Pathways School

Safer Recruitment Policy

Policy Monitoring

Date policy last reviewed: April 2026

Signed by:

Neil Jones	Headteacher	Date:	April 2026
Saima Ali	Chair of governors	Date:	April 2026

Date of next review: April 2027

This policy will be reviewed at least annually and following any concerns and/or updates to national/local guidance or procedure.

1. Introduction

Pathways School is committed to ensuring the best possible environment for the students in our care. Safeguarding and promoting the welfare of children, young people and adults at risk is our highest priority. The school aims to recruit high calibre staff that share and understand our commitment and to ensure that all applicants are treated fairly by promoting equality and diversity in line with good practice and legislation. An entry is made on the Single Central Register for all current members of staff at the school, the proprietor and advisory body and all individuals who work in regular contact with students including volunteers, supply staff and those employed by third parties or engaged as self-employed consultants. All checks are made in advance of appointment or as soon as practicable after appointment.

2. Legislation and guidance

This policy has due regard to all relevant legislation including, but not limited to, the following:

- Keeping Children Safe in Education (September 2021)
- The Education (Independent School Standards) Regulations 2014
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014
- Disqualification under the Childcare Act 2006 (July 2018)
- Equality Act 2010

3. Links to other school policies and practices.

- Equality and Diversity Policy
- Safeguarding and Child Protection Policy
- Teachers Pay Policy
- Early Career Teachers Policy
- Volunteers Policy

4. Scope

The Recruitment Policy and Procedure herewith refers and applies to staff recruited and engaged by the school. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as: *"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."*

In the case of agency or contract workers, the Chair of Trustees shall obtain written confirmation from the agency or company that it has conducted the appropriate checks. The Headteacher or School Administrator conducts identity checks on agency and contract workers on arrival in school and, in the case of agency workers which includes supply staff, the school must be provided with a copy of the DBS check for such staff. The Chair of Trustees checks with the relevant supply agency that the required checks have been conducted (identity, enhanced disclosure – renewed every three years, right to work in the UK, barred list, prohibition,

qualifications, overseas checks plus (in line with Keeping Children Safe in Education (KCSIE)) two references, declaration of medical fitness, check of previous employment history). The Single Central Register shows these checks have been made and the school through the Chair of Trustees conducts its own identity check and has seen a copy of the disclosure (whether it discloses any information).
In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. The Headteacher will determine the appropriate level of supervision depending on the circumstances. Any staff who TUPE transfer into the school's staff will be required to undertake the statutory requirements regarding safer recruitment checks. If staff are transferred under TUPE (gap of three months or less and information is complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

5 The Recruitment and Selection Process

5. 1 Advert

All vacancies are advertised on the school website. Existing employees are encouraged to apply if they have the appropriate qualifications, skills, and experience. Where appropriate, adverts will also be placed via other sources, e.g., professional networks, recruitment websites. Whenever we advertise, we always include the school's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken. All adverts specify the safeguarding responsibilities of the post as per the job description and personal specification; and whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

All applicants receive an Information pack relating to the vacancy containing:

- Application form
- Safeguarding Policy and Procedure
- Recruitment policy
- Job description
- Person specification
- Selection procedure for the post

5. 2 Application Form

Pathways School only accepts applications from candidates completing the relevant Application Form in full. CVs or other methods of application are not accepted in substitution for completed Application Forms. Checks are made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate. As the position for which candidates are applying involves substantial opportunity for access to children, it is important that applicants provide the school with legally accurate answers.

It is an offence to apply for a role if the applicant is barred from engaging in regulated activity relevant to children. Upfront disclosure of a criminal record may not debar a candidate from appointment as the school shall consider the nature of the offence, how long ago and at what age it was committed and any other relevant factors. Information should be submitted in confidence enclosing details in a separate sealed envelope which will be seen and then destroyed by the Headteacher. If candidates would like to discuss this beforehand, they are asked to please telephone the Headteacher in confidence for advice.
Any unspent convictions, cautions, reprimands, or warnings must be disclosed to the school. However, amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers and cannot be considered. Guidance and criteria on the filtering of these cautions and convictions can be found at the Disclosure and Barring Service website.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected, offer of employment being withdrawn or summary dismissal by the school if they have been appointed, and a referral to the police and/or DBS.

We require applicants to provide:
• personal details, current and former names, current address, and national insurance number.
• details of their present (or last) employment and reason for leaving.
• full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment.
• qualifications, the awarding body, and date of award.
• details of referees/references (see below for further information); and
• a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

5.3 Shortlisting

Shortlisted candidates must complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.
For example:
• if they have a criminal history.
• whether they are included on the barred list.
• whether they are prohibited from teaching.
• whether they are prohibited from taking part in the management of an independent school.
• information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted.
• if they are known to the police and children’s social care.
• have they been disqualified from providing childcare and,
• any relevant overseas information.
Applicants must sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate must physically sign a hard copy of the application at point of interview.

• At least two people carry out the shortlisting exercise.
• consider any inconsistencies and look for gaps in employment and reasons given for them; and,
• explore all potential concerns.
Applicants are shortlisted based on the relevance and applicability of their professional attributes and personal qualities specified by the role. Essential and desirable qualities are published in the Person Specification for each role. The school will not discriminate against any protected characteristics and will always promote difference and inclusion throughout the school.

5. 4 Employment history and references

• Pathways School does not accept open references e.g., to whom it may concern.
• We will not rely on applicants to obtain their reference.
• We ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the Headteacher/Principal as accurate in respect to disciplinary investigations).
• We obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed.
• We secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer.
• We always verify any information with the person who provided the reference.
• We ensure electronic references originate from a legitimate source.
• Pathways School contacts referees to clarify content where information is vague or insufficient information is provided.
• compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
• establish the reason for the candidate leaving their current or most recent post.
and ensure that any concerns are resolved satisfactorily before appointment is confirmed.

5.5 Selection

Pathways School uses a range of selection techniques to identify the most suitable person for the post. Selection methods are objective, promote equality of opportunity and guard against bias in line with the Equality and Diversity policy. All candidates are vetted throughout the process for their suitability to work with children, young people, and adults at risk. Students are involved in the recruitment process in a meaningful way. The school is committed to ensuring that safeguarding is a top priority; therefore, where appropriate, the school may check candidates' social media or other online activity prior to the interview.

This process may include a search for the candidate on the following, but not limited to:

- Facebook
- Twitter
- Instagram
- LinkedIn

- Google
- Tiktok

Any concerns are addressed during the interview.

5.6 Interview

Short-listed applicants are invited to attend a formal interview at which their relevant skills and experience are discussed in more detail and their suitability to work with children and young people is explored.

All formal interviews have a panel of at least two people, one of whom will be safer recruitment trained. The interviewers involved must declare any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Trustees as to whether an interviewer should withdraw from the panel should a potential conflict of interest arise.

All candidates will be asked a mandatory question: “Have you at any time been subject to an interview, inquiry, children’s services or social services investigation, suspension from work, disciplinary, police investigation, caution or conviction as a result of concerns about student abuse or neglect or the abuse or neglect of an adult?”
The panel will also ask questions to assess the candidate’s personal competencies in relation to their:

- Motivation for working with children or adults at risk
- Emotional resilience
- Physical resilience
- Values and ethics

Questions on the above should have direct links to the Person Specification for the role and be structured in such a way that examples of what would constitute a positive indicator in a response is set alongside what a negative indicator would be, to assist the panel in measuring the responses.
Questions include, finding out what attracted the candidate to the post being applied for and their motivation for working with children; exploring the candidates’ skills and asking for examples of experience of working with children which are relevant to the role; and probing any gaps in employment.
Interviews are used to explore potential areas of concern to determine the applicant’s suitability to work with children. Areas that may be concerning and lead to further probing include implication that adults and children are equal; lack of recognition and/or understanding of the vulnerability of children; inappropriate idealisation of children; inadequate understanding of appropriate boundaries between adults and children; and indicators of negative safeguarding behaviours.

Candidates are asked to explain any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g., the original or certified copy of certificates, diplomas etc.) Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The school request that all candidates invited to interview also bring with them:

- A current driving licence photocard or a current passport or a full birth certificate.
- A utility bill or financial statement issued within the last three months showing the
- candidate's current name and address.
- Any documentation evidencing a change of name, where appropriate.
- Additional proof of entitlement to work and reside in the UK where appropriate.

Originals of the above are necessary. Photocopies or certified copies are not accepted.

Candidates with a disability who are invited to interview should inform the school of any necessary, reasonable adjustments or arrangements to assist them in attending the interview.

Temporary staff who are appointed on a fixed-term basis will only be appointed to a permanent position if the full recruitment, selection, and vetting processes have been followed.

All information considered in decision is recorded along with decisions made.

6. Remote recruitment

The school will follow all the requirements set out in this policy when recruiting remotely, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this. Online interviews will take place on Zoom or Microsoft Teams in line with the school's ICT Acceptable Use policy. Staff members will ensure they understand how to operate the functionalities of the platform and check it is operating correctly before the interview commences.
The school will communicate its expectations to candidates regarding the use of the online platform and remote completion of written tasks in good time prior to the interview. These expectations will include, but will not be limited to, the following:

- The candidate will participate in the interview with both the video camera and
- microphone features enabled at all required times.
- The candidate will participate in the interview in a suitable setting – a quiet area
- with a neutral background.
- The candidate will keep personal information which is not relevant to the recruitment process private, e.g., their email password, and will not ask the staff
- members conducting the interview to share any such private information
- Where necessary, the candidate will be aware that the school may record the online interview, and that they will be required to consent to this for the interview process to continue

7. References

At least two professional references will be taken up for every appointment, whether internal, permanent, temporary, part-time or fixed-term and previous employers may be approached for information to verify experience or qualifications, before the interview. Additional references may be required dependent on the role, employment history and type of references received. In the case of staff who have lived or worked abroad we will take up at least one reference from the employer in the relevant

country. One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish the school to take up references in advance of the interview, they should notify the school at the time of applying. The school will ask all referees if the candidate is suitable to work with children. For specific roles at least one reference should be taken up prior to interview. This includes, but is not limited to, all senior roles, teaching posts and allied health professionals. The school will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The school will verify all references. Where references are received electronically, the school will ensure they originate from a legitimate source. When references are not sufficient in response; they will be followed up with a phone call to the referee and details of the response noted. The school will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

8. Conditional offer of appointment: pre-appointment checks

Any offer to a successful candidate will be conditional upon completion of the checks set out below to the school's satisfaction. The checklist is not exhaustive and may be added to and adapted to improve the process when appropriate:

- Receipt of at least two satisfactory references (if these have not already been
- received).
- Verification of identity, including evidence of the right to work in the UK.
- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List(s) maintained by the DBS. Any positive DBS checks will be discussed with the Headteacher and the candidate, the results of which will be recorded. See Appendix 1 for further details on the Recruitment of Ex-offenders. Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy becomes known subsequently.
- For a candidate to be employed as a teacher, the Chair of Trustees will carry out a check that that the candidate is not subject to a prohibition order issued by the Secretary of State.
- Verification of professional qualifications, where appropriate.
- Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999).
- Where the successful candidate has worked or been resident overseas such criminal record checks and other confirmations as the school may consider appropriate so that any relevant events that occurred outside the UK can be considered. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the Chair of Trustees will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. The Chair of Trustees will pursue criminal records checks for overseas applicants and will obtain a letter/police certificate (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason they may be unsuitable to

teach. If a letter/certificate is not available, the Chair of Trustees will pursue alternative methods of checking suitability or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

- Verification of a satisfactory medical physical and mental fitness to carry out the role which the candidate has been offered through completion of a pre-employment
- Complete Health questionnaire. In this context, the school is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.
- Where the successful candidate will be taking part in the management of the school, a check will be conducted under section 128 of the Independent Educational
- Provision in England (Prohibition on Participation in Management) Regulations 2014.

9. Offer of employment

Pathways School are regulated activity providers in a student and adult workforce. This means that all employees will be subject to an Enhanced DBS application with a check on the children and adult barred lists. Barred list checks must be completed before the person may commence employment and if employment commences prior to receipt of an enhanced DBS certificate or overseas criminal record check, the individual's employment will not be confirmed, they will be closely always supervised and wear an identifying lanyard to indicate that checks are not complete. Pathways School also requires all roles to subscribe to and maintain annual membership of the DBS Update Service from the commencement of employment and for the duration of employment service.

10. Candidate reserve list

Candidates who are deemed to be suitable for appointment by the selection panel, but for whom there are not enough vacancies, can, if they wish, be placed on to a reserve list. If another vacancy for the same role with the same specification becomes vacant then the vacancy may be filled directly from the reserve list without the need to re-advertise or reinterview subject to pre-employment checks including updated references.

Candidates will be placed in order on the reserve list in selection result order. Appointments will be subject to the candidate being able to fulfil any specific requirements of the vacancy at the time. The reserve list will be valid for 6 months from the interview date.

11. Fraudulent applications

Providing false information could result in the application being rejected, an offer being withdrawn or summary dismissal if the applicant has been selected. If an application turns out to be fraudulent this may need to be referred to the police and/or DBS as a criminal act may have been committed.

12. Candidate feedback

As part of our commitment to good practice, we offer feedback to all interviewed candidates, where possible, within three weeks from the date of interview. We can

offer feedback on unsuccessful applications for those not shortlisted for interview to internal applicants only.

13. Agency and contractors

All agencies supplying agency staff will provide Pathways School with a written agreement that they have conducted all pre-employment checks required by the school and will be recorded on the school's Single Central Register.

All agency staff must provide photographic ID, right to work documents, proof of address and their DBS certificate on their first day before they are allowed to start work at the school. Contractors on site will not be left alone in areas where they can have access to or access to data about children or adults at risk. If employed to work with children or adults at risk, they will be subject to the same checks as a school employee.

14. Criminal records policy

The school will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education September 2021' and any amended version in conducting the necessary required DBS checks.

The school complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here: https://www.gov.uk/government/publications/dbs-code-of-practice.

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff ("M") has worked in:

- A school or a maintained school in England in a position which brought M regularly into contact with children or young persons.
- A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons.
- An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education, or which brought M regularly into contact with children or young persons, during a period, which ended not more than three months before M's appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained. If the candidate is not currently working with children but has done so in the past, the school will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the school will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the school may request character references which may include references from the candidate's school or university.

15. Retention, security of records and data protection obligations

The school will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy (in compliance with GDPR). Copies of DBS certificates will

not be retained for longer than 6 months. The school will comply with its data protection obligations in respect of the processing of criminal records information.

Appendix 1: Policy on the recruitment of ex-offenders

The school will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The school makes appointment decisions based on merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the school. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All positions within the school are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered “spent” except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected, an offer being withdrawn or summary dismissal if they have been appointed, and a referral to the police and/or DBS. Under the relevant legislation, it is unlawful for the school to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children or adults at risk. In addition, it will also be unlawful for the school to employ anyone who is the subject of a disqualifying order made on being convicted or charged with certain violent and sexual criminal offences against children or adults at risk, at home or abroad. It is also unlawful for the school to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance “Disqualification under the childcare Act 2006 (July 2018)”.

It is a criminal offence for any person who is disqualified from working with children or adults to attempt to apply for a position within the school. The school will report the matter to the Police and/or the DBS if:

- the school receives an application from a disqualified person.
- is provided with false information in, or in support of an applicant's application; or
- the school has serious concerns about an applicant's suitability to work with children.
- if relevant information (whether in relation to previous convictions or
- otherwise) is volunteered by an applicant during the recruitment process or obtained
- through a disclosure check, the school will consider the following factors before
- reaching a recruitment decision:
- whether the conviction or other matter revealed is relevant to the position in question.
- the seriousness of any offence or other matter revealed.
- the length of time since the offence or other matter occurred.
- whether the applicant has a pattern of offending behaviour or other relevant matters.
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters.

- in the case of disqualification from providing childcare, whether the applicant has or can obtain a waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the
- convicted person.

Appendix 2: Recruitment of Volunteers

Volunteers fall outside of the definition of staff contained in the Education (Independent Schools Standards) (England) Regulations 2014. Volunteers are individuals who undertake unpaid activity in the school of their own free choice.

Pathways School is committed to ensuring that:

- students benefit from working with volunteers
- volunteers benefit from working at Pathways School
- volunteers support the aims and objectives of the school
- employed staff understand the role of volunteers

A range of opportunities will be offered to encourage volunteers to work with us. Pathways School expects volunteers to:

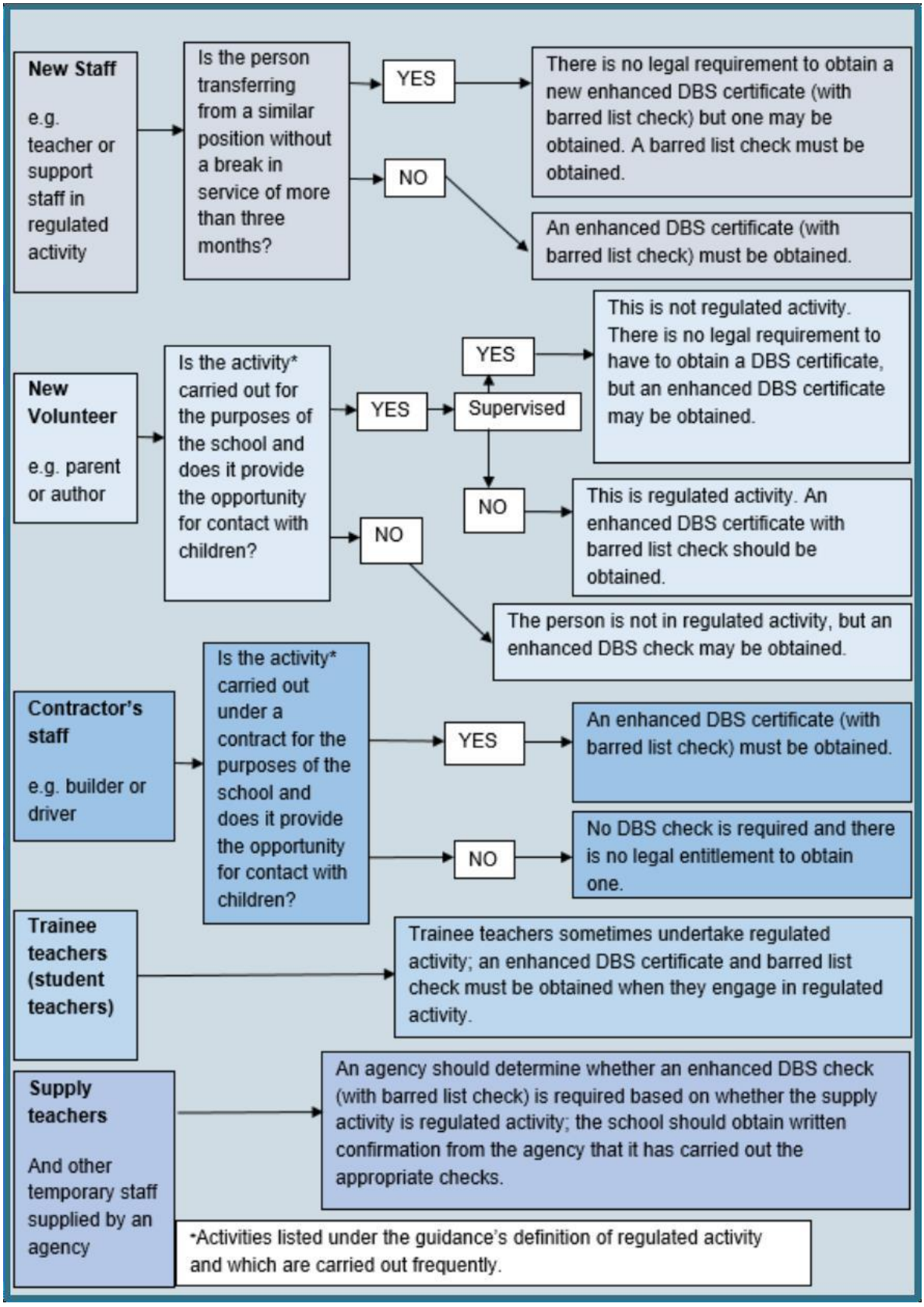
- be reliable and honest
- uphold the school's values
- comply with the school's policies and procedures
- contribute positively to the aims of the school
- carry out tasks within agreed guidelines
- Volunteers can expect:
- to have clear information about what is and is not expected of them
- to receive adequate training, support, and supervision
- to be insured and volunteer in a safe environment

Anyone wishing to volunteer at Pathways School should approach the Headteacher with their contact details and details of how and when they would like to volunteer. Volunteers must complete a Volunteer Application Form with details of two referees who can confirm their suitability to work with children. If an applicant is accepted to volunteer at the school, a volunteer agreement will be drawn up setting out the conditions of the volunteering, code of conduct and checks required before volunteering can commence.

In line with guidance from Keeping Children Safe in Education volunteers will be:

- risk assessed for the type of DBS check required according to the nature of the
- work with children, whether the role if eligible and the information known about the volunteer
- Always supervised by an employed member of staff in regulated activity

The school will undertake an Enhanced DBS check with barred list for children and adults on all individuals undertaking regulated activity. In addition, volunteers will undergo the following checks before volunteering may commence:

- ID check, confirming their identity and current address
- Health disclosure to confirm their physical and mental fitness for the role
- DBS check
- At least two references from individuals who can confirm their suitability to work with children and do not know the applicant solely as a friend or relative
- Overseas check, where the volunteer has lived or worked abroad for more than three months in the past five years

Appendix 3: Flowchart of DBS criminal record and barred list checks