Safer Recruitment and Employment

Policy Guidance

May 2025

This procedure has been developed in partnership between the WES HR Service and the Education Safeguarding Team and is applicable to all community, voluntary controlled, voluntary aided, foundation, independent and academy schools, FE Colleges and alternative providers of education in Warwickshire.

May 2025
Education Safeguarding Team
Adopted by Water Orton Primary School June 2025

***'Keeping Children Safe in Education'*, DfE (2025)**

The model policy was revised in May 2025 to reflect the changes in national guidance as a consequence of the publication of revisions to *'Keeping Children Safe in Education'* on 25 May 2025.

CHILD FRIENDLY WARWICKSHIRE



WARWICKSHIRE CHILDREN AND FAMILIES SAFER RECRUITMENT POLICY MAY 2025

Policy statement

The school's safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and welfare of children and learners.

This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review. Representatives of the whole school community of pupils, parents, staff, volunteers, and governors will be involved in reviewing, shaping, and developing the school's safeguarding arrangements and policies.

This policy will reference online abuse and abuse that will take place in person, please be aware that they are not mutually exclusive, and children can experience these types of abuse simultaneously.

Water Orton Primary School

Safer Recruitment Policy
Date of publication: June 2025

Review date: September 2025

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SAFER RECRUITMENT AND EMPLOYMENT

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SAFER RECRUITMENT AND EMPLOYMENT

Introduction

1. This policy applies to all schools/academies that employ staff and/or recruit volunteers to work with or provide services to children and young people in Warwickshire. It is designed to support recruiting managers in schools/ academies to make their recruitment practices and processes safer for children.

2. All schools/academies should adopt a consistent and thorough process of safer recruitment in order to ensure that people who are unsuitable to work with children and young people are prevented from doing so. That process should include all individuals who may not have direct contact with children but who, because of their presence and familiarity in certain settings, will still be seen as safe and trustworthy.

3. The principles of safer recruitment should be included in the terms of any contract drawn up between a school/academy and contractors or agencies that provide services for children and young people for whom the school/academy is responsible. The school/academy should monitor compliance with the contract, which should also include a requirement that the provider will not sub-contract to any personnel who have not been recruited subject to a safer recruitment process.

4. This policy is entitled 'Safer Recruitment and Employment' in order to highlight the importance of continued vigilance after an employee or volunteer has been appointed. Recruitment cannot and must not be the end of the matter. Although schools and academies are safe environments for the great majority of children and the vast majority of people who work with children have children's safety and welfare at heart, schools and academies need to promote a culture of ongoing vigilance in order to avoid complacency.

5. Two fundamental principles of effective safer recruitment and employment are therefore that schools/academies should not rely on any one process in order to safeguard children; and that effective safeguarding requires robust policies for the management and supervision of staff after the recruitment phase. A comprehensive and systematic approach must therefore include policies and practices designed to:

    - **Deter** unsuitable people from seeking employment or opportunities to volunteer to work with children and young people;
    - **Reject** applications from unsuitable people;
    - **Prevent** abuse and neglect of children by staff and volunteers;
    - **Identify** incidents of abuse and neglect by staff and volunteers;
    - **Respond** to concerns in an open and positive way;
    - **Manage allegations** in accordance with school/academy procedures.

Safer recruitment practice should therefore be applied at all stages of the recruitment and employment process including all of the following:

- Ensuring job descriptions and person specifications reflect the importance of safeguarding and define accurately the safeguarding responsibilities of the role
- Advertising and information for applicants including reference to online checks
- A structured application process
- Scrutinising applications
- Shortlisting
- References
- Self-disclosure form
- Online checks
- Other checks before interview
- Interviewing short-listed candidates
- Selection of preferred candidates
- Pre-appointment checks including barred list and criminal record (DBS) checks
- Offer of appointment to successful candidates
- Induction of newly appointed staff
- Probationary periods
- Supervision and appraisal of staff
- Staff codes of conduct
- Open and listening workplace culture
- Effective whistleblowing and management of low level concerns and allegations policies
- Ongoing culture of vigilance
- Effective supervision and support of staff
- Provision of references

Context

6. *Working Together to Safeguard Children* (DfE 2023) states that organisations including schools/academies should have arrangements in place that reflect the importance of safeguarding and promoting the welfare of children, including

   - safe recruitment and ongoing safer working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check;

   - appropriate supervision and support for staff, including undertaking safeguarding training;

   - creating a culture of safety, equality and protection within the services they provide;

   - clear whistleblowing procedures, which are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;

   - clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies.

7. *Working Together 2023* states that schools/academies are also responsible for:

- ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children;
- creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- ensuring that staff are given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare;
- ensuring that all practitioners have regular reviews of their own practice to ensure they have knowledge, skills and expertise that improve over time.

Volunteers recruited to work with children should be treated in the same way.

8. Safer practice in recruitment means thinking about and including consideration of child protection, safeguarding and promoting the welfare of children at every stage of the recruitment process and in the induction, management, development and training of staff.

9. Throughout the process of recruitment and selection, it is therefore important that applicants for all positions in schools/academies working with children are aware of the school/academy's commitment to safer recruitment and safeguarding children in general. Ensuring that safeguarding features highly in all of the organisation's processes, policies, procedures and practice sends a clear message to applicants and existing staff and volunteers and helps to deter unsuitable individuals and inappropriate behaviour.

10. In addition to the requirements of *Working Together 2023*, specific guidance for schools and academies *Keeping Children Safe in Education* (DfE 2025) highlights that it is vital that schools and colleges create a culture of safeguarding and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. It also states that governing bodies and proprietors must act reasonably in making decisions about the suitability of prospective employees based on checks and evidence including: criminal record checks (DBS checks), Barred List checks and prohibition checks, together with references and interview information.

Safer Workforce Cycle

11. It is helpful to think about a safer workforce cycle, which has 6 stages that operate together to make up a safer environment within organisations:

(1) Safer recruitment
(2) Induction
(3) Training
(4) Supervision and appraisal
(5) Managing allegations
(6) Determining future employment

(1) Safer Recruitment

12. Safer Recruitment covers activity from a decision to create a post or role to the successful candidate's first day working or volunteering in the position in a school/academy.

13. It can be further broken down into 4 stages and activities:

    1.1 Preparation and advertisement - sending the right message to potential applicants in order to deter unsuitable applicants
    1.2 Shortlisting – rejecting unsuitable applicants
    1.3 Interview/selection process – rejecting unsuitable candidates
    1.4 Pre-employment checks – rejecting unsuitable preferred candidates

1.1 Preparation and advertisement

14. When a vacancy is first identified – whether a new or existing post – the first priority is to review the job description and person specification to ensure they accurately describe the role and attributes required including explicit reference to expectations in respect of safeguarding; responsibility and opportunity for contact with children in the role; attitude, motivation for working with and values towards children and young people and any specific duties in relation to the school/academy's safeguarding responsibilities.

15. Managers should clearly identify the duties of the post/role and exactly how they expect the post/role holder to perform those duties; and should ensure that the skills, abilities, experience and behaviours required for that performance are reflected in the job description and person specification.

16. On the basis that safeguarding children and young people is everybody's responsibility, there can be no post or volunteer role that involves work in a school/academy that does not contain expectations in relation to safeguarding children and young people.

17. Job descriptions and person specifications for specialist safeguarding roles, e.g. designated safeguarding lead, pastoral support staff, school counsellor, family support/link worker will require detailed and delineated duties and attributes that reflect the technical and vocational nature of those roles.

18. For other generic posts such as teachers, classroom assistants, lunchtime supervisors, administrative and support staff, appropriate wording in job descriptions would be "*Contribute to the school/academy's responsibility to safeguard and promote the welfare of children and young people.*" Appropriate wording in person specifications would be "*Displays commitment to the protection and safeguarding of children and young people*".

    For job descriptions and person specifications for management and leadership roles, appropriate wording would be similar but preceded by "*Lead staff in fulfilling the school/academy's responsibility to …… etc.*" and "*Displays understanding and leadership skills in ensuring staff maintain their commitment ……. etc.*".

    Such wording not only makes explicit reference to and describes expectations, but also facilitates exploration of a candidate's suitability for the post/role in terms of their commitment to safeguarding during the selection process.

19. Before the recruitment campaign for the post/role begins, schools/academies should also ensure that:

    - there is an up-to-date recruitment and selection policy that accurately describes the process to be followed;
    - the school/academy has a robust and up to date safeguarding policy and that a statement about the school/academy's commitment to safeguarding is included in all recruitment and selection materials;
    - the job description and person specification for the role(s) are fit for purpose as above and have been agreed with the recruiting manager;
    - an appropriate advertisement that contains all necessary information about the role, timetable for recruitment and a clear statement about the school/academy's commitment to safeguarding* is prepared;
    - a suitable candidate information pack containing all the required information about the school/academy, role, recruitment timetable, safeguarding and child protection policy and application form is compiled.

20. When placing an advertisement for the post/role, schools/academies should ensure that unsuitable applicants will be deterred from applying by:

    - stating the school/academy's commitment to safeguarding *;
    - stating the need for DBS disclosures **;
    - sending information about the school/academy's safeguarding policy and practices to prospective applicants.
    - whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (amended 2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ's guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide

      * Suggested wording - *"This* school/academy *is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and parents to share that commitment"*.

      ** Suggested wording - *"Successful candidates will be required to undertake an enhanced DBS check with Children's Barred List check" (see paragraphs 86 and 88 below for information about Barred List checks).*

1.2 Shortlisting

Planning

21. It is essential to plan the recruitment campaign so that sufficient time is allocated for:

- applicants to respond to the advertisement, peruse the information provided and submit an application that addresses all required areas;

- scrutinising of all applications in a systematic way by at least two members of the recruitment panel in order to agree the shortlist before sending invitations to interview;

- agreeing the selection process to include a face-to-face interview with every candidate as a minimum;

- agreeing systematic selection criteria for each aspect of the selection process, based on the person specification;

- requesting and scrutinising references for each shortlisted candidate before interview;

- planning the selection process so that all personnel, rooms and resources are available;

- ensuring that all shortlisted candidates receive the same letter of invitation to interview, supplying them with all of the necessary information.

NB wherever possible, it is useful to specify the date of interviews/selection in the advertisement to give candidates as much notice as possible to ensure their availability to attend.

Application forms

22. Application forms should require applicants to provide all of the following information:

- Personal details, current and former names, current address and national insurance number (name/address/contact details including telephone numbers and Email addresses)
- Full history of present and past employment and reasons for leaving
- Full history since leaving school (education and employment or voluntary work)
- **Explanation of any gaps** in education and/or employment
- Qualifications, the awarding body and date of award
- Details of referees (applicants are expected to nominate their current or most recent employer as their first referee)
- Personal statement to meet person specification with details of the personal qualities and experience that the applicant believes are relevant to the suitability for the post.
- Signed declaration that all information is true, that applicant is not barred from working with children and *(for relevant posts) that the candidate is not disqualified from working with children subject to the Disqualification under the Childcare Act 2006.*

Criminal background self-disclosures

23. Schools/academies should be aware that information about criminal records, even where volunteered, is personal data and must be processed lawfully and with

regard to the candidate's right to privacy.

24. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK. For example:
    - if they have a criminal history
    - if they are included on the children's barred list
    - if they are prohibited from teaching
    - if they are prohibited from taking part in the management of an independent school
    - information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
    - if they are known to the police and children's local authority social care
    - if they have been disqualified from providing childcare, and,
    - any relevant overseas information.

25. The school's privacy notice for applicants should confirm that after shortlisting the disclosed information will be considered, who will see it, and how that information may be used to inform recruitment decisions. The *SRC, DfE and ICO agree that criminal record self-disclosures should be considered for all shortlisted candidates and explored at interview.*

26. Self-disclosure by applicants about any criminal background can play an important role in the recruitment process as it gives candidates an opportunity to share relevant information at an early stage, which can then be discussed at interview and/or considered before the DBS certificate comes back.

27. The purpose of criminal background self-disclosures is to:

    - deter unsuitable people from applying for the post;
    - ensure applicants understand the information that may be revealed in a DBS check and are thus aware that the prospective employer is entitled to see that information;
    - give applicants an opportunity to be open, honest and demonstrate their integrity by bringing any relevant information to the prospective employer's attention in a confidential way at an early stage so that, if necessary, it can be discussed with the candidate at interview or beforehand.

28. Schools/academies may also choose to ask candidates the following questions as part of the self-disclosure:

    - whether they have ever been the subject of a police investigation that did not lead to a criminal conviction;
    - whether they have ever had any allegation made against them, which has been reported to and investigated by a Children's Social Care department;
    - whether there has ever been any cause for concern regarding their conduct with children, young people and/or vulnerable adults.

29. All applicants should be asked to sign a statement at the end of their application form and any self-disclosure, declaring that the information they have provided is complete and accurate. In the event that the DBS certificate subsequently reveals previously undeclared offences, this may mean that the successful candidate has

been dishonest about his or her criminal background, in which case the employer, the police and/or the regulatory agency may take action against the applicant.

30. It must also be emphasised that a DBS certificate should still be sought even where a self-disclosure is made. Applicants may not tell the truth or the whole truth in a self-disclosure so information in the criminal record self-disclosure should be compared with information on the DBS certificate when that is received later in the process.

31. As a result of an amendment to the Rehabilitation of Offenders Act (ROA) 1974, 1975,2013 and 2020) certain old and minor convictions and cautions are no longer subject of DBS disclosures and applicants should not be asked to disclose any such convictions or cautions in their criminal record self-disclosure. This process is known as 'Filtering'.

32. Home Office and DfE policy requires employers to explain the effect of the exceptions to the Rehabilitation of Offenders Act (ROA) and filtered or protected offences to applicants, to give them an opportunity to declare any relevant criminal record they have and to provide a signed statement that their declaration is accurate and complete.

33. Schools/academies must therefore ensure that their mechanism for enabling applicants to provide criminal background self-disclosures makes it clear that applicants are not required to disclose information about offences subject to filtering. Schools/academies should therefore include the following statement on application forms:

> whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (amended 2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ's guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide

34. NB all convictions and cautions for serious violent and sexual offences remain subject of disclosure and where an individual has more than one conviction or caution, all convictions and cautions will be disclosed.

35. In order to assist candidates in deciding which convictions are subject of filtering, it is helpful to ask the following questions:

    1. Have you received more than one conviction?
       If yes, none of your convictions will be filtered.
       If no, move to 2.

    2. If you have only received one conviction, did you receive a custodial sentence (including a suspended sentence) for it?
       If yes, your conviction will not be filtered.
       If no, move to 3.

3. Is the conviction that you received on the list of exempt offences?
   Check list of offences that will never be filtered on GOV.UK website - https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check
   If yes, your conviction will not be filtered.
   If no, your conviction will be filtered, subject to 4; move to 4.

4. Did you receive the conviction when you were under 18 years of age?
   If yes, your conviction will be filtered after 5 and a half years of the date of conviction.
   If no, your conviction will be filtered after 11 years of the date of conviction.

36. In order to assist candidates in deciding which cautions are subject of filtering, it is helpful to ask the following questions:

1. Is the caution that you received on the list of exempt offences?
   Check list of offences that will never be filtered on GOV.UK website - https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check

   If yes, your caution will not be filtered.
   If no, your caution will be filtered subject to 2; move to 2

2. Did you receive the caution when you were under 18 years of age?
   If yes, your caution will be filtered after 2 years of the date of the caution
   If no, your caution will be filtered 6 years after the date of the caution

<u>The shortlisting process</u>

37. Schools/academies should ensure that school leaders and governors who are responsible for recruiting staff and volunteers to work in the school/academy access safer recruitment training; and that at least one member of every selection panel (ideally the recruiting manager or chair of the panel) has accessed that training.

38. At least two members of the recruitment panel should scrutinise all applications in order to draw up a shortlist. The panel should agree criteria based on the person specification against which applications will be evaluated, using an objective scoring system (e.g. if an applicant fully demonstrates she/he meets one of the criteria, panel members would award 2 points, with 1 point being awarded if the applicant only partially meets the criteria).

39. Shortlisting criteria must be applied consistently to all applicants.

40. At least one of the criteria used for shortlisting should be based on the safeguarding aspects of the person specification.

41. It must be emphasised that shortlisting takes time. When planning shortlisting processes, recruiting managers should allocate sufficient time for scrutinising a large number of applications.

42. When scrutinising applications, panel members should be vigilant in identifying:

- any inconsistencies;
- application forms that have not been completed fully;

- that information and evidence provided relates to the person specification and job description for the post/role;
- any gaps in the applicant's employment history or other information that need to be explored;

43. The shortlisting panel should ensure that applicants have provided all of the information as in para 22 above.

44. While candidates may choose to submit CVs, these should not be accepted in lieu of a fully completed application form. A CV will be structured to provide only the information the applicant chooses to provide, whereas an application pro forma provided by the recruiting school/academy should ask applicants to demonstrate how they are able to meet the requirements of the person specification and job description for the post/role.

45. If there is time, the shortlisting panel may choose to return incomplete applications to the applicant with an invitation to resubmit a fully completed application.

46. Once the short list of candidates has been agreed, the shortlisting panel will also need to make decisions and plan the interview/selection process (see paras 72-82 below). Panel members should agree what additional specific questions need to be asked of individual candidates arising from their application form, criminal background self-disclosure and references.

47. When DBS checks are undertaken in respect of preferred candidates at the end of the interview/selection process, it is important to compare information in the self-disclosure and the candidate's responses at interview about the self-disclosure with information on the DBS certificate and any additional information shared at the discretion of the Police.

Employment history and references

48. *Keeping Children safe in Education 2025* specifies that employers should always ask for written information about previous employment history and check that information is not contradictory or incomplete. It states that the purpose of seeking references is to allow the school to obtain objective and factual information to support appointment decisions.

49. Ideally, references should be sought on all shortlisted candidates, including internal ones, **before interview**, so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview.

50. References should always be obtained, scrutinised and any concerns resolved satisfactorily, before an appointment is confirmed. Requests for references should always be addressed directly.

51. Candidates should be expected to nominate their current employer as their first referee in order to secure the most recent information about the candidate's employment history, work performance and suitability for the post that is being recruited to.

52. Recruiting managers should carefully explore with the candidate reasons for not nominating their current or most recent employer as a referee, making it very clear

that it may not be possible to proceed with an appointment without an opportunity to check the candidate's suitability for the role with their most recent employer.

53. Candidates may request that the recruiting manager delays requesting a reference from a current employer until a decision about making a conditional offer of employment has been made, in order to avoid any prospective repercussions of seeking alternative employment in the event that the candidate is unsuccessful in their application. Recruiting managers should be sensitive to such requests but should make it clear to candidates that references will be sought in due course and that it may be necessary to call them back for a further discussion about any issues arising from references before a final decision can be made.

54. If a candidate for a post requiring a specific qualification (e.g. teacher, nursery officer) is not currently employed in that vocational role, the recruiting manager should check with the school, early years provider or organisation at which the candidate was most recently employed in a similar role to confirm details of their employment and their reasons for leaving.

55. If a candidate is not currently working with children, the recruiting manager should seek references from previous employers where the role involved working with children.

56. The recruiting school/academy should use a standard reference pro forma that asks the same questions for all candidates with reference to the job description and person specification, which should also be provided for the perusal of referees. In addition to other information, reference pro forma should specifically ask referees whether there have been concerns about:

    - any behaviour that might give rise to concern about the candidate's suitability to work with children or to fulfil the criteria of the person specification;
    - any substantiated allegations about the candidate's behaviour towards children;
    - any disciplinary action taken in respect of the candidate.

57. Upon receipt of all references, the recruiting manager should:

    - scrutinise the reference carefully, giving active consideration to the significance of all information provided;
    - check that the information provided is not contradictory or incomplete;
    - check to ensure that all specific questions on the reference pro forma have been answered satisfactorily. NB. Referees should be contacted to provide further clarification as appropriate;
    - compare the information provided to ensure it is consistent with the information provided by the candidate on the application form;
    - confirm the specific details and responsibilities of the candidate's previous post as provided by the applicant;
    - take up any discrepancies with the candidate at interview;
    - if there are any anomalies or doubts about the candidate's suitability to fulfil the requirements of the role, contact the referee and explore the issues, asking the referee whether there are any reasons that would prevent them from re-employing the candidate. The recruiting manager should make and retain a detailed written record of all such discussions and sign the record

The school/academy's recruitment and selection policy should make it explicit that recruiting managers reserve the right to contact referees directly to discuss information provided in references and clarify a candidate's suitability to fulfil the requirements of the role.

58. Best practice is for recruiting managers to contact all referees directly to confirm that they have provided the written reference and that they have provided all available information to support a safe decision about the recruitment of the candidate.

Dangers of open references

59. Open references could be written by the applicant or could be the outcome of a settlement agreement with a previous employer. As such, they should not be used as part of the recruitment process.

60. Alternatively, an open reference may have been provided in circumstances of a workplace closing and redundancy. If a candidate provides an open reference, the recruiting manager should therefore ask the candidate to confirm the name and contact details of the referee so that a standard reference request with the pro forma, job description and person specification for the role can be sent to the referee as above.

Online checks

61. 'As part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates.' (KCSiE, DfE 2025). Schools/academies may choose to undertake such searches before interview to facilitate exploration of any causes for concern at interview.

62. If choosing to undertake such searches, schools/academies should exercise great caution to avoid allegations of discrimination or unwarranted bias in recruitment decisions.

63. If the school/academy wishes to undertake online searches in respect of candidates, that should be stated explicitly in the school/academy's recruitment and selection policy; and candidates should be informed as part of the advertisement or in writing when expressing interest in the post.

64. There must be a legitimate purpose for undertaking online checks as part of recruitment decisions. For schools and academies, that legitimate purpose is to mitigate against and, if possible, prevent risk to children and/or to the reputation of the school/academy.

65. Online checks must therefore focus on verifying information which has a bearing on the job for which the candidate is applying. However, it may be deemed appropriate to undertake online checks for all posts in a school or academy because all employees have the opportunity of contact with children and to damage the school/academy's reputation.

67. It is recommended that only information that is public facing and therefore easily accessible both to the prospective employer and other stakeholders including pupils and their parents/carers should be viewed and considered. ACAS guidance suggests that only job websites and LinkedIn should be considered but in the context of schools and the higher safeguarding standards required, it may be reasonable to consider social media sites such as Facebook in relation to any content that is not subject to privacy settings and is therefore accessible to any other user of that social media platform, i.e. it is in the public domain.

68. The relevance of any information gathered from such online and social media searches should be assessed specifically in relation to the candidate's suitability to undertake the duties and responsibilities of the role for which they are applying. Every paid and unpaid role in a school must have a job description that references the job/role holder's responsibility for safeguarding and commitment to safeguarding children. Therefore, any material that brings into question the individual's capacity to safeguard and/or their commitment to safeguarding should be considered. Similarly, any current or recent behaviour that would be a breach of the school's staff behaviour policy (code of conduct) or any other school policy should be considered.

69. However, schools/academies should be careful not to discount prospective employees as a result of online activity unless there is evidence that the individual has engaged in conduct or holds beliefs that are incompatible with the requirement to safeguard children; or that would damage the reputation of the school. For example, it is unlikely to be necessary to discount candidates due to one-off comments posted or behaviour reported or depicted in the past, particularly from when the candidate was a child, or isolated 'likes' for organisations or views which could be considered extreme or curious in some way, unless there is other evidence of wider involvement in extreme or harmful activity or views which would be likely to place children at risk or bring the reputation of the school/academy into disrepute.

70. The school's privacy notice for applicants should confirm the stage in the recruitment process at which the employer proposes to consider information available on social media, who will see it, and how that information may be used to inform recruitment decisions.

71. It is very important that online checks are never carried out prior to shortlisting. ICO guidance on vetting prospective employees is that it should take place at as late a stage as possible in the recruitment process. If the employer considers it proportionate to undertake such checks on shortlisted candidates then no assumptions should be made or conclusions reached before interview about any information found as a result of those checks; and candidates should be given a full opportunity at interview to make representations and answer any questions about how any information of concern that may have arisen from online checks might impact upon their suitability for the role and ability to fulfil the job description and person specification.

72. If the school/academy decides to undertake online checks only in respect of preferred candidates after interview and in the event of an online search giving rise to a concern at that stage, the candidate would need to be invited back for a follow-up interview before a decision is made on whether to offer the role (or withdraw the offer if it has been made on a conditional basis). As above, the follow-up interview should provide the candidate with an opportunity to make representations and answer any questions about how any information of concern that may have arisen from online checks might impact upon their suitability for the role and ability to fulfil the job description and person specification.

1.3 Interview/Selection process

73. When short listing, the panel should also agree the structure of the interview and selection process. As a minimum, all candidates for posts subject to this policy should undertake a face-to-face interview with a panel consisting of at least two members. The interview should consist of an agreed framework of structured questions to be put to all candidates based upon criteria in the person specification.

74. As well as exploring candidates' skills, attributes to perform the role and relevant experience, every interview should include at least two value-based questions designed to explore the candidate's suitability for the role in relation to the safeguarding criteria in the person specification. Value-based questions should be an integral part of the interview and should not merely be added after the other interview questions in a tokenistic manner. They should be used to enable panel members to explore and probe candidates' motives, attitudes and behaviours in relation to safeguarding and working with children, including how they manage challenging situations and how they establish and maintain appropriate professional boundaries when working with children.

75. In addition to the agreed framework of questions, the panel should ask follow up questions to address any vagueness or areas of concern and to check its understanding in relation to candidates' attitudes towards children, child protection issues and motives for working with children

76. Furthermore, as highlighted above, the panel should agree and ask additional specific questions to address concerns or lack of clarity arising from individual candidates' application forms, gaps in employment history, frequent changes in employment, references, self-disclosure of any criminal history and any concerns or issues arising from any online or social media searches that the school or academy has decided to undertake.

77. The shortlisting panel should also consider whether or not any selection tools in addition to a face-to-face interview will be used. These may include meeting service users, group interview/exercise, written test etc.

78. Opportunities to observe candidates' interactions with pupils/students can be very informative in assessing their suitability for the role but the shortlisting panel will need to agree how other parts of the process in addition to the face-to-face interview will be assessed and scored, what weighting will be given to those scores and how the panel will receive feedback from pupils/students and other staff involved in the process.

79. The shortlisting panel should also give consideration to how pupils/students will be safeguarded and supported while in contact with candidates during the recruitment process.

80. The greater the number of candidates and the more complex the selection process, the more time, planning and organisation will be required to ensure the process runs efficiently, is safe for pupils/students and is fair to all candidates.

81. If it is possible to appoint an administrator to ensure the interview and selection process runs smoothly, that can be very helpful in ensuring that all candidates are greeted appropriately, documentation is checked and copies taken as necessary (e.g. identity documents to expedite pre-employment checks in the event that the candidate becomes a preferred candidate – copies for other candidates should be destroyed immediately or returned to the candidate), appropriate instructions are provided to all candidates and candidates are escorted from one part of the process to the next at requisite times.

Interviewing

82. The following are useful guidelines for selection panels when drawing up interview questions and conducting interviews:

- Questions and expected responses should be based on the person specification.
- Draw up a list of positive indicators, i.e. what the panel would expect a good candidate to say, and responses that would raise potential concerns. These cannot be exhaustive, should be a guide only, should be bespoke to the role and used to underpin selection decisions and as evidence of why a candidate is suitable or unsuitable for appointment.
- Agree a scoring system for assessing candidates' responses to all structured questions (e.g. 5 = excellent; 4 = good; 3 = fair; 2 = below average; 1 = poor).

- Clearly document candidates' responses and all panel decisions.
- Seek to enable every candidate to perform to the best of their ability by making them welcome, addressing comfort issues, providing clear instructions and explanations, providing typed copies of questions at the start of the interview etc.
- Ask open questions which invite longer responses, e.g. 'Tell me about…', 'Can you give me an example of…', 'How do you go about…'.
- Ask follow up questions and probe to check understanding.
- Past behaviour is a good predictor of future performance.
- Avoid questions based on hypothetical situations but questions based on real scenarios can be very useful in exploring candidates' capacity to identify issues, challenges, complexities, priorities and their own values as well as what they would actually do. If using such questions, candidates should be asked specifically to identify and discuss those issues, challenges, complexities, priorities and values in relation to how they might respond to a scenario. They should never simply be asked 'What would you do if…?'
- When asking about practice experience, ask candidates what they have actually done, what was the situation, what was the action they took, was the result an effective or ineffective outcome?

- Beware of prejudices and discrimination. Panel members should challenge each other as necessary when discussing candidates' responses after the interview.

Areas of potential concern

83. When assessing candidates' suitability to work with children based on their responses in interview, panel members should be alert to the following areas of concern about a candidate:

- No understanding or appreciation of children's needs;
- Unrealistic/unreasonable expectations of children in relation to their age and stage of development;
- Candidate wanting the role to meet their own needs at the expense of the needs of children;
- Inappropriate language when talking about children;
- Unclear boundaries with children;
- Vagueness about their experiences and gaps in employment/ information;
- Unable to provide any examples to support what they say in interview;
- Reluctance/unwillingness to work as part of a team, comply with guidelines and/or within agreed frameworks/systems.

1.4 Pre-employment checks

84. In order to save time and as suggested in para. 82 above, candidates can be asked to bring evidence of their identity, other documents that will be required in order to process a DBS check, right to work in the UK and professional qualifications to interview.

85. *Keeping Children Safe in Education (DfE 2025)* requires schools/academies to do all of the following when appointing new staff:

- verify a candidate's identity, preferably from current photographic ID and proof of address. Identification checking guidelines can be found at https://www.gov.uk/government/publications/dbs-identity-checking-guidelines;
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in Regulated Activity) ***;
- obtain a separate Barred List check if an individual will start work in Regulated Activity before the DBS certificate is available;
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice at https://www.gov.uk/check-job-applicant-right-to-work;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate; and
- verify professional qualifications, as appropriate. The Teacher Services' system should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In addition:

- schools must ensure that a candidate to be employed to carry out teaching work* is not subject to a prohibition order issued by the Secretary of State, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012; and

- independent schools, including academies and free schools, must check that a person taking up a management position as described at paragraph 129 of *Keeping Children Safe in Education (DfE 2025)* is not subject to a section 128 direction** made by the Secretary of State.

** *Keeping Children Safe in Education 2025* also specifies that a section 128 direction disqualifies a person from holding or continuing to hold office as a governor of a maintained school.

* The Teachers' Disciplinary (England) Regulations 2012 define teaching work as: planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work for the purposes of the regulations if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

86. Verification of candidates' mental and physical fitness to do the job should not take place until after the job offer has been made. Schools/academies will need to decide how this will be undertaken, e.g. completion of a health questionnaire to be considered by the occupational health medical adviser, letter from medical practitioner. However, the key principle is that only candidates selected as suitable for employment subject to pre-employment checks should be asked to participate in this process.

87. Staff in roles that constitute Regulated Activity are eligible for Enhanced Disclosure and Barring Service (DBS) checks in order to establish any previous criminal convictions plus other information held by the Police that is considered relevant by the Police; along with checks of the DBS Children's Barred List to establish that an individual is not barred from working with children.

    N.B. The DBS determines whether an adult should be barred from working with children or vulnerable adults. It maintains 'Barred Lists' of people barred from working with children and vulnerable adults. The two lists are not identical but some people are on both. The DBS lists replace the lists maintained by the former Independent Safeguarding Authority.

88. In the event that the post/role also involves work with vulnerable adults, a request for a Vulnerable Adults Barred List check would also be necessary.

89. The DBS also undertakes enhanced checks **without** checks of the Barred List and Standard checks, which are checks of the Police National Computer (PNC) records of convictions, cautions, reprimands and warnings only.

90. More information is available on the DBS website at https://www.gov.uk/government/organisations/disclosure-and-barring-service/about

91. When the DBS has completed its check of an applicant's PNC record and, if appropriate, whether or not they are on the Barred List, the relevant information will be recorded on a certificate (the DBS certificate) that is sent to the applicant. The applicant must show the DBS certificate to their potential employer before they take up post or as soon as practicable afterwards.

91.1. Checks on staff where the school makes use of Alternative Provision

In line with KCSiE 2025 Paragraph 331, the school should obtain written confirmation from the alternative provision 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. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

92. If a school/academy allows an individual to start work in Regulated Activity before the DBS certificate is available then they should ensure that the individual is appropriately supervised and that all other checks, including a separate Barred List check, have been completed.

93. *** NB *Keeping Children Safe in Education 2025* specifies that there is no requirement for a school to obtain an enhanced DBS certificate if, during a period which ended not more than three months before the applicant's appointment, the applicant has worked in a school in England in a post which brought them regularly into contact with children or young persons. However, if a decision is made not to obtain an enhanced DBS certificate, the school/academy must still obtain a separate Barred List check.

94. **If an employer knows or has reason to believe that an individual is on the Children's Barred List, it commits an offence if it allows the individual to carry out any form of Regulated Activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work**.

Regulated Activity

95. The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government have produced a *factual note on Regulated Activity in relation to Children: scope* at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Regulated Activity includes:

(a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children,

(b) work for a limited range of establishments (known as 'specified places', which include childcare settings, schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

Work under (a) or (b) is regulated activity only if done regularly, i.e. once per week or four times in a 30 day period. In addition, work under (a) is always regulated activity if it is ever undertaken between 2.00 a.m. and 6.00a.m. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. These include:

(c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

personal care includes helping a child - for reasons of age, illness or disability - with eating or drinking; or in connection with toileting, washing, bathing and dressing;

health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Volunteers and governors

96. Any volunteer role in a school that gives the individual undertaking the role unsupervised contact with children is deemed to be Regulated Activity and should therefore be subject to the same level of pre-employment checks including DBS checks with a Barred List check as an employed role.

97. All governors must and all volunteers who have regular or frequent contact with children (i.e. once or more per week or on more than three days in a 30-day period) should have an Enhanced DBS check; but that should only include a Barred List check where the governor or volunteer undertakes Regulated Activity.

Agency and third-party staff

98. Schools/academies that allow staff from third-party organisations (e.g. health professionals, peripatetic specialist teachers) to have regular direct contact with children on their premises and/or use the services of staff who are employed by external agencies (e.g. bank staff, supply teacher agencies) to care for or teach children must obtain **written notification** from the third-party organisation or agency that it:

    - operates a safer recruitment policy and
    - has carried out the checks on the individual who will be working at the setting/school that the setting/school would otherwise perform. Those checks must include a Barred List check prior to the individual commencing work at the setting/school.

99. Schools/academies must also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

100. Schools and academies who commission contractors to undertake work on site when children are present must ensure that any contractor, or any employee of the contractor, has been subject to the appropriate level of DBS check.

101. Schools/academies will first need to determine whether the contractor and/or the contractor's employees will be engaging in Regulated Activity in order to decide what checks are required. Contractors engaging in Regulated Activity will require an enhanced DBS certificate (including Barred List information).

102. For all other contractors who are not engaging in Regulated Activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including Barred List information) will be required.

103. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

104. The key questions to ask in order to ascertain whether or not checks are required are:

- Does the activity give the opportunity for contact with children?
- Is the activity carried out regularly or frequently (i.e. once per week or more or on more than three days in a 30 day period)?

105. Schools and academies must obtain written notification from the contractor that they have carried out DBS checks at the appropriate level and also that the contractor has seen their employees' DBS certificates. It is not necessary for the school/academy to see the DBS certificate of an individual that the school/academy does not employ.

107. Schools/academies should ensure that contractors and their employees for whom appropriate DBS checks have not been undertaken are supervised at all times if they are going to have contact with children.

108. If a self-employed contractor has contact with children, the school/academy should consider obtaining the DBS check because self-employed people are not able to make an application directly to the DBS on their own account.

108. Schools/academies should always check the identity of contractors and their employees on arrival at the school/academy.

Relevance of criminal records

When assessing applicants' criminal records both in self-disclosures and DBS certificates, recruiting managers should consider any offences in terms of:

- nature, seriousness and relevance to the role applied for;
- how long ago the offence occurred;
- if it was a one-off or part of a history;
- circumstances of the offence being committed;
- changes in the applicant's personal circumstances since the conviction;
- country of conviction;
- subsequent decriminalisation of the offence;
- remorse and the applicant's sense of responsibility.

109. *Keeping Children Safe in Education 2025* specifies that schools/academies must maintain a single central record (SCR) of pre-appointment checks. The checks are specified in regulations which are set out in *KCSiE 25*. The single central record must cover:
- all staff, including teacher trainees on salaried routes, agency and third party supply staff who work at the school; and
- for independent schools, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

112. *KCSiE 25* specifies the **minimum information** that must be recorded. The templates depicted in Appendices 1 and 2 cover all of the minimum information and are readily available from Warwickshire County Council. There are a number of available SCR templates for schools to use and *KCSiE 25* is not prescriptive about the format of the SCR. It can be kept in paper or electronic form. Whilst there is no statutory duty to include on the SCR details of any other checks, schools and colleges are free to record any other information they deem relevant. For example, checks for childcare disqualification, volunteers, and safeguarding and safer recruitment training dates. *KCSiE 25* also states that schools and colleges may also wish to record the name of the person who carried out each check.

113. It is important to emphasise that *KCSiE 25* states that for agency and third party supply staff, schools and colleges must also include in the SCR whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff. **This does not mean that schools should ask or expect to see the DBS certificate of an individual that the school does not employ**. The written confirmation is sufficient, along with checking that the individual presenting themselves for work at the school is the same person on whom the checks have been made.

(2) Induction

114. *Keeping Children Safe in Education* (DfE 2025), highlights that:

- **All** staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

  - ✓ child protection policy (which should amongst other things also include the policy and procedures to deal with child-child abuse)
  - ✓ behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.)
  - ✓ staff behaviour policy (sometimes called a code of conduct) Should amongst other things, include low- level concerns, allegations, against staff and whistleblowing.
  - ✓ safeguarding response to children who are absent from education particularly on repeat occasions and /or prolonged periods
  - ✓ role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

- Copies of the requisite policies as above and a copy of part one of *Keeping Children Safe in Education 2025 and Annex B* should be provided to staff at induction.

- All school/academy staff have a responsibility to provide a safe environment in which children can learn;

- Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child;

- If staff have **any concerns** about a child's welfare, they should act on them immediately;

- Headteachers and principals should ensure that the policies and procedures adopted by governing bodies and proprietors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by **all** staff;

- Staff in schools/academies are particularly important in safeguarding children as they are in a position to identify concerns early, provide help for children and prevent concerns from escalating;

- Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school/academy **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection. This should be explicit in the role holder's job description;

- Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local safeguarding partnership;

- In addition, all staff should receive regular safeguarding and child protection updates (for example, via Email, E-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;

- **All** staff should be aware of their local early help process and understand their role in it;

- **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments;

- **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the headteacher (in the case of allegations against a member of staff or volunteer), designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child;

- **All** staff should be aware of indicators of abuse, neglect and specific safeguarding issues as set out in paragraphs 19-48 of *Keeping Children Safe in Education 2025* so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy);

- **All** staff should be clear as to the school/academy's policy and procedures with regards to child-on-child abuse;

- The *Teacher Standards 2012* state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

115. Furthermore, in accordance with *Working Together 2023*, all schools/academies should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;
- clear whistleblowing procedures, which reflect the principles in Sir Robert Francis' Freedom to Speak Up Review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;
- clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies;
- safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check;
- appropriate supervision and support for staff, including undertaking safeguarding training;
- creating a culture of safety, equality and protection within the services they provide.

116. In addition, *Working Together* 2023 states that:

- employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare;
- all practitioners should have regular reviews of their own practice to ensure they have knowledge, skills and expertise that improve over time.

117. The application of robust processes for induction, probationary periods, supervision, training and appraisal is therefore essential. The importance of safeguarding should continue to be highlighted throughout the cycle of an individual's employment.

118. Empowering and encouraging members of staff and volunteers to report concerns or allegations about the behaviour of others is essential in order to tackle inappropriate or abusive behaviour. Schools/academies should therefore develop policies and practices that minimise opportunities for abuse and ensure its prompt reporting by

promoting and maintaining an ongoing culture of vigilance and openness within the organisation.

Features of a safer culture

- Open, no secrets
- Belief that 'it could happen here'
- Clear procedures for reporting concerns
- Support in raising concerns and commitment to take action
- Setting acceptable standards of behaviour
- Policies and procedures put into practice
- Induction and probationary periods
- Commitment to safeguarding and an ongoing culture of vigilance

119. The familiarisation with safeguarding and child protection responsibilities before any individual commences unsupervised work with children that all staff and volunteers should be given as part of their mandatory induction should specifically include:

- recognition of signs and symptoms of abuse and neglect (highlighting that children are abused and neglected by their parents/carers and by adults who are employed and volunteer to work with them);
- appropriate responses to disclosure of abuse or neglect by a child;
- procedures to be followed if anyone has any concerns about a child's safety or welfare, including the identity of the designated child protection officer within the agency or setting and the agency's whistle blowing procedure;
- the school/academy's staff behaviour policy or code of conduct, which makes explicit the standards of behaviour required of staff in order to safeguard children.

120. As highlighted in para 19 above, best practice would be for schools/academies to provide a copy of the safeguarding and child protection policy as part of the information pack sent to all potential applicants prior to application. All new starters should certainly receive a copy of both the safeguarding and child protection policy and the staff behaviour (code of conduct) policy with their offer of employment or volunteering opportunity, with a clearly stated expectation that the new starter will have read both policies before commencing work.

121. New starters should then be given an opportunity to discuss and clarify any issues arising from the safeguarding and child protection and staff behaviour policies on their first day before they have any contact with children; and should be asked to sign a pro forma to confirm they have read, understood and agree to work in accordance with both policies.

122. Schools/academies also need to ensure that all staff working with children – regardless of role – are informed about and provided with copies of other relevant policies and procedures in relation to safeguarding and promoting the welfare of children, such as:

- Behaviour management policy (which should include guidelines in respect of physical intervention and the use of force);
- Online safety;
- Staff use of social media;

- Whistleblowing (i.e. how to raise concerns about abuse or neglect of children by other staff/volunteers or conduct of staff/volunteers that places children at risk or undermines the organisation's safeguarding practice);
- Tackling bullying;
- Intimate care;
- Health and safety.

123. Schools/academies should ensure that their staff training strategies include the provision of safeguarding training for staff as part of their induction and regular refresher training thereafter.

(3) Training

124. *Keeping Children Safe in Education 2025* states that the designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role; and that this training should be updated at least every two years. In addition to formal training, the DSLs' knowledge and skills should be refreshed via e-bulletins, meeting other designated safeguarding leads or via reading about safeguarding developments at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

125. In order to highlight the importance of safeguarding to all staff and volunteers in all roles, the Warwickshire County Council Education Safeguarding Team (EST) advises that focused training should be provided in different ways on an ongoing basis, possibly including thematic training sessions, discussions in staff team meetings, material provided on the school's online learning and resources platform for staff and the provision of guidance documents with a requirement that staff read them by identified dates.

126. Schools and academies are also advised that all staff appointed to designated safeguarding lead roles access initial, and update training provided by the EST. The EST also provides training for whole school staff groups, designated safeguarding governors and safer recruitment training by request.

127. Schools/academies are encouraged to facilitate staff and volunteers accessing inter-agency training provided by the county council, Warwickshire Safeguarding and other reputable organisations in addition to single agency training.

Establishing and maintaining an ongoing culture of vigilance

128. Staff training should include regular reminders of the principles highlighted in *Keeping Children Safe in Education 2025* that '***It could happen here***' and '*All staff and volunteers should feel able to raise concerns about poor or unsafe practice and* ***potential failures*** *in the school/academy's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team'.* Those regular reminders will help to establish an ongoing culture of vigilance and promote the importance of staff reporting any breaches of the school/academy's staff behaviour policy (code of conduct) to the headteacher/principal in order to maintain the school/academy as a safe environment in which children can learn.

129. Training should address both how staff should record and report any such concerns; and to whom those reports should be addressed. *Keeping Children Safe in*

Education 2025 indicates that the headteacher/principal should be the recipient of such concerns. However, if a decision is made to devolve that responsibility to another school leader, that arrangement must be made explicit in induction, training and in the school/academy's safeguarding and child protection and staff behaviour policies.

130. Schools/academies should also identify by name the individual to whom staff and volunteers should report any concerns in the absence of the headteacher/principal or in the event that their concerns are about the headteacher/principal. That named individual would ordinarily be the chair of governors/trustees, but it could also be the safeguarding governor.

131. Furthermore, *Keeping Children Safe in Education 2025* states that *'Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them'*.

132. For staff who do not feel able to raise concerns regarding child protection failures internally or who have concerns about the way a concern is being handled by their school/academy, advice about raising such concerns is available from the NSPCC at https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/.

133. Staff can phone the NSPCC helpline on 0800 028 0285 from 8:00a.m.to 8:00p.m., Monday to Friday, or Email help@nspcc.org.uk.

134. All staff and volunteers should therefore be provided with those contact numbers and addresses. They should also be provided with contact details for the locality support network in the Local Authority including the Education Safeguarding Team.

135. Please refer to 'Section 5 Managing allegations and Section 6 'Low Level Concerns' below for further information about whistleblowing.

(4) Supervision and Appraisal

136. In order to fulfil the requirements of *Working Together to Safeguard Children 2023* and *Keeping Children Safe in Education 2025*, schools/academies should develop a policy for the supervision and appraisal of staff with specific reference to their safeguarding responsibilities.

137. *Keeping Children Safe in Education 2025* requires governing bodies and proprietors to appoint a designated safeguarding lead, who should be '*an appropriate **senior member** of staff from the school or college **leadership team***'; and states that the DSL should take **lead responsibility** for safeguarding and child protection (including online safety), that this should be explicit in the role holder's job description, that the DSL should have the appropriate **status and authority** within the school to carry out the duties of the post and that they should be given the **time, funding, training, resources and support** to provide **advice and support** to other staff on child welfare and child protection matters.

138. KCSiE 25 further specifies that, during term time, the designated safeguarding lead or a deputy should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

139. It is a matter for individual schools/academies and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

140. The *Ofsted* guidance *Inspecting safeguarding in early years, education and skills settings (2022)* states that *'clear and effective arrangements for staff development and training on the protection of children and learners. This should include training for governors and trustees so that they can challenge leaders in order to assure themselves that **safeguarding is effective** in their school or college.'* The guidance goes on to specify that such evidence will include that *'Staff and other adults **receive regular supervision and support** if they are working directly and regularly with children and learners whose safety and welfare are at risk.'*

141. Warwickshire County Council seeks to support schools and academies to meet these requirements by providing training for DSLs in reflective supervision.

142. It is recognised that education professionals and DSLs in particular are managing more complex, challenging and emotionally demanding situations in order to fulfil their statutory duty to safeguard and promote the welfare of children, making it increasingly challenging for DSLs to provide staff with appropriate professional advice, direction and robust professional challenge in order to ensure that children are safeguarded effectively by schools and academies.

Earle, Fox, Webb & Bowyer (Research in Practice 2017) suggest that:

- A good supervisor is able to **contain** the supervisee's anxiety, stress and hopes to **model** the kind of relationship practitioners are expected to build with children and families.
- A supervision experience should enable the practitioner to walk away feeling **less anxious** than when they walked in, and with a **clearer view** of what the child, family and organization require, what actions are most likely to produce the **best results**, and **what to do next**.
- At its best reflective supervision offers a **safe space** for a practitioner to **slow down and think**, **explore** possibilities, look for **meaning** and a way to **do their work well**.

143. *'We need to foster resilience by providing staff with the scaffolding they need to get out there, work with the most vulnerable members of our society with the emotional intelligence and compassion that will make a difference. Relationships are at the heart of good practice and relationships must be at the heart of the way we supervise and manage as well' (Wonnacott, 2013).*

Key functions of reflective supervision in safeguarding

144. Reflective supervision is widely considered to have three inter-related functions:

1. Line management

- To ensure that safeguarding practice is competent, accountable and safe;
- To ensure that safeguarding policies and procedures are followed appropriately;

- To ensure that staff fully understand their roles, responsibilities and the scope of their professional duties in safeguarding children;
- To provide reflective space for the purposes of analyzing ongoing concerns and specific incidents, assessing risk & need and providing a check and balance on decision making and planning in relation to safeguarding children.

2. Professional development

- To ensure that staff professional development needs with respect to safeguarding are considered and supported.

3. Personal Support

- To provide reflective space for the supervisee to discuss and work through the personal impact of the safeguarding role and responsibilities. This includes support to address the emotional impact of the work where required.

145. Effective reflective supervision involves a balance between all three elements, not always within one session, but certainly over the entire supervision process. It will support and strengthen the school/academy's safeguarding culture, promoting and modelling the following indicators of a safe school:

- Children are listened to;
- Leaders model safe and respectful behaviour;
- Staff are open about discussing good and poor practice;
- Staff are empowered to challenge poor practice;
- Staff are aware and acknowledge that adults who may abuse or mistreat children may be in the employment of the school/academy;
- Staff know about, understand and feel empowered to use whistleblowing procedures as and when appropriate;
- Blame only occurs in extreme circumstances;
- Staff are knowledgeable about the vulnerability of the children that they look after.

146. It is a matter for individual schools/academies to decide how best to develop and embed the practice of reflective supervision but the following are some of the possible options:

- Structured DSL team (i.e. the DSL and all deputy DSLs) supervision meetings, providing opportunities for mutual support and safe professional challenge;
- Local consortia or multi-academy trust-based group supervision for DSLs;
- DSLs and headteachers accessing reflective supervision skills training in order to be better equipped to provide reflective supervision for other staff;
- External providers of individual supervision;
- External facilitators of school-based, consortia or trust-based group supervision;

- Creating opportunities for individual reflective supervision to explore very complex/stressful/challenging cases;
- Consideration of shared funding across local consortia or multi-academy trusts to provide individual and/or group supervision opportunities.

147. All reflective supervision meetings should be recorded by the supervisor; and signed and dated by both supervisor and supervisee.

148. All records of supervision are confidential and should be stored securely by the supervisor. They may be subject to inspection and audit.

149. Case decisions from supervision made in respect of individual children should be recorded on the individual child's child protection file and referenced in the chronology.

(5) Managing allegations

150. In accordance with *Working Together 2023* and *Keeping Children Safe in Education 2025*, all schools/academies should have in place arrangements that include clear procedures for dealing with allegations against members of staff and volunteers.

151. The school/academy's procedure must state that it relates to members of staff and volunteers who are currently working in the school/academy regardless of whether the school/academy is where the alleged abuse took place. Allegations against a teacher who is no longer teaching or another member of staff no longer in employment should be referred to the Local Authority Designated Officer LADO, subject to the same procedure in relation to allegations against a current member of staff, as set out below.

152. Schools/academies must ensure that their procedures for dealing with allegations against members of staff and volunteers are consistent with Part Four of *Keeping Children Safe in Education 2025* and Warwickshire Safeguarding's procedure *Allegations Against Staff or Persons in Positions of Trust*, which can be found at: https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures

153. Schools/academies are encouraged to adopt the use of 'yellow forms' as a mechanism to support staff and volunteers to bring any breaches of the staff behaviour policy to the attention of the headteacher/principal in order to ensure the headteacher/principal is informed about any issues at the earliest opportunity and to give them the opportunity to intervene quickly to maintain the school as a safe environment for children and staff alike.

154. If used properly, yellow forms will facilitate early conversations by the headteacher/principal with staff to prevent any issues developing to the point where serious misconduct occurs and children suffer abuse at school. As such, many yellow forms will not reach the threshold for referral to the Local Authority Designated Officer, LADO. However, the headteacher/principal should always seek advice from the LADO if it is unclear whether a referral should be made to the LADO. Recording the advice given/ discussed and outcome of the consultation.

155. As stated above, all early conversations in relation to alleged breaches of the school/academy's staff behaviour policy must be recorded and placed securely on the individual's personnel file.

156. *Working Together 2023 and KCSiE 25* states that a clear distinction should be made between an allegation, a concern about the quality of care or practice or a complaint. An allegation may relate to a person who works with children who 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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

157. Any allegation should be reported immediately to the headteacher/principal of the school/academy unless the allegation relates to the headteacher/principal, in which case staff should report the allegation to the chair of governors/chair of the management committee/proprietor or otherwise named governor or trustee (e.g. the safeguarding governor). The school/academy must ensure that all staff have ready access to contact details for the chair of governors/chair of the management committee/proprietor or otherwise named governor/trustee.

158. As stated in the 'Training' section above, the headteacher/principal must ensure that all staff are informed and reminded regularly about these reporting arrangements and responsibilities.

159. The Local Authority is required to appoint a Designated Officer (LADO) to be involved in the management and oversight of individual cases. The LADO provides advice and guidance to employers and voluntary organisations, liaising with the Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

160. The LADO should be informed within one working day of all allegations that come to the attention of the headteacher/principal or chair of governors/chair of the management committee/proprietor/ otherwise named governor/trustee (known as the 'case manager') or that are made directly to the Police.

161. Schools/academies should ensure they have effective policies for whistleblowing and the management of allegations that are consistent with part 4 of *Keeping Children safe in Education 2025* - '*Allegations of abuse made against teachers and other staff*'.

162. As highlighted above, schools/academies should ensure that all staff recognise the principle of 'It could happen here' and their responsibilities to report any concerns about the conduct of any adult that works with children that may constitute a risk to children. Any impediments/disincentives to appropriate reporting in order to safeguard children should be discussed openly and addressed as part of a safe and open culture.

163. If a school/academy removes an individual (paid worker or unpaid volunteer) from work in a school/academy (or would have, had the person not left first) because the person poses a risk of harm to children, the school/academy's case manager must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

(6) Low level concerns and allegations that do not meet the harm threshold

164. KCSiE 25 states 'it is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.'

165. The culture of the school should promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

166. All concerns should be shared responsibility and with the right person, recorded and dealt with appropriately. Implemented correctly this culture should

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

167. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and

• does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

• being over friendly with children

• having favourites

• taking photographs of children on their mobile phone, contrary to school policy

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or

• humiliating children.

168. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

169. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

170. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should

also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

171. Headteacher and governing should state set out the procedures for low level concerns within the school/setting code of conduct and safeguarding policy.

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system

(7) Determining future employment

172. In order to complete the cycle of effective protection of children from potential abuse and neglect by staff and volunteers, it is essential that schools/academies ensure that when their managers are asked to provide references, they are written with the following 4 objectives in mind:

- **Deter** unsuitable people from seeking employment or opportunities to volunteer to work with children and young people;
- **Reject** applications from unsuitable people;
- **Prevent** abuse and neglect of children by staff and volunteers;
- **Identify** incidents of abuse and neglect by staff and volunteers and **respond** appropriately.

173. In particular, school leaders/managers should provide honest, objective and factual information in respect of any substantiated concerns about the applicant's practice with children and any disciplinary action taken in relation to those substantiated concerns including outcomes and any sanctions imposed.

174. This requirement highlights the importance of managers addressing concerns with employees and volunteers as early as possible and maintaining a clear record of all such discussions. The use of 'yellow forms' will assist this practice. It is essential that school leaders/managers create and retain securely clear records of discussions undertaken in the context of day to day management and supervision, as well as formal investigation and disciplinary processes.

175. School leaders/managers should refer to their supervision, whistleblowing and management of allegations policies and ensure these are consistent with *Working Together 2023* and other relevant government guidance.

176. Schools and academies should make it clear to all members of staff - including other members of the school leadership team, designated safeguarding leads and heads of department - that no references should be provided in the name of the school/academy without being approved and signed off by the headteacher/

principal. This will ensure that information about substantiated concerns and disciplinary action, which other school leaders/DSLs/heads of department may not be aware of, is included in references as appropriate

Appendix 1 – single central record

Example single central record of checks

Identity					Qualifications		Prohibited list	GTCE list	EEA list check	S128 Prohibited from management	Barred list check	DBS certificate		Right to work in UK	Overseas Check		Volunteers only
Surname	First name	Date evidence of ID seen	Start date	Role	Required Yes / No	Check evidenced date	Check evidenced date	Check evidenced date	Check evidenced date	Check evidenced date	Check evidenced dated	Original certificate seen da	Disclosure number	Check evidenced date	Checks required Yes / I	Checks complete Yes / I	Date risk assessment completed
													NOT STATUTORY				NOT STATUTORY

OFFICIAL