

Nord Anglia Education

UK SCHOOLS SAFER RECRUITMENT

POLICY

2026

POLICY DETAILS – UK SCHOOLS SAFER RECRUITMENT POLICY			
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1. Introduction

This policy has been developed to clarify and embed safer recruitment practices and procedures throughout Nord Anglia Education and its UK schools as well as to support the creation of a safer culture by reinforcing the importance of safeguarding and well-being for the children and young people in our care. The practices set out in this document comply with UK regulatory imperatives including Keeping Children Safe in Education (KCSiE) as well as NAE global safeguarding requirements.

All successful candidates for paid or voluntary positions will be made aware of this policy but it is the individuals' own responsibility to ensure that they read, understand and follow the guidance contained within this and all other Nord Anglia policies.

This policy is an essential element in creating and maintaining a safe and supportive environment for all students, staff and others within our schools and Nord Anglia Education.

2. Mission and Policy Statement.

Nord Anglia Education is fully committed to ensuring the safety and well-being of its students. We are dedicated to maintaining rigorous and transparent recruitment processes for individuals who work in our schools, especially those in unsupervised settings. This includes:

- Attracting the best possible candidates to vacancies.
- Identifying and rejecting those candidates who are unsuitable to work with children and young people.
- A thorough evaluation of all applicants through interviews, application forms, and background checks.
- Verifying identity, qualifications, and professional history, including obtaining and verifying references.
- Comprehensive criminal background checks from all countries where the applicant has lived or worked in the last 10 years (7 years for applicants from the USA).
- Prohibition from teaching and disbaring checks.
- Ensuring that at least one member of each interview panel for roles involving unsupervised contact with children has completed safer recruitment training in the last 5 years.

Detailed and accurate records of all recruitment checks will be maintained, including DBS checks & ICPC checks, if applicable, criminal record checks from other countries, qualifications, prohibition from teaching and disbaring checks.

Background checks are mandatory for any individual who participates in 'regulated activity'; who regularly has unsupervised contact with students, including contractors and third-party staff (e.g., bus drivers, security personnel, caterers, and cleaners). Nord Anglia Education will ensure that background checks are conducted for contractors engaged under a formal agreement with any Nord Anglia Education entity.

The safety of the staff employed by the school is the responsibility of the Principal. School leaders together with governors of schools should ensure that systems and checks are in place. This will ensure oversight and confidence that all adults who will have unsupervised access to students are suitable to work with children (i.e have gone through all the appropriate safer recruitment procedure set out in this document) and that appropriate safer recruitment records are held in the right place.

3. Aims and Objectives

1. To deter, reject, or identify unsuitable individuals who may pose a risk to children or vulnerable groups.
 2. To ensure fairness and consistency throughout the recruitment process.
 3. To maintain a safe and secure environment for all students and staff.
 4. To establish a culture that actively promotes safeguarding within each step of the recruitment process.
 5. To ensure all relevant equal opportunities legislation is adhered to and that appointees are not discriminated against on the grounds of race, nationality, gender, religion, age, disability, marital status, sexual orientation.
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4. Recruitment and Selection Procedures

4.1. Advertising

All job advertisements will include a clear statement affirming our commitment to safeguarding and child protection. Each job advertisement will contain a detailed job description and person specification outlining the role's required qualifications and responsibilities.

Schools should include the following information when defining the role (through the job or role description and person specification):

- The skills, abilities, experience, attitude, and behaviours required for the post.
- The safeguarding requirements, i.e. to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to children.

The advert should include:

- The school commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken.
- The safeguarding responsibilities of the post as per the job description and personal specification.

and

- 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.

4.2. Application Process

Where a role involves engaging in regulated activity, schools should include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply such a role if the applicant is barred from engaging in regulated activity relevant to children.

Schools should also provide a copy of the school's safeguarding/child protection policy and practices and also the policy on employment of ex-offenders in the application pack or refer to a link on its website.

Applications

- Applicants must submit a comprehensive application form which must be signed. This can either be done in person, at interview or online.
- Schools should only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own does not provide adequate information.
- All gaps in the candidate's employment history must be identified so that they can be investigated at interview.

4.3. Shortlisting and Interviews

- Shortlisted candidates should be asked to complete a self-declaration of their criminal record or any 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). A copy of this self-declaration should be kept on the individuals HR file.
- A self-declaration should only be requested from applicants who have been shortlisted. The information should not be requested in the application form to decide who should be shortlisted.
- Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.
- Schools should ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview process as well for a consistent approach).
- Shortlisting will be conducted based on the criteria specified in the job description and person specification.
- As part of the shortlisting process schools will, where possible, undertake a social/ media/on-line check on the short-listed candidates which also forms part of the due diligence process. This may identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks. (See Part two - Legislation and the Law for information on data protection and UK GDPR, the Human Rights Act 1998 and the Equality Act 2010). Evidence of a completed check for the successful candidate should be saved in the individual's HR file upon appointment.
- Interviews will include questions related to safeguarding, the candidate's understanding of child protection, and their suitability to work with at risk groups.
- Interview panels should include at least two but preferably three member of school staff. At least one is required to have completed safer recruitment training. The school employee holding this training must be able to evidence they have it.
- Notes from interview should be kept on the individuals HR file and be signed and dated by the interviewer, including evidence of safeguarding questions.
- Any gaps in employment should be asked about and notes on the explanations taken and held in the individuals HR file if appointed.

4.4. References

The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools will endeavour to obtain references before interview, to investigate any concerns raised by the referee with the candidate at interview.

In requesting and checking references schools should:

- Seek a minimum of two references.

- Ensure that at least one of the 2 referees has known the candidate for a minimum of 3 years.
- Save all references on the individuals HR file on appointment.
- Not accept open references e.g. 'to whom it may concern'
- Not accept previously completed references or letters of recommendation provided by the candidate; schools must source the references themselves.
- Ensure any references are from the candidate's current or most recent employer and have been completed by a senior person with appropriate authority (if the referee is school based, the reference should be confirmed by the Headteacher/Principal as accurate in respect of any disciplinary investigations).
- Where the individual is not currently employed, obtain a reference for their most recent relevant period of employment.
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then obtain a reference from their current employer
- Aim to always verify (by telephone) the information provided within the reference with the person who provided the reference. Evidence of this verification (including the date of the check and who checked by) must be held in the individuals HR file on appointment. Where the reference originates from the referee's school or company email address and is checked on the school or company website, this suffices as verification
- Contact referees to clarify content where information is vague or insufficient information is provided
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate at interview.
- Establish the reason for the candidate leaving their current or most recent post, and,
- Ensure any concerns are resolved satisfactorily at interview.

When asked to provide references, schools should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold.

All references must be obtained and verified before the employee's start date.

4.5. Selection

Schools should use a range of selection techniques to identify the most suitable person for the post. Selection should always include at least one interview but can be supplemented by in-tray exercises, psychometric testing, lesson observations and practical assessments.

Those interviewing should agree structured questions and should establish:

- What attracted the candidate to the post being applied for and their motivation for working with children (academic and boarding staff) or in a school environment (for support staff).
- Exploring their skills and asking for examples of experience of working with children which are relevant to the role, and,
- Probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
- Each selection process must include asking at least 2 safeguarding questions.

The interviews should be used to explore potential areas of concern and to determine the applicant's suitability to work with children. Areas that may be concerning and should lead to further probing include:

- Implication that adults and children are equal
- Lack of recognition and/or understanding of the vulnerability of children
- Inappropriate idealisation of children
- Inadequate understanding of appropriate boundaries between adults and children, and,

- Indicators of negative safeguarding behaviours.

Any information disclosed about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

For Boarding, Academic and SLT roles, students should ideally be involved in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with pupils/students is common and recognised as good practice.

4.6. Pre-Employment Checks

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks outlined below.

All schools must undertake the following checks before allowing an individual to have any unsupervised access to students:

- **Identity:** Verify a candidate's identity, it is important to be sure that the person is who they claim to be. This includes being aware of the potential for individuals to change their name. Best practice is to check the name on their birth/marriage/divorce/deed poll certificate, where this is available, but a passport and/ or ID card would be acceptable. Dates seen should be entered on the school's central record but copies of the personal data should not be held in the HR file.
- **DBS:** All successful candidates must undergo an Enhanced DBS check with barred list check prior to commencing employment. The original certificate must be seen and the date of the check recorded in the school's central record.
- **Children's Barred list:** To check whether a candidate has been barred from working with children before DBS checks are available. This check can be accessed using the school's DfE account.
- **Overseas police checks:** For candidates who have lived outside the UK, a police check from all of the countries they have lived in during the 10-year period prior to appointment must be provided by the individual. The date these checks were completed must be recorded on the school's central record and evidence held within the individual's HR file.
- **Qualifications:** Where a requirement for the post, the candidate's qualifications should be checked and verified. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- **Right to Work:** Verification that the candidate has the legal right to work in the UK must be obtained and recorded. The date this check was undertaken should be recorded on the school central record and the evidence of the check held on the individual's HR file.
- **Section 128:** A Section 128 check is related to independent schools and verifies whether individuals are barred from taking part in the management of such schools. It is based on a direction made by the Secretary of State for Education. Checks should be carried out and evidence recorded for any appointments to a school's management team or governing body. Dates should be recorded on the central record and evidence of this check held in the individual's HR file.
- **Social media/online:** Checks should be carried out on all individuals to be appointed as part of pre-employment checking process. Any issues should be reported to SLT and discussed with the candidate to understand context and any potential risk to children. Evidence of these checks should be held in the individual's HR file.
- **Prohibition order:** Checks must be conducted on all new teaching appointments and evidence of the check being undertaken stored on the individual's HR file.
- **Fitness:** The candidate's mental and physical fitness to carry out their work responsibilities must be checked. An 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. This can be done through a questionnaire and evidence of the check should be recorded on the school's central record and held in the individual's HR file.

The date the check was undertaken must be recorded in the school's central record in all cases and the date of all checks must precede an individual's start date.

Notes:

Qualifications, prohibition checks can be performed using the following link: <https://check-a-teachers-record.education.gov.uk/check-records/search>

Section 128 checks are completed using the following link:

<https://www.gov.uk/government/collections/individuals-prohibited-from-managing-or-governing-schools>

4.7. Overseas staff and staff who have never lived in the UK

- Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in school. This includes obtaining an enhanced DBS certificate (including children's barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK.
- The DBS certificate must be checked and verified before the employee begins unsupervised work onsite in the school.
- Overseas police checks covering a 10-year period (7 years for the US) prior to the commencement of employment for any country that the individual has lived in must be provided by the individual.

Additional background checks for non-UK based applicants should include:

- Obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.
- Where this information is not available schools should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Risk assessment and decision-making process should be signed off by the Principal and recorded on the individual's HR file.

All checks on overseas staff must be recorded on the school's central record and recorded on the individual's HR file.

4.8. Agency and third-party staff

Schools must obtain written confirmation from any agency, or third-party organisation, that the same checks have been performed as the school would otherwise perform on any individual who will be working at the school (or who will be providing education on the schools' behalf, including through online delivery).

This confirmation should be in the form of a letter of assurance from the agency or third-party organisation and state that the following checks have been satisfactorily completed:

- Right to work in the UK
- Enhanced DBS check: Where the DBS certificate has disclosed any matter or information, or any information was provided to the employment business, the school must obtain a copy of the certificate from the agency.
- References: Agencies also need to have obtained 2 references and must also confirm they have made the appropriate verification checks as per NAEs procedures.

- Children's Barred List: Where the position requires a children's barred list check, this must be obtained by the agency or third party by obtaining an enhanced DBS certificate with children's barred list information, prior to appointing the individual.
- Training completed (safeguarding, Prevent, first aid etc).

The letter of assurance must confirm who has completed the checks and when they were performed.

Only individuals for whom all of the required checks have been completed should be deployed to the school.

The school should confirm the identity of the person presenting themselves for work to ensure that it is the same person on whom the checks have been made by the agency.

All of the above checks and assurances must be in place prior to the individual starting work with the school.

A record of all of the above checks must be entered on the school's SCR.

Third party workers should also wear a coloured lanyard which identifies their status as a contractor.

Where an agency worker is subsequently made permanent within the school, the normal safer recruitment checks must all be completed, including obtaining an updated enhanced DBS check, additional 'temporary to permanent' interview with safeguarding questions and reference checks.

4.9. Contractors, consultants and self-employed workers

Where schools and colleges use third party contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school. Schools should ensure that any contractor, or any employee of the contractor who is to work at the school has been subject to the appropriate level of DBS check.

Contractors engaging in regulated activity relating to children require an enhanced DBS check (including children's barred list information). Such contractors must not start their engagement within the school until a valid enhanced DBS check has been received.

Contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children also require an enhanced DBS check (not including children's barred list information). Such contractors may start their work but must be supervised at all times until a valid enhanced DBS check has been received.

In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children, schools should decide on whether a basic DBS disclosure would be appropriate and clearly document the decision, including the name of the final decision maker.

Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.

If an individual working at a school is self-employed, the school should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Contractors must provide the original DBS certificate and schools should always check the identity of contractors on arrival at the school.

Schools should be able to provide evidence of the contractual arrangements with all contractors and the checks performed. This should be recorded on the schools' central record.

Contractors should also wear a coloured lanyard which identifies their status.

4.10. Proprietors (including Governors) of independent schools

Before an individual becomes either the proprietor of an independent school or the chair of a body of people which is the proprietor of an independent school, the Secretary of State will; carry out an enhanced DBS check; and where such a check is made, obtain an enhanced DBS certificate (either including or not including children's barred list information as appropriate).

The following additional checks must also be performed by the school:

- Confirm the individual's identity.
- If the individual lives or has lived outside of the UK, where applying for an enhanced check is insufficient, carry out such other checks as the Secretary of State considers appropriate.
- Where the proprietor is a body of people (including a governing body), the chair must ensure that enhanced DBS checks are undertaken for the other members of the body, and that where such a check has been undertaken, an enhanced DBS certificate is obtained. The chair must ensure that identity checks are completed before, or as soon as practicable after, any individual takes up their position. The chair must also ensure that members of the body are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school.
- All checks undertaken in relation to the governing body must be recorded on the school's central record.
- For Chair of Governors / Proprietors a letter countersigned by Secretary of State confirming their suitability for the role must be kept on file.

All pre-recruitment checks must be completed and recorded properly prior to any new appointment commencing on the school site or having any unsupervised access to students in the school.

Proprietors and Governors should also wear a coloured lanyard which identifies their status.

4.11 Regular visitors to the school

All regular visitors (such as regular volunteers or NAE visitors) should have the following checks completed and recorded on the school's SCR:

- Enhanced DBS check
- Safeguarding training
- Identity check (passport or driving licence)

Where these checks are not in place, these visitors should be supervised at all times when onsite.

Visitors should also wear a coloured lanyard which identifies their status.

5. Onboarding and Induction

- All new staff members must undergo a comprehensive induction, which includes safeguarding and child protection training. Completion of this should training be recorded. It is not mandatory to record this on the school's central record, but it does need to be documented in an accessible format.

- All relevant policy documents must be provided to the new starter and throughout the probation period these policies should form the basis of conversations with new starters to ensure that new staff understand their responsibilities. An understanding of the school's safeguarding/child protection policy should feature in these discussions.
 - All members of school staff must complete PREVENT training during their induction period and a record of this training must be kept on the individual's training file.
 - All new staff should be asked to sign a form to indicate that they have read, understood, and agree to follow the expectations of all the school's policies. This should be kept in the individual's HR file.
 - The probation review process should be used to support induction through the probation period and safeguarding should be part of the employee's ongoing performance management process.
 - Before confirming that the probation period has been passed successfully a probation meeting must be held to review performance. This should be documented and held on the individual's HR file.
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6. Training

- All staff must complete all the required NAE or local authority mandatory safeguarding training, regardless of role, as soon as practical and must complete all relevant courses before the end of any probation period.
 - Safeguarding training should ideally be completed prior to commencing in post but no later than the first day in post.
 - All staff will receive regular safeguarding updates within school in order to ensure compliance with the latest legislation and best practices. Typically this will happen during INSET at the beginning of the new academic year.
 - Safer Recruitment training should be renewed every 5 years by those regularly conducting interviews.
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7. Regulated activity

A person will be engaging in regulated activity with children if, as a result of their work, they:

- Will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
 - Will be working on a regular basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children, or
 - Engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once. Note: it is especially important to note that anyone staying with students is considered to be in regulated activity. This means that volunteers (including parents) used to support school trips etc would fall into this category.
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8. Further guidance

- The details of an individual should be removed from the single central record once they no longer work at the school or college.
 - If after completion of the DBS or other background check, convictions which have not been disclosed are identified this must be considered by SLT and HR to assess if the candidate poses a risk to children. This process must involve escalation to the regional HR Director and the Global Head of Safeguarding before further decisions are taken. All decisions must be recorded and evidenced on the employee's HR file.
 - Where the school is using Gap students or recent graduates, these individuals should be subject to the same level of scrutiny as any other individual in school who is engaging in regulated activity. The school must be clear about the level of responsibility that these individuals can hold.
 - Any person being provided with accommodation by the school should be aware of how their conduct (as set out in the safer working practices and staff accommodation contract) can affect their ability to stay in the accommodation. They may have to leave immediately if their behaviour falls below expected standards, or they are seen as being a risk to children.
 - If a candidate has had many employers over a short period of time employers, this should be explored during the interview and may lead to acquiring further references or checks.
 - Schools are free to record any other information they deem relevant, but this is not considered mandatory. For example, checks made on volunteers, checks made on governors, dates on which safeguarding and safer recruitment training was undertaken, and the name of the person who carried out each check.
 - The single central record can be kept in paper or electronic form.
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Monitoring and Review

- This policy will be reviewed annually to ensure it remains effective, relevant, and aligned with the latest legal and regulatory requirements including KCSIE, NMS boarding schools, Rehabilitation of Offenders' Act, Equality Act.