

Newham Community Learning: Safer Recruitment

"This draft policy is now in use across the Trust, and is due for formal ratification at the Trust Board on 17 September 2026. At that point, designated Trustees will be appointed to the key oversight roles. Pending those appointments, between 1 and 17 September these responsibilities are exercised by the Chair of the Trust Board, Dr M Mansoor Siddique."

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Safer Recruitment Policy

1. Statement of Intent

At NCL we are committed to safeguarding and promoting the welfare of our children and young people, and expect all employees, volunteers and visitors to share this commitment. Safer recruitment is a core part of our approach to vigilance and keeping children safe: every appointment across the Trust follows a consistent, rigorous process designed to deter, identify and prevent people who pose a risk of harm to children from working in or gaining access to our schools.

This policy applies equally to permanent, temporary, casual, agency and voluntary appointments, and to contractors, volunteers and Trustees/governors with access to children.

2. Legal and Statutory Framework

This policy is written in line with:

- Keeping Children Safe in Education (KCSIE), current statutory guidance
- The Education Act 2002 (Section 175/157)
- The Childcare Act 2006
- The Safeguarding Vulnerable Groups Act 2006
- The Rehabilitation of Offenders Act 1974 (Exceptions Order 1975)
- The Disclosure and Barring Service (DBS) statutory guidance
- The Immigration, Asylum and Nationality Act 2006 (right to work checks)
- The Academy Trust Handbook
- Statutory guidance on the Prevent duty
- Working Together to Safeguard Children (current guidance)
- Data Protection Act 2018 & UK GDPR
- The Crime and Policing Act 2026
- The Data (Use and Access) Act 2025

3. Roles and Responsibilities

Role	Responsibilities
Board of Trustees	Ensures the Trust has effective safer recruitment policies and practice in place, and receives assurance reporting.
CEO	Overall accountability for safeguarding and safer recruitment across the Trust.

HR Director	Owns this policy; ensures consistent application across all academies; maintains oversight of the Single Central Record (SCR); ensures recruitment panels include a member with safer recruitment training.
Headteachers / Principals	Day-to-day implementation at academy level; ensure local recruitment activity follows this policy; escalate concerns to HR Director.
Designated Safeguarding Lead (DSL)	Advises on safeguarding-related recruitment decisions, including risk assessments and self-disclosures.
Recruiting Managers	Follow this policy for every vacancy; complete safer recruitment training before chairing or sitting on an appointment panel where required.
Single Central Record (SCR) Administrator	Maintains an accurate, up-to-date SCR for each academy, in the format required by the Trust. The Data is stored centrally on Sam People

4. Recruitment Panels and Training

- Every appointment panel for a post working with children must include at least one member who has completed accredited safer recruitment training within the **last 3 years**.
- Panels should normally comprise at least two people wherever possible.
- Panel members must declare any personal relationship or conflict of interest with an applicant before shortlisting or interviewing.

5. Advertising and Application

- All recruitment activity must be initiated via the MNT (MyNewTerm) platform and adhere to the Trust's Request to Recruit approval process prior to any vacancy being advertised.
- All job adverts and information packs state the Trust's commitment to safeguarding and that the post is subject to an enhanced DBS check.
- The Trust requires a fully completed application form for every post working with children; CVs are not accepted in place of an application form.
- Application forms require candidates to account for gaps in employment or education history.
- Candidates are asked to declare any criminal convictions, cautions, reprimands or pending investigations, and any disqualification or sanction imposed by a regulatory body, in line with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
- As part of the application process, all candidates must provide signed declarations confirming:
 - **Right to Work:** Acknowledgement of the requirement to provide valid evidence in line with the Immigration, Asylum and Nationality Act 2006.
 - **Fitness:** Confirmation of physical and mental fitness to carry out work responsibilities in accordance with the Education (Health Standards) (England) Regulations 2003.

- **Identity:** Acknowledgement of the requirement to provide valid identification in line with Keeping Children Safe in Education* (KCSIE).
- **Online Searches:** Acknowledgement that the Trust may conduct online searches on shortlisted candidates as part of due diligence.

5.1 Online checks and The use of Artificial Intelligence (AI)

- In accordance with KCSIE, the Trust conducts online searches (including publicly available social media) on all shortlisted candidates **prior to interview**. The purpose is to identify any posted or published content that may render the candidate unsuitable to work with children. Any relevant findings will be explored with the candidate during the interview process
- The use of Artificial Intelligence (AI) tools in the recruitment process (including but not limited to the generation of interview materials) is subject to the Trust's current AI Policy. Any use of such tools must be fully compliant with this policy and must not compromise the integrity of the safeguarding process.

6. Shortlisting and References

- Shortlisting is carried out against the essential and desirable criteria in the person specification, applied consistently to all candidates.
- At least two references are obtained for shortlisted candidates before interview **wherever possible**, and always before a final offer is confirmed. One reference must be from the candidate's most recent employer. The Trust will only request and provide factual details of substantiated safeguarding concerns that meet the harm threshold; references must not include details of any concerns or allegations that were found to be false, unfounded, unsubstantiated, or malicious.
- References are requested directly from the referee, not provided by the candidate, and are scrutinised for consistency, including any employment gaps and, where relevant, comment on the candidate's suitability to work with children.
- Open references or references that appear inconsistent with the application are followed up directly with the referee before a final decision is made.
- Online searches, appropriate to the seniority of the role, are carried out on shortlisted candidates as part of due diligence, in line with KCSIE.

7. Interview

- All candidates are interviewed in person (or by video call where in-person attendance is genuinely not possible) before appointment; no candidate is appointed on the strength of a written application alone.
- Interviews explore the candidate's motivation for working with children, and directly explore any gaps or anomalies in their employment history.
- Interview questions and candidate responses are recorded and retained as part of the recruitment file.
- Appendix 1 contains some guidance and example questions that interviewers may ask when testing candidates' motivation for working with children.

8. Pre-Employment Checks

Before a new appointee starts work, the Trust obtains and verifies the following, as applicable to the role:

Check	Who does it apply to?	Notes
Enhanced DBS certificate	All staff working with children; volunteers engaging in regulated activity (frequently or overnight, regardless of supervision)	Enhanced with barred list check where the role is regulated activity
Barred list check	Anyone engaging in regulated activity relative to children	Must be checked before the individual starts, and cannot be done by the individual alone
Identity check	All appointees	Photographic ID verified in person
Right to work in the UK	All appointees	Checked and copied before the start date, in line with Home Office guidance
Prohibition from Teaching check	All teaching staff	Checked via the Teacher Services system
Prohibition from Management check	Those taking up leadership positions in schools/academies	Checked via the Teacher Services system
Qualifications check	Where a qualification is essential to the role (e.g. QTS, subject-specific)	Original certificates verified
Overseas checks	Candidates who have lived or worked outside the UK in the last 5 years	Certificate of good conduct or equivalent, appropriate to the country. The Trust will also require candidates to obtain a letter from the professional regulating authority in the country where they worked, confirming they have not had sanctions or restrictions imposed on them, or that the authority is aware of any reason they may be unsuitable to teach.
Medical fitness	All appointees	Self-declaration as a minimum; occupational

		health referral where indicated
Section 128 direction check	Those taking up management positions	Confirms the individual is not subject to a prohibition on management

No individual will start work in a role involving access to children, in a paid or voluntary capacity, until all essential pre-employment checks for that role have been completed and recorded – except where a risk-assessed, time-limited arrangement is agreed by the Headteacher and DSL in line with KCSIE (e.g. certain checks are outstanding through no fault of the individual), and always with barred list and identity checks completed first. This starting exception strictly does not apply to any staff or volunteers working in settings subject to the Early Years Foundation Stage (EYFS) framework (such as nurseries or reception classes), who must never be permitted to begin working under a risk assessment until the school has received their physical Enhanced DBS certificate including barred list information.

9. Agency Staff, Contractors, Volunteers and Trustees

- Agency and supply staff: the Trust obtains written confirmation from the agency that all required checks (including enhanced DBS and barred list) have been carried out, and the agency provides the DBS certificate number and date of issue. The Trust does not rely on agency assurance alone for roles in regulated activity without evidence.
- Contractors and visiting professionals with unsupervised access to children are subject to the same DBS requirements as staff; those working under supervision are signed in, given a visitor badge, and never left unsupervised with children.
- In accordance with the Crime and Policing Act 2026, the 'supervision exemption' has been removed from the definition of regulated activity. Consequently, any volunteer who teaches, trains, instructs, or supervises children frequently (defined as more than 3 days in a 30-day period) or overnight is in regulated activity and must undergo an Enhanced DBS check with children's barred list information, regardless of whether they are supervised. For existing volunteers who transitioned into regulated activity on 1 September 2026 due to this change, the Trust must obtain an Enhanced DBS check with barred list information (or perform a standalone barred list check if they already hold an Enhanced DBS without a barred list check and have had no break in service). Where an individual volunteers at multiple settings, the Trust will collaborate with the other settings to determine which setting should apply for the check. For volunteers who do not meet these frequency or overnight criteria and are not in regulated activity, the Trust will complete a written risk assessment to determine whether an Enhanced DBS check (without barred list information) or a Basic DBS check is required; under no circumstances will a completely unchecked volunteer be left unsupervised.
- Trustees and local governors are subject to an enhanced DBS check and, since they exercise management functions, a prohibition from management check.

10. Single Central Record (SCR)

Using Sam People each academy maintains an accurate, up-to-date Single Central Record of all staff, Trustees, governors, volunteers and regular visitors, evidencing that the checks required by KCSIE have been completed. The SCR must indicate whether each check has been carried out or certificate obtained, and the exact date on which each check was completed, including: identity checks, standalone barred list checks, enhanced DBS checks, teaching prohibition checks, overseas checks, professional qualification checks, and right to work checks. For academies within the Trust, details of Section 128 management checks must be recorded on the SCR for those in leadership/management positions. For any college/post-16 settings within the Trust, the SCR must also record whether the person's position involves 'relevant activity' (regularly caring for, training, supervising, or being in charge of individuals under 18).

The HR Director carries out a termly audit of each academy's SCR, and any gaps are remediated immediately and reported to the CEO.

11. Self-Disclosure, Induction and Ongoing Suitability

- All staff have an ongoing duty to disclose any caution, conviction, court order, reprimand or warning that may affect their suitability to work with children, as soon as it arises.
- All new staff and volunteers receive a safeguarding induction, covering the Trust's Safeguarding & Child Protection Policy, Code of Conduct, and how to raise a concern, before or on their first day.
- The Trust operates a probationary period for new staff, during which performance and suitability are actively monitored.
- DBS checks are renewed or re-checked in line with the Trust's risk assessment and current statutory guidance; staff are expected to self-declare any change in circumstances in the interim. Where the DBS Update Service is used, individuals must join either at the point of application or within 30 calendar days of the issue date on the certificate. Before conducting an online check via the Update Service, the Trust must obtain the individual's consent, confirm that the certificate matches their identity, examine the original physical certificate to verify its validity for the child workforce, and ensure the check level is appropriate for the role.

12. Record-Keeping, Confidentiality and Data Protection

- Recruitment records, including application forms, references, interview notes and evidence of checks, are retained securely in line with the Trust's Data Protection Policy and retention schedule.
- Information gathered through the recruitment process is used only for the purpose of assessing suitability to work with children and is handled in accordance with data protection laws, which collectively include the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. The Trust operates on the absolute statutory principle that data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare of, and protect the safety of children.

13. Monitoring, Review and Non-Compliance

- This policy is reviewed annually by the HR Director and approved by the Board of Trustees, or sooner following changes to statutory guidance.
- Compliance is monitored through the termly SCR audit, HR Director oversight, and periodic internal scrutiny/audit review.
- Any breach of this policy is treated seriously and may be addressed through the Trust's Disciplinary Policy.

This policy should be read alongside the Trust's Safeguarding and Child Protection Policy and current KCSIE statutory guidance, which take precedence in the event of any conflict.

Appendix 1

Interview Panel guidance and questions to ask

Companion document to the Safer Recruitment Policy – for use by all appointment panels recruiting to posts working with children

1. Purpose and How to Use This Guidance

This question bank supports panels to explore a candidate's motivation, values and understanding of professional boundaries in relation to working with children – a specific requirement of safer recruitment practice, distinct from assessing subject knowledge or general competence.

- At least one panel member must have completed accredited safer recruitment training.
- Use the same core questions with every candidate for a given post, so responses are genuinely comparable and the process is defensible if challenged.
- These questions supplement – and never replace – references, DBS/barred list checks and other pre-employment checks set out in the Safer Recruitment Policy.
- Record answers in the candidate's own words (or close paraphrase) on the scoring sheet at Appendix A, not just a pass/fail judgement.
- Ask gap/anomaly questions of every candidate where relevant, factually and neutrally – never accusingly – and always record the answer given.
- Where a panel has concerns arising from these questions, discuss with the HR Director and/or DSL before making a final decision; concerns do not automatically disqualify a candidate but must be explored and resolved.

2. Question Bank

2.1 Motivation and Values

Question	What good practice looks like
What draws you to working with children specifically, as opposed to other career paths?	A genuine, specific answer grounded in experience – not a generic, rehearsed statement.
Tell us about a time you went out of your way for a child's wellbeing. What made you do that, and how did you know it was the right thing to do?	Reference to appropriate channels (e.g. raising with a colleague, DSL, following policy), not acting alone or in secret.
How would you describe the difference between a	Clear, confident understanding of the distinction; discomfort or vagueness here is worth probing further.

professional relationship with a child and a personal friendship?	
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2.2 Boundaries and Professional Conduct

Question	What good practice looks like
Give an example of a professional boundary in this role. How would you handle a child who wanted to be 'best friends' with you, or to contact you outside school?	Recognises the boundary, explains how they'd redirect it kindly but firmly, and would tell a colleague/DSL.
A pupil gives you a personal gift. What do you do?	Familiarity with the Trust's gifts/hospitality expectations; discloses it rather than keeping it private.
How would you respond if a child became attached to you and sought you out more than seems typical?	Treat this as something to notice and discuss with the DSL/line manager, not something to manage alone or encourage.
What's your view on physical contact with pupils – when is it appropriate, and when isn't it?	Understanding of proportionate, policy-compliant contact (e.g. supporting a young child, first aid) versus inappropriate contact.
How do you use social media, and how do you keep that separate from your professional life?	Clear separation of personal/professional accounts; would not accept friend requests from pupils or ex-pupils who are still minors.

2.3 Recognising and Responding to Risk

Question	What good practice looks like
A child discloses something concerning to you. Walk us through exactly what you'd do, step by step.	Follows a clear disclosure process: listen, don't promise confidentiality, record accurately, report promptly to the DSL.
What would you do if you saw a colleague behaving in a way that made you uncomfortable around a child – even if you weren't sure it was 'serious'?	Would report it (e.g. via the Whistleblowing Policy or to the DSL/Headteacher), even where uncertain, rather than staying silent or deciding for themselves it's nothing.

Have you ever had to challenge a colleague's practice? What happened?	Willingness to raise concerns through appropriate channels; reflects some understanding that this can be uncomfortable but necessary.
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2.4 Self-Awareness and Reflective Capacity

Question	What good practice looks like
Tell us about a time a child made you feel frustrated or tested your patience. How did you handle it, and how did you feel afterward?	Honest reflection, evidence of self-regulation and appropriate response, rather than denial that this ever happens.
What would you find most difficult about this role, and why?	Genuine, specific self-awareness rather than a deflective or overly polished non-answer.

2.5 Employment History – Gaps and Anomalies

Question	What good practice looks like
Your application shows a gap between [date] and [date] – can you talk me through that period?	A clear, consistent account. Ask factually and record the response verbatim where possible; follow up with referees if anything doesn't align.
You've moved roles fairly frequently – what's driven those moves?	A plausible, consistent explanation. Any reluctance to answer, or an account that shifts from the application form, should be explored further and referenced back to referees.

3. Recognising Concerning Responses

No single answer should be treated as conclusive, but the panel should discuss and record any pattern of the following:

- Vague or generic answers where a genuine, experienced practitioner would be expected to give specifics.
- Discomfort with, or dismissal of, boundary questions (e.g. 'that would never be an issue for me').
- A pattern of positioning themselves as a child's special confidant or exception, rather than part of a team operating within policy.
- Irritation, defensiveness or evasiveness when asked about employment gaps or moves.

- Over-rehearsed answers that do not hold up or shift naturally under a genuine follow-up question.
- Inconsistency between the candidate's account and information from references or the application form.

4. After the Interview

- Complete the scoring sheet for every candidate immediately after the interview, while responses are fresh.
- Where any concern has been noted, the panel chair discusses this with the HR Director and/or DSL before an offer is confirmed.
- Interview records, including responses to these questions, are retained as part of the recruitment file in line with the Safer Recruitment Policy and the Trust's data retention schedule.
- Any concern that could constitute a safeguarding risk is escalated in line with the Trust's Safeguarding and Child Protection Policy, regardless of the outcome of the recruitment process.