Chessbrook
Education Support Centre
Courage | Pride | Resilience

Safer Recruitment Policy

REVIEWED ON: 20/10/2026

APPROVED BY RESOURCES COMMITTEE

Reviewed by Suzanne Briscall | Review cycle: Annual | Next review date: October 2027

© HFL Education

Policy based on:

Safer Recruitment Policy

Date of issue; September 2026

- The recognised professional associations and trade unions have been consulted on this document, and HFL Education recommends it for adoption.

Changes since previous version:

- Restructured to strengthen governance, delegated authority, definitions, audit trails and decision-making.
- Updated for Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and the removal of the supervision exemption from regulated activity from 1 September 2026.
- Strengthened sections on references, online searches, conditional offers, assessment of adverse information and offer-withdrawal provisions.
- Expanded provisions for agency staff, contractors, self-employed individuals, volunteers, visitors, governance roles and alternative provision.
- Revised criminal-record self-declaration.

Contents

1. Introduction and purpose....4
2. Scope....4
3. Definitions....4
4. Key principles....5
5. Roles, delegated authority and conflicts of interest....5
6. Planning the recruitment process....6
7. Advertising and candidate information....6
8. Applications, employment history and shortlisting....6
9. Criminal-record self-declaration....7
10. References....7
11. Online searches....8
12. Selection and interview....9
13. Conditional offers and pre-appointment checks....9
14. Assessing criminal-record and other adverse information....9
15. Identity, right to work, qualifications and professional status....10
16. Health, disability and reasonable adjustments....10
17. Overseas checks....10
18. DBS, barred-list and regulated-activity decisions....11
19. Starting before all checks are complete....11
20. Agency staff, contractors and self-employed individuals....12
21. Volunteers....12
22. Visitors....13
23. Governors, trustees and members....13
24. Trainees, students, work experience and host arrangements....13
25. Alternative provision and commissioned placements....14
26. Single central record and assurance....14
27. Induction, probation and ongoing suitability....14
28. Data protection, confidentiality and retention....15
29. Recruitment concerns and complaints....15
30. Links with other policies, statutory guidance and procedures....16
31. Monitoring and review....16

Appendix 1 – Regulated Activity....17

Appendix 2 – Criminal Record Self-Declaration Form....18

Appendix 3 – Online Search Record....**Error! Bookmark not defined.**

1. Introduction and purpose

Safeguarding and promoting the welfare of children is paramount. The purpose of this policy is to support robust, fair and consistent recruitment and selection arrangements that deter unsuitable applicants, identify safeguarding and suitability concerns and prevent unsuitable individuals from being appointed or engaged to work with children.

Recruitment and appointment decisions form part of Chessbrook ESC's (the School's) wider safeguarding responsibilities and its commitment to effective information sharing and multi-agency safeguarding. This policy should therefore be applied in accordance with Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, the applicable statutory framework and relevant local safeguarding arrangements, in each case as amended or replaced from time to time.

Chessbrook ESC (the School) is committed to a recruitment process that is safeguarding-focused, professional, transparent and respectful. Candidates will be assessed against the published requirements of the role, provided with reasonable adjustments where required and given an appropriate opportunity to explain any material discrepancy or concern before a final decision is made, except where appointment is prohibited by law.

Maintained schools: "the School" means the employing organisation with responsibility for recruitment and employment matters.

This policy is non-contractual. It should be read with current statutory guidance and local recruitment procedures. Current statutory requirements prevail where they change.

2. Scope

The policy applies, where relevant, to the recruitment, appointment, engagement or approval of:

- employees, workers and apprentices;
- agency, supply and third-party staff;
- contractors and self-employed individuals;
- volunteers;
- governors, trustees and members;
- trainee teachers, students and others on placement;
- alternative provision and commissioned arrangements;
- anyone whose role may provide access to children, premises, systems or confidential information.

The checks applied depend upon status, activities, frequency, regulated-activity status, opportunity for contact and the statutory requirements applying to the setting.

3. Definitions

Candidate: a person applying or considered for employment, engagement, appointment,

placement or voluntary activity.
Conditional offer: an offer subject to specified conditions being completed satisfactorily.
Recruiting manager: the authorised person managing the process.
Recruitment panel: the persons authorised to shortlist, assess or interview candidates and to make a recommendation or appointment decision.
Regulated activity: activity falling within the statutory definition, determined by the activities undertaken, their frequency and the circumstances of the role, rather than the role title alone.
Online search: a proportionate search of publicly available online information as safer-recruitment due diligence.
Conflict of interest: an actual or perceived interest capable of affecting impartiality.
Single central record: the record of checks required by law and statutory guidance for relevant categories.

4. Key principles

- Safeguarding is paramount.
- Appointments are made on merit against objective, role-related criteria.
- Mandatory checks must be satisfactory before appointment is confirmed.
- No single check replaces the whole suitability assessment.
- Information is assessed accurately, fairly and in context.
- Discrepancies are explored and not treated automatically as dishonesty.
- Conflicts must be declared and managed.
- Reasonable adjustments will be made.
- Only relevant and lawfully obtained information will be considered.
- Records must show criteria, evidence, reasons and authority.
- Meeting the minimum criteria does not guarantee appointment. The decision will take account of comparative merit, the requirements of the role and the overall assessment of safeguarding and suitability.
- Chessbrook ESC (the School) may fairly pause, repeat, amend or discontinue a process and record the reasons.

5. Roles, delegated authority and conflicts of interest

Maintained schools: Operational decisions may be exercised by the Executive Headteacher or another person with delegated authority under the Management Committee's delegation arrangements.

The Management Committee is responsible for ensuring that effective safer-recruitment arrangements are in place and monitored. Recruiting managers are responsible for ensuring that the process, checks and records required for a particular appointment are completed.

At least one person involved in interviewing and making the appointment decision must have completed appropriate safer-recruitment training. Chessbrook Esc (the School) will ensure safer recruitment training is refreshed periodically and whenever significant legislative or safeguarding changes occur.

Every person involved in recruitment must declare any personal relationship, prior involvement, financial interest or other connection with a candidate that could create an actual or perceived conflict. A person with a material conflict must not participate unless an authorised person has assessed the position, established safeguards and recorded the reasons.

No person may promise appointment, agree or vary salary or contractual terms, waive a required check or confirm an appointment unless authorised to do so.

6. Planning the recruitment process

Before advertising or seeking candidates, the recruiting manager will confirm:

- authority and budget to recruit;
- the employer, role, location, hours, status and proposed terms;
- an up-to-date job description and person specification;
- the safeguarding responsibilities, opportunity for contact with children and whether the role is regulated activity;
- the checks, qualifications, professional status and right-to-work evidence required;
- the selection criteria, assessment methods, panel membership and timetable;
- arrangements for reasonable adjustments;
- who has authority to make the appointment decision.

Selection criteria must be objective, relevant to the role and agreed before applications are reviewed.

7. Advertising and candidate information

Advertisements and recruitment information will state Chessbrook ESC's (the School's) commitment to safeguarding, the safeguarding responsibilities of the role, whether regulated activity is involved, and the checks to which appointment will be subject.

Candidate information will normally include the job description, person specification, safeguarding statement, selection process, Child Protection Policy, Safeguarding Policy, this policy or a link to it, and information about criminal-record self-declaration and online searches.

8. Applications, employment history and shortlisting

Candidates must complete a standardised application form. A curriculum vitae may supplement but will not normally replace a completed application form.

The application form will require a complete employment and education history, explanations for gaps, relevant qualifications and declarations necessary for the role.

Protected equality-monitoring information will be separated from selection information so far as reasonably practicable.

Shortlisting will be undertaken against the published criteria. Panel members will record sufficient reasons for their decisions. Where scoring is used, panel members should normally assess independently before moderation.

Employment gaps, repeated changes, inconsistencies or incomplete information will be identified for clarification. They will not automatically be treated as evidence of wrongdoing. Internal candidates will be assessed against the same published criteria. Verified employment information already held by the employer may be considered where lawful, fair and relevant, but informal opinion, rumour or undisclosed information must not replace proper evidence or a fair opportunity to respond.

We promote the practice of using anonymised application forms at the shortlisting stage to manage unconscious bias.

9. Criminal-record self-declaration

Shortlisted candidates for posts eligible for a Standard or Enhanced DBS check will be asked to complete a criminal-record self-declaration limited to information Chessbrook ESC (the School) is lawfully entitled to request. Candidates must not be asked to disclose protected cautions or convictions or information that the law requires to be disregarded.

Self-declarations will not be used to determine initial shortlisting. Information will be handled separately and shared only with those who need it to assess suitability. A declaration will not automatically prevent appointment. (See Appendix 2 for a suggested template).

10. References

A minimum of two references will normally be obtained, including one from the current or most recent employer. References will be sought directly from an appropriate authorised referee and not accepted solely as open testimonials supplied by the candidate.

Where the candidate has worked in education, a reference should normally be obtained from the Headteacher, Principal, Chief Executive Officer or another appropriately senior authorised person. References will be verified where authenticity, authorship or content is uncertain.

References should normally be obtained before interview where reasonably practicable. Where unavailable, any offer will remain conditional and relevant matters must be resolved before appointment is confirmed.

Referees will be asked whether they are satisfied that the applicant is suitable to work with children, whether there are substantiated safeguarding findings relevant to the post,

whether there are safeguarding-related disciplinary sanctions or live concerns which it is lawful and relevant to disclose, the outcome of any relevant formal process, and whether they would re-employ the person in a role involving children.

References must not include allegations found to be false, unfounded, unsubstantiated or malicious. Information must be accurate, factual, relevant and capable of substantiation.

Discrepancies will be explored with the referee and candidate. Access to references will be managed under data-protection law, including any applicable exemption for confidential employment references.

Where there is uncertainty regarding a referee's identity or the authenticity of a reference, reasonable steps will be taken to verify the source. This may include direct telephone contact, verification through organisational contact details or confirmation from another authorised representative.

11. Online searches

Chessbrook ESC (the School) will consider carrying out an online search as part of due diligence on shortlisted candidates. Where searches are used, they will normally take place after shortlisting and before interview, and candidates will be informed in advance.

Searches will:

- use proportionate criteria agreed in advance;
- be limited to publicly available information reasonably relevant to safeguarding, professional conduct, suitability or material verification of application information;
- be applied consistently to candidates for the same role;
- avoid deliberate searches for protected-characteristic information or irrelevant private-life information;
- be undertaken, wherever practicable, by a person who is not a final decision-maker;
- distinguish verified information from opinion, third-party content and possible mistaken identity;
- record only relevant findings;
- give the candidate an opportunity to respond to material concerns before a decision is made.

An online search will not form part of the initial shortlisting decision. The scope may be adapted to the seniority, duties and risk profile of the post. Information obtained will be handled in accordance with data-protection law and the recruitment privacy notice.

The recruiting manager will ensure that search parameters are agreed in advance and applied consistently to all shortlisted candidates for the same post. Chessbrook ESC (the School) may determine which search engines, publicly available platforms and search terms will be

used and the extent of searching required. (See Appendix 3 for a suggested template)

Wherever practicable, searches will be undertaken using employer devices and accounts.

Information obtained through online searches will be processed in accordance with UK GDPR and data protection legislation.

12. Selection and interview

Selection methods will relate to the requirements of the role and may include interview, presentation, task, observation, testing or other assessment. Candidates will be assessed consistently, and reasonable adjustments will be made where required.

The interview and selection process will explore motivation to work with children, safeguarding attitudes and understanding, professional boundaries, employment gaps, discrepancies, any previous conduct relevant to the low-level concerns framework and any material matter arising from references, declarations or online searches. Candidates will be given a fair opportunity to explain relevant concerns.

Panel notes, scores, reasons and the appointment recommendation or decision will be retained. The panel is not required to appoint the highest-scoring candidate where unresolved safeguarding or suitability concerns remain, but the reasons must be reasonable, relevant and documented.

13. Conditional offers and pre-appointment checks

Any offer will be conditional until the Chessbrook ESC (the School) confirms in writing that all applicable conditions have been met satisfactorily. Conditions include identity, right to work, references, qualifications, professional status, health assessment, DBS and barred-list information, prohibition checks, overseas checks, childcare disqualification (where relevant) and any role-specific requirement.

A conditional offer may be withdrawn where a mandatory check cannot be completed satisfactorily, the individual is prohibited from the role, material information is false or incomplete, a concern cannot be resolved, the candidate lacks a required qualification or right to work, the candidate does not cooperate reasonably, or suitability has not been demonstrated on reasonable and documented grounds.

Before withdrawal, the candidate will normally be told the material concern and given a reasonable opportunity to respond. This does not apply where appointment is prohibited by law or another restriction prevents disclosure.

14. Assessing criminal-record and other adverse information

Information from a reference, self-declaration, DBS certificate, online search, overseas check

or other source will not automatically result in exclusion unless the person is legally prohibited from the role.

The decision-maker will consider:

- accuracy, reliability and source;
- relevance to the role and safeguarding responsibilities;
- seriousness and circumstances;
- time elapsed and the person's age at the time;
- whether there is a pattern;
- the candidate's explanation and evidence;
- changed circumstances and rehabilitation;
- professional-boundary and public-confidence implications;
- whether reasonable safeguards could manage risk;
- the need to protect children, colleagues and the legitimate interests of Chessbrook ESC (the School).

The assessment, advice obtained, candidate's response, decision and reasons will be recorded.

15. Identity, right to work, qualifications and professional status

Identity will be verified using current official guidance, with careful consideration of previous names and consistency across documents. Chessbrook ESC (the School) will complete the prescribed right-to-work check before employment begins and retain the evidence required by law.

Qualifications, registrations and professional status essential to the role will be verified through original evidence or an authoritative source. Teaching prohibition, interim prohibition and section 128 checks will be completed where applicable using the current authorised service.

No appointment will be confirmed where a legal prohibition, disqualification or absence of a mandatory requirement prevents the person from undertaking the role.

Copies of documents used to verify identity, qualifications and right-to-work status will be retained where required by law or organisational procedure. The person completing the check should record the date the original evidence was seen and verified.

16. Health, disability and reasonable adjustments

Health or disability questions will not normally be asked before an offer except where permitted by law, including to arrange selection adjustments, establish whether an intrinsic function can be undertaken, or for another lawful purpose.

Following a conditional offer, a successful candidate may be asked to complete a confidential health assessment relevant to the role. A disability, health condition or need for adjustment will not, by itself, prevent appointment. Chessbrook ESC (the School) will consider occupational-health advice, reasonable adjustments and the intrinsic functions of the role before deciding.

17. Overseas checks

A candidate who has lived or worked outside the UK will undergo the same checks as other candidates. Chessbrook ESC (the School) will also determine what additional checks are available, lawful and appropriate so that relevant overseas events can be considered.

Depending on the country concerned, additional evidence may include certificates of good conduct, criminal-record checks, letters of professional standing, confirmation from a regulatory authority, employer statements or other appropriate documentation.

Where information cannot be obtained, Chessbrook ESC (the School) will consider alternative evidence and complete a documented risk assessment before deciding whether to proceed.

An overseas qualification, registration or lack of recorded sanction does not replace the other required safer-recruitment checks.

18. DBS, barred-list and regulated-activity decisions

The appropriate level and workforce of DBS check will be determined by legal eligibility and the activities of the role. A barred-list check will be undertaken only where legally permitted and required.

An enhanced DBS check with children's barred-list information will be obtained for a person undertaking regulated activity. An enhanced check without barred-list information may be requested where the role is eligible but not regulated activity. The Update Service may be used only where lawful, the certificate is at the correct level and workforce, identity is verified and the original certificate is seen where required.

Chessbrook ESC (the School) will inspect the original DBS certificate where required and resolve any discrepancy between information declared and disclosed. A copy will be retained only where there is a lawful and documented reason and for no longer than necessary.

19. Starting before all checks are complete

A person will not normally start until all required checks are complete. Exceptionally, where a person starts in regulated activity before the enhanced DBS certificate is available, Chessbrook ESC (the School) must have completed all other checks, obtained barred-list information through a lawful route, approved a written safeguarding risk assessment,

specified supervision or restricted duties, and arranged prompt inspection of the certificate when issued.

Any exceptional arrangement will be recorded, communicated to the relevant managers and kept under review until the outstanding check has been completed satisfactorily.

No person may undertake regulated activity where Chessbrook ESC (the School) knows or has reason to believe that they are barred.

20. Agency staff, contractors and self-employed individuals

Before an agency, supply or third-party individual starts, Chessbrook ESC (the School) will obtain written assurance from the provider that the checks required for that individual have been carried out as required by KCSIE and relevant legislation, including the appropriate DBS and barred-list checks where relevant. Identity will be checked when the person presents for work.

Chessbrook ESC (the School) may refuse access or require removal where assurances are absent, identity cannot be confirmed, a safeguarding concern arises or continued access would create an unacceptable risk. Ending an assignment does not prevent safeguarding action or any required referral.

For self-employed individuals, Chessbrook ESC (the School) will determine and arrange or verify the appropriate checks. An existing DBS certificate will not be accepted automatically: identity, level, workforce, role compatibility and Update Service status will be checked, and a new check obtained where required.

Where an existing DBS certificate is presented, Chessbrook ESC (the School) will satisfy itself that the certificate relates to the individual concerned, remains appropriate for the proposed activity and workforce, and that no additional checks are required.

21. Volunteers

From 1 September 2026, the supervision exemption from regulated activity no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children will undertake regulated activity where the statutory frequency or overnight condition is met.

A volunteer must not undertake regulated activity until Chessbrook ESC (the School) has confirmed that the required enhanced DBS check with children's barred-list information, or another lawful barred-list route, has been completed. It is a criminal offence for a barred person to engage in regulated activity and for an organisation to permit a barred person to do so.

Where a volunteer role is not regulated activity, Chessbrook ESC (the School) will complete a written role and risk assessment to determine what identity, reference and DBS checks are

lawful, eligible, necessary and proportionate. The assessment will be reviewed when duties or frequency change.

Volunteer risk assessments may take account of:

- the nature and frequency of contact with children;
- whether the volunteer is known to Chessbrook ESC (the School);
- information available from employers, referees or community organisations;
- whether the volunteer undertakes similar activities elsewhere;
- opportunities for supervision;
- the legal eligibility for DBS checking; and
- any safeguarding risks associated with the proposed role.

Volunteer arrangements must not be used to avoid safer-recruitment requirements for paid work.

22. Visitors

Visitors attending on an occasional basis will not normally be subject to DBS or barred-list checks solely because they visit. Chessbrook ESC (the School) will check identity where appropriate, provide relevant safeguarding information (including reporting details where relevant) and decide whether escort or supervision is required.

For a visitor attending in a professional capacity, Chessbrook ESC (the School) will obtain appropriate assurance from the visitor's employer or commissioning body about the checks completed for the activity, without routinely requesting to inspect the DBS certificate itself. Chessbrook ESC (the School) retains responsibility for site access and safeguarding arrangements.

23. Governors, trustees and members

Maintained schools: Management Committee Members/Governors will be subject to the checks required by law and KCSIE, including an enhanced DBS check. A barred-list check will be undertaken only where the governor also undertakes regulated activity or another lawful basis applies.

No person will be appointed or continue in office where they are disqualified or prohibited from doing so. Additional operational duties will be assessed separately to determine whether further checks are required.

24. Trainees, students, work experience and host arrangements

Chessbrook ESC (the School) will obtain or complete the checks required for trainee teachers, students and others on placement, and will verify identity and written assurances before access begins.

Where Chessbrook ESC (the School) arranges work experience, it will assess the placement and the activities of adults who will teach, train, instruct, care for or supervise the child. The removal of the supervision exemption must be considered when determining whether an adult is undertaking regulated activity.

Host-family or homestay arrangements, where used, will be managed under the current statutory framework and local safeguarding procedures. The policy does not authorise a check that is not legally available for the arrangement.

25. Alternative provision and commissioned placements

Commissioning alternative provision does not transfer Chessbrook ESC's (the School's) safeguarding responsibility for the pupil. Before placement, Chessbrook ESC (the School) will obtain written assurance that the provider has completed appropriate checks on relevant individuals and will notify Chessbrook ESC (the School) of staffing or other changes that may affect safeguarding.

Assurances and any risk assessment will be retained. Chessbrook ESC (the School) may pause, refuse or end a placement where necessary assurances are absent, a concern arises or the arrangement no longer provides adequate safeguards.

Chessbrook ESC (the School) will maintain appropriate oversight of commissioned placements and seek assurance that safeguarding arrangements remain effective throughout the placement.

26. Single central record and assurance

Chessbrook ESC (the School) will maintain a single central record containing the information required by law and KCSIE for the categories of person applicable to the setting. Entries will be accurate, complete, supported by appropriate evidence and updated promptly.

The record will show whether each required check has been completed and the date completed or obtained. Additional information may be recorded where it supports safeguarding assurance and is accurate, relevant and lawfully processed.

Responsibility for maintaining, checking and periodically auditing the single central record will be assigned expressly. Discrepancies will be investigated and corrected promptly. Audit activity and remedial action will be recorded.

27. Induction, probation and ongoing suitability

New employees and relevant appointees will receive safeguarding and role-specific induction. Employees will be managed under the applicable Probation Policy where relevant. Induction support may continue beyond probation and does not alter the contractual duration

or outcome of probation.

Safer recruitment is part of an ongoing culture of vigilance. Information arising after appointment that may affect legal eligibility, professional status or suitability will be considered promptly under safeguarding procedures, the low-level concerns process, Code of Conduct, Probation Policy, Disciplinary Policy or another appropriate route.

Chessbrook Esc (the School) will consider referrals to the DBS, Teaching Regulation Agency, LADO, police, children's social care, professional regulator or other body. Resignation, dismissal, non-renewal, removal from duties or ending an assignment does not prevent required safeguarding consideration or referral.

28. Data protection, confidentiality and retention

Recruitment information will be processed lawfully, fairly and securely under the recruitment privacy notice. Access will be limited to those who need it for selection, safeguarding, employment, audit, legal or regulatory purposes.

Records for successful candidates will be kept on their personal file for audit and inspection purposes (including risk assessments)

Records for unsuccessful candidates will normally be retained for the period specified in Chessbrook ESC's (the School's) retention schedule and then securely destroyed, unless another lawful reason applies. Retention will usually not exceed six months following completion of the recruitment process.

DBS certificates and criminal-record information will not be retained longer than necessary.

The fact, date and outcome of a check and any associated risk assessment may be recorded where lawful.

Candidates must not be promised absolute confidentiality. Information may be shared where necessary for safeguarding, legal compliance, procedural fairness or regulatory referral.

29. Recruitment concerns and complaints

A candidate may raise a concern about the recruitment process through the route specified in the candidate information. Chessbrook ESC (the School) will consider whether there has been a material procedural error, discrimination, conflict of interest, misuse of information or other unfairness.

A recruitment concern is not an appeal against the panel's reasonable assessment of merit and suitability. The employee Grievance Policy will not normally apply to an external candidate and will not automatically apply merely because an internal candidate disagrees

with a recruitment outcome.

Wherever reasonably practicable, a concern about the conduct of the recruitment process will be considered by a person who was not the sole decision-maker in the matter complained about.

Chessbrook ESC (the School) may correct an error, repeat a stage, seek further evidence or discontinue a process where appropriate. Raising a complaint, protected disclosure, equality concern or legitimate trade-union issue must not result in victimisation or adverse treatment.

30. Links with other policies, statutory guidance and procedures

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Early Years Foundation Stage statutory framework, where applicable
- DBS Code of Practice
- Child Protection and Safeguarding Policy
- Code of Conduct
- Low-Level Concerns procedure
- Probation Policy
- Disciplinary Policy
- Whistleblowing Policy
- Relationships at Work Policy
- Equality, Diversity and Inclusion Guidance
- Data Protection Policy and recruitment privacy notice
- Scheme of Delegation and financial regulations

Where issues overlap, Chessbrook ESC (the School) will determine the most appropriate procedure and may manage matters concurrently where fair and appropriate.

31. Monitoring and review

This policy will be reviewed periodically and may be updated earlier where there are changes in legislation, statutory guidance, case law, safeguarding expectations, governance arrangements or operational requirements.

Chessbrook ESC (the School) will keep its safer-recruitment arrangements under review, including compliance with required checks, the accuracy of the single central record, any exceptional starts, recruitment complaints, adverse-information decisions, volunteer assessments and any themes arising from safeguarding reviews or audit activity.

Where concerns or recurring weaknesses are identified, Chessbrook ESC (the School) will consider appropriate action, which may include training, guidance, process changes, enhanced oversight or revision of supporting documentation.

Appendix 1 – Regulated Activity

This appendix is a summary and must be read with current law and official guidance.

Recruiting managers must seek advice where there is uncertainty regarding regulated activity status before recruitment decisions are made.

Regulated activity is determined by the activity, frequency and circumstances, not the role title.

- Teaching, training, instructing, caring for or supervising children may be regulated activity where the statutory frequency or overnight condition is met.
- Frequent contact is defined as occurring on more than 3 days in any 30-day period.
- Overnight is defined as occurring at least once between 2am and 6am with children present.
- Certain personal care and health-care activities are regulated regardless of frequency.
- Paid work in specified places may be regulated activity where the statutory conditions are met, subject to applicable exceptions.
- From 1 September 2026, supervision no longer removes relevant unpaid activity from regulated activity.
- It is a criminal offence for a barred person to engage in regulated activity and for an organisation to permit a barred person to do so.

Appendix 2 – Criminal Record Self-Declaration Form (template)

Complete only where the post is eligible for the criminal-record information requested. You are not required to disclose a protected caution or conviction or information which the law says must not be considered. If uncertain, obtain independent advice.

This post is exempt from the Rehabilitation of Offenders Act 1974. For further information on criminal record self-declaration for roles that are eligible for standard or enhanced DBS checks please refer to Nacro guidance and the MoJ website.

For each declaration below, enter Yes, No or Not applicable in the Response column. If you answer "Yes", provide sufficient relevant information in the final row to enable the School/Trust to understand the matter. Do not provide protected information that you are not legally required to disclose.

Information disclosed will be considered fairly and in accordance with section 14 of this policy. A declaration will not automatically prevent appointment.

Field	Response
Candidate name	
Post applied for	
Date	
Teacher Reference Number (where applicable)	
Unspent conditional cautions or convictions to disclose	
Adult cautions or spent convictions not protected by filtering rules	
Barred status or childcare disqualification relevant to the role	
Teaching prohibition, interim prohibition or section 128 direction	
Professional or regulatory restriction relevant to the role	
Relevant overseas criminal, professional or regulatory restriction	
Details of any "yes" answer	

Declaration

I confirm that the information provided is accurate and complete to the best of my knowledge and that I have disclosed the information I am lawfully required to disclose for this post. I understand that knowingly providing false or materially incomplete information may result in withdrawal of a conditional offer or, if discovered after employment begins, consideration under the applicable employment procedure.

Signed: _____ Date: _____

This record will be retained and disposed of in accordance with the School/Trust's recruitment schedule, data protection policy and relevant statutory guidance.

Appendix 3 – online search record (template)

This template form may be adapted where the School/Trust carries out an online search after shortlisting.

Search criteria must be agreed in advance, applied consistently to candidates for the same role and limited to publicly available information reasonably relevant to safeguarding, professional conduct, suitability for the role or material verification of information provided during recruitment.

The search must not deliberately seek information about protected characteristics or irrelevant aspects of private life.

Candidate name:	
Previous/ other name(s) provided:	
Role shortlisted for:	
Searcher initials:	
Date and time of online search:	

Agreed search terms:
● 'Candidate name' + ● 'Candidate name' + 'location' ● 'Candidate name' + 'teacher' (or + job title if this does not contain 'teacher') ● 'Candidate name' + 'current employer' ● 'Candidate name' + 'previous employer' ● 'Candidate name' + 'finance' ● 'Candidate name' + 'accounts'
Agreed platforms:
Their current or most recent employer's website – to confirm employment details. Google (All tab + News tab) – searches as detailed above.
Agreed limitations:
For each search carried out using the agreed terms, look at the first 3 pages of results.
Findings to note:
We are specifically looking for things that could a) make someone unsuitable to work with children and/or b) could bring the employer into disrepute (for example evidence of offensive or inappropriate behaviour). It is important not to include irrelevant personal information.

Search conducted	**Summary / link findings**
Their current or most recent employer's website – to confirm employment details	

‘Candidate name’	
‘Candidate name’ + ‘location’	
‘Candidate name’ + ‘job title’	
‘Candidate name’ + ‘current employer’	
‘Candidate name’ + ‘previous employer’	
‘Candidate name’ + ‘finance’	
‘Candidate name’ + ‘accounts’	

***These criteria will be applied to all shortlisted candidates fairly and consistently.**

© HFL Education