

THE MOUNT SCHOOL

SAFER RECRUITMENT POLICY

2026–2027

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This policy applies to recruitment and suitability checking across The Mount School, including the EYFS/nursery provision. It must be read alongside the Safeguarding & Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy and relevant employment procedures.

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1. Introduction and aims

The safe recruitment of staff and other adults is a fundamental part of safeguarding children. The Mount School is committed to deterring, rejecting and identifying people who may pose a risk to children or who are otherwise unsuitable to work in the School.

- recruit the best person for each role on merit, ability, experience and suitability;
- ensure recruitment is fair, consistent, transparent and compliant with equality and employment law;
- ensure safeguarding is considered at every stage, rather than being reduced to a DBS check;
- carry out all checks required by law, the Independent School Standards and KCSIE;
- ensure that no barred or prohibited person undertakes work they are legally prevented from undertaking;
- maintain an accurate Single Central Record and auditable recruitment files;
- apply proportionate checks to volunteers, contractors, agency staff, self-employed workers, trainees and other adults; and
- maintain vigilance about ongoing suitability after appointment.

Employees involved in recruitment must understand and follow this policy. A conflict of interest, including a close personal or family relationship with an applicant, must be declared and the individual must not participate in decisions where the conflict could compromise fairness or safeguarding.

2. Legal, statutory and regulatory framework

- Keeping Children Safe in Education 2026 (KCSIE), particularly Part Three;
- the Education (Independent School Standards) Regulations 2014, particularly paragraphs 18–21 of the Schedule;
- DfE Independent School Standards guidance, April 2026;
- the Safeguarding Vulnerable Groups Act 2006, as amended;
- the Crime and Policing Act 2026 changes to regulated activity from 1 September 2026;
- the Rehabilitation of Offenders Act 1974 and Exceptions Order, as amended;
- the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) Regulations and current DfE guidance;
- the Education Act 2002 and Education and Skills Act 2008, including prohibition and section 128 arrangements;
- the Immigration, Asylum and Nationality Act 2006 and current right-to-work requirements;
- the Equality Act 2010;
- the Data Protection Act 2018 and UK GDPR;
- current Disclosure and Barring Service guidance; and
- the Prevent duty guidance.

Where the law or statutory guidance changes during the life of this policy, the School will follow the current requirement and update the policy as soon as practicable.

3. Roles and responsibilities

3.1 Director / Proprietor

- ensure effective safer recruitment policies and procedures are in place and implemented;
- ensure the School complies with the Independent School Standards relating to staff, supply staff and proprietor checks and the Single Central Record;
- provide appropriate oversight and challenge;
- ensure persons involved in management are subject to the checks required by the ISS, including section 128 where applicable; and
- ensure deficiencies identified through audit or inspection are corrected promptly.

3.2 Headteacher

- lead safer recruitment practice and ensure appointment decisions are safeguarding-led;

- ensure appropriate checks are identified for each role before work begins;
- ensure recruitment panels include appropriately trained staff;
- ensure agencies, contractors and external providers give required assurances;
- ensure the SCR and personnel files accurately evidence checks; and
- ensure DBS/TRA referral duties are considered when employment ends or safeguarding concerns arise.

3.3 School administration / recruitment staff

Staff delegated recruitment administration must obtain, verify, record and securely retain the evidence required by this policy; flag missing or inconsistent information; and must not treat a checklist as a substitute for professional scrutiny.

3.4 Recruitment panels

At least one person involved in interviewing will have undertaken appropriate safer recruitment training. The panel must explore safeguarding suitability, gaps, inconsistencies, employment history, references and any concerns identified through online searches or other checks.

4. Safer recruitment principles and planning

Before advertising a role, the School will determine the duties, whether the role involves regulated activity, the level of DBS check legally available and required, whether a barred-list check is required, whether prohibition/section 128/childcare disqualification or other checks apply, and how the role will be supervised.

The job description and person specification will accurately describe the role and include responsibility for safeguarding and promoting children's welfare where relevant. The 2025 policy reference to a 'boarding environment' is removed because The Mount is not a boarding school.

Recruitment decisions will be based on the totality of information available. No single check replaces careful assessment of suitability.

5. Regulated activity with children from 1 September 2026

From 1 September 2026 the supervision exemption is removed for relevant teaching, training, instructing, caring for or supervising children. Supervision by a person already in regulated activity no longer prevents such activity from being regulated activity where the statutory nature and frequency criteria are met.

5.1 Frequency / period condition

For teaching, training, instructing, caring for or supervising children, the activity meets the relevant period condition when it is carried out on more than three days in any 30-day period, or once overnight between 2am and 6am with the opportunity for face-to-face contact.

Where a volunteer works in more than one setting, relevant days across settings count cumulatively towards the more-than-three-days-in-30 condition.

5.2 Practical effect for The Mount

- A weekly reading volunteer is now in regulated activity even if a teacher supervises them.
- A volunteer helping on an overnight School trip is in regulated activity.
- A person volunteering on four relevant days in a 30-day period may be in regulated activity even if those days are spread across different settings.
- An occasional parent helping at a one-off event or non-overnight day trip will not ordinarily meet the frequency condition merely because they have contact with children.
- Supervision remains an important safeguarding control but is no longer the test that removes qualifying teaching/caring/supervising activity from regulated activity.

The change does not mean that every person who comes into contact with children is automatically in regulated activity. The School will assess the actual nature, place, frequency and circumstances of the role.

5.3 Barred persons

It is a criminal offence for a barred person to engage in regulated activity with children and for an organisation knowingly to permit a barred person to do so. The School will ensure that any person undertaking regulated activity is checked in accordance with the applicable legal and sector requirements.

6. Advertising and recruitment information

- the School's commitment to safeguarding and promoting children's welfare;
- that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post;
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the effect of the filtering rules;
- the School's approach to online searches of shortlisted candidates; and
- any requirement for qualifications, professional registration or other role-specific checks.

Vacancies will normally be advertised openly unless there is a legitimate reason to use another recruitment method. Equality of opportunity and safeguarding requirements apply regardless of recruitment route.

7. Application forms, CVs and declarations

The Mount School will use a structured application form for employment. A curriculum vitae may be accepted only alongside a completed application form; it will not replace it.

Applicants will provide full employment history, qualifications and relevant experience and account for gaps or discrepancies. The application form will include appropriate declarations concerning suitability to work with children and relevant criminal-record information within the law.

The School will not state that every spent conviction or caution must be disclosed. Applicants will be given accurate information about the Rehabilitation of Offenders Act exemptions and the statutory filtering rules so that only information they are legally required to disclose is requested.

Providing materially false or misleading information may lead to withdrawal of an offer, disciplinary action or referral to relevant authorities.

8. Shortlisting and online searches

Shortlisting will be undertaken consistently against the person specification. Wherever practicable, at least two people will shortlist.

In accordance with KCSIE, the School will consider carrying out an online search as part of due diligence on shortlisted candidates. The purpose is to identify publicly available information that may need to be explored with the applicant at interview; it is not to conduct intrusive surveillance or make decisions on irrelevant protected or private matters.

The School will tell shortlisted candidates that online searches may be carried out. Relevant concerns will be recorded and discussed fairly with the candidate. The outcome of an online search is not an ISSR-prescribed SCR field and will not be recorded on the SCR merely because a search occurred; appropriate recruitment-file evidence will be retained.

9. References and employment history

References should, where possible, be obtained before interview so that concerns can be explored. Where the candidate has asked that a current employer not be contacted before interview, the School will obtain that reference before confirming appointment.

- seek references directly from the referee rather than relying on open references or testimonials;
- obtain a reference from the current or most recent employer and, where relevant, an employer with whom the applicant most recently worked with children;

- ask about the applicant's suitability to work with children and relevant substantiated safeguarding concerns or disciplinary matters that the referee is lawfully able to disclose;
- compare references with the application form and other information;
- follow up gaps, inconsistencies, vague wording or concerns;
- verify the authenticity of references, including direct contact with the referee/organisation where appropriate; and
- not accept a reference from a relative as a professional reference.

A minimum of two satisfactory references is the School's normal requirement. Where circumstances make this impossible, the Headteacher must record the exceptional rationale and the alternative evidence used; no statutory check may be omitted.

10. Interviews and safeguarding assessment

Interviews will normally be face-to-face wherever practicable and will involve at least two interviewers. Safeguarding suitability will be explored explicitly.

- motivation for working with children;
- attitudes towards safeguarding, professional boundaries and authority;
- understanding of appropriate adult-child relationships;
- gaps or anomalies in employment history;
- information arising from references or online searches;
- reasons for leaving previous employment involving children;
- relevant disciplinary history, allegations or criminal-record information lawfully disclosed; and
- the candidate's response to safeguarding scenarios appropriate to the role.

Interview notes and the rationale for appointment will be retained in accordance with the School's retention schedule.

11. Conditional offer and pre-employment checks

Any offer will be conditional upon the School completing and being satisfied with all checks applicable to the role. Depending on the role these may include:

- identity;
- enhanced DBS certificate and children's barred-list information where required;
- prohibition from teaching;
- section 128 direction for management roles;
- right to work in the UK;
- appropriate overseas checks or further suitability checks;
- professional qualifications where required;
- childcare disqualification where applicable;
- medical fitness after an offer has been made and with Equality Act requirements observed;
- references and employment-history scrutiny; and
- any additional statutory or role-specific check.

The School will record the date on which each statutory check was completed and the person who checked it where required by the SCR standard.

12. Identity and right to work

The School will verify identity against original or otherwise legally acceptable documents in accordance with DBS identity guidance and will verify any change of name. Right to work will be checked using a legally permitted Home Office route and evidence retained in accordance with current requirements.

The School will not rely on appearance, accent, nationality assumptions or a DBS check as evidence of right to work.

13. DBS checks and children's barred list

The School will obtain the level of DBS check required and legally available for the role. Enhanced DBS checks with children's barred-list information will be obtained where required for regulated activity.

A barred-list check will not be requested where the School is not legally entitled to obtain one. Equally, supervision will not be used after 1 September 2026 as a reason to omit barred-list information where the person's teaching, training, instructing, caring or supervising activity meets the regulated-activity criteria.

13.1 DBS certificates

The applicant normally receives the DBS certificate. The School must see the original certificate where required before appointment is confirmed, subject to the limited arrangements for commencement pending a certificate set out later in this policy.

13.2 Existing DBS information

A previous certificate is not automatically portable. The School will consider the workforce, level of check, barred-list status, identity, role and any break in service, and will use the Update Service only where legally permitted and with the applicant's consent.

14. DBS Update Service and portability

An applicant can register for the DBS Update Service while an application is in progress or within 30 days of the certificate being issued. The School will remind eligible applicants of this timescale.

When relying on an Update Service status check, the School will:

- obtain the individual's consent;
- verify identity;
- see the original certificate;
- confirm that the certificate is for the appropriate workforce and level, including children's barred-list information where required; and
- record the status check and any resulting action.

The Update Service is free for volunteers. The School will not retain inaccurate historic statements about a fixed annual fee.

15. Convictions, cautions and DBS information

The School will assess relevant criminal-record information fairly and proportionately. It will have regard to statutory filtering rules and will not require disclosure of protected convictions or cautions that applicants are not legally required to disclose.

- nature and seriousness of the matter;
- relevance to the role and safeguarding;
- time elapsed;
- pattern or isolated incident;
- age and circumstances at the time;
- subsequent conduct and evidence of change;
- explanation provided; and
- any advice from DBS, LADO, HR/legal advisers or other appropriate bodies.

Where DBS information is disputed, the School may defer a final decision while the applicant uses the DBS dispute process, where this is practicable and safe.

16. Prohibition from teaching and section 128 directions

16.1 Teaching prohibition

For a person appointed to carry out teaching work, the School will check whether they are subject to a prohibition order or interim prohibition order using the current DfE service. A prohibited person must not be appointed to carry out teaching work covered by the prohibition.

16.2 Section 128

A section 128 direction prohibits or restricts a person from taking part in the management of an independent school. The School will carry out section 128 checks for persons in management positions where required, including relevant proprietor/director roles and staff with management responsibilities.

The School will not assume that a barred-list check alone is an adequate substitute for a section 128 check in every case; the appropriate DfE checking route will be used.

17. Childcare disqualification

The School will apply current childcare-disqualification legislation and DfE guidance only to roles within scope. It will not require a blanket childcare-disqualification declaration from every employee.

Disqualification by association does not apply to individuals working in non-domestic settings such as schools and nurseries. Historic evidence required to demonstrate compliance with earlier legislation will be retained where necessary.

18. Medical fitness and reasonable adjustments

After a conditional offer and before appointment is confirmed, the School will establish that the applicant has the health and physical capacity for the role as required by the Independent School Standards.

The School will comply with the Equality Act 2010, including restrictions on pre-employment health questions and the duty to consider reasonable adjustments. A job offer will not be withdrawn on health grounds without appropriate evidence and consideration of adjustments.

19. Qualifications

Where a qualification is a legal or School requirement for the post, or is material to the appointment, the School will verify it. Original or authoritative evidence will be used and the verification recorded.

20. Applicants who have lived or worked outside the UK

A DBS certificate may not provide a complete picture of a person's criminal history outside the UK. Where a candidate has lived or worked outside the UK, the School will make such further checks as it considers appropriate, having regard to KCSIE and DfE guidance.

There is no blanket statutory 'three months abroad' rule that automatically determines whether an overseas criminal-record check is required. The School will consider the country, duration, nature of residence/work, availability and reliability of checks, the role and other evidence of suitability.

Where a certificate of good conduct or equivalent cannot be obtained, the School will consider alternative evidence and undertake a documented risk assessment. It will not automatically refuse appointment solely because a foreign authority does not provide such a certificate.

Right-to-work and immigration sponsorship will be managed under current Home Office requirements. The obsolete references in the previous policy to non-EEA status, the Resident Labour Market Test and NQF6 sponsorship criteria are removed.

21. Agency and supply staff

Before an agency or business supplies a person to the School, the School will obtain written confirmation that the agency/business has carried out the checks the School would otherwise be required to carry out, together with the information required by the Independent School Standards.

The School will verify the identity of the supplied person on arrival. It will obtain confirmation of the appropriate DBS check and barred-list information where applicable and will see the DBS certificate where KCSIE/ISS arrangements require this, including where the certificate contains information.

The SCR will record the required information for supply staff supplied by an agency, including the date the School received written notification that checks had been completed.

An allegation concerning agency or supply staff will be managed jointly with the agency; the School will not simply cease using the person as an alternative to following safeguarding procedures.

22. Contractors

The School will ensure that contractors and their staff are subject to the checks appropriate to their work, access and regulated-activity status. The School will obtain written assurance from the contractor where the contractor is responsible for checks and will verify the identity of individuals on arrival.

A contractor for whom no checks have been obtained will not be allowed to engage in regulated activity or have unsupervised access to children. Supervision and site controls will be proportionate to risk.

The previous blanket statement that every contractor must complete exactly the same checks as a School employee is replaced by a role- and eligibility-based approach consistent with KCSIE and the ISS.

23. Self-employed individuals

Where an individual is self-employed and works for the School, the School cannot rely on an employer or agency to complete checks. In line with KCSIE 2026, the School should obtain the appropriate DBS check itself or, where the individual has obtained their own eligible certificate, see the certificate and ensure it is at the level required for the role.

All other relevant checks, including identity, right to work, qualifications, barred-list eligibility and safeguarding suitability, will be addressed as applicable.

24. Trainee teachers

All necessary checks will be completed for trainee teachers, including an enhanced DBS check with children's barred-list information where the trainee is engaging in regulated activity. The School will establish whether checks are the responsibility of the training provider or the School and obtain written confirmation where another body has carried them out.

Trainee teachers are also within the School's adult-allegation safeguarding arrangements while working at The Mount.

25. Volunteers

Volunteers are subject to safer recruitment proportionate to their role. The School will obtain identity and suitability information and determine whether the volunteer will engage in regulated activity.

25.1 Volunteers in regulated activity

From 1 September 2026, a volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in a 30-day period, or overnight between 2am and 6am with opportunity for face-to-face contact, will be in regulated activity even if supervised.

All volunteers engaging in regulated activity will have an enhanced DBS check with children's barred-list information in accordance with DfE sector guidance.

25.2 Occasional volunteers

Occasional volunteers who do not meet regulated-activity criteria, such as a parent helping at an occasional event or a non-overnight day trip, are not automatically subject to a barred-list check. The School will undertake the checks legally available and appropriate to the role and will apply proportionate supervision and risk management.

25.3 Multiple settings

The School will ask relevant regular volunteers whether they undertake similar volunteering elsewhere because days across settings count towards the period condition. Schools may cooperate over obtaining an appropriate DBS certificate.

25.4 Volunteer suitability

- references or character information where appropriate;
- informal or formal interview;
- identity checks;
- consideration of employment/volunteering history where relevant;
- DBS and barred-list checks where eligible/required;
- clear role description and safeguarding boundaries; and
- induction and supervision proportionate to the role.

The previous policy rule requiring a new DBS certificate solely because a volunteer had not attended for three consecutive months is removed. The School will instead apply current KCSIE rules concerning breaks in service, the Update Service and the particular check required.

26. Visiting professionals and visitors

Visitors do not all require DBS checks. The School will determine the safeguarding arrangements according to the visitor's purpose, contact with children, frequency, professional status and whether the activity is regulated activity.

For professional visitors such as social workers, health professionals, police or local-authority officers attending in their professional capacity, the School will verify identity and professional purpose and apply normal visitor controls. It will not request a DBS check where there is no legal eligibility or need.

Visitors who will undertake regular work with children will be assessed under the relevant staff, contractor, self-employed or volunteer provisions rather than being treated as casual visitors.

27. Visiting speakers

The School will maintain clear protocols for visiting speakers. Appropriate due diligence will consider safeguarding, Prevent and the suitability of the content and speaker. Speakers will sign in, wear identification and be supervised as appropriate.

A DBS/barred-list check will not be requested merely because a person is a visiting speaker. The check depends on the actual role and legal eligibility.

28. Educational visits and overnight volunteers

Adults supporting educational visits will be assessed according to the nature and frequency of their role. From 1 September 2026, volunteers helping on an overnight School trip are in regulated activity and require an enhanced DBS check with children's barred-list information.

For occasional non-overnight day-trip volunteers, the School will use proportionate checks, briefing and supervision and will not obtain barred-list information unless legally entitled.

29. Starting work before a DBS certificate is available

The School's normal expectation is that all required checks, including the DBS certificate, are complete before the individual begins work.

Exceptionally, where legally permissible and the School decides that a person may start before the DBS certificate is received, the Headteacher must approve and record a written risk assessment. Before commencement:

- identity and right to work must be confirmed;
- all other required pre-employment checks must be complete and satisfactory;
- where the person will engage in regulated activity, the School must ensure the barred-list requirement has been addressed through a legally available route;
- references and employment-history concerns must have been resolved;
- the DBS application must have been submitted;
- appropriate supervision and restrictions must be defined and communicated; and
- the arrangement must be reviewed until the certificate is seen.

The removal of the supervision exemption does not itself prohibit a risk-assessed start while a DBS application is pending; however, supervision does not remove the role from regulated activity and a barred person must never be permitted to undertake regulated activity.

30. Single Central Record

The proprietor will keep a Single Central Record (SCR) containing the information required by paragraph 21 of the Independent School Standards. The SCR is a regulatory record of specified checks; it is not a general recruitment checklist.

30.1 Persons covered

- all staff appointed to work at the School;
- relevant supply staff supplied by an agency or third party; and
- members of the proprietor body / Directors as required by the ISS.

The School may choose to record additional categories, such as regular volunteers and contractors, for operational assurance, but will clearly distinguish statutory SCR requirements from additional School records.

30.2 Information recorded

For each category, the School will record the checks and dates required by the ISS, including as applicable identity, barred-list, enhanced criminal-record check, prohibition from teaching, section 128, right to work, further overseas checks, professional qualifications and the date on which checks/notifications were completed or received.

For agency/supply staff, the SCR will show the date on which the School received written notification from the agency/business that required checks were made, together with the identity check undertaken by the School.

For proprietor-body members, the SCR will contain the information required by the ISS according to the School's proprietor structure.

30.3 SCR accuracy

Entries will be made promptly, use consistent dates and terminology, and be supported by evidence on the recruitment/personnel file. The SCR will be audited regularly and before inspection.

31. Personnel-file recruitment record

A recruitment checklist will be retained on each successful candidate's personnel file. It will evidence matters that may not belong on the SCR, including application form, shortlisting, online-search outcome, interview notes, references and verification, employment-history scrutiny, risk assessments and offer conditions.

The existence of an SCR entry does not remove the need to retain sufficient evidence to demonstrate how the School reached a safe appointment decision.

32. Induction and probation

All new staff and relevant volunteers will receive safeguarding induction before or at commencement. This will include the Safeguarding & Child Protection Policy, Staff Code of Conduct, KCSIE Part One, DSL/DDSL details, reporting procedures, allegations/low-level concerns, whistleblowing, online safety and role-specific procedures.

Probation and early supervision will be used to assess conduct, competence, professional boundaries and suitability. Concerns arising after appointment will be recorded and addressed promptly.

33. Ongoing suitability and duty to disclose

Safer recruitment does not end on the first day of employment. Staff must inform the Headteacher promptly of relevant changes that may affect their suitability, including criminal matters, professional restrictions, disqualification or other circumstances required under School procedures.

The School may undertake further checks where legally permitted and justified by a change of role, break in service, safeguarding concern, statutory requirement or other relevant circumstance.

The School will not impose arbitrary blanket DBS re-checking intervals unless required by law or adopted as a documented School policy; it will use risk, legal requirements and the Update Service appropriately.

34. Allegations, low-level concerns and third-party workers

Recruitment information may become relevant to later safeguarding concerns. The School will link this policy with Part Four of KCSIE and its Safeguarding & Child Protection Policy.

Concerns about staff, volunteers, contractors, agency workers, self-employed individuals or trainee teachers will be reported through the adult-concern procedure. Where the individual is employed or supplied by a third party, The Mount and the third party share responsibilities and the School will ensure the safeguarding process is not avoided by simply ending the placement.

Low-level concerns and patterns of behaviour may inform supervision, training, suitability review, disciplinary action or escalation to the harm threshold.

35. DBS and Teaching Regulation Agency referrals

The School has a legal duty to refer to the DBS where the statutory referral conditions are met, including where a person has been removed from regulated activity, or would have been removed had they not resigned or otherwise left, and the relevant harm/risk criteria are satisfied.

The School will also act where it becomes aware that a barred person has applied for or undertaken regulated activity, including contacting the appropriate authorities.

Where the individual is a teacher, the School will consider whether referral to the Teaching Regulation Agency is appropriate. DBS and TRA processes are distinct; one does not automatically replace the other.

A settlement agreement, resignation or agency termination will not be used to avoid a safeguarding investigation or statutory referral duty.

36. Record retention, confidentiality and data protection

Recruitment information will be handled lawfully, fairly and securely. Access will be limited to those who need it.

Successful-candidate records will be retained in accordance with the School's employment and safeguarding retention schedule and legal obligations. DBS certificate information will be handled in accordance with DBS requirements and will not be copied or retained longer than permitted without lawful justification.

Records relating to unsuccessful applicants will normally be retained for a proportionate period, commonly at least six months to address potential recruitment claims, then securely destroyed unless there is a lawful reason to retain them longer.

Medical information will be held with enhanced confidentiality and separately or with restricted access where appropriate.

37. Monitoring, audit and inspection readiness

- annual policy review against current KCSIE and ISS requirements;
- regular SCR audit against paragraph 21 of the ISS;
- sampling recruitment files against SCR entries;
- checking that section 128 and prohibition checks are used for the correct roles;
- reviewing all regular and overnight volunteer roles for the September 2026 regulated-activity change;
- checking agency and contractor assurance letters;
- reviewing conditional-start risk assessments;
- checking online-search, reference and employment-history evidence;
- checking that allegations and DBS/TRA referrals are not avoided when third-party workers leave; and
- ensuring recruitment staff and interviewers receive current safer recruitment training.

For inspection, the School will be able to explain why each check was required, show evidence supporting the SCR, demonstrate how suitability was assessed beyond DBS checking, and evidence corrective action where an audit identified a gap.

Appendix A – Pre-employment check matrix

Category	DBS / barred list	Other core checks	SCR	Key note
School employee	Enhanced + barred list where regulated activity	Identity; right to work; references; overseas; qualifications; prohibition/128/childcare disqualification as applicable	Yes	Determine checks by actual role.
Agency/supply	Agency completes required checks; School receives written confirmation; barred list where applicable	School verifies identity; certificate arrangements per KCSIE/ISS	Yes	Record date notification received.
Contractor	Appropriate check based on role/access/regulated activity	Identity; contractor assurance; supervision/access controls	Where required / School may record additionally	Do not use one-size-fits-all checks.
Self-employed	School obtains appropriate DBS or sees eligible certificate at required level	Identity; right to work; qualifications; suitability	As applicable	No agency/employer to rely upon.
Trainee teacher	All necessary checks; enhanced + barred list where regulated activity	Identity; provider assurance; prohibition as applicable	As applicable	Covered by adult-allegation procedures.
Regular volunteer	Enhanced + barred list where regulated activity	Identity; suitability; references/interview as appropriate	School may record additionally	Supervision exemption removed 1 Sep 2026.
Occasional volunteer	No barred-list check unless eligible; other DBS only if legally available/appropriate	Identity, briefing, supervision, risk assessment	Not normally statutory SCR	One-off/non-overnight does not automatically become regulated activity.
Director/proprietor member	Checks required by ISS according to proprietor structure and activity	Identity; right to work where required; s128; overseas as applicable	Yes	Follow ISS paragraphs 20–21.

Appendix B – Volunteer regulated-activity decision guide

- 1. What will the volunteer actually do? Teaching, training, instructing, caring for or supervising children is particularly relevant.
- 2. How often? If the relevant activity occurs on more than three days in any 30-day period, the period condition is met.
- 3. Overnight? Relevant activity once overnight between 2am and 6am with opportunity for face-to-face contact meets the condition.
- 4. Does the volunteer do similar activity at other settings? Count relevant days across settings.
- 5. Do not apply the old supervision exemption. Supervision no longer removes qualifying activity from regulated activity from 1 September 2026.
- 6. If regulated activity: obtain an enhanced DBS check with children's barred-list information in accordance with DfE guidance.
- 7. If not regulated activity: consider what check is legally available and proportionate; define supervision and safeguarding controls.
- 8. Record the decision and rationale.

Appendix C – SCR audit checklist

- Correct categories of staff, supply staff and proprietor members included.
- Identity check recorded where required.
- Enhanced DBS check and date recorded where required.
- Children's barred-list check/date recorded where required.
- Teaching prohibition check/date recorded for teaching work.
- Section 128 check/date recorded for management roles.
- Right-to-work check/date recorded.
- Further overseas checks/date or recorded risk-assessment outcome where applicable.
- Professional qualifications recorded where required.
- Agency/supply written confirmation date recorded and identity independently checked.
- Proprietor/director entries match the School's legal proprietor structure.
- SCR dates agree with evidence on personnel files.
- No inappropriate fields are treated as statutory simply because they are useful recruitment checks.
- Any historic gaps are explained and risk-assessed rather than silently altered.

Appendix D – Recruitment-file checklist

- Approved job description/person specification and regulated-activity assessment.
- Advertisement and safeguarding statement.
- Completed application form; CV only as supplementary information.
- Shortlisting record.
- Online-search notification and relevant outcome.
- Interview notes and safeguarding questions.
- Identity and name-change evidence.
- Right-to-work evidence.
- Two references / exceptional rationale and verification.
- Employment-history/gap scrutiny.
- DBS certificate/check and barred-list evidence as applicable.
- Prohibition from teaching / section 128 evidence as applicable.
- Overseas checks or documented alternative/risk assessment.
- Qualification verification.
- Childcare-disqualification check where role is in scope.
- Medical fitness confirmation after conditional offer.
- Agency/contractor/provider assurance where applicable.
- Conditional-start risk assessment where used.
- Offer letter and evidence all conditions were satisfied.
- SCR entry checked against file.
- Safeguarding induction and KCSIE Part One confirmation.