

## SAFER RECRUITMENT INCLUDING SCR POLICY

<b>ODBST Level 1 Statutory Policy:</b>	<b>ALL</b> Schools require this policy with <b>no changes</b> allowed to core text. No changes are necessary to personalise this with school name and branding, as this is a Trust level policy for use, without change, by all schools, <b>except</b> where a school contact is required as identified in the content of the policy. LGBs will <b>note</b> adoption in LGB meetings. Review will take place at Trust level, and schools will be notified of updates and review dates as necessary.
<b>Other related ODBST policies and procedures:</b>	ODBST Whistleblowing Policy ODBST Equality and Diversity Policy ODBST Statement of Procedures for Managing Allegations of Abuse Against Staff
<b>Committee responsible:</b>	FRAPP
<b>Approved by:</b>	FRAPP and Trust Board
<b>Date Approved:</b>	October 2025
<b>Review Date:</b>	Autumn 2026

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

## **1. Introduction**

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- attracting the best possible candidates/volunteers to vacancies;
- deterring prospective candidates/volunteers who are unsuitable from applying for vacancies;
- identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people.

Safer recruitment means thinking about and including issues to do with child protection, safeguarding and promoting the welfare of children at every stage of the recruitment process.

## **2. Scope**

This policy applies to trustees, governors, all staff, contractors, service providers and volunteers.

## **3. Legislation**

This policy is written in line with Keeping Children Safe in Education (2025) and Childcare Disqualification Regulations (2018). The aim of this policy document is not to replicate the KCSIE guidance. Schools should refer to the (<https://www.gov.uk/government/publications/keeping-children-safe-in-education>) in conjunction with this policy.

## **4. General Principles**

### **4.1. Definitions**

- Unless indicated otherwise, all references to “teacher” include the headteacher;
- Unless indicated otherwise, all references to ‘staff’ include teaching, support and shared services staff.
- Unless indicated otherwise, all references to ‘school’ refer to each individual school within ODBST.

### **4.2. Consistency of Treatment and Fairness**

The Trust is committed to ensuring consistency of treatment and fairness and will abide by all relevant employment and equality legislation.

### **4.3. Delegation**

The Trust has chosen to delegate some of its functions to local governing bodies as set out in this policy and the scheme of delegation.

### **4.4. Monitoring and Evaluation**

The local governing body and headteacher will monitor the operation and effectiveness of the school’s safer recruitment policy and may be required to provide feedback to officers and Trustees of the ODBST, or the Local Authority Designated Officer where appropriate.

## **5. Responsibilities**

### **5.1. Responsibilities of the Trust**

It is the responsibility of the Trust to ensure that the ODBST has effective policies and procedures in place for the safe and fair recruitment and selection of staff and volunteers in

accordance with Department for Education guidance and legal requirements and the relevant Local Authority's Safeguarding Children's Board procedures and to monitor members school's compliance with them.

## **5.2. Responsibilities of the Headteacher/ School**

- To ensure that the school operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance;
- To ensure that all appropriate checks have been carried out on staff and volunteers in the school;
- To ensure that appropriate staff and governors have completed safer recruitment training, that it is logged and updated where appropriate and that every recruitment panel has at least one member safer recruitment trained within the last three years;
- To monitor any contractors and agencies compliance with this document;
- To promote the safety and well-being of children and young people at every stage of this process.

## **5.3. Responsibilities of the Local Governing Body**

- To regularly audit the single central record to ensure that all appropriate safer recruitment checks have been carried out on staff, governors, volunteers, contractors and agency staff in the school;
- To ensure that schools adhere to the requirement that every recruitment panel has at least one member safer recruitment trained within the last three years;
- To ensure that a sufficient number of governors are safer recruitment trained to support the school's recruitment panels;
- To promote the safety and well-being of children and young people at every stage of this process.

## **5.4. General Responsibilities**

- It is the responsibility of all potential and existing workers, including volunteers to comply with this document;
- It is the responsibility of all contractors and agencies to comply with safer recruitment pre-employment checks;
- The responsibilities of Ofsted, within inspection and regulation work, also include identifying safeguarding concerns such as inadequate recruitment checking processes.

## **6. Overview**

The ODBST and school is committed to using procedures that deal effectively with those adults who fail to comply with the school's safeguarding and child protection procedures and practices.

We are under a duty to refer any allegation of abuse made against a member of staff to the Local Authority Designated Officer within one working day of the allegation being made. A referral will be made if a teacher or member of staff (including volunteers) has:

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children/young people; or
- Behaved towards a child in a way that indicates that he/she is unsuitable to work with children

Under certain circumstances, we have a duty to refer to the Disclosure and Barring Service (DBS), any member of staff who, following investigation, is either dismissed or resigns prior to the completion of disciplinary procedures, because of conduct or action towards a pupil that has placed that pupil at harm or risk of harm.

## 7. Inviting Applications for a Role

All advertisements for posts, paid or unpaid, will include the following statement:

“The **school/Trust** is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment. All post holders in regulated activity are subject to appropriate vetting procedures and a satisfactory Disclosure and Barring Service (DBS) Enhanced check. The ODBST is an Equal Opportunities employer”.

Where the post involves working directly with children or young people, the following statements will be included in the advertisement:

*This post is covered by the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975 because it is a post which involves working directly with children or young people and the applicant is required to declare any criminal convictions (or cautions or bind-overs) including those which are “spent”. The amendments to the Exceptions Order 1975 (2013, 2020) provide that certain spent convictions and cautions are ‘protected’ and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Disclosure and Barring Service website: [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#)*

*[It is an offence to apply for this role if you are barred from engaging in regulated activity relevant to children.](#)*

It is expected that all vacant posts will usually be advertised externally so as to encourage as wide a field of potential candidates as possible. In certain circumstances there may be justification for an internal advertisement only but the rationale for this should be discussed with the ODBST HR team prior to advertising.

All applicants will receive a pack or link to a website containing the following when applying for a post:

- Job description and person specification;
- An application form;
- A recruitment monitoring form;

- Information about the ODBST, the school and other general information such as reference to the school's commitment to ensuring the safety and well-being of the pupils and to legislation concerning the protection of children;
- Details of the selection procedure for the post;
- The contact details of any person who will be able to provide additional information about the post;
- A statement about access to the school for applicants who may wish to see it or who may wish to speak with the Headteacher before making an application;
- The ODBST Safeguarding and Child Protection policy and the ODBST Safer Recruitment policy; and
- Job applicant privacy notice

Prospective employee applicants must complete, in full, the ODBST application form online via MyNewTerm. A curriculum vitae will not be accepted. Any applicants requiring support in completing the on-line form can request assistance via the recruiting school/ individual responsible for recruitment. Written information about previous employment history will be requested and will be checked to ensure that it is not contradictory or incomplete.

By completing and submitting an application form, applicants are deemed to have provided a signed declaration that the information given is factually correct and that they possess the qualifications, skills and experience that they have stated on the form.

## **8. Identification of the Recruitment Panel**

At least one member of the Selection and Recruitment Panel will have successfully completed training in safer recruitment within the last three years.

### **Shortlisting and References**

Candidates will be short listed against the person specification for the post. A minimum of two people should carry out the short-listing process, one of whom should have completed appropriate safer recruitment and selection training.

The Trust will carry out online searches on short listed candidates. Searches carried out will be done so in accordance with current data protection legislation on the basis of public task for the purposes of safeguarding. Information which is found to suggest the person is unqualified for the role, poses a safeguarding risk or risks damaging the reputation of the Trust will be investigated through discussion with the applicant and will form part of the overall information on which to base the hiring decision and as part of the holistic assessment of the candidate's suitability for the role and Trust.

References for shortlisted candidates will normally be sent for immediately after shortlisting. The only exception to this is where candidates have indicated on their application forms that they do not wish their current employer to be contacted. In such cases, this reference will be taken up as soon as permission to contact the current employer is provided. One reference will be sought prior to interview wherever possible. In all cases references will be reviewed and any discrepancies probed either during the selection process, prior to an offer of employment being confirmed or

when the reference is received. All references of employment made are subject to the receipt of satisfactory references and pre-employment checks.

References will be sought directly from the referee via MyNewTerm, and where necessary, the referee will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges. Where a company chooses to upload their own reference (rather than completing the standard Trust reference template on MyNewTerm), the recruiting manager and/or Headteacher should confirm with the referee the reason for this. Where this is due to the company's standard recruiting processes, it is important that the referee is asked to specifically comment on the individual's suitability to work with children. The wording from the reference form is as follows:

*Has [name of candidate] been involved in any disciplinary procedures, allegations or concerns related to safety and welfare of children or young people? Please include any 'live' or spent warnings or disciplinary action.*

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Any such reference checks will be discussed with the candidate before contact is made with a previous employer.

Schools should:

- Not accept open references e.g. to whom it may concern;
- Ensure that references are completed by a senior person within the organisation with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations). If the reference is provided by the HR department, the school/Trust must check that the referee has access to all the required information regarding any disciplinary investigations, safeguarding concerns etc;
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- 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 is received from their current employer;
- Always verify any information provided on the reference with the person who provided the reference;
- Ensure electronic references originate from a legitimate source;
- Contact the referees to clarify content where information is vague or insufficient detail is provided;
- Ensure electronic references originate from a legitimate source (e.g. not personal email accounts etc); and
- 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 any concerns are resolved satisfactorily before appointment is confirmed.

Detailed written records will be kept of such exchanges.

Referees will be asked specific questions about the following:

- The candidate's suitability to work with children and young people;
- Their relationship to the candidate;
- Any substantiated allegations;
- Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people;
- The candidate's suitability for the post.

Reference requests will also include the following factual information:

- Applicant's post and salary for the period in question;
- Disciplinary record.

All appointments of external applicants will be subject to satisfactory references, vetting procedures and DBS clearance.

It is recognised that, from a safer recruitment perspective, existing employees of ODBST who apply for a new role within ODBST (and are therefore "internal candidates") have already completed the necessary Trust safer recruitment procedures (KCSIE 2025, 351). Where an individual has a significant change to their role including a move to a regulated position from a non-regulated position, where there has been a break in service of 12 weeks or more or when there have been any concerns raised around their suitability to work with children full checks should be completed.

Where an individual changes school (on a permanent basis) it would be expected that a DBS is requested for the new position as the certificate names an individual school.

To ensure a fair non-biased process, it is not considered best practice for a member of the interviewing panel to provide a reference for an applicant. In these circumstances the current references on file for the individual should be reviewed. If they are relevant and cover suitability for the position applied for, it will not be necessary to request additional references. Please refer to the Trust HR team for guidance on this if unsure. In all cases the Headteacher of the existing employee (or Trust HR if the candidate is a Trust Headteacher) would be asked to confirm that there are no disciplinary, safeguarding or conduct issues to be disclosed.

## **9. Invitation to Selection Process**

Candidates invited to the selection process will receive:

- An email via MyNewTerm confirming details of the interview and any other selection techniques;
- Details of the panel members;
- A copy of the job description and person specification;
- The opportunity to discuss the process prior to the interview;

- A request to provide proof of identity, proof of current address and proof of right to work in the UK documentation to support a DBS check and right to work check;
- A request to provide evidence of the qualifications relevant to the role as listed on the candidate's application form;
- A self-declaration form for completion - Shortlisted candidates must complete the self-declaration of their criminal record or any information that would make them unsuitable to work with children. This is sent through MyNewTerm. This must be reviewed by the school/Trust (for central team roles) ahead of the interview to allow the information to be discussed and considered at the interview before the DBS certificate is received. Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview. (KCSIE 2025).
- A notification that online searches will be conducted as part of the recruitment process in accordance with the Trust's commitment to safeguarding
- A notification that online searches will be conducted as part of the recruitment process in accordance with the Trust's commitment to safeguarding.

## **10. The Selection Process**

Selection techniques will be determined by the nature and duties of the post, but all vacancies will require an interview of short-listed candidates.

A robust selection process should not rely solely on an interview and a range of selection activities should be designed in order to help assess who is the most suitable candidate for the job. Interviews should be conducted face to face in person, wherever possible. In exceptional circumstances, interviews may be conducted remotely over a video platform. In such a situation the candidate and recruitment panel must be visible to each other; a telephone only interview will not be sufficient.

Panels of at least 2 people should always be involved in interviews so as to allow observation of the candidate and notes to be taken and to minimise the risk of any allegation of bias.

Candidates will be required to:

- Explain any gaps in employment of more than one month (these will be evident from the MyNewTerm application form);
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel;
- Declare any information that is likely to appear on the DBS disclosure;
- Demonstrate their ability to safeguard and protect the welfare of children and young people.

To assess the suitability of a candidate to work in a school the interview may examine:

- What attracted the candidate to the post being applied for and their motivation for working with children;
- Explore their skills and ask for examples of experience of working with children which are relevant to the role, and,

- Probe any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

The interview process should be used to explore potential areas of concern and 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 the appropriate boundaries between adults and children; and,
- Indicators of negative safeguarding behaviours.

KCSIE 2025 has recognised that it is best practice to involve pupils/students in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with pupils/students is common for relevant roles.

## **11. Employment Checks**

An offer of appointment will be conditional, and all successful candidates will be required to:

- Provide proof of identity (including checking documents related to name changes) and address;
- Complete an enhanced DBS application with document verification (including children's barred list check for those in regulated activity) and receive satisfactory clearance. Where an individual is on the update service, schools must still see the original physical certificate (KCSIE 2025, 238). Under KCSIE 2025 (239) there is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than 3 months before the person's appointment, the applicant has worked, in a school in England, in a post which has brought the person regularly into contact with children however it is ODBST's standard practice to obtain an enhanced DBS certificate. Please contact the Trust HR team to discuss this further if required to complete a risk assessment;
- Obtain a children's barred list check if an individual will start work in a regulated activity with children before the DBS certificate is available;
- Verify the candidate's mental and physical fitness to carry out their work responsibilities by ensuring the individual has a pre-employment health check (e.g. through Smartclinic);
- Provide proof of professional status and actual certificates of relevant qualifications;
- Confirm completion of an induction period if joining in a teaching role, unless starting as an ECT;
- Complete a confidential health questionnaire to verify their mental and physical fitness to carry out their work;
- Provide proof of eligibility to live and work in the UK;
- Request appropriate overseas checks where the individual has lived or worked outside the United Kingdom for three months or more in the last five years (whether consecutively or in total). This includes: Criminal records checks from the relevant country/countries, a letter of professional standing from the professional regulating authority in the country (or countries) in which the applicant has worked, where applicable.

For EEA nationals, consideration should be given to obtaining a certificate of good conduct or equivalent.

Please refer to KCSIE 2025 for further guidance on overseas checks.

Where it is not possible to obtain an overseas criminal records check, schools should seek alternative methods of checking suitability and/or undertake a risk assessment. The Home Office has published guidance on [criminal records checks for overseas applicants] (<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>).

- Have at least two satisfactory references.

Additional checks will be carried out depending on the role such as:

- Verification that anyone employed as a teacher is not subject to a prohibition order issued by the Teaching Regulation Agency (TRA) or interim prohibition order, and checks for any sanctions or restrictions imposed by another regulating authority in the UK or overseas
- For teachers who have taught outside England, schools should check for teacher sanctions or restrictions via the Teacher Services system and consider information about any teacher sanction or restriction that an EEA regulating authority has imposed
- Undergo appropriate checks to ensure that they are not disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006 for relevant roles;
- Confirmation that anyone taking up a management position in accordance with the definition in KCSIE 2025 is not subject to a section 128 direction prohibiting them from taking part in the management of an any school (including academies, independent and free schools)

All checks will be:

- Confirmed in writing;
- Documented and retained on the personnel file;
- Recorded on the school's Single Central Record;
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Employment will commence subject to all checks and procedures being satisfactorily completed.

It is strongly recommended that all efforts are made to obtain all pre-employment checks prior to the commencement of employment, particularly in relation to references and DBS checks. Where this is not possible, appointments should be delayed until satisfactory checks are received, or arrangements made for supervision of the staff member until such time that they are received and an appropriate risk assessment placed on file.

Documented evidence of the checks made- e.g. eligibility to work, notification of the DBS certificate number (although not the certificate itself), references etc. – should be kept on the individual's personnel file in the school.

## 12. Recruitment of Ex-Offenders

The ODBST will not unfairly discriminate against any applicant for employment based on conviction or other details disclosed. The ODBST makes appointment decisions based on merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the Trust. Each case will be decided on its merits in accordance with the objective assessment criteria.

All positions within our schools are exempt from the provisions of the Rehabilitation of Offenders Act 1974. 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. A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence. It is unlawful for the Trust to employ anyone in regulated activity who is included on the children's barred list maintained by the DBS. It is a criminal offence for any person who is barred from working with children to apply for a position in regulated activity. The Trust will make a report to the Police and / or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of a candidate's application;
- it has serious concerns about an applicant's suitability to work with children.

Assessment criteria in the event that 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 Trust 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;
- the circumstances surrounding the offence and the explanation(s) offered by the applicant

If the post involves regular contact with children, it is the Trust's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the Trust's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the Trust's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

Assessment procedure in the event that 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 Trust will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Headteacher and Chair of Governors in the case of school based roles or the CEO and Chair of Trustees in the case of shared services roles before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the Trust may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

### **13. Disclosure information**

If a DBS Certificate reveals any convictions, the person concerned will be invited to attend a meeting to discuss the conviction(s) and circumstances. Following this meeting a risk assessment will be carried out and a decision made and communicated back to the person concerned. Schools should liaise with Trust HR for guidance in these circumstances. For safer recruitment purposes, until this decision has been made the applicant should not commence employment.

Further details regarding storage and retention of DBS information can be found under section 20.2.

### **14. Induction**

All staff and volunteers who are new to the school will receive information on the school's safeguarding policy and procedures, guidance on safe working practices which would include guidance on acceptable conduct/behaviour and a copy of Part one (or Annex A where appropriate) of Keeping Children Safe in Education 2025 guidance from the Department for Education.

These expectations will form part of new staff members' induction training.

All successful candidates will undergo a period of induction and will:

- Meet regularly with their line manager;
- Attend any appropriate training including generalist child protection training.

### **15. Supply Staff**

The School/Trust will only use those agencies which operate a Safer Recruitment Policy and supply written confirmation that all relevant checks have been satisfactorily completed. Any information disclosed as part of the DBS check will be treated confidentially. These agencies should be able to demonstrate that their staff have received appropriate safeguarding training.

The school will carry out identity checks when the individual arrives at school and keep a record on the school's single central record of the checks contained in the letter of assurance received from the agency.

## **15.1 Alternative Provision Providers**

Where the school/Trust places a pupil with an alternative provision provider, the school will:

- Obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff
- Ensure that the alternative provider has confirmed in writing that.
- Enhanced DBS checks with children's barred list checks have been obtained for all staff and volunteers in regulated activity
- Section 128 checks have been completed for management positions (where applicable)
- The provider has appropriate safeguarding policies and procedures in place
- Staff have received appropriate safeguarding training
- Maintain records of these assurances and checks on the school's Single Central Record, clearly indicating the provider name and confirmation date
- Review these assurances annually or when there are significant changes to staffing at the alternative provision
- The school retains responsibility for the safeguarding of any pupil placed with an alternative provider.

## **16. Peripatetic Staff**

The school will require and seek confirmation that all necessary checks and DBS requirements have been satisfactorily completed for peripatetic staff.

The school will carry out identity checks when the individual arrives at school and keep a record on the school's single central record of the checks carried out or contained in a letter of assurance.

## **17. Volunteers**

As a school we commit to:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with children's barred list check for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without children's barred list information for any volunteers not engaged in regulated activity
- Carry out a risk assessment when deciding whether to seek references for individuals looking to volunteer at the school/Trust
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations or Childcare Act 2006 for relevant roles.

## **18. Contractors**

As a school we will:

- Ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check;
- Ensure that any contractor who has not been subject to an appropriate check will not be allowed to work unsupervised or engage in regulated activity under any circumstances;

- Check the identity of all contractors and their staff on arrival at the school and keep a record on the school's single central record of the checks contained in the letter of assurance received from the company.

### **19. Trainee/Student Teachers**

Where applicants for initial teacher training are salaried by the ODBST, we will ensure that all necessary checks have been carried out. Where trainee teachers are fee-funded we will obtain written confirmation from the training provider that necessary checks have been carried out and log the letter of assurance on the school's single central record. The school will carry out identity checks when the individual arrives at the school.

### **20. Single Central Record**

In line with DfE requirements, the school will keep and maintain a single central record of recruitment and vetting checks. The central list will record all staff who are employed at the school, including casual staff, supply agency staff whether employed directly or through an agency, volunteers, governors who also work as volunteers, those who provide additional teaching or instruction for pupils but who are not staff members, e.g. specialist sports coach, trustees and ODBST shared services employees. The SCR will also include the members and trustees of the academy trust. All staff and individuals working with the school/Trust have a duty to ensure that they inform the headteacher or SCR administrator of any changes to their recorded information.

The SCR is maintained electronically using the Online SCR portal and is maintained by each school with Trust oversight. The Trust provides procedural documents to support the maintenance of the SCR in the HR Document Store.

The SCR is a "live document" and therefore must be updated whenever there are any changes to the individuals employed at or working in schools/at Trust level. The details of an individual should be removed from the single central record once they no longer work at/for the school/Trust.

The SCR is reviewed and updated regularly by the school's agreed SCR administrator and is subject to internal audit by the:

- Headteacher once every half term
- School's Chair of Governors or Safeguarding Governor every term, and
- ODBST HR every term.

The ODBST checks required for each role are KCSIE compliant and pre-determined within the Online SCR. Any questions regarding relevant checks or questions arising from internal audit of the SCR should be directed to ODBST HR immediately.

The checks required within the Online SCR portal go beyond the minimum expectations from Ofsted (Sept 2025) for the SCR:

SCR coverage	<ul style="list-style-type: none"> <li>• Must cover all staff, even if they only work for one day (this includes teacher trainees on salaried routes, agency and third-party supply staff even if they work for one day)</li> <li>• For academies, the SCR must include members and trustees of the academy trust</li> </ul>
For agency and third-party staff, the SCR records	<ul style="list-style-type: none"> <li>• Whether the school has received written confirmation that the employment business supplying the member of staff has carried out the relevant checks and obtained the appropriate certificates. These are commonly known as 'Letters of Assurance'.</li> <li>• The date the school this confirmation was provided</li> <li>• Whether details of any enhanced DBS certificate have been provided in respect of the member of staff</li> </ul>
For all remaining staff (including teacher trainees on salaried routes), the SCR must record whether the following checks have been carried out (or certificates obtained). These include:	<ul style="list-style-type: none"> <li>• An identity check</li> <li>• A children's barred list check</li> <li>• An enhanced DBS check (with children's barred list check) requested/certificate provided</li> <li>• A prohibition from teaching check</li> <li>• Further checks on people who have lived or worked outside the UK</li> <li>• A check of professional qualifications, where required</li> <li>• A check to establish the person's right to work in the UK</li> <li>• For academies and free schools, if the section 128 checks have been carried out for those in management positions</li> </ul> <p>The SCR indicates the date when each check listed above was completed (or certificate obtained).</p>

## 20.1 DBS renewals

ODBST has robust safeguarding procedures and has committed to renewing staff, volunteer and governor/Trustee DBS certificates every 5 years.

It is understood that Local Authorities or schools joining the Trust may have different policies and therefore it is understood that there will be a period of transition to facilitate all checks being renewed as per ODBST guidance. On joining ODBST, a school will ensure that DBS renewals are completed in line with ODBST policy within 12 months of academising.

Where individuals are on the update service, the employee should provide their original DBS certificate and authorisation to complete a check on the government portal.

All other individuals (agency, contractors etc) will be subject to their employer's DBS renewal processes. The Letter of Assurance details the checks that have been made with the relevant dates.

## **20.2 Retention of documents**

The school/Trust must retain the following on file:

- Copies of documents used to verify the candidate's identity (e.g. passport or photo driving licence)
- Right to work (e.g. passport, Visa, birth certificate etc)
- Required qualifications (e.g. QTS certificate)

## **20.3 DBS Certificates/Certificate Information**

In line with [government guidance](#), the ODBST is committed to comply fully with the code of practice regarding the correct handling, use, storage, retention and disposal of DBS certificates and DBS certificate information.

ODBST complies fully with its obligations under the GDPR, Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of DBS certificate information. KCSIE (2025, paragraph 283) is clear that DBS certificates should not be retained once the recruitment process is complete and an individual has commenced employment. The only exception is where there is a specific valid reason for retaining the certificate (for example, if it contains relevant information that informed the recruitment decision). In such exceptional cases, the certificate should not be kept for longer than six months from the recruitment decision being made.

The ODBST will:

- Not routinely retain copies of DBS certificates beyond verification
- Record all relevant information from the DBS certificate on the Single Central Record immediately upon receipt
- Destroy/securely dispose of DBS certificates within six months where there is a valid reason for temporary retention
- Document the reason for any temporary retention beyond the recruitment process completion
- Ensure that where certificates are temporarily retained, they are kept securely with strictly controlled access

A record that a DBS check has been performed should be recorded on the Online SCR including the:

- issue date
- disclosure number
- level of disclosure (e.g. DBS Enhanced)

- name of the school/Trust based individual who has evidenced that they have seen the DBS certificate
- name of the counter signatory
- check result (e.g. Certificate Contains No Information)

Where the certificate “contains information” this should be discussed with ODBST HR immediately and they will advise as to the procedure for appropriate risk assessment. Where a copy of the outcome certificate has been provided this should be kept securely, in lockable, non-portable, storage container with access strictly controlled and limited to those who are entitled to see it as part of their duties. The DBS certificate must then be securely disposed of (e.g. by shredding).

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. The school should include on the risk assessment a record of all those to whom certificates or certificate information has been revealed. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **APPENDIX A: GUIDANCE ON CONDUCTING ONLINE SEARCHES**

### **1. Purpose**

Online searches are conducted as part of the Trust's due diligence and safeguarding responsibilities to help ensure the suitability of candidates to work with children.

## **2. Scope**

Online searches will be conducted on all shortlisted candidates for roles within ODBST schools and central team.

## **3. Who Conducts Searches**

- Searches should be conducted by trained members of the recruitment panel
- At least two people should review any findings
- Searches should be conducted objectively and without bias

## **4. What Will Be Searched**

- Publicly available social media profiles (e.g., Instagram, Facebook, X/Twitter, Instagram, LinkedIn)
- Professional networking sites
- News articles and press coverage
- Public records and databases relevant to the role

## **5. What We Look For**

Information that may indicate:

- Potential safeguarding concerns
- Unsuitable attitudes toward children or young people
- Behaviour that may bring the Trust into disrepute
- False information provided in the application
- Concerns about professional conduct

## **6. Recording and Acting on Information**

- All searches conducted must be documented
- Any concerning information must be recorded objectively
- Candidates must be given the opportunity to respond to concerns at interview
- Decisions must be based on the totality of information available, not solely on online searches

## **7. Data Protection**

- Searches will be conducted in accordance with UK GDPR and Data Protection Act 2018
- Information will only be processed where necessary for safeguarding purposes
- Records will be retained in accordance with the Trust's retention schedule