part of the DBS application process. However, there are occasions when the **Federation** will need to obtain a barred list check separately from the DBS process. This is an absolute requirement if

- the school/college accepts a DBS check for an employee from another employer or organisation
- a person is required to start work prior to the arrival of the DBS certificate (see Appendix 1).

From 2021 onwards, KCSIE states that the above two circumstances are the only occasions when a barred list check is to be requested separately; otherwise, it should be obtained as part of the DBS process. The **Federation** will not, therefore, take a 'blanket' approach to obtaining a separate barred list check, but rather, will use this service only in relation to the two circumstances above.

When a barred list check is required separately from the DBS process, it is obtainable from the DfE Secure Access website, the same site as is used for the teacher prohibition checks. The **Federation** needs accreditation to obtain a username and password in order to use this site.

DBS and Barred List Flowchart

The DBS Criminal Record Checks and Barred List Checks flowchart, previously available in KCSIE was removed in September 2026 as it was no longer factually accurate in relation to the Crime and Policing Act 2026. It must no longer be used.

Prohibition from Teaching Check

The school/collegewill undertake a Prohibition from Teaching Check, using the DfE's Secure Access/Employer Online service on any person to be employed to carry out teaching work since April 2012 before he or she begins work at the school, whether or not they hold a teaching qualification. A definition of 'teaching work' is provided in The Teachers' Disciplinary (England) Regulations 2012 and cited in the ISI Commentary on the Regulations. In summary, *each* of the following is considered as teaching work;

- Preparing lessons
- Delivering lessons
- Assessing the pupils' progress
- Reporting on the pupils' progress

The school/college will judge each appointment on a case-by-case basis to determine whether the role includes 'teaching work'.

Prohibition from Management Check ("Section 128 direction")

The school/college will check whether staff appointed to management positions are subject to a Section 128 direction. The posts, which would fall under this definition are:

- Governors and Proprietors
- Head
- Senior Leadership Team staff (including non-teaching staff)
- Teaching positions with departmental headship

Since summer 2018, any staff member promoted internally to a position of management in these categories must also be checked.

Letters of professional standing (formerly EEA Teacher Prohibition Check)

Prior to 1st January 2021, the school/college undertook the EEA check in relation to anyone who had undertaken 'teaching work' in another EEA country, to determine whether any prohibition order had resulted from such employment. However, following the end of the Brexit transition period, UK schools no longer have access to this database. The school/collegenow undertakes this check for prohibition orders by asking the applicant to provide a 'letter of professional standing' from the relevant teacher regulation body in the country or countries in which the applicant has undertaken teaching work. KCSIE does not restrict the requirement to obtain a letter of professional standing to those who have worked in the EEA. Therefore, the school/collegeapplies this guidance in relation to any appointments who have undertaken teaching work overseas. However, the school/collegerecognises that, in some countries, it may not be possible to obtain

such a letter of professional standing. In such situations, a risk assessment will be undertaken and alternative methods of checking suitability will be considered.

Disqualification from Childcare

The school/college must not knowingly employ someone to work in childcare or in the management of childcare who is disqualified from working in childcare and asks relevant members of staff to complete a Disqualification from Childcare Self-Declaration Form, both prior to the start of employment and annually on an affirmation form. This applies to those members of staff who work in or manage the School's EYFS provision (aged 5 and under) and those who care for pupils up to the age of eight either in before- or after-school provision.

Care is needed to ensure that staff are not asked to sign the declaration if they do not fall under the requirements of the legislation. It is usual to ask all classroom staff at primary level to sign the declaration because they are likely to be involved in duties or cover with responsibilities for children in these age groups. The requirement also includes any staff who supervise or work with EYFS children at lunchtimes and in after school/collegeclubs, instrumental music lessons, ballet, etc. However, the legislation does not, as a default, apply to healthcare staff, cleaners, maintenance and admin staff, unless their role also extends to supervising or working with children in EYFS or with children up to the age of 8 in wraparound provision.

Right to Work in the UK

This will usually be the candidate's UK passport. However, the school/college will follow Government-issued guidance in cases where a candidate is unable to provide an UK passport. A holder of an Irish, Channel Islands or Isle of Man passport has a right to work in the UK arising from the Common Travel Area arrangements, which predate the formation of the EU. Therefore, such a passport can be accepted as evidence of right to work in the UK.

In October 2020, the Home Office introduced new requirements relating to Right to Work in the UK, arising due to the end of the Brexit transition period. The requirements necessitate additional measures for schools and nurseries in relation to any current or future employees of EU, EEA or Swiss nationality. For full details, please refer to Appendix 2.

Overseas Check

If a candidate, whether of British or overseas nationality, has lived overseas, prior applying for a post at the school/college, the school/college must consider whether an overseas check is required. There is no regulatory stipulation of the time spent abroad nor how recent this must have been. However, NSPCC guidance of '3 months in the last 5 years' is accepted as a reliable benchmark by the DfE and the inspectorates. The school/college follows this guidance. The intention is to obtain the closest equivalent to a DBS check as is available in each overseas country where the candidate has lived. This may be a Police Check, a Certificate of Good Conduct or an application to a national database, similar to the DBS. In some countries the candidate is responsible for obtaining the check and showing it to the future employer. In other countries, the responsibility for obtaining the check rests with the school/college. Where the responsibility for obtaining the check lies with the applicant, in some countries it is impossible to obtain the check after having left the country. In such cases, the school/college will seek to advise the future employee, for example at interview, to obtain the check prior to returning permanently to the UK.

In all cases, the school's/nursery's starting point is the Home Office website. The website provides an alphabetical list of countries, together with details of what checks are available in that country and how to obtain them. The school/college is aware that in some countries, the authorities may accept financial inducements to enable an applicant to cover up past demeanours, thus undermining the trust which can be

placed in the country's checks. The Home Office website is also a source of information on the trustworthiness of checks in overseas countries. Where the Home Office casts doubt on the faith which can be placed in a check, the school/college follows DfE guidance in obtaining additional references from someone in the country in question to compensate for the reduced faith in the overseas check.

If a candidate applies for a post in education in the UK from an overseas country and a visa is required, the UK Visa agency (UKVI) now insists that an overseas check is obtained as part of the visa application process. The qualifying period of time to be checked, which UKVI considers as relevant, is the last 10 years as an adult. (Some schools adopt this period as a benchmark in preference to the NSPCC benchmark. Either is acceptable). Where a candidate has obtained a UKVI visa in order to work in the UK, the school/college can be confident that the overseas check has been undertaken and does not need to repeat the process. However, the school/collegemust still see evidence of the overseas check.

The overseas check must be seen as an addition to, and not an alternative to the DBS check. The DBS check must always be undertaken, even if the applicant claims never to have previously visited the UK, since such a claim may be an attempt to conceal a conviction arising from a previous visit. Where the candidate has worked in a school/collegein the UK since moving from overseas and has not returned for a period of work overseas, the school/college does not need to repeat the check. The school/college may, nevertheless, ask for evidence of the check, or for confirmation from the previous employer that the check was undertaken.

Medical Fitness Check

Prior to confirmation of an appointment, candidates will be required to make a medical self-declaration, as specified in safeguarding regulations, namely that they know of no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the post in question. After the appointment has been confirmed, the successful candidate will be asked to complete a pre-employment Health Questionnaire to enable the school/college to fulfil its obligations under the Equality Act 2010, in making reasonable adjustments, if necessary, to enable people to carry out their duties effectively.

Qualifications Check

The qualifications check applies to all positions in which a qualification is noted as being required in the job specification. The school/collegemust check and retain copies of;

- Evidence of all qualifications required by the job specification
- Any qualifications declared by the applicant which are relevant to the post.

Therefore, the qualifications check does not just apply to teaching positions and may also encompass, for example;

- Secretarial or bookkeeping qualifications for admin staff
- Health and safety qualifications for a site manager or caretaker
- A driving licence check with the required categories for a minibus driver
- Qualifications which are required in order to meet ratio requirements in EYFS.

All candidates will be asked to provide original proof of any qualifications they hold which are either required for, or relevant to, the position. If no original is to be found, the school/college will ask the candidate to order replacement certificates or will request confirmation of the qualification in writing from the organisation or institution concerned. The confirmation will be kept on file.

Social Media Check (also known as Online Vetting Check)

Since September 2022, KCSIE expects schools to undertake social media (online vetting) checks on candidates who are shortlisted for interview as part of due diligence. Such checks are not intended to be used for the reduction of the field of applicants to a shortlist, but rather, they may identify incidents or issues which should then be explored further at interview. Social media checks can help to identify extreme views or discriminatory behaviour. The member of staff who undertakes the searches must not be involved in any later stages of the recruitment process. This is because this person is likely to have seen something he or she would not normally have seen, potentially contributing to unconscious bias. Ensuring that the social media searcher is independent of further stages of the recruitment process will also help to reduce the risk of any discrimination cases which may result later.

Social media searches take place after shortlisting for interview and only information which it is necessary to explore at interview should be passed on to the recruitment panel. The types of behaviour or information to be passed on are those which could present:

- Safeguarding risks
- Reputational damage
- Cause for concern
- Information that differs to that detailed in the candidate's application

The **school/college** needs to ensure a consistent process which is fair to all candidates. Initially, the searcher should conduct a simple search, using a search engine, such as Google. The search could use information such as:

Candidate's full name and location
Candidate's full name, location and current employer
Candidate's full name, location and previous employer

Secondly, the search could extend to local and national newspapers. Thirdly, the searcher can undertake a search of the candidate's visibility on social media platforms (see below).

As with other aspects of the recruitment process, online searches need to comply with data protection laws. Searching for information on a candidate counts as data processing, so the procedure must comply with the seven principles of data processing. Each piece of data held on a candidate must be processed lawfully, fairly, transparently and collected for specific, legitimate purposes. Data must be relevant and limited to what is necessary to achieve the purpose of the process. The candidate's consent is not required for a social media search, since the searcher will be viewing only publicly available information. However, candidates must be informed that they will be subjected to an online search, what this involves and that any matters arising will be raised at interview.

The lawful basis for processing this data is that it is a 'public task'; the data is being processed to determine the suitability of an individual to work with children and to keep children safe, which are of public interest. The searcher should be aware that, for good reason, many people, to enhance their privacy, now use a different name on their social media profiles from their professional name. The **Federation** should ask candidates to provide details of their username/handle so that the searcher can be sure of checking the right person.

As with other aspects of the recruitment process, not everything found on social media pages will be as black and white as it might at first seem. For example, a candidate may not have updated his or her career history on LinkedIn for a long time, resulting in a discrepancy with what appears on the application form. Whatever is found and is deemed necessary to pursue further, it is important that the candidate is provided with the opportunity to offer an explanation.

When conducting a search of social media, the following points need to be given consideration:

- What types of images and information has this candidate made available in the public domain? Are they appropriate? Whatever can be seen by the searcher can also be seen by the **Federation's** parents, pupils, employees and visitors.
- What type of views are being expressed by the candidate? Could these be perceived as, or considered as, racist, offensive or discriminatory? Could they cause an issue if they were discovered by a parent or pupil?

The school's internet filtering may prevent the searcher from accessing certain social media and gaming sites. If this is the case, a conversation should take place with a member of IT staff to enable a measure of appropriate access to be put in place to allow the searcher to conduct the search. Platforms to be considered may include, but should not be limited to:

- X/Twitter
- Facebook
- Instagram
- LinkedIn
- TikTok
- Online gaming sites

The **Federation** works with its staff and pupils to raise their awareness of the risks of loose privacy settings on their social media profiles and advises on the type of information which should and should not be shared on public domains. Similarly, the searcher would expect to find that the candidate has a suitable level of awareness of such standards; as a minimum, social media settings should be set to private, rather than public. If the searcher identifies a vulnerability in this respect in relation to the successful candidate, it would be wise to facilitate advice from a relevant member of staff to strengthen social media settings and better protect the reputation of both the individual and the **Federation**.

Online searches and The Equality Act 2010. The Equality Act serves to protect candidates from discrimination with reference to the Protected Characteristics during the recruitment process. Undertaking online searches could increase the risk of being accused of discrimination during the process. This underlines the importance of the person carrying out online searches being independent of the recruitment stages which follow shortlisting. The searcher may find information which is not relevant to the recruitment process and was not otherwise known, such as, for example, a candidate's pregnancy. Maintaining a separation between the searcher, who passes on only relevant issues and concerns, and the recruitment panel guards against subsequent accusations of discrimination.

Overall Note

As a rule of principle, all required checks will be made in advance of the first day of work in regulated activity. No appointment can be confirmed until all required checks have been successfully completed. Until such a point, any offer of employment remains provisional, and conditional on the successful completion of the required checks. KCSIE makes provision for a new employee to begin work, under controlled conditions, before the return of the DBS certificate. If such a situation arises, approval must be sought from the Head/Chair of Governors and the school/collegefollows the procedures as set out in this policy. Otherwise, KCSIE requires that all required checks, as listed in this policy, are successfully completed before work starts in regulated activity.

Outcomes of the Application and Recruitment Process

Where the following apply, the School/collegewill report the facts to the Police, the Disclosure and Barring Service and/or the Teaching Regulation Agency (TRA), as relevant:

- The candidate is found to be on the Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a Court or
- The candidate is found to have been prohibited from the teaching profession
- A candidate has provided false information in, or in support of, his or her application or
- There are serious concerns about a candidate's suitability to work with children

Appointment and Safeguarding Procedures for Others

Agency Supply Staff

The school/college may engage professional supply agencies to provide staff to cover temporary staffing needs in, for example, teaching, teaching assistants, EYFS staff, catering and cleaning. The school/college obtains written confirmation from the relevant supply agency that the required checks have been carried out (identity, enhanced DBS disclosure, right to work in the UK, barred list check, prohibitions (as relevant from teaching, from management and from teaching in another country), qualifications, overseas checks, references, declaration of medical fitness, employment history and, if applicable, disqualification from working in childcare). The school/college will carry out an identity check on the supply staff on or before the first working day, will have sight of the original DBS disclosure and will keep a record of its number. A record is maintained on file of the agency's written confirmation that checks have been completed, together with the date that such confirmation was received. It is mandatory to record information on the checks on supply staff and the date of receipt of confirmation in the SCR (even if the person works for only one day). The school/college may accept the confirmation of recruitment checks in the format provided by the supply agency if such confirmation is deemed to be sufficiently comprehensive. The use of a phrase such as "all the required checks" does not meet with requirements since each check undertaken needs to be named. If the school/college has any doubt about the thoroughness of the supply agency's letter of confirmation, it will use the template letters provided at Appendix 5, intended for use in relation to third party employees. In accordance with the requirement that work cannot start in regulated activity until all the required checks have been confirmed, the school/college will not allow agency staff to begin work in regulated activity until the letter of confirmation has been received.

According to the terminology of the regulations, "supply staff" refers to staff brought in from an agency to fill a temporary position, such appointments remaining as the employee of the agency. The school/college may source temporary staff directly, such as a retired teacher who returns on an ad hoc basis and, colloquially, may call them "supply staff". However, in the terminology of the regulations, such staff are not supply staff, but rather they are employees, since they are paid directly by the school. Checks are undertaken on such staff according to the the requirements for "staff".

On occasion, the school/college may engage someone on a temporary basis from a supply agency and then subsequently offer him or her a permanent position as an employee. In such cases, this is considered as new employment, even though there may be continuity in working at the school. As the new employer, the school/collegemust undertake its own recruitment checks according to this policy and cannot carry over the checks confirmed by the supply agency.

Visiting Professionals

Individuals such as psychologists and other public-sector staff will have been checked by their employing organisation (for example, LA, Primary Care Trust or Strategic Health Authority). The school/college will, therefore, ask for confirmation from the employer that the required checks have been undertaken and require evidence of identity. There is no obligation to require sight of a DBS certificate, though this may be offered. The school/college will require the visiting professional to provide proof of identity upon arrival. This can, but

does not need to be the documents usually associated with a DBS application. The school/collegecan accept sight of an official identity badge from the employee's company. However, if the individual is self-employed, the same checks will apply as those for staff.

Visiting Speakers

The school/college checks visiting speakers in line with current requirements. For full details, please refer to the Visitors and Visiting Speakers policy.

Volunteers (including pupils from other schools aged 16 or over undertaking work experience)

There are no set regulations for the vetting of volunteers, unless they are involved in regulated activity. The school/collegedecides first of all, therefore, whether the volunteer will be in regulated activity. In summary, the following constitute regulated activity;

- Engaging in personal care
- Engaging in activity which includes an overnight* stay
- Being unsupervised and being present frequently or regularly
    - The definition of "frequent and regular" is as follows:
        - Once a week, or more often
        - On 4 or more days in a 30-day period

Teaching is considered to be a regulated activity, whether or not it is supervised.

A volunteer who is always supervised does not fall under the heading of regulated activity unless he or she is undertaking personal care or involved in an overnight stay, such as when accompanying a residential trip. When a volunteer is supervised, the supervision must be undertaken by someone who has DBS clearance, it must be regular and day-to-day, and must be reasonable in relation to the circumstances to protect the pupils. Further details can be found in Annex F of KCSIE.

An unsupervised volunteer, whose presence is frequent and regular, is in regulated activity and must be fully checked, including an enhanced DBS and a barred list check. A DBS check is not required for a volunteer who is not in regulated activity, but the school/college is entitled to request one. However, the school/college is not entitled to obtain a barred list check for someone who is not in regulated activity. Therefore, for a volunteer who is not in regulated activity, the school/collegemust request an enhanced DBS check without barred list information.

A one-off volunteer, for example for an event or a day-time* school/collegetrip does not require vetting checks, but must not be allowed unsupervised access to children.

* in relation to regulated activity, 'overnight' is defined as between the hours of 2am and 6am.

In all cases, the procedure for the appointment of a new volunteer includes;

- An informal interview
- An identity check
- Checking for any concerns within the school/college community
- A risk assessment which includes consideration of the person's suitability, temperament and experience in relation to the role and the age and nature of the pupils involved. Such a risk assessment is completed in writing and retained on file. A template risk assessment for volunteers not in regulated activity can be found here.

In some cases, depending on the nature of the role of the volunteer and the nature of the pupils, further procedures will be included in the recruitment of a new volunteer. These may include;

- Talking up references
- Checking qualifications
- Undertaking overseas checks
- Undertaking a prohibition from teaching check if the role includes teaching work
- Asking for a childcare disqualification declaration if the role falls under these regulations

The school/college maintains a record of recruitment checks undertaken on volunteers. Although it is not a regulatory requirement to keep this information on the SCR, this is school/collegepolicy, since the DfE advises strongly that this is done.

School/collegeGovernors

The school/college will carry out the following checks on all new governors, in accordance with the requirements of the ISSRs and KCSIE:

- Enhanced DBS Certificate
- Identity Check
- Overseas Checks (where appropriate)
- Right to work in the UK
- Prohibition from management check ("section 128 direction")
- Childcare Disqualification Declaration (if directly involved in the oversight of the school's EYFS or Wraparound provision for pupils up to the age of 8)

A barred list check will not be requested as part of the Enhanced DBS check, unless the governor is in regulated activity at the school.

Staff from Other Organisations (known as Third Party employees)

The school/college ensures that any company which provides employees who will have access to areas where unsupervised contact with children is possible, provides written confirmation that it has undertaken the required recruitment checks on its employees. This requirement also applies to staff who may work with, and have opportunity for unsupervised contact with, children at the school/college at another venue. The use of a phrase such as "all the required checks" does not meet with requirements since each check undertaken needs to be named. Template letters to seek and receive such information can be found at Appendix 5. Copies of the written confirmation are retained, together with a note of the date on which such confirmation is received. The information, including the date of receipt is added to the school's SCR. Whilst it is not a regulatory requirement to use the SCR for this purpose, it is a requirement to keep a record of the information and the SCR is deemed for The School/collegeto be the best location so that all recruitment information is stored in one place. In accordance with the requirement that work cannot start in regulated activity until all the required checks have been confirmed, the school/college will not allow third party employees to begin work in regulated activity until the letter of confirmation has been received.

The school's/nursery's safeguarding procedures require that, where services or activities are provided separately by another body, supervising the children either on or off school/collegesite, the school/college seeks assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school/collegeon these matters where appropriate. The template letters at Appendix 5 make provision for this confirmation.

Vetting Check Exemptions

In line with the Regulatory Requirements, the school/collegeis not required to conduct vetting checks on the following:

- Visitors to the Head/other staff
- Those who have only brief contact with children in the presence of a teacher
- Pupils aged under 16 on work experience or similar
- Those on the school/collegesite only when pupils are not present
- Visitors carrying out repairs or servicing equipment, delivery staff and refuse collectors
- Pupils aged over 18 who are registered as pupils at the school

The School/collegedoes not re-check staff returning from maternity leave, sabbaticals or similar, where continuity of employment is maintained, because they are still on the school/collegestaff roll. Such staff, and any who are on zero hours contracts have 'continuity of employment' if they have a contract of employment, even if this is one that does not provide them with certainty of hours. Nevertheless, during such periods of leave, the school/collegewill aim to ensure 'keeping-in-touch' meetings not less frequently than every three months.

The Three-Month rule

It is a premise of DBS requirements that a custodial sentence of less than 3 months is unlikely to indicate a criminal offence leading to unsuitability to work with children. On this basis, any employee who has a gap in employment of three months or more must have a new DBS check. For the same reason, as a general rule, schools should not apply for a DBS certificate more than three months before work starts. However, this is permissible if there is a reason to do so, such as a new employee having a notice period of three months or more in his or her previous employment and needing confirmation of the new position before giving notice.

Induction

All new staff will take part in an induction programme designed to help familiarise them with the school's/nursery's policies and procedures, including safeguarding, safe practice and the standards of conduct and behaviour expected of staff and pupils in the school. The programme also includes attendance at safeguarding, risk assessment and online safety training as appropriate to the role. For further information, refer to the induction policy.

The Single Central Register/Record of Appointments (SCR)

In accordance with current legislation, the school/college keeps a Single Central Register of Appointments (SCR), indicating whether or not the following checks have been completed on all current members of staff at the school, the governors, and all individuals who work in regular contact with children including volunteers, supply staff, peripatetic staff, and those employed as third parties:

- Identity checks
- Qualification checks for any qualifications required for the position
- Enhanced Disclosure (or DBS Status Check)
- Barred List check (within the DBS check unless a separate earlier barred list check was undertaken)
- Right to work in the UK
- Overseas checks, where applicable
- Prohibition from Teaching Check (where appropriate)

- Prohibition from management check (where appropriate)
- letter of professional standing (formerly EEA check)
- References
- Career/Employment History
- Medical Declaration
- Childcare Disqualification Declaration (delete this bullet point if the school/collegedoes not have pupils under the age of 8.

The SCR records, as a minimum, the date on which the check was undertaken, the name or initials of the checker, and the DBS certificate number. A checklist, as found at Appendix 8 is completed with regard to the recruitment checks outlined in this policy. The completed checklist is stored in each member of staff's personnel file. For further information, please refer to the SCR policy.

Recruitment Process Summary

1. Planning & Advertising

- Produce Job Description and Person Specification
- Produce Advert, including statement re Safeguarding, references and DBS
- Update all standard recruitment letters:
    - Applicants & Referees spreadsheet
    - Application Form
    - Application & Recruitment Process
    - Reference Request Form
    - Acknowledgement Letter
    - 'No' Letters
- Agree recruitment panel and interview questions

2. Response to Advert

- Keep details of all enquiries
- Send an application pack to each enquirer consisting of:
    - Job Description and Person Specification
    - Application Form
    - The School/collegeApplication and Recruitment Process Explanation
    - Safeguarding and Child Protection Policy Statement

3. Applications

Number each application in the order in which they arrive. Keep original in HR Office and give copies to each member of the recruitment panel.

4. References

When the recruitment panel has decided on a short list of candidates, proceed with requesting references, with the intention of receiving references prior to interviews. Seek two references and ensure that referees are suitable by ensuring, as far as is possible, that:

- One reference is from the current or most recent employer

- One reference is from the most recent case of working with children
- A period of roughly five years is covered

5. Interviews

When applicants are shortlisted for interview, the 'Pre-interview vetting disclosure form' (Appendix 4) is sent out alongside the invitation to interview. This form asks candidates for information on relevant convictions and cautions and must be completed and returned by the day prior to the interview.

The recruitment panel will consist of at least two people. For appointments to leadership positions, the Federation will invite the Chair of Governors to nominate a member of Governing Body to join the panel. At least one member of the recruitment panel will have undertaken training in safer recruitment within the last five years. A member of admin staff may be asked to take notes at the recruitment panel's short-listing meetings and the interviews.

Long-listed applicants may be invited to a brief, informal, initial interview to enable a more accurate short-listing process. Short-listed applicants will be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail. Depending on the position, interviews will normally consist of skills-related questions and a safer recruitment interview. There will be a lesson observation for teaching positions and an equivalent activity or a skills test for non-teaching positions.

The safer recruitment interview will include determining the candidate's reasons for wanting to work with children. Written records of all interviews, observations and other activities and skills tests will be kept on the successful applicant's personnel file. If there are any gaps in the employment history, as set out in the application form, which have not been resolved prior to interview, these will be discussed during the safer recruitment interview. The candidate may be asked to resubmit the application form with the gaps explained. The candidate's responses in explaining any gaps will be recorded in the interview notes. Candidates should be asked if there is anything they wish to declare in light of the requirement for a DBS check. If references are not obtained prior to the interview, the candidate should also be asked at interview if there is anything, he/she wishes to declare or discuss in light of the questions that have been (or will be) put to their referees. It is a requirement of KCSIE that references are obtained and scrutinised before a person's appointment is confirmed and before he or she starts work.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional upon the satisfactory completion of the checks listed in the section, 'Appointment Procedures for Staff', above.

6. Recruitment Decision and Checks

The Chair of the interview panel contacts the successful candidate directly to informally offer him or her the position. Informal acceptance of the position at this stage will result in the generation of a Letter of Appointment, to be produced in conjunction with, where relevant the new employee's future line manager or other appropriate member of staff. The Letter of Appointment will include details of;

- Start and end dates of the contract and hours of work
- Salary
- A summary of the induction process and any training or professional development required prior to starting work
- Review period
- A list of the checks that need to be completed before the first day at work
- If relevant, invitation to familiarisation and/or handover days prior to starting

Letters to unsuccessful candidates should be sent once the position has been formally accepted, including to those who have been on 'hold'.

7. Payroll

The school/college ensures that the candidate has:

- Handed in a P45 or completed an HMRC New Starter Checklist
- Been advised of the Pension policy and procedure
- Completed any further Federation paperwork
- Completed the following:
  - Letter of Acceptance
  - Signed Contract
  - Statutory Safeguarding Induction
- Confirmed reading and understanding the following:
  - Keeping Children Safe in Education, Part 1 and Annex A
  - Other documentation required in KCSIE to be covered at induction (see Induction Policy)
  - Any other policies and procedures relevant to the post to which he or she has been appointed.

8. Safeguarding and Child Protection Training

The Designated Safeguarding Lead (DSL) takes responsibility for the safeguarding and child protection training of newly appointed staff. He or she will, prior to the newly appointed person starting work;

- Establish when he or she most recently undertook formal safeguarding training and, as necessary, organise for such training to be done or refreshed
- Ensure that he or she completes the statutory safeguarding elements of induction, as required in KCSIE
- Include him or her in the **Federation's** programme of at least annual safeguarding updates and ensure an understanding of the aspects of safeguarding procedures which are particular to the school
- Brief him or her, as appropriate, regarding any children with whom he or she will be involved for whom there is a safeguarding concern, including details of any vulnerable children, children with attendance challenges and any who are foster children, looked after or previously looked after children or who have a social worker.
- Ensure that he or she completes the post-training document and annual affirmation to confirm
  - reading and understanding The **Federation's** policies and related government guidance
  - where relevant to the post, confirming that he/she is not disqualified from working in childcare.

Interpretation

In this policy, the term "senior manager" means a school/college Head and their designated deputies.

This policy applies to all employees in the **Federation** and other work environments used by the **Federation**.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Appendix 1: DBS Risk Assessment Checklist

Since the update to the EYFS Framework in 2026, this procedure cannot be used for people appointed to volunteer regularly or work with children in the EYFS, since the framework now requires that a DBS check is completed before work starts, without exception.

This document enables the **school/college** to consider the requirements related to judging whether a member of staff can start work prior to the original DBS certificate having been seen by the school. The risk assessment should be completed to calculate whether to allow a new member of staff to start work before a new DBS certificate has been received and the level of supervision which is required in such circumstances.

Name of Person .....

Role .....

Interview Date .....

Proposed Start Date .....

DBS Check application date .....

[The person must not start without a DBS application having been submitted]

- Is the person in 'Regulated' Activity? Yes ☐ No ☐

1. Starting work prior to DBS Certificate being seen

Reason for proposing starting before seeing a new DBS Check

- Continuity of the school's provision to pupils ☐
- Other (please state) .....

Known Information

All the following checks, as required for the post, must have been satisfactorily completed (tick or mark as n/a as appropriate).

- Identity check (photographic) [Essential] ☐
- Verification of current address [Essential] ☐
- Barred list check (if legally appropriate) [Essential] ☐
- Prohibition checks:
  - Teacher Prohibition check (for those doing teaching work) ☐
  - Letter of professional standing (those have done teaching work in another country) ☐
  - Prohibition from Management (see explanatory notes in the safer recruitment policy) ☐
- Overseas criminal records check (where relevant) ☐
- Right to Work in the UK [Essential] ☐
- Confirmation of qualifications [Essential] ☐
- Two references [Essential] ☐
- Declaration of Medical Fitness [Essential] ☐
- Resolution of and unexplained gaps in Employment/Career History [Essential] ☐

Any other information (please state)

.....

.....

Previous DBS Certificate

If the person has a previous DBS, on what date was it issued? .....

When was the person's last day at work in their previous school or college? …….

If the person has a DBS certificate from the previous school or college and the proposed start date and the last day of employment at the previous school or college are less than three months apart, then a new Enhanced DBS check is not required in law, although it is considered as best practice. Therefore, providing there is sufficient other information, the person could be assessed to be of low risk.

Please complete the checklist for a new starter prior to the return of the DBS certificate (above), attach it to this document and keep the documents as evidence in the new person's personnel file.

Summary of factors leading to decision

.....

.....

.....

.....

Decision (tick to indicate selected option)

High Risk – ☐

Example: Person should not be allowed to start without a new Enhanced DBS, as there has been a break in service of more than three months (or they do not have an Enhanced DBS certificate) and/or there is insufficient information about the person in the 'Known Information' list above. A candidate whose work involves mainly one-to-one tuition may also be considered as high risk.

Medium Risk – option (a) ☐

Medium Risk – option (b) ☐

Example: Person may start work and, although there is sufficient other information listed above, because there is a gap in service of three months or more (or they do not have an Enhanced DBS certificate), the person must be (a) supervised at all times and should not undertake 1:1 work, personal care activities or residential visits. The unchecked person must always be 'within sight and hearing' of a supervising person with an Enhanced DBS check; or (b) mostly supervised and should not undertake 1:1 work, personal care activities or residential visits. The unchecked person must mostly be 'within sight and hearing' of a supervising person with an Enhanced DBS check, but may from time to time, for example, work with a group of children in an adjacent room or break-out space.

Low Risk – ☐

Example: Person may start work, without additional supervision, already holding an Enhanced DBS check and there is no break in service of three months or more and all other checks have been satisfactorily completed.

2. Supervision Agreement and Authorisation

Signatures:

Supervising Person(s) ..... Date……

Person Under Supervision ..... Date…....

Head …….. Date…….

Safeguarding Goveror …….. Date…….

3. Review of the Supervision Arrangement

It is a requirement that these arrangements are reviewed by the head with a frequency of not less than every two weeks. This table should be completed to annotate each review

Date of review	Notes on Review meeting	Head's initials

Appendix 2: Employing EU, EEA and Swiss citizens in the UK

In October 2020, the Home Office introduced new requirements related to the UK's new immigration system. These requirements must be considered when appointing citizens from the EU, EEA and Switzerland, and also when checking the right to work in the UK of citizens from these countries who were already living in the UK before 1st January 2021, including citizens of these countries who were already employed by the **school/college**.

Section 1 – Checking an EU, EEA or Swiss citizens' right to work in the UK

Employers can check the applicant's right to work online, if he or she has used the online right to work checking service and given the employer a share code.

Anyone seeking to come to the UK for work from these countries, except Irish, Channel Islands and Isle of Man* citizens, after 1st January 2021 will need to seek permission first. They will need to apply to work in the UK via the 'Skilled Worker' or another permissible worker route.

From 1 January 2021, prospective employees recruited directly from outside the UK through the Skilled Worker route need to demonstrate that:

- they have a job offer from a Home Office licensed sponsor
- they speak English at the required level
- the job offer is at the required skill level of RQF3** or above
- they'll be paid at least the current qualifying minimum rate, as stipulated by the government or the 'going rate' for the job offer, whichever is higher.

If the job will pay less than this, the applicant may still be able to apply by 'trading' points on specific characteristics against their salary. For example, if they have a job offer in a shortage occupation or have a PhD relevant to the job. There are different salary rules for workers in some health or education jobs, and for "new entrants" at the start of their careers. Further information on which occupations are at the required skill level and the salaries for these occupations can be found in Annex E of the UK points-based immigration system: further details statement.

Employers need a sponsor licence in order to employ EU, EEA and Swiss citizens coming directly from overseas to the **school/college** for work after 1st January 2021.. Employers who may want to hold a sponsor licence from 1st January 2021 should apply. Further information on the application process can be found here: https://www.gov.uk/apply-sponsor-licence.

*The right of Irish, Channel Islands and Isle of Man citizens to work in the UK arises from the Common Travel Area (CTA) arrangements, which predate the formation of the EU. Under the CTA, these citizens and British citizens can move freely and reside in each jurisdiction and enjoy associated rights and privileges, including the right to work and study. Therefore, the method by which such citizens need to prove their right to work in the UK remains unchanged by Brexit. Further information can be found here:

https://www.gov.uk/government/publications/common-travel-area-guidance

**Regulated Qualifications Framework, in which, for example, Level 2 is equivalent to GCSE, Level 3 to A Level and Level 6 to a Bachelor's Degree.

Section 2 – Requirements regarding EU, EEA and Swiss citizens already employed before 1/1/2021

The arrangements noted in Section 1 do not apply to EU, EEA and Swiss citizens whom an employer already employed before 1st January 2021. These employees and their family members should have applied to the EU settlement scheme if they wished to continue working in the UK after 30th June 2021.

Schools were asked to obtain confirmation, by 30th June 2021, that any employees of EEA or Swiss nationality (except from Ireland, Isle of Man and the Channel Islands – see above) had obtained EU Settled Status through the settlement scheme. Subsequent government guidance notes that, if schools had carried out right to work checks in line with those in force at the time of an employee's appointment, they have a 'statutory excuse' and are protected from a civil penalty if an employee is subsequently discovered not to have the right to work in the UK. However, the guidance goes on to note that having an illegal worker removed from the school's employment may have a negative impact on the school's operations, its continuity of safeguarding and its health and safety provision. Therefore, the **school/college** ensures that it has obtained confirmation of EU settled status, where this is required.

Conclusion – Action for Schools

- Consider whether you need a sponsor licence in order to employ citizens directly from the EU, EEA or Switzerland and take appropriate action.
- If you plan to appoint any citizens from the EU, EEA or Switzerland, follow the requirements noted in Sections 1 and 2 above.
- If you already employed any citizens from the EU, EEA or Switzerland prior ro 1st January 2021, and they have continued in employment after 30th June 2021, ensure that they and you have acted in accordance with the new requirements.
- In each case, ensure that you have tracked and dated each stage of the required processes in the employee's personnel file, with a summary in the 'Notes' column of your Single Central Record/Register.

Appendix 3: DBS Update Service – additional information

The DSB Update Service is a facility which enables holders of DBS certificates who have subscribed to the service to permit schools to undertake an immediate DBS check at no cost. The service is only available in relation to DBS Certificates which have been issued since 17 June 2013. A subscriber must apply to register with the Update Service either when applying for a DBS certificate or within a few days of receipt. The service cannot be accessed and added to an existing DBS certificate at a later date. Employers must have the DBS certificate holder's consent to use the Update Service; the **school/college** will ask the candidate to sign a statement to give The **school/college** permission to access his or her record on the DBS Update Service.

The DBS Update Service is most useful for people who work in several educational establishments, such as peripatetic music teachers, sports coaches and after-school activity providers. It avoids the need to obtain a new DBS each time such a person accepts work at an additional school. The DBS Update Service is useful for the **school/college** because it provides an instant response and represents an economy in costs. It is as robust as a new DBS certificate because it draws on a fresh reference to the DBS database, whereas the acceptance of a DBS certificate obtained by a previous employer, whilst permissible, can relate only the situation at the time the certificate was obtained.

Candidates who have registered with the DBS Update Service must produce the original of their DBS Certificate, along with the required proofs of identity. On undertaking the check, using the reference numbers provided by the candidate, the **school/college** receives notification as to whether there have been any changes to the DBS record since the certificate was issued. This notification must then be considered alongside the information contained on the candidate's original certificate. If the Update Service check results in a notification that there has been a change in the candidate's record, the **school/college** must proceed with a full new DBS check. If the response is that there has been no change and there are no concerns arising from the original certificate, the **school/college** can consider the DBS check to be complete and can continue the appointment process.

Appendix 4: Pre-Interview Vetting Disclosure Form

The Federation of the Annunciation Catholic Schools is committed to safeguarding and promoting the welfare of children and expects all staff to share this commitment. Employment at the **Federation** is subject to satisfactory pre-employment checks. In accordance with the exemptions to the Rehabilitation of Offenders Order 1974 (updated 2013, 2020, 2023 and 2026), candidates who are invited for interview are required to provide the information requested on page 2 of this form. Please complete this disclosure form and return it directly to **the relevant school office at least one day prior to interview**. If we have not received this completed form, we reserve the right to withdraw the offer of interview.

This post is exempt from the Rehabilitation of Offenders Act 1974; pre-employment checks will be carried out, references will be sought and successful candidates will be subject to an enhanced DBS check and other relevant checks with statutory bodies. We comply with the Disclosure & Barring Service (DBS) code of practice and have a written policy on the recruitment of ex-offenders, both of which are available on request.

You are required to declare any relevant convictions, adult cautions or other matters which may affect your suitability to work with children. As a result of amendments to the Rehabilitation of Offenders Act 1974 (exceptions order 1975), as amended, when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers and, if they are disclosed, employers cannot take them into account.

Please read the information here before answering the questions on page 2. If you are unsure whether you need to disclose criminal information, you should seek legal advice, or you may wish to contact the charities Nacro or Unlock for impartial advice. Guidance about whether a conviction or caution should be disclosed can also be found on the **Ministry of Justice** website. A flowchart to support you can be found here.

Nacro - https://www.nacro.org.uk/criminal-record-support-service/ or email helpline@nacro.org.uk or Phone 0300 123 1999

Unlock – http://hub.unlock.org.uk/contact/ Phone 01634 247350

Please turn to page 2 to complete the form.

POST APPLIED FOR:	Date:

Surname:	Previous surname(s) (if any):	
Forename(s):	Preferred title:	Date of birth

1. Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974?

(please tick) YES ☐ NO ☐

2. Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) (England and Wales) Order?

(please tick) YES ☐ NO ☐

If YES, please provide details in a sealed envelope marked 'Confidential' addressed to the chair of the interview panel, or send them, marked 'Confidential', to the email address in the first paragraph on page 1.

A new Enhanced Level Disclosure and Barring Service (DBS) check of criminal records will normally be required for this post. Access to the application process will be provided. Subscription to the DBS Update Service may be a condition of employment. Other standard checks before your employment commences include, as relevant, accessing lists of 'Teachers and Others' prohibited from the profession; Secretary of State directions; Induction and Probation Failures; and sanctions imposed by teacher regulation authorities overseas.

3. Do you have an existing Enhanced level DBS? *(please tick)* YES ☐ NO ☐

Issue Date (if known):

4. Are you included on the DBS Children's Barred List? *(please tick) YES* ☐ NO ☐

If yes, please provide details here:

5. Have you lived or worked outside the UK for more than three months in the last 5 years? *YES* ☐ NO ☐

If yes, please provide details here:

6. Have you been convicted of any criminal offences (consistent with questions 1 and 2, above), in any country in line with the law as applicable in England and Wales, not the law of your country of origin or where you were convicted? *YES* ☐ NO ☐

If yes, please provide details here:

Please complete this declaration:

I declare that all the information I have provided in this disclosure is full and correct at the time of application and that I have not omitted anything that could be relevant to the appointment of someone who will work with children. I understand that the recruitment panel may be made aware of any relevant information that I have disclosed in order to discuss the matter(s) with me as part of the recruitment process and that, if my application is successful, a risk assessment of the disclosed information will be held securely on my personnel file. I understand that the declaration of a criminal record will not necessarily prevent me from being offered this role.

Signed: **Date:**

Information disclosed on this form will be treated confidentially. The forms relating to candidates whose application is unsuccessful will be securely destroyed within six months of the date of submission.

Appendix 5: Template letters for seeking and receiving confirmation of recruitment checks in relation to Third Party employees

Name of School/College
Education Lane
Teachington
SE18 NQT
{Date}

Dear xxx

In order to comply with safer recruitment regulations, we are required to receive confirmation from all businesses whose employees work at **The Federation of The Annunciation Catholic Schools** or with children from the school, that they were appointed in accordance with correct safer recruitment procedures. I should be grateful, therefore, if you would complete the letter below, sign it and return it to me for our records.

We are required to ensure that no adults who work with our children in childcare are disqualified from working with children under the terms of the Childcare (Disqualification) Regulations 2009. This requirement applies to those who work with children in the EYFS and those who work in wraparound provision with children up to the age of 8. I should be grateful if you could also confirm in the letter below. (This paragraph is to be removed for schools where there is no EYFS, nor wraparound provision up to the age of 8).

In the case of staff from a supply agency, please inform such staff that the Federation will need to see an original copy of their DBS certificate on or before their first day of work at the school. In the case of other third-party employees, I need to receive confirmation that an enhanced DBS certificate is in place, together with the certificate number. In all cases, I need to receive your confirmation that you will inform the headteacher of any declared convictions arising from DBS checks on your employees who may be due to work at the **Federation**. The headteacher will then need to decide whether it is appropriate for them to work with us. The letter below also covers this requirement.

Finally, in accordance with the **Federation's** safeguarding procedures, please confirm, if you provide services or activities which involve working with the children either on or off the **Federation** site(s), that your company has appropriate policies and procedures in place for safeguarding children and child protection. In this respect, if your staff have any safeguarding or child protection concerns, we ask you or them to liaise with our Designated Safeguarding Lead, **Daniel McCreadie**

Many thanks in anticipation of your help.

Yours sincerely

xxx

Name of business
Business address
Date

Mrs xxx
Name of School/College
Education Lane
Teachington
SE18 NQT

Dear **Mrs xxx**

Following the request in your letter of **"date",** I am writing to confirm that all employees of "xx Company" who work at **The Federation of the Annunciation Catholic Schools**, or with children who attend the **Federation**, were appointed in accordance with safer recruitment procedures and that the required checks were successfully undertaken, namely:*

- identity ☐
- employment history ☐
- references ☐
- qualifications ☐
- overseas criminal records check (where required) ☐
- prohibition from teaching check (if undertaking teaching work) ☐
- EEA prohibition from teaching check, prior to 1/1/21 or letter of professional standing since 1/1/21 (if undertaking teaching work, having previously undertaken teaching work outside the UK) ☐
- prohibition from management check (if applicable) ☐
- right to work in the UK ☐
- declaration of medical fitness ☐
- enhanced DBS clearance ☐
- children's barred list. ☐

* Please tick the boxes to confirm that the check has been undertaken, or mark as n/a if the check is not required for this position.

I also confirm that, in accordance with the Childcare (Disqualification) Regulations 2009 as updated in 2018, none of our employees to whom these regulations apply, who work with The Federation of The Annunciation Catholic Schools children, are disqualified from working with children under the terms of the regulations.

The following is a list of employees who work or are likely to work with children at **the Federation**, together with their DBS number:

Name	DBS Number
Name	eg 1/2345678

I confirm, if I provide services or activities which involve working with the children, either on or off the **Federation** site(s), that the company has appropriate policies and procedures in place for safeguarding children and child protection.

I understand that, should I need to ask a different employee to work at the Federation who has not worked at the school(s) before, I will use only an employee for whom the above checks have also been completed and also that I will notify the **Federation** in advance of any change by providing an additional copy of this letter. I will advise the employee that he/she will need to provide evidence of identity (including photographic identification) on first arrival at the **school(s)**.

I also understand that I must inform the headteacher at **The Federation of The Annunciation Catholic Schools** should any DBS check on an employee who is due to work at the **Federation** result in a criminal offence being declared. The headteacher will then decide whether it is appropriate for that person to work at the school.

Yours sincerely

Appendix 6: Policy on the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information

1.1 General principles

As an organisation using the Disclosure and Barring Service checking service to help assess the suitability of applicants for positions of trust, the Federation complies fully with the DBS code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information. This is the written policy on these matters, which is available to those who wish to see it on request.

1.2 Storage and access

Certificate information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

1.3 Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it. It should be noted that inspection bodies may be legally entitled to retain the certificate for the purposes of inspection. Standard practice is that the Federation does not retain DBS certificates or copies longer than is required and never for more than six months (the retention period). If any requirement should arise to retain certificates in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits, there may be a legal entitlement to retain the certificate. However, such practice must be compliant with the Data Protection Act, Human Rights Act and General Data Protection Regulation (GDPR).

1.4 Usage

Certificate information is used only for the specific purpose for which it was requested and for which the applicant's full consent has been given.

1.5 Retention

Once a recruitment (or other relevant) decision has been made, other than recording the information noted in the second paragraph of 1.6, below, the **Federation** does not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

1.6 Disposal

Once the retention period has elapsed, the **Federation** will ensure that any DBS certificate is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). The **Federation** will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate beyond the 6-month period noted above. However, notwithstanding the above, the **Federation** will keep a record of the date it had sight of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

1.7 DBS logo

The DBS logo is protected by crown copyright, the copying and use of the DBS logo is not permitted without prior approval of the DBS.

Appendix 7: DBS Disclosure and Recruitment Policy

The **Federation of The Annunciation Catholic Schools** is committed to safeguarding and promoting the welfare of its children and young people and expects all staff* and volunteers to share this commitment.

The Recruitment Policy and Procedures are based on and conform to statutory and non-statutory guidance contained in the most recent editions of 'Keeping Children Safe in Education', 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings', the 'EYFS Statutory Requirements' and 'Working Together to Safeguard Children. This policy also has due regard for Prevent Duty Guidance: advice for schools and childcare providers (as updated in March 2024) and The Use of Social Media for On-line Radicalisation (July 2015)).

- The **Federation** is committed to the fair treatment of its staff, potential staff or users of its services, regardless of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation, or offending background.
- The **Federation** actively promotes equality of opportunity for all with the right mix of talent, skills, and potential, and welcomes applications from a wide range of candidates.
- Candidates will be selected for interview based on their skills, qualifications and experience, as assessed from the information provided by the applicant when completing the application form.
- As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for employment, The **Federation** complies fully with the DBS Code of Practice. It undertakes to treat all applicants for positions fairly and will not discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.
- The **Federation** is required to obtain a Disclosure for all appointments, except those noted in the 'Vetting Check Exemptions' section of this policy, above. All application forms and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- The **Federation** is required to ask questions about the applicant's entire criminal record, including "spent" convictions as defined in the Rehabilitation of Offenders Act 1974 (as updated) and additional guidance on DBS filtering, issued in November 2020, when recruiting to any position within an educational establishment.
- The **Federation** ensures that all those who are involved in the recruitment of staff and volunteers have been suitably trained to identify and assess the relevance and circumstances of offences. The **Federation** also ensures that they have received appropriate guidance and training in the relevant legislation and statutory guidance relating to the employment of ex-offenders.
- At interview, or in a separate discussion, The **Federation** ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- All applicants will be made aware of the existence of the DBS Code of Practice and a copy made available on request.
- The DBS disclosure process will be completed before an appointee starts work and not usually earlier than three months before. There is provision for a DBS certificate to be sought earlier than three months before the intended start date, should circumstances require this. For further information, see "The Three-month Rule" section of this policy, above.
- The **Federation** undertakes to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer of employment.
- Having a criminal record will not necessarily bar an applicant from working with the **Federation**. This will depend on the nature of the position and the circumstances and background of the applicant's offences.

The decision will be made by the Head or Deputy unless the applicant is for a post on the SLT in which case the decision will be made by the **Chair of Governors**.

- If the applicant is turned down for a position because of his or her criminal record, an appeal can be made to the **Chair of Governors**. This will be conducted using a procedure based on the Complaints Procedure.

*The **Federation** uses the DfE definition of 'staff' as found under the heading 'staff' near the start of this policy.

Appendix 8: Recruitment and Selection Checklist

This checklist, once completed, should be retained in the applicant's personnel file.

The **Federation of the Annunciation Catholic Schools** should not retain copies of (or original) DBS certificates for longer than 6 months. The DBS number and the date the certificate was seen by the **Federation** should be recorded on the SCR. Otherwise, evidence of checks, consistent with this checklist and the SCR, should be retained in the appointed person's personnel file. For clarity, every check in this checklist which should be supported by an evidence document in the personnel file is marked with an asterisk *.

Name of applicant:		
Pre-interview:	**Initials**	**Date**
Planning - Timetable decided: job description, person specification and other documents to be provided to applicants, reviewed and updated as necessary. Application form seeks all relevant information and includes relevant statements about references, safeguarding etc.		
Vacancy advertised (where appropriate) Advertisement includes reference to safeguarding policy; that is, statement of commitment to safeguarding and promoting welfare of children and need for successful applicant to be DBS checked.		
***Applications on receipt** - Scrutinised - any discrepancies/anomalies/gaps in employment noted to explore if candidate considered for short-listing.		
Short-list prepared		
References – seeking Sought directly from referee on short-listed candidates; References should always be obtained from the current employer; if there is no current employer, verification of the most recent period of employment and reasons for leaving should be obtained. For posts involving working with children, if the applicant is not working with children in the current post, a reference will be sought from a previous employment involving working with children, where possible. References should be from a senior person with 'appropriate authority'. Information provided directly by the candidate should be verified. The **Federation** should verify that electronic references originate from a legitimate source. The request for a reference should ask the recommended specific questions, including on suitability and include statement about liability for accuracy.		
***References - on receipt** - Checked against information on application; scrutinised; any discrepancy/issue of concern noted to take up with referee and/or applicant (at interview if possible).	1. 2.	1. 2.
Invitation to interview - Includes all relevant information and instructions; pre-interview vetting disclosure form (Appendix 4) sent to shortlisted candidates and returned prior to interview.		
Interview arrangements - At least two interviewers; panel members have authority to appoint; have met and agreed issues and questions/assessment criteria/standards At least one person involved in the interviews holds a current safer recruitment qualification.		
Face-to-Face Interview - Explores applicants' suitability for work with children as well as for the post. Checks any gaps in employment history as yet still unexplained.		
Note: identity, right to work in the UK and qualifications of successful applicant verified on day of interview by scrutiny of appropriate original documents; copies of documents taken and placed on file; where appropriate applicant completed application for DBS disclosure.		
***Conditional offer of appointment**: Offer of appointment is made, conditional on satisfactory completion of the following pre-appointment checks and, if relevant, a probationary period.		
***Identity** (if that could not be verified at interview) including birth certificate, where possible.		
***Qualifications** (if not verified on the day of interview)		

***Right to work in UK** Obtain a copy of the applicant's passport (or birth/adoption certificate if the applicant does not have a passport) and add to personnel file. For an EEA or Swiss citizen, obtain, if required, evidence of EU settled status, as described in Appendix 2.		
DBS certificate - where appropriate, satisfactory DBS certificate – original seen.		
***DBS Barred list** - person is not prohibited from taking up the post. See guidance notes relating to circumstances when this check needs to be obtained separately from the DBS check. **Note:** The **Federation** is entitled to undertake a barred list check only if the appointed person will be engaged in regulated activity.		
***Overseas Criminal Records Check** - see policy section and Home Office website for more information.		
***Health** - the candidate self declares as physically and mentally fit for the post, as described in the job specification. Candidate usually to make this declaration on the job application form.		
***Prohibition from teaching work** - the candidate has not been included in the prohibition list or interim prohibition list.		
***EEA Prohibition Check/letter of professional standing -** for teaching work where the applicant has undertaken teaching work in another country. **Prior to 1/1/21** – checked against the EEA prohibition list on the Secure Access website. **Since 1/1/21** – applying this check worldwide, obtain from the applicant a letter of professional standing from the relevant overseas teacher regulation body.		
***Prohibition from Management Check** - (see notes in the policy for how this check is applied).		
Childcare Disqualification Self-declaration – confirming that the applicant is not disqualified from working in childcare.		
***Qualified Teacher Status (QTS)** - (statutory requirement only for teaching posts in maintained education) the teacher has obtained QTS; the teacher has obtained a Post Graduate Certificate of Education (PGCE), Bachelor of Education (BEd) or Certificate of Education (Cert. Ed) awarded by a higher education institution.		
***Statutory NQT/ECT induction** (for teachers who obtained QTS after 7 May 1999)		
***Federation Induction** (refer to the Induction Policy and annotate here when the statutory safeguarding elements of the induction checklist are complete).		

FINAL CONFIRMATIONS

I confirm that all the required appointment checks have been completed and have been entered in the single central record/register.

Signed _____ Head

I confirm that the initial, statutory stage of induction (prior to starting work) has been completed and this member of staff has signed to confirm that he/she has read and understands all the policies, as required at induction.

Signed _____ Head

No person may start work or volunteering with the Federation **until the Head has signed this form to confirm that all the required recruitment checks and procedures have been successfully completed.**