

Safer Recruitment, DBS and Staff Suitability Policy

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Safeguarding lead	Hannah Lewis
Approved by	Nathan Warr
Applies to	Directors, employees, tutors, associate tutors, subcontractors, volunteers and any person working on behalf of the business
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Linked documents	Safeguarding and Child Protection Policy; Managing Allegations Against Staff Policy; Staff Code of Conduct and Low-Level Concerns Policy; Single Central Record; Workforce Competency and Compliance Register; Data Protection and UK GDPR Policy; Privacy Notice; Staff Supervision and Case Review Policy; Whistleblowing Policy; Staff Application Form.

Governance note

No adult should work unsupervised with children on behalf of PACE until required safer recruitment, DBS, identity, right to work, suitability and induction checks are complete and recorded. The Single Central Record and Workforce Competency and Compliance Register provide the linked evidence base for safer recruitment and ongoing suitability assurance.

1. Purpose

PACE Education Pathways is committed to safeguarding children by ensuring that all adults who work for, volunteer with, subcontract to, or otherwise represent the business are safely recruited, properly checked, suitably trained and appropriately supervised.

The purpose of this policy is to set out the business's safer recruitment and staff suitability arrangements for a small 1:1 alternative provision and tutoring service. It covers recruitment planning, advertising, applications, shortlisting, interviews, identity checks, references, DBS checks, barred list checks, right to work checks, qualification checks, overseas checks, induction, probation, ongoing suitability and record keeping.

2. Scope

This policy applies to directors, employees, tutors, associate tutors, subcontractors, volunteers, work experience adults and any person engaged to work on behalf of the business. It applies to paid and unpaid roles, permanent and temporary arrangements, sessional teaching, online teaching, community-based provision and home-based provision.

No adult may have unsupervised contact with pupils or access to sensitive pupil information until the required pre-engagement checks have been completed, assessed and recorded, unless there is a documented risk assessment approved by the Director and DSL. In practice, the business will seek to avoid any such exception.

3. Policy principles

Safer recruitment is a safeguarding control, not simply an HR process. The business will recruit in a way that deters unsuitable applicants, identifies potential risk, verifies identity and suitability, checks employment history, tests safeguarding understanding and creates a clear audit trail.

The business will apply proportionality to its small-provider model, but it will not lower safeguarding standards because the organisation is small. Where the business is commissioned by a school or local authority, it will be able to evidence that staff suitability checks have been completed before provision starts.

4. Legal and guidance framework

This policy has been written with reference to Keeping Children Safe in Education (current edition), Working Together to Safeguard Children (current edition), the DfE Arranging Alternative Provision guide, the Rehabilitation of Offenders Act 1974, the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, the Equality Act 2010, UK GDPR, the Data Protection Act 2018 and current Disclosure and Barring Service guidance.

Although PACE Education Pathways is not intended to operate as a registered independent school, it works directly with children and young people, including pupils who may be vulnerable, absent from school, excluded, SEND, anxious or receiving reintegration support. Schools and local authorities commissioning provision will expect safer recruitment standards that support their safeguarding duties.

5. Roles and responsibilities

The Director / Governance Lead is responsible for maintaining this policy, ensuring that recruitment records are complete, maintaining the Single Central Record, checking that required documents are in place before engagement and reviewing suitability concerns with the DSL.

The Designated Safeguarding Lead is responsible for advising on safeguarding suitability concerns, contributing to interview questions where relevant, reviewing disclosures or concerns that may affect suitability, and ensuring that safeguarding induction and training are completed before pupil contact.

All adults working for or on behalf of the business are responsible for providing accurate information, declaring relevant changes in circumstances, complying with the Staff Code of Conduct and reporting concerns about adults or recruitment processes.

6. Recruitment planning and role definition

Before any role is advertised or agreed, the business will identify whether the role involves regulated activity with children, unsupervised pupil contact, online contact, access to pupil records, transport, home visits or work with pupils who may present increased safeguarding or behavioural risk.

Each role will have a written role description or service specification. It will identify the safeguarding responsibilities of the role, expected conduct, required checks, required training, reporting lines and whether the role is employee, associate, subcontractor or volunteer.

Role type	Likely checks before pupil contact
Director / DSL / Governance role	Identity; right to work where applicable; enhanced DBS and barred list where eligible; references or professional history checks; safeguarding training; policy acknowledgement.
Employee tutor / teacher	Application form; interview; identity; right to work; enhanced DBS with children's barred list where eligible; references; qualification check; induction; training record.
Associate tutor / subcontractor	Identity; contract; enhanced DBS and barred list where eligible; references or agency assurance supported by evidence; insurance; safeguarding induction; signed policy acknowledgement.
Volunteer / helper	Role risk assessment; identity; DBS level according to role; references where appropriate; supervision plan; induction; code of conduct.

7. Advertising and applicant information

Advertisements and role descriptions will make clear that the business is committed to safeguarding and promoting the welfare of children and that appointments are subject to safer recruitment checks, including identity verification, references, DBS checks and other checks appropriate to the role.

Applicants will be informed that shortlisted candidates may be asked to discuss safeguarding scenarios, employment gaps, conduct issues, suitability to work with children and any relevant information arising from pre-appointment checks. The business will not make informal appointments that bypass safer recruitment controls.

8. Application process

Where possible, applicants will complete an application form rather than relying only on a CV. The application process should capture full employment history, education/training history, qualifications, references, right to work information, any gaps in employment or education, and a declaration relating to suitability to work with children.

CVs may be accepted as supporting information, but unexplained gaps, frequent changes of employment, missing dates, vague role descriptions or unclear reasons for leaving must be clarified and recorded before appointment.

9. Shortlisting

Shortlisting will assess the applicant against the role requirements and will consider safeguarding as well as teaching, mentoring, SEND, behaviour and communication suitability. At least two people should be involved in shortlisting where practicable.

Where only one director is available, shortlisting decisions must still be recorded, and any safeguarding or suitability concern must be discussed with the DSL before proceeding. The business should avoid appointing solely because the person is known personally or professionally.

10. Interviews and suitability assessment

Interviews will include questions that assess motivation to work with children, boundaries, professional judgement, safeguarding awareness, response to disclosures, lone working judgement, online safety, working in pupils' homes and willingness to follow policy.

Applicants should be asked about employment gaps, reasons for leaving relevant roles, any disciplinary or safeguarding concerns, and any circumstances that may affect suitability. Answers must be recorded briefly and kept with the recruitment file.

11. Pre-appointment checks

Before an adult starts work with pupils, the business will complete and record the checks required for the role. The checks below are the minimum expected for anyone working directly with children or accessing sensitive pupil information.

Check	Minimum expectation
Identity	Verified before appointment using original documents or approved digital route.
Right to work	Checked before employment or engagement where applicable.
Enhanced DBS	Required for direct work with children where eligible.
Children's barred list	Included where the person is in regulated activity and the check is legally eligible.
References	Normally two, including most recent employer or relevant children's workforce reference.
Qualifications	Checked where the role depends on teaching, SEND, first aid or specialist competence.
Employment history	Gaps and inconsistencies explored and recorded.
Overseas checks	Considered where the person has lived or worked outside the UK.
Safeguarding induction	Completed before pupil contact.

12. DBS and barred list arrangements

The business will obtain the appropriate level of DBS check for the role before the person starts regulated activity. For adults working in regulated activity with children, this will normally be an enhanced DBS check with children's barred list information, subject to eligibility rules.

Where a person subscribes to the DBS Update Service, the original certificate must be seen and identity verified before an online status check is completed. The business will record the date of the check, certificate number, level of check, workforce, whether barred list information was included where eligible, and the outcome decision.

The business will not keep DBS certificates longer than necessary. It will normally record that the certificate has been seen, the relevant details and the suitability decision. Any information from a certificate will be handled confidentially and in line with data protection requirements.

13. References

At least two references should be obtained for employees or associate tutors before unsupervised pupil contact. One reference should normally be from the most recent employer or, where relevant, the most recent role involving work with children.

References should be requested directly from a professional email address or official organisation route where possible. Open testimonials, character references from friends, references supplied only by the applicant, or vague informal references should not be accepted as the only evidence of suitability.

References should ask about dates of employment, role, reason for leaving, performance, conduct, safeguarding concerns, disciplinary findings, suitability to work with children, reliability and whether the referee would re-employ or re-engage the person.

14. Right to work, identity and qualifications

The business will verify the identity of each adult before appointment. Identity checks must be based on original documents or approved digital identity checking arrangements where applicable.

Right to work in the UK must be checked before employment or engagement begins. Where a role requires teaching qualifications, specialist qualifications, professional registration or specific training, evidence must be seen and recorded. Where a person claims Qualified Teacher Status or another professional status, this should be verified where possible.

15. Overseas checks and employment history

Where an applicant has lived or worked outside the UK, the business will consider whether additional checks are required. This may include overseas criminal record checks, certificates of good conduct, additional references or further risk assessment depending on the country, duration and nature of the work.

Employment history must be reviewed for gaps, inconsistencies or unexplained changes. Gaps are not automatically a concern, but they must be discussed and recorded so the business can show that it considered suitability carefully.

16. Single Central Record and recruitment file

The business will maintain a Single Central Record or equivalent suitability register. This will show, for each adult, which checks have been completed, the date completed, who checked them and any expiry or renewal dates.

A recruitment file will be maintained for each person. It will include the application information, interview notes, evidence of checks, references, qualification evidence, DBS decision record, induction record, training record and signed policy acknowledgements.

17. Induction before pupil contact

No adult should work with pupils until they have completed a safeguarding induction appropriate to their role. As a minimum, induction will include the Safeguarding and Child Protection Policy, Staff Code of Conduct, low-level concerns and allegations reporting, whistleblowing, lone working and home visit expectations, data protection, online safety, incident reporting and attendance reporting.

Adults must confirm in writing that they have read and understood the key policies before they start working with pupils. Where a person does not understand a policy, they must seek clarification before starting work.

Minimum induction evidence

The induction checklist should be signed and dated by the adult and the person completing the induction. Copies of training certificates and signed policy acknowledgements should be stored with the recruitment file or staff suitability record.

18. Ongoing suitability

Suitability is not a one-off check. Adults working for or on behalf of the business must declare any change in circumstances that may affect suitability to work with children. This includes criminal investigations, cautions, convictions, allegations, safeguarding concerns, professional disciplinary action, loss of right to work, driving disqualification where transport is relevant, or any restriction imposed by another organisation.

The business may repeat DBS checks, carry out Update Service checks, request updated references, review training, restrict duties, suspend engagement or seek advice from the LADO, DBS or commissioner where suitability concerns arise.

19. Associate tutors, subcontractors and volunteers

Associate tutors and subcontractors must meet the same safer recruitment and suitability standards as employees when they have direct contact with pupils or access to sensitive pupil information. The business will not rely only on a subcontractor's assurance where direct evidence is reasonably required by the commissioner or risk profile.

Written agreements with associates or subcontractors will require compliance with PACE Education Pathways policies, safeguarding reporting routes, confidentiality requirements, data protection expectations, insurance requirements and cooperation with audits or investigations.

20. Dealing with disclosures, convictions or suitability concerns

A criminal record, employment gap or past concern will not automatically prevent engagement. Decisions will be made fairly, proportionately and with safeguarding as the priority. The business will consider the nature of the matter, relevance to the role, time elapsed, pattern of behaviour, explanation given, evidence of rehabilitation and any risk to pupils.

Where information suggests a person may be unsuitable to work with children, the business will not allow pupil contact until the concern has been reviewed and a written decision has been made. Where required, advice will be sought from the LADO, DBS, commissioner or legal/professional adviser.

21. Allegations and referrals to DBS

Where an adult working for or on behalf of the business is alleged to have harmed a child, behaved in a way that may indicate a risk of harm, committed a relevant offence, or behaved in a way that raises suitability concerns, the matter must be managed in line with the Safeguarding and Child Protection Policy and the Managing Allegations Against Staff Policy.

If the business removes a person from regulated activity, or would have done so had they not left, because they harmed a child or may pose a risk of harm to children, the business will consider its legal duty to make a referral to the Disclosure and Barring Service. The business will also cooperate with any LADO, police, local authority or commissioner process.

22. Record retention and confidentiality

Recruitment and suitability records will be kept securely with access limited to those who need the information for safeguarding, governance, HR, legal or commissioning purposes. Sensitive data will be handled in line with the Data Protection and UK GDPR Policy and Privacy Notice.

DBS certificate information will not be copied or retained unless there is a clear lawful reason. Suitability decisions, check dates and outcomes will be recorded. Recruitment records should be retained for the period set out in the Records Retention Schedule.

23. Monitoring and review

The Governance Lead will review the Single Central Record at least termly while the business is actively providing services and before any new adult starts work with pupils. Any gaps must be resolved before pupil contact wherever possible.

This policy will be reviewed at least annually and sooner if there are changes to statutory guidance, DBS rules, commissioner expectations, the business model, or following a serious incident, allegation or audit finding.

Appendix A - Recruitment decision checklist

- Role description or service specification completed.
- Regulated activity assessment completed.
- Application form or CV reviewed and gaps clarified.
- Interview completed with safeguarding questions recorded.
- Identity verified.
- Right to work checked where applicable.
- Enhanced DBS and barred list check completed where eligible.
- References received and reviewed.
- Qualifications/professional status checked where relevant.
- Overseas checks considered where relevant.
- Suitability decision recorded.
- Safeguarding induction completed.
- Core policies read and acknowledged.
- Training matrix updated.
- Single Central Record updated before pupil contact.

Appendix B - Example safeguarding interview questions

1. Tell us why you want to work with children who may be out of school, anxious, excluded or receiving alternative provision.
2. A pupil tells you something worrying but asks you not to tell anyone. What would you do?
3. How would you maintain professional boundaries during 1:1 work in a pupil's home or community setting?
4. What would you do if a parent/carer attempted to involve you in a family dispute or asked you to keep information from the school or local authority?
5. What would you do if you saw another tutor messaging a pupil from a personal phone in a way that felt too familiar?
6. How would you respond if a pupil became distressed, aggressive or refused to engage during a session?

Appendix C - Staff declaration

I confirm that I have read and understood this Safer Recruitment, DBS and Staff Suitability Policy. I understand that I must provide accurate information, cooperate with suitability checks, follow the Staff Code of Conduct and declare any change in circumstances that may affect my suitability to work with children.

Name: _____

Role: _____

Signature: _____

Date: _____

Key guidance references

Keeping Children Safe in Education (current edition); Working Together to Safeguard Children (current edition); DfE

24. Ongoing suitability and assurance

Safer recruitment does not end at appointment. PACE will maintain ongoing suitability through supervision, policy acknowledgements, training and competence monitoring, DBS Update Service checks where used, review of allegations or low-level concerns, and prompt consideration of any new information that may affect suitability. The Single Central Record must be kept current and auditable.

25. Commissioner assurance

Where a commissioner requests evidence of safer recruitment, PACE will provide proportionate assurance while protecting personal data. An anonymised Single Central Record may be provided where appropriate. Original identity, right-to-work, DBS and qualification evidence should be verified and recorded in accordance with PACE data-protection arrangements rather than routinely copied or shared.