SAFER RECRUITMENT, COMPLIANCE CHECKS AND SINGLE CENTRAL RECORD (SCR) POLICY AND PROCEDURE

Version:	1.0
Reviewer:	OHC&AT HR
Approval body:	Joint Board
Date this version approved:	27th March 2026
Due for review:	Spring 2027

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Safer Recruitment, Compliance Checks & Single Central Record (SCR) Policy and Procedure

1. INTRODUCTION

Orchard Hill College & Academy Trust (OHC&AT) is fully committed to safeguarding and promoting the welfare of children, young people and vulnerable adults. Safer recruitment is a fundamental component of this commitment and ensures that the Trust recruits individuals who are suitable, safe, and aligned with the highest safeguarding expectations.
This policy sets out the Trust's approach to:

- Safer recruitment
- Pre-employment safeguarding and compliance checks
- Ongoing vetting and safeguarding assurance
- Robust management and quality assurance of the Single Central Record (SCR)

This policy should be read alongside:

- Keeping Children Safe in Education (KCSIE)
- Recruitment & Selection Policy
- Child Protection, Adult Protection and Safeguarding Policy
- Staff Code of Conduct
- Equality, Diversity and Inclusion Policy
- Information and Records Retention Policy
- Data Protection Policy
- Staff Privacy Notice

Non-Negotiable Principle:

No individual may commence work until all required checks have been:

- Completed
- Verified
- Assessed as satisfactory
- Recorded on the SCR

2. SAFEGUARDING PRINCIPLES

Safeguarding underpins every stage of recruitment, onboarding, and employment activity within OHC&AT.

OHC&AT will ensure:

- Safer recruitment practices are consistently applied across all settings
- All pre-employment checks are completed before engagement
- Concerns are identified, explored, risk-assessed, and resolved
- All decisions are evidence-based and clearly documented

- The SCR remains accurate, complete, and inspection-ready

Key principles

- Safeguarding overrides operational pressures
- Compliance is continuous and proactive
- Any anomalies must be addressed immediately
- Recruitment processes are reviewed and improved regularly
- Professional advice is sought promptly when concerns arise

3. SAFEGUARDING CULTURE STATEMENT

OHC&AT's safeguarding culture is built on the principle that safeguarding is everyone's responsibility.

We commit to:

- Not waiting for inspection to drive standards
- Not making exceptions
- Not compromising on safeguarding expectations
- Challenging unsafe or noncompliant practice
- Protecting learners — always

4. ROLES AND RESPONSIBILITIES

Clear roles and responsibilities are essential for ensuring that safer recruitment and SCR compliance are robust, consistent, and effective across the Trust.

Trustees

The OHC and OHCAT Boards of Trustees are responsible for:

- Ensuring safer recruitment policies and procedures are in place
- Receiving assurance that checks and SCR requirements are met across all settings
- Monitoring compliance through audit reports and safeguarding updates
- Ensuring statutory duties under KCSIE are fulfilled

Executive Senior Leadership Team (ESLT)

The ESLT is responsible for:

- Ensuring consistent implementation of safer recruitment across the organisation.
- Ensuring leaders have capacity, training, and resources to meet compliance requirements.
- Taking effective action to address any noncompliance or recruitment-related safeguarding risks.

Principals/Head of Colleges

School and College leaders are responsible for:

- Ensuring safer recruitment practices are fully embedded and consistently applied within their setting
- Ensuring that at least one interview panel member has up-to-date Safer Recruitment Training
- Ensuring all pre-employment checks are completed and verified before an individual begins work, except in the very limited exceptions permitted under this policy
- Holding overall accountability for SCR accuracy, completeness and statutory compliance
- Ensuring regular SCR audits are conducted in accordance with OHC&AT requirements
- Acting promptly on any compliance concerns identified via internal review, external audit, or safeguarding escalation

Recruiting Managers

Recruiting Managers are responsible for:

- Planning and conducting recruitment in line with OHC&AT's Recruitment & Selection Policy & Procedures.
- Ensuring job descriptions, adverts, and interview materials reflect safeguarding responsibilities.
- Shortlisting candidates using objective and safer recruitment-compliant criteria.
- Ensuring interview questions and assessment activities address safeguarding and suitability to work with children and vulnerable adults.
- Ensuring interview documentation is completed accurately and submitted promptly for pre-employment checks.

OHC&AT HR Team

The HR Team is responsible for:

- Overseeing all aspects of Safer Recruitment and compliance across OHC&AT
- Supporting recruitment checks for College and Central Teams roles, and supporting Academies where required
- Completing or verifying pre-employment checks
- Maintaining the Trust-wide SCR
- Providing Safer Recruitment and SCR training, guidance, and support.
- Escalating noncompliance concerns to senior leaders when necessary.
- Conducting internal audits of recruitment and SCR compliance.

School Office Managers / School Admin Teams

School-based administrative teams are responsible for:

- Supporting recruitment administration and interview process, including sending interview invitations and preparing interview packs for the panel
- Ensuring candidate documentation is checked and verified
- Ensure recruitment paperwork is signed, dated, collected and submitted to the HR Team promptly
- Maintaining an accurate and compliant Local SCR for the school

- Ensuring contractors, temporary staff, and visitors meet safeguarding compliance requirements
- Updating SCR promptly for all new starters
- Liaising with HR to resolve discrepancies

College Operations Manager / College Admin Teams

College-based administrative teams are responsible for:

- Supporting recruitment activity in partnership with HR
- Ensuring candidate documentation is checked and verified
- Ensure recruitment paperwork is signed, dated, collected and submitted to the HR Team promptly.
- Maintaining College Local SCR documentation.
- Ensuring contractors, temporary staff, and visitors meet safeguarding compliance requirements.
- Updating SCR promptly for all new starters.
- Liaising with HR to resolve discrepancies.

Line managers for volunteers, contractors, and agency staff

Line managers are responsible for:

- Ensuring required checks are completed before engagement.
- Supervising unchecked individuals (only in exceptional permitted cases).
- Ensuring correct SCR recording via Admin or HR teams.

OHC&AT Governance Team

The Governance Team is responsible for:

- Leading the recruitment and appointment processes for Governors, Trustees and Members.
- Working closely with the HR Team to ensure that all required safeguarding and suitability checks are completed and verified prior to commencement.
- Managing, updating and maintaining the Governors/Trustees/Members Single Central Record (SCR) to ensure accuracy, compliance, and readiness for inspection.

All staff Involved in recruitment

All staff involved in recruitment must:

- Understand and follow safer recruitment principles.
- Declare conflicts of interest and avoid personal bias in selection decisions.
- Report any safeguarding concerns immediately to HR or safeguarding leads.

Appointed candidates

Candidates are responsible for:

- Providing accurate and complete information during the recruitment and vetting process.
- Supplying documents and references within requested timeframes.

- Declaring any information that may affect suitability to work with children or vulnerable adults.

5. SAFER RECRUITMENT OVERVIEW AND PURPOSE

This section provides OHC&AT's mandatory framework for all pre-employment safeguarding and compliance checks. All recruitment activity across OHC&AT must comply with this policy.

In line with statutory guidance, including *Keeping Children Safe in Education (KCSIE)*, *Disqualification under the Childcare Act (DUCA)*, and the *Independent School Standards Regulations (ISSRs)*, OHC&AT undertakes a comprehensive range of checks for all prospective employees.

OHC&AT is committed to ensuring that all checks are conducted fairly, consistently, robustly, and without discrimination.

5.1 Legal and information requirements

OHC&AT is legally required to carry out the pre-employment checks set out within this policy.

Candidates must:

- Provide accurate and complete information
- Submit all required documentation
- Engage fully and promptly with screening processes

Failure to provide required information, documentation, or clarification within the required timeframe may result in:

- Delays to the recruitment process; and/or
- Withdrawal of an offer of employment.

Where appropriate, OHC&AT will share relevant information with authorised third parties, including:

- The Disclosure and Barring Service (DBS)
- The Teaching Regulation Agency (TRA)
- Previous employers and referees
- Online and publicly available sources

All information is processed in accordance with the Staff Privacy Notice.

5.2 Safeguarding and the harm test

All pre-employment checks aim to ensure that individuals are suitable to work within OHC&AT and do not pose a risk to children, young people, or vulnerable adults.

In accordance with KCSIE, OHC&AT will consider whether an individual meets the harm test. A person may pose a risk of harm if they have:

- Behaved in a way that has harmed a child or vulnerable adult, or may have harmed them
- Possibly committed a criminal offence against or related to a child or vulnerable adult
- Behaved towards a child or vulnerable adult in a way that indicates they may pose a risk of harm
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children or vulnerable adults

All information obtained through pre-employment checks will be accessed holistically to determine overall suitability.

5.3 Requirement to complete checks prior to employment

All required pre-employment checks must be completed before an individual begins employment.

A start date will not be confirmed until checks are:
- Fully completed
- Verified by authorised staff
- Assessed as satisfactory
- Recorded on OHC&AT systems, including the SCR

Exception: *DBS pending scenario* (Section 6.4.4)
- Applies to Academies and Central Teams only
- Does not apply to Orchard Hill College staff
- Must be formally risk assessed, senior approved and fully documented

5.4 Employee screening process and timescales

Following a conditional offer, candidates must complete all required actions within OHC&AT's screening portal, including:
- Full completion of all required sections
- Full employment and education history
- Referee details
- Uploading all required documents
- Responding to HR within required timescales

Unless otherwise agreed, all submissions must be completed within **21 days**.

Failure to comply may result in:
- A delayed start date; or
- Withdrawal of the offer of employment

5.5 Verification, recording and follow-up

All pre-employment checks must be fully completed, verified, recorded and assessed as satisfactory **before** an individual commences work.

All checks must be:

- Completed in full prior to start date
- Verified using original documentation
- Verified by trained and authorised OHC&AT staff
- Signed and dated by the verifier
- Accurately recorded on the SCR
- Retained securely in line with data protection requirements

Photocopies or scanned copies of verification documents must be retained securely in accordance with the Information and Records Retention Policy.

Where concerns or discrepancies arise:

- Issues must be investigated promptly
- Additional information or evidence must be obtained
- All findings and outcomes must be clearly documented
- All concerns must be fully resolved prior to employment commencing

No assumptions should be made; no concerns should be disregarded without proper review, clear justification and recorded rationale.

5.6 Critical safeguarding standard

A candidate may be unsuitable if they have:

- Harmed, or may harm, a child or vulnerable adult
- Committed relevant offences
- Demonstrated concerning or unsafe behaviour
- Indicated unsuitability to work with vulnerable groups

5.7 Critical rule

No individual may start work until all required checks, including references, are completed, verified and satisfactory, except in strictly controlled DBS delay arrangements for Academies and Central Teams roles only.

5.8 Non-negotiable requirements

- All checks must be completed before employment commences
- No start date may be confirmed without HR approval
- Verbal assurances are not accepted
- All checks must be evidenced, recorded and auditable
- All checks must be recorded on the SCR

5.9 Alignment with recruitment process

Pre-employment checks are initiated as part of the recruitment but must be:

- Completed following conditional offer
- Verified prior to confirmation that pre-employment checks are complete
- Recorded in line with SCR requirements

Recruiting managers must work in partnership with HR throughout the process to ensure full compliance.

5.10 Managing concerns or incomplete checks

Where concerns arise:

- Discrepancies must be fully investigated and resolved
- References must be clarified where required
- A risk assessment must be completed and approved by HR (where appropriate)
- All decisions, actions and outcomes must be clearly documented

In exceptional circumstances where a start date is agreed prior to a check being completed:

- This applies only to an outstanding DBS outcome for *Academies and Central Teams roles*, or an outstanding overseas police check
- HR approval is required
- A formal risk assessment must be completed and reviewed regularly until all checks are finalised
- Appropriate supervision and safeguarding measures must be put in place

6. PRE-EMPLOYMENT COMPLIANCE CHECKS FOR OHC&AT EMPLOYEES

OHC&AT carries out a consistent set of mandatory checks in line with statutory safer recruitment requirements.

6.1. Identity and address verification

All candidates must have their identity verified prior to commencing employment. Verification must confirm:

- Full legal name, date of birth, and current address
- Identity verification using **original documents only**
- A full birth certificate (or valid alternative where unavailable)
- Documentation confirming any change of name (e.g. marriage certificate, deed poll)

The verifier must:

- Check original documents in person
- Sign and date copies to confirm that originals were seen
- Ensure evidence is retained and accurately recorded on the SCR.

Identity verification must be completed before any other checks are finalised.

6.2. Right to work in the UK

All candidates must demonstrate their legal right to work in the UK in line with Home Office requirements. OHC&AT has a statutory duty to prevent illegal working and must ensure that all right to work checks are completed correctly and consistently.

Requirements:

- Right to work checks must be completed before employment starts

- Original documents or approved Home Office digital checks must be verified by trained and authorised staff
- Evidence of checks must confirm that documents are valid, genuine and belong to the individual
- Visa conditions must permit the work offered

Where applicable:
- IDSP digital checks or Home Office Online checks may be used
- Verification must involve matching the individual to the online result
- Copies of evidence must be dated, signed, and retained

For individuals with time-limited visas:
- Visa conditions must be monitored and adhered to
- Follow-up checks must be carried out prior to visa expiry
- Employment must cease if eligibility cannot be reverified

Failure to provide valid Right to Work evidence may result in delayed start or withdrawal of offer. Any concerns must be escalated to HR immediately.

6.3. Qualification checks

All applicants must provide evidence of any qualifications required for the role or listed on their application.

Candidates must present original documents to verify:
- Academic qualifications
- Professional qualifications
- Role-specific certifications or licences

The recruiting panel or authorised verifier must:
- Check original documents
- Take and sign dated copies to confirm verification

Where qualifications are essential or statutory (e.g. QTS, professional registration), these must be formally verified prior to appointment. This may include verification with awarding bodies or relevant professional organisations where appropriate.

Any discrepancies between the application form and the evidence provided must be investigated and resolved prior to appointment. Failure to provide satisfactory evidence may result in removal from the process or withdrawal of offer.

6.4. Criminal records check

OHC&AT will undertake appropriate criminal records checks for all prospective employees in accordance with statutory guidance and safeguarding requirements.

6.4.1 DBS filtering rules
Certain old and minor offences are filtered from disclosures. Protected cautions and convictions must be disregarded during recruitment.

Filtering rules depend on age at the time of offence, offence type, custodial sentence, and elapsed time. Offences on the DBS “specified list” are never filtered.

Candidates must not be asked to disclose filtered information.

6.4.2 Regulated activity
Most roles across OHC&AT meet the definition of regulated activity. Where a role meets this threshold, OHC&AT will conduct:

- An Enhanced DBS check, and
- A Children’s Barred List check
- Adult’s Barred List (where applicable)

The purpose of this check is to:

- Confirm whether an individual is barred from working with children or vulnerable adults, by inclusion on the Children’s Barred List and/or Adult’s Barred List; and
- Obtain relevant safeguarding information to assess suitability

This applies where work with children or vulnerable adults is:

- Frequent (once a week or more)
- Overnight (between 2am–6am)
- Meets the period condition (4+ times in 30 days)
- Provides opportunity for unsupervised contact

Unpaid roles require regulated activity checks if unsupervised. Some Central Teams roles may require a Standard or Basic DBS check instead.

6.4.3 DBS Disclosure Certificate

The DBS issues certificates directly to the applicant. Employment remains conditional upon:

- The original certificate being presented prior to or on the first working day
- The certificate is verified by authorised staff
- Assessment of content as satisfactory

All DBS checks must be:

- Recorded on SCR via iTrent
- Verified, signed, and dated

6.4.4 Starting work pending receipt of DBS (Academies and Central Teams only)

In strictly controlled and exceptional circumstances, and only within Academies and Central Teams, an individual may be permitted to commence work before their DBS certificate is received.

This is subject to strict conditions:

- Children’s barred list check completed and clear
- All other checks (including references) completed and satisfactory
- A formal DBS Risk Assessment (Appendix 7) has been completed
- Appropriate supervision arrangements in place

- Approval granted by Director or Assistant Director of HR

This exception:
- Must be documented
- Is time-limited
- Must be regularly reviewed until DBS check is completed

This provision does not apply to Orchard Hill College staff.

6.5. Reference check

OHC&AT conducts robust reference checks as part of safer recruitment practice. All offers of employment are conditional upon the receipt of at least two satisfactory references, covering the previous five years of employment wherever possible, and these must be verified and assessed prior to employment commencing.

Pre-interview reference check

References will be requested for shortlisted candidates prior to interview wherever possible.

No questions relating to a candidate's health or medical fitness will be asked before any offer of employment is made.

Responsible teams:
- Academies roles: School Office Managers/ School Admin Team
- College & Head Office roles: OHC&AT HR team

Post-interview reference check

Post-interview reference checks are completed by the HR Team as part of the pre-employment clearance process.

As part of robust safer recruitment, OHC&AT will seek references covering the last five years of employment, wherever possible. These must include:
- A reference from the candidate's current or most recent employer; and
- A reference from the most recent role involving work with children (if the current or most recent role does not involve such work).

Reference requirements

To ensure the integrity and safeguarding value of references, references must:
- Be obtained directly from referees
- Come from professional or corporate email addresses (personal email accounts are not accepted)
- Be completed by an appropriate senior person (line manager, Principal / Headteacher, HR department, or other suitably senior person)
- Provide sufficient information to assess suitability

References **must not:**

- Be provided by relatives or personal friends
- Be testimonials, open references
- Be provided directly by candidates

All references are treated as confidential and will not normally be shared with candidates.

Information requested from referees

Referees will be asked to comment on the candidate's suitability for the role and suitability to work with children and vulnerable adults.

OHC&AT will request confirmation of:

- Employment dates, job title, duties, and reason for leaving
- Performance, conduct, attendance, and sickness record
- Disciplinary history, including any safeguarding-related allegations (excluding unsubstantiated, unfounded, false or malicious allegations)
- Any concerns about behaviour that may indicate a safeguarding risk
- Whether the individual may be considered involved in extremism (as defined in KCSIE)

Questions relating to health or sickness absence are asked only after an offer of employment has been made.

OHC&AT will not ask, nor respond to, enquiries about whether references formed part of a settlement agreement.

Cross-checking and verification

All references will be crosschecked against:

- Application form
- Interview assessment
- Screening portal information
- Employment history

Any discrepancies must be investigated, clarified, and resolved before employment is confirmed.

Factual references containing minimal information (e.g., job title and dates) will not automatically disadvantage a candidate, but additional references may be sought.

Mandatory requirements before start date

No candidate may commence work until:

- A minimum of two satisfactory references have been received
- References have been fully verified
- *For school-based roles*: references have been countersigned by the Headteacher or Principal

Internal candidates

Internal candidates applying for new roles within OHC&AT will be assessed using the same standards.

- References may be obtained from internal colleagues, as OHC&AT is the current employer.
- Pre-employment checks will include an up to date health assessment, a DBS renewal check (in line with OHC&AT's DBS renewal requirements), and one reference from their current employer within OHC&AT.

6.6. Employment history verification

OHC&AT will obtain and verify a full employment history for all applicants, covering the period since they left full-time education. Applicants must provide a complete chronology, including detailed explanations for any gaps in employment, education, or voluntary work.

In accordance with *Keeping Children Safe in Education (KCSIE)* and safer recruitment standards, OHC&AT will carry out robust checks to ensure that no gaps or inconsistencies exist that cannot be fully accounted for. This includes:

- Verifying the accuracy and consistency of information provided on the application form and the screening portal.
- Exploring any discrepancies directly with the candidate prior to appointment.
- Ensuring all gaps in employment or activity are satisfactorily explained.

Employment history will be cross-checked against references and other pre-employment checks to ensure completeness and accuracy.

All information gathered will be considered holistically as part of the overall assessment of a candidate's suitability to work with children and vulnerable adults.

6.7. Medical fitness

OHC&AT has a legal duty to ensure the medical fitness of all individuals appointed to a post. This assessment is undertaken after a conditional offer has been made, but before the appointment is confirmed.

All successful candidates are required to complete a Health Assessment Questionnaire (HAQ). The information provided will be reviewed by OHC&AT's Occupational Health Advisor and assessed against:

- The job description
- The person specification
- Any specific physical or mental requirements of the role

Where necessary, OHC&AT may seek:

- Additional medical information
- A full medical assessment
- Clarification or advice regarding any identified concerns

If any issues arise regarding an applicant's fitness for the role, OHC&AT will explore the potential for reasonable adjustments, working collaboratively with the applicant.

OHC&AT recognises its responsibilities under the Equality Act 2010. No offer of employment will be withdrawn without first:

- Consulting with the applicant
- Obtaining and considering relevant medical evidence
- Considering reasonable adjustments
- Considering suitable alternative employment, where appropriate

6.8. Online searches

As part of OHC&AT's commitment to safeguarding and safer recruitment, online searches will be undertaken for all shortlisted candidates in accordance with *Keeping Children Safe in Education (KCSIE)*. These searches support OHC&AT in identifying any information that may indicate a safeguarding risk or impact the individual's suitability to work within an educational environment.

Responsibility:

- Academies roles: School Office Managers / School Admin Team
- College and Central Teams roles: OHC&AT HR Team

Online searches must be conducted independently by an individual who is not involved in shortlisting, interviewing, or the final appointment decision, to minimise the risk of bias. Only information that is relevant to the candidate's suitability to work with children or vulnerable adults must be recorded, retained in accordance with data protection requirements, and shared with the selection panel where appropriate.

<u>Scope of searches</u>

Publicly available information may be reviewed from:

- Internet search engines
- Publicly accessible websites
- Social media platforms
- Professional networking sites

Applicants are asked on the application form to provide details of their online profiles, including account names, social media handles, and professional networking accounts. This information will be used to support the search process.

Applicants will **not** be asked to:

- Provide passwords.
- Grant access to private accounts or restricted content.

However, if profile information (e.g., profile photos, bios) is publicly viewable – even on otherwise locked accounts – it may be considered.

OHC&AT will ensure all applicants for similar roles are treated consistently in relation to online searches.

<u>Purpose</u>

Online searches are used to identify information that:

- May be relevant to the applicant's suitability for the role.
- May indicate risk relating to safeguarding.
- May raise concerns about behaviour incompatible with working with children or vulnerable adults.
- May impact OHC&AT's reputation (positively or negatively).

Findings must be recorded on the Online Search Record – Shortlisted Candidate (Appendix 6) and may be discussed at interview.

Evaluation of findings

In determining whether information is relevant or concerning, OHC&AT will consider:

- The relevance of the information to the role applied for
- The relevance to suitability to work within an educational setting
- The potential impact on OHC&AT's reputation
- Whether the information calls into question the applicant's willingness or ability to uphold OHC&AT's safeguarding commitment
- The age of the information and whether circumstances have changed
- Whether there is evidence of a pattern of concerning behaviour
- Any explanation provided by the applicant

Decisions will always be made proportionately and in context.

Data retention

- Successful candidates: information will be retained for the duration of employment and then in accordance with OHC&AT's Information and Records Retention Policy.
- Unsuccessful candidates: information will be retained for six months following notification of the outcome, after which it will be securely destroyed.

6.9. Overseas checks

Where a candidate has lived or worked overseas for a period of three months or more within the last five years, additional checks will be required to assess their suitability for employment within OHC&AT.

A DBS certificate alone is not sufficient in these cases. OHC&AT will therefore require candidates to obtain appropriate overseas checks from each relevant country. These will normally include:

- A criminal record check or certificate of good conduct from the relevant country.
- Confirmation of any teaching sanctions or restrictions, where applicable, from the appropriate regulatory authority.
- Additional references where deemed necessary.

OHC&AT will refer to Home Office guidance on overseas criminal records checks when determining the appropriate checks required.

Teaching roles overseas

Where an applicant has worked as a teacher outside the UK, they must obtain confirmation from the relevant professional regulatory authority in that country stating that:

- No sanctions or restrictions have been imposed; and
- There is no known reason why the applicant should be considered unsuitable to teach.

Shortlisted applicants will also be asked to disclose whether they have ever been referred to, or been the subject of a sanction imposed by, a teaching regulator in any country where they have taught.

The presence of sanctions or restrictions does not automatically prevent appointment; however, all information will be carefully considered as part of the overall suitability assessment.

Risk-based approach and delays

OHC&AT recognises that overseas checks can take time and may not always be obtainable. In such cases, OHC&AT will adopt a proportionate, risk-based approach, which may include:

- Seeking additional references
- Requesting evidence of professional standing
- Completing a formal risk assessment
- Delaying the start date where appropriate

In exceptional circumstances, a candidate may be permitted to start employment prior to receipt of overseas checks, provided that:

- Sufficient alternative assurances have been obtained (e.g., references, letters of professional standing).
- A formal risk assessment supports the decision.
- The candidate is deemed suitable to start work based on the information available.

Employment will remain conditional upon receipt of satisfactory overseas checks.

If information cannot be obtained at all, employment may proceed only where a risk assessment confirms suitability.

All decisions must be fully documented.

6.10 Prohibition from teaching check

OHC&AT is required to verify whether any individual carrying out “teaching work” is subject to a prohibition or interim prohibition order. OHCA&T uses the DfE’s *Check a Teacher’s Record* service to confirm whether successful applicants are prohibited from teaching by the Teaching Regulation Agency (TRA).

Due to the nature of OHC&AT’s provisions – and the vulnerability of its students, including children and adults with complex learning needs – this check will be

completed for all successful candidates, regardless of their role, as part of OHC&AT's safeguarding responsibilities.

In addition, all shortlisted applicants must declare whether they have ever:

- Been referred to the Teaching Regulation Agency or an equivalent UK regulatory body; or
- Been the subject of any teaching-related sanction, restriction, or prohibition.

Where an applicant is not currently prohibited, but has previously:

- Been referred to the TRA or an equivalent body
- Attended a conduct hearing
- Been issued with a sanction that has since lapsed or been lifted

OHC&AT will review the underlying facts to determine whether the individual remains suitable to work within the organisation.

Definition of teaching work

As set out in the Teachers' Disciplinary (England) Regulations 2012, teaching work includes:

- Planning and preparing lessons and courses for pupils
- Delivering lessons to pupils
- Assessing pupils' development, progress, and attainment
- Reporting on pupils' development, progress, and attainment

These activities do not constitute teaching work if carried out under the supervision of a qualified teacher or another person nominated by the Head.

Where there is any doubt, or where an applicant has taught previously or may teach in the future (including for sports coaches and other instructional roles), the prohibition check will be undertaken.

6.11. Prohibition from management (Section 128) check

OHC&AT is legally required to confirm whether any applicant for a management position is subject to a Section 128 direction under the Education and Skills Act 2008. A Section 128 direction prohibits, disqualifies, or restricts an individual from taking part in the management of an independent school, including academies and academy trusts.

Roles requiring a Section 128 check

OHC&AT will undertake Section 128 checks for all appointments (external or internal) to management positions made on or after **12 August 2015**. This includes (but is not limited to):

- Principals / Headteachers
- All members of the Senior Leadership Team (including nonteaching posts)
- Teaching roles with departmental or subject leadership responsibilities
- Members, Trustees, and Governors
- Directors (College and Trust)

- Leaders and managers working on behalf of OHC&AT

OHC&AT will also determine, on a case by case basis, whether a Section 128 check is required for other teaching or support staff roles that include significant management responsibilities.

All individuals appointed to Governing Bodies will be subject to a Section 128 direction check.

How the check is obtained

Information relating to Section 128 directions may be obtained through:
- Enhanced DBS certificate (if role is in regulated activity), and/or
- DfE's online list of individuals prohibited from management

Applicant declarations

As part of OHC&AT safer recruitment process, shortlisted applicants will be asked to declare whether they have:
- Ever been referred to the Department for Education
- Ever been subject to a Section 128 direction; or
- Ever been subject to any other sanction that prohibits, restricts, or disqualifies them from involvement in school or academy management.

This declaration is captured in the Self-Declaration Form for Shortlisted Candidates (Appendix 3a).

Considering information from referrals or previous sanctions

Where an applicant is not currently prohibited, but has:
- Previously been subject to a referral
- Attended a hearing before the DfE or another relevant body
- Been subject to a Section 128 direction or similar sanction which was later lifted or has lapsed

OHC&AT will evaluate the underlying facts, circumstances, and outcomes to determine whether the applicant remains suitable to work within the organisation.

This assessment will take account of:
- The nature and seriousness of the concerns
- The time elapsed since the incident(s)
- Any evidence of remediation or changes in circumstances
- The role being applied for and its level of responsibility

6.12. Disqualification from acting as a charity Trustee or senior manager

Under the Charities Act 2011, it is a criminal offence for an individual to act as a charity trustee or senior manager if they are disqualified. Disqualification may result from certain criminal offences or other regulatory sanctions.

Within OHC&AT, the disqualification rules apply to:

- Trustees (as charity trustees)
- The Principal
- Senior staff who report directly to governors or hold significant financial or managerial responsibility

Individuals covered by these rules must complete a Self-declaration for Trustee and Senior Manager (Appendix 8) confirming whether they meet any disqualification criteria.

They must also inform OHC&AT immediately if their circumstances change in a way that may result in disqualification.

Failure to disclose relevant information, or providing false information, may result in withdrawal of an offer or termination of appointment, and may constitute a criminal offence.

OHC&AT will check relevant publicly available registers for governors and senior managers, including:

- The Bankruptcy and Insolvency Register
- The Companies House register of disqualified directors
- The register of persons removed as charity trustees

Individuals who meet one or more disqualification criteria may apply to the Charity Commission for a waiver. OHC&AT may withdraw an offer or end an appointment where a waiver is required or where a waiver application is refused and is not obliged to await the outcome before taking action.

6.13. Childcare disqualification

Under the Childcare Act 2006 and associated regulations, OHC&AT must not employ any individual in Early Years Provision (EYP) or Later Years Provision (LYP) if they are disqualified. It is also an offence for a disqualified person to be involved in the management of EYP or LYP.

OHC&AT will determine whether a post falls within the scope of EYP or LYP in accordance with Disqualification Under the Childcare Act (DUCA). Employment in any relevant role is conditional upon completion of the required self-declaration and confirmation that the applicant has not been disqualified.

Definitions:

a. ***EYP*** includes *usual school activities and any other supervised activity for a child up to 1 September after the child's 5th birthday, which takes place on the school premises during or outside of the normal school day.*
b. ***LYP*** includes *provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example breakfast clubs, after school clubs and holiday clubs. It does not include extended school hours for co-curricular activities such as sports activities.*

Relevant roles

The disqualification rules apply to staff who:

- Work directly with children in EYP
- Supervise children under 8 in LYP
- Are involved in the management of EYP or LYP (e.g., Principal, relevant leaders/managers)

Roles commonly included:

- Teachers and teaching assistants in EYP
- Staff supervising under-8s in LYP
- Managers or leaders responsible for EYP/LYP provision

Roles not automatically covered unless directly providing childcare:

- Cleaners
- Drivers or escorts
- Catering staff
- Office/admin staff

Governors and volunteers may also fall within scope depending on duties.

Where a role involves childcare only occasionally, OHC&AT will assess its relevance on a case by case basis.

Grounds for disqualification

The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the Regulations. They are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

a) having been cautioned (after 6 April 2007) for, or convicted of, certain criminal offences including violent and sexual criminal offences against children and adults whether committed in the United Kingdom or overseas;
b) various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;
c) having been refused registration for the provision of childcare (including nurseries, day care and child minding or other childcare), having been disqualified from any such registration or having had that registration cancelled;
d) having been refused an application for registration of a children's home or having had any such registration cancelled; or
e) having been prohibited, restricted or disqualified from private fostering.

Self-declaration form

Applicants offered a relevant EYP or LYP role must complete the Childcare Disqualification Self Declaration Form (Appendix 3b).

The Academies Recruiting Manager is responsible for:

- Determining whether a role is relevant under EYP/LYP.

- Informing the School Office Manager / Admin Team and HR.
- Ensuring shortlisted candidates complete the declaration **prior to interview**.

Applicants must disclose:

- Details of any relevant offences or orders (unless filtered under DBS rules).
- The date and issuing authority of any sanction.
- A copy of the relevant order or conviction (where applicable).

Applicants do not need to request information directly from the DBS. They must provide information to the best of their knowledge.

Failure to disclose relevant information may lead to withdrawal of offer or disciplinary action.

A disqualified person cannot start work in a relevant role.

OHC&AT reserves the absolute right to withdraw an offer where information indicates unsuitability.

Waivers

Individuals who meet disqualification criteria may apply to Ofsted for a waiver. OHC&AT may withdraw an offer of employment at its absolute discretion and is under no obligation to await the outcome of an Ofsted waiver application. If a waiver application is rejected OHC&AT will withdraw the conditional offer of employment.

Retention of information

OHC&AT will securely destroy any information which is provided by an applicant which is not relevant to the childcare disqualification requirements as soon as it is established that it is not relevant. Where a person appointed to a role at OHC&AT is found to be disqualified, OHC&AT will retain any relevant information only for the period it takes for a waiver application to be heard and the decision communicated to OHC&AT, after which it will be securely destroyed.

Continuing duty to disclose

Staff in relevant roles have an ongoing duty to inform OHC&AT immediately of any change in circumstances that may result in disqualification.

Failure to disclose such information, now or in future, may result in disciplinary action, including withdrawal of a job offer or dismissal for gross misconduct.

7.SAFER RECRUITMENT: PRE-ENGAGEMENT REQUIREMENTS FOR OTHER WORKFORCE

Scope

This section applies to individuals engaged by OHC&AT who are **not directly employed** by OHC&AT, including:

- Agency staff
- Contractors (including self-employed individuals and external companies)
- Governors, Trustees and Members
- Volunteers
- Trainee/ student teachers
- Visitors and professional visitors

All individuals must undergo appropriate safeguarding and compliance checks prior to engagement, in accordance with statutory guidance and OHCA&T requirements.

7.1 Agency staff

Safeguarding accountability

While recruitment agencies are responsible for completing statutory pre-employment checks, OHC&AT retains ultimate safeguarding responsibility for all agency workers engaged with OHCA&T.

OHC&AT must:

- Obtain written assurance that all required checks have been completed.
- Independently verify key safeguarding elements (including ID and DBS).
- Ensure full compliance before engagement begins.

Pre-engagement requirements

Agencies supplying staff to OHC&AT must complete all pre-employment checks that OHC&AT would undertake for its own employees.

OHC&AT must receive:

- Written confirmation **each time an individual is supplied**, confirming completion of all required checks, in line with statutory guidance and OHC&AT requirements.
- A fully completed OHC&AT Compliance & Vetting Form for Agency Staff (Appendix 10).

Confirmation must include evidence that the following checks have been completed:

- Identity verification
- Right to work in the UK
- Enhanced DBS check (with Children's and/or Adult's Barred List where applicable)
- Prohibition from teaching check (All roles)
- Section 128 check (where applicable)
- Childcare disqualification (where applicable)
- Employment history verification
- References (minimum two)
- Qualifications
- Overseas checks (if applicable)

Failure to provide the required assurance and documentation will result in the agency not being permitted to supply staff.

DBS requirements:

- All agency staff must hold a valid Enhanced DBS certificate
- Regulated activity →Barred List checks required

DBS currency:

- New agency workers: DBS < 3 months, or on DBS Update Service
- Existing/long-term agency workers: DBS renewed annually by the agency; Update Service strongly recommended

Non-negotiable

Agency staff undertaking regulated activity **must not** start work under any circumstances without:

- A valid Enhanced DBS, and
- The relevant Barred List check

Such individuals must not start work under any form of risk assessment or supervision arrangement.

Identity and DBS verification

OHC&AT does not rely solely on agency assurance. OHC&AT must:

- Verify identity using original photographic ID
- Verify the original DBS certificate (or approved digital result)
- Record all vetting details on the Local SCR
- Complete verification on or before the first day

No agency worker may commence duties until these verifications are completed.

Positive disclosures

If a DBS contains information:

- The agency must disclose full details in advance
- A Positive Disclosure Risk Assessment (Appendix 9) must be completed
- The case must be reviewed by HR (Director/Assistant Director)
- Final approval must be granted by the Deputy CEO

No individual with a positive disclosure may commence work until formal written approval has been granted.

7.2 Contractors

OHC&AT must ensure that appropriate safeguarding checks are carried out for all contractors and contractor employees. Where contractors undertake regulated activity or work regularly within OHC&AT, they require full employee-level vetting.

Pre-engagement requirement

Before any contractor or their employees work on site, OHC&AT must obtain:

- Written confirmation from the contracting company that all required safeguarding checks have been completed for each individual.
- This written assurance must be:
    - Clear and role-specific
    - Fully compliant with statutory guidance
    - Explicit about the DBS level

OHC&AT does not rely solely on contractor assurance. Schools/College must also:

- Verify original ID documents on arrival.
- Check and verify the original DBS certificate where applicable.
- Ensure the individual matches the documentation.
- Record details on the Local SCR.

No contractor may commence work until these checks are completed.

Definition of staff (ISSRs)

Under ISSRs,"staff" includes *"Any person working at a school, whether under a contract of employment, under a contract for services, or otherwise… (excluding supply staff or volunteers)."*

Accordingly, contractors may be treated as staff, depending on the nature, frequency, context and level of their work, and may require full vetting checks.

DBS requirements

In line with KCSIE, *"Schools must ensure that any contractor, or employee of the contractor, working on site has been subject to an appropriate level of DBS check."*

"Where work involves regulated activity, the relevant Barred List checks are required."

DBS must be:

- Less than 12 months old or on Update Service
- DBS renewed annually by the contracting company; Update Service strongly recommended

Risk assessment

A case-by-case assessment must be undertaken to determine:

- The level of contact with students
- Whether the work constitutes regulated activity
- The appropriate level of DBS check
- Any supervision or control measures required

Risk assessments must be:

- Completed prior to commencement

- Documented and retained
- Clearly outline safeguarding control measures where full checks are not in place

Non-negotiable

- No contractor is permitted on site without appropriate vetting
- OHC&AT must verify, not merely accept third-party assurance
- All safeguarding checks must be verified, evidenced, and recorded

7.3 Categories of contractors

Contractors from third-party organisations

OHC&AT will set safeguarding requirements within contractual agreements. The level of checks required must reflect the nature of the role.

The contracting company is responsible for:

- Completing all required pre-employment checks.
- Providing written confirmation (e.g**.** OHC&AT Compliance & Vetting Form for Contractors (Appendix 11) or Letter of Assurance) prior to commencement.

The School Office Manager / College and School Admin Team must:

- Verify documentation before work starts.
- Notify HR prior to commencement to conduct additional checks (e.g. TRA, Section 128 where applicable).
- Check original ID and DBS certificate on first day.
- Record details on the Local SCR.

Self-employed contractors

Where individuals are engaged directly (not via a company), they will be treated as staff.

The Principal / Recruiting Manager / HR must carefully assess whether the role constitutes regulated activity and determine the appropriate level of checks. The Recruiting Manager must assess IR35 status via the CEST tool and share outcomes with the Finance Team.

OHC&AT HR is responsible for:

- Completing all required vetting checks.
- Issuing clearance prior to commencement.
- Providing SCR details with School/College.

The School Office Manager / College and School Admin Team are responsible for:

- Notifying HR as early as possible to avoid delays.
- Verify documentation before work starts.
- Ensuring the individual is not permitted to commence work until HR clearance is confirmed.
- Verifying ID and DBS certificate before or on the first day.

- Record details on the Local SCR.
- Monitor DBS status on Local SCR, repeat annual update service check.

Where contractors are engaged on a regular or ongoing basis, they must register with DBS Update Service. This enables OHC&AT to carry out periodic online status checks to ensure criminal record information remains up to date.

7.4 Risk-based approach to contractor checks

Contractors should be risk assessed according to frequency, duration, and level of contact with students or vulnerable adults.

Regular/long-term contractors with student contact

Examples**:** Catering staff, cleaners, therapists, coaches, regular consultants

Legal position: Full pre-employment checks equivalent to OHC&AT employees apply. These individuals must be recorded on local SCR.

Required checks include:
- Enhanced DBS
- Children's Barred List
- Adult Barred List (where involved with regulated activities with adults)
- Identity verification
- Right to work in the UK
- Employment history and references (minimum two)
- Qualification checks (where applicable)
- Prohibition from teaching (if applicable) – OHC&AT HR can support with this check at request
- Section 128 (for management roles only) – OHC&AT HR can support with this check at request
- Childcare disqualification (if applicable)
- Overseas checks (if applicable)

Compliance requirements:
- Must be recorded on Local SCR by School Office Manager / College and School Admin Team
- Written assurance must be obtained and verified (OHC&AT Compliance & Vetting Form for Contractor (Appendix 11))
- HR review of Letter of Assurance **if** using a non-OHC&AT assurance format
- ID and DBS must be verified before or on first day
- DBS less than 12 months old unless on Update Service.
- Annual DBS Update Service checks must be undertaken (where applicable)
- New DBS are recommended where possible to ensure up-to-date information

School Office Manager / College and School Admin Team must monitor DBS status via the Local SCR, and request DBS renewal checks where applicable.

Indicative DBS levels:

- Child Workforce + Child Barred List: Catering, cleaners, ICT engineers, gardeners
- Child & Adult Workforce + Child & Adult's Barred Lists: Therapists and roles involving regulated activities with children and vulnerable adults

Regular but short-term contractors

Examples: Building contractors, project-based workers

Minimum requirements (in line with KCSIE para 295 approach):
- Identity verification
- Enhanced DBS check with children's barred list
- Additional checks as relevant to role (e.g. Prohibition from Teaching, Childcare Disqualification etc.)
- And/ or any others OHC&AT deems necessary in order to properly manage the safeguarding risk

Compliance mirrors that for regular/long term contractors with student contact, and must be recorded on Local SCR.

Temporary / occasional / emergency contractors (regulated activity)

Where contractors undertake regulated activity, or have responsibility for children/vulnerable adults:
- Enhanced DBS with Children's Barred List
- Additional checks as relevant
- Identity verification

Compliance mirrors that for regular/long term contractors with student contact, and must be recorded on Local SCR.

Temporary / occasional/ emergency contractors (no regulated activity)

Where contractors:
- Have no unsupervised access to children and/or vulnerable adults, and
- Do not undertake regulated activity

Temporary or occasional paid work is not regulated activity if it does not involve teaching / supervising / caring for / or driving a vehicle for children and/or vulnerable adults.

Requirements:
- Written assurance required.
- No DBS required, provided appropriate supervision is in place.

Compliance measures:
- A case-by-case risk assessment must be undertaken.
- Contractors must be supervised at all times while on site.
- ID must be checked on arrival.
- Must sign in via Visitors' Register.

- No SCR entry required.
- No vetting form required.

Key compliance principles

- The level of checks must reflect the nature of the role and safeguarding risk
- Written assurance must be obtained before work commences
- The local SCR must be accurate, complete, up to date
- If in any doubt, apply the safer recruitment approach

7.5 Governors, Trustees and Members

OHC&AT will ensure that appropriate safeguarding and suitability checks are carried out for all governors, trustees and members. These checks reflect both statutory requirements and OHC&AT's commitment to robust safer recruitment.

Required pre-appointment checks

An enhanced DBS check will be obtained for all governors, trustees and members.

A children's barred list check will only be undertaken where the individual is engaging in regulated activity with pupils or students at, or on behalf of, OHC&AT.

In line with KCSIE, the following checks will be completed:

- Identity verification
- Right to work in the UK (for trustees and members)
- Enhanced DBS disclosure
- Children's barred list check (where the role involves regulated activity)
- Overseas checks (where applicable, particularly for trustees)
- Prohibition from management check (Section 128 direction)
- Section 142 direction (where applicable)
- Declaration confirming the individual is not disqualified from acting as a trustee or senior manager of a charity (trustees only)
- Online search checks, including:
    - Google search (for governors)
    - Social media checks (for trustees and members)

References and safeguarding restrictions

As good practice, OHC&AT will obtain a minimum of two satisfactory references for all governors, trustees and members. Wherever possible, one reference should be from the individual's current or most recent employer.

Under no circumstances will OHC&AT permit any unchecked governor, trustee, member, or volunteer to have unsupervised contact with pupils or students.

Responsibility and SCR recording

The HR Team completes all necessary pre-employment checks and shares the SCR checklist with the Governance Team for recording**.**

The Governance Team:

- Records and maintains the Governor/ Trustee/ Member SCR
- Issues updated SCR reports to schools and College centres upon request, or on a termly basis.

7.6 Volunteers

The Principal / Head of College is responsible for undertaking a written Risk Assessment for Volunteers (Appendix 12) and applying professional judgement to determine the level of checks required for each volunteer.

Risk assessment considerations:

- The nature of the work with children and young adults, including whether it constitutes regulated activity, and the level of supervision in place
- What the establishment knows about the volunteer, including formal or informal information provided by staff, parents, and other volunteers
- Whether the volunteer has other employment or voluntary activities where referees can provide information on their suitability

DBS requirements

OHC&AT will obtain:

- An Enhanced DBS check with children's barred list information for volunteers undertaking regulated activity
- An Enhanced DBS check (without barred list information) for volunteers who are not undertaking regulated activity, but who have regular contact with students

Volunteers who do not undertake regulated activity should be regularly supervised on a day-to-day basis by a fully vetted member of staff (or an appropriately checked volunteer).

Under no circumstances will an unchecked volunteer be permitted to have unsupervised contact with pupils or students.

Ongoing suitability and DBS Update Service:

- A new enhanced DBS check will be required for volunteers engaging in regulated activity where there has been a break in service of three months or more
- Volunteers engage on a regular basis will be required to register with the DBS Update Service, enabling OHC&AT to carry out periodic status checks

Existing volunteers do not require a repeat DBS check (including barred list), unless:

- There has been a significant break in service, or
- There are concerns about the individual's suitability

Additional suitability checks

Where appropriate, OHC&AT will seek to obtain additional suitability information. This may include:

- Formal or informal feedback from staff, parents, or other volunteers
- Character references from the volunteer's employer or other relevant sources
- An informal safer recruitment discussion or interview

Long-term or unsupervised volunteers

For volunteers who:
- Work on a long-term basis, or
- May have unsupervised access to pupils/students

OHC&AT will normally require the following:
- A completed application form
- A full employment history (minimum 5 years)
- A minimum of two references (one from the most recent employer where applicable)
- Qualification checks (if relevant to the role)
- Prohibition from teaching (if applicable)
- Section 128 (for management roles only)
- Childcare disqualification (if applicable)
- Overseas checks (if applicable)

Such individuals must be treated in line with full safer recruitment principles.

OHC&AT HR Team will complete all necessary checks and will share the SCR checklist with the School Office Manager / College and School Admin Team for entry on the Local SCR.

Key principle

All decisions relating to volunteer checks must be risk-based, proportionate, and defensible, made with safeguarding as the primary consideration.

7.7 Trainee / student teachers

OHC&AT must ensure that all trainee and student teachers, whether salaried or fee funded, are subject to the appropriate safeguarding and suitability checks before undertaking any activity within OHC&AT.

Responsibility for checks

- *Salaried Trainee Teachers:*

Where trainee teachers are employed and paid **by OHC&AT,** OHC&AT will carry out all required pre-employment checks in line with those required for directly employed staff.

- *Fee-Funded Trainee Teachers:*

Where trainee teachers are **fee-funded** through an initial teacher training (ITT) provider, it is the ITT's responsibility to carry out the necessary checks. In such cases, OHC&AT must obtain written confirmation from the ITT provider confirming:
- All required pre-employment checks have been completed in line with statutory requirements; and

- The trainee has been assessed as suitable to work with children and/or vulnerable adults.

Required checks

Pre-employment checks (undertaken either by OHC&AT or the ITT provider, as applicable) must include:

- Identity verification
- Right to work in the UK
- Enhanced DBS disclosure
- Children's and/or adult barred list check (where engaging in regulated activity)
- Overseas checks (where applicable)
- Medical fitness
- Childcare disqualification check (where applicable)
- Prohibition from teaching check
- Employment history check and references
- Qualification verification

DBS requirements

Trainee teachers will, in most cases, be undertaking regulated activity. Therefore:

- An Enhanced DBS with Children's Barred List information is required (and adult barred list where applicable).
- The DBS certificate must be no more than 3 months old at the point of starting at OHC&AT, unless:
    - The individual has worked in a school or further education setting in England within the last 3 months; or
    - The individual is registered with the DBS Update Service.

Verification and SCR requirements

OHC&AT will:

- Independently verify the identity of all trainee teachers supplied by an ITT provider.
- Check the original DBS certificate prior to commencement, in line with internal procedures.
- Record all checks on the Local SCR by School Office Manager / College and School Admin Team.

Key principle

No trainee teacher will be permitted to commence duties until:

- All required checks are completed, verified, and recorded; and
- Written assurance has been received from ITT provider, verified by OHC&AT and formally accepted.

Written assurance must be verified, documented, and confirmed by OHC&AT before any engagement begins.

7.8 Visitors, visiting speakers and the Prevent Duty

Visitors are not required to be recorded on the SCR.

OHC&AT will not request DBS checks or Barred List checks, nor request sight of DBS certificates, for ad hoc visitors such as parents, carers, or individuals attending school events (e.g. sports day, performances).

Principals/ Heads of College must use professional judgement to determine the level of escort or supervise required for such visitors.

Professional visitors

Professional visitors (e.g. educational psychologists, social workers, health professionals, local authority officers) must follow enhanced safeguarding controls.

Schools/ College must:

- Check the visitor's identification on arrival.
- Obtain written assurance from their employer confirming that appropriate DBS checks have been completed.
- Supervise the visitor as appropriate to the level of risk.
- Verify the DBS certificate on arrival wherever possible.
- Record the visit on the Professional Visitors & Carers Register (Appendix 13), including confirmation of DBS status.

Visiting speakers and the Prevent Duty

In line with the Prevent Duty Guidance, OHC&AT will ensure that all visiting speakers are:

- Suitable and appropriate to present to pupils/students.
- Properly risk assessed prior to the visit.
- Supervised at all times while on site.

OHC&AT will obtain such formal or informal background information about visiting speakers as is reasonably practicable to determine whether to invite and/or permit attendance.

OHC&AT is not permitted to request a DBS check or Children's Barred List information for visiting speakers who:

- Do not engage in regulated activity; and
- Do not undertake regular duties on behalf of OHC&AT.

All visiting speakers must follow OHC&AT's visitor protocols, including:

- Signing in and out at Reception.
- Wearing a visitor badge at all times.
- Being escorted by a fully vetted member of staff.

Safeguarding and extremism considerations

When assessing visiting speakers, OHC&AT will have regard to:

- OHC&AT's Visiting Speaker Policy
- The Prevent Duty Guidance
- The definition of extremism within Keeping Children Safe in Education (KCSIE): *"Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs."*

OHC&AT will fulfil its Prevent Duty obligations without discriminating based on any protected characteristic.

Key principle

All visitors must be managed in a way that ensures safety and welfare of pupils/ students at all times.

Supervision and risk assessment must always be proportionate to the nature of the visit, with safeguarding remaining the primary consideration.

Where there is any uncertainty regarding the level of checks required, OHC&AT will adopt a safer-recruitment approach, applying the highest level of safeguarding scrutiny.

8. SINGLE CENTRAL RECORD (SCR)

8.1 Purpose

The Single Central Record (SCR) is a statutory safeguarding requirement and provides a central record of all mandatory pre-employment safeguarding checks completed for staff and other workforce categories.

The SCR is:
- A live compliance record.
- A key element of OHC&AT's safeguarding controls.
- A core part of demonstrating OHC&AT's duty of care.

It is not an administrative task but a critical safeguarding mechanism and must be treated as such.

8.2 SCR content

Each SCR entry must include:
- Full name
- Role
- Start date
- Identity verification
- Right to work check
- DBS check (including barred list where applicable)
- Prohibition checks
- Qualification checks

- Overseas checks (where applicable)

Legal requirement

For each check, the SCR must show:
- Whether the check was completed
- The date the check was completed

8.3 SCR standards

The SCR must be:
- Accurate and complete
- Updated in real time
- Fully aligned with personnel records
- Available for inspection at any time

Any gaps, late checks or anomalies must be clearly explained and evidenced in the Notes column with supporting evidence.

8.4 SCR maintenance

- The SCR must be updated as checks are completed (daily expectation).
- "N/A" must be used where checks are not applicable.
- The Notes column must record:
  - Clarifications
  - Delays
  - Risk assessments
- Leavers must be removed promptly.
- The SCR report must be archived monthly.

8.5 Key recording rule

All checks must be completed **before the start date.** If not, it must be exceptional and must include:
- HR approval
- Documented risk assessment
- Clear rationale recorded

8.6 Start date control

- Start dates must not be confirmed without HR clearance.
- Verbal or informal start approvals are not permitted.
- Payroll processing must never override safeguarding clearance.

9. SCR OPERATIONAL PROCESS

9.1. Responsibilities for pre-employment checks and SCR recording

Category	Pre-employment checks	SCR recording
OHC&AT employee	Trust HR	HR + School/College
Agency staff	Agency	School/College
Contractors (3rd party)	Contracting company	School/College
Self-employed contractor	Trust HR	School/College
Volunteers	Trust HR	School/College
Governors/Trustees/Members	Trust HR	Governance Team
ITT trainee teachers	ITT provider	School/College
Salaried trainee teachers	Trust HR	School/College

9.2 Monthly employee SCR process

HR responsibilities

- Issue Employee SCR Report monthly (post payroll)

School/College responsibilities

- Download report and add to the Local SCR – Current Staff Tab
- Review for accuracy and completeness
- Identify and close gaps
- Verify new starter DBS and update SCR details on iTrent
- Escalate discrepancies with HR team immediately

9.3 Ongoing SCR requirements

The SCR must be

- Reviewed regularly
- Must reflect live position at all times
- Must not rely solely on monthly HR reports

9.4. Auditing and monitoring

<u>Audit requirements</u>

- Ultimate accountability sits with the Principal/Head of College
- The SCR must be reviewed at least half-termly
- The SCR Monitoring Checklist (Appendix 13) must be completed for each audit
- The SCR Check Audit Log on the SCR report must be updated after each review
- The SCR report must be archived monthly and retained for audit purposes
- A clear, transparent audit trail must be maintained at all times

<u>Quality assurance</u>

Audits must confirm:

- All required checks are present
- Dates are accurate
- SCR entries match personnel files
- No unauthorised individuals appear on the SCR

- SCR entries are cross-checked against:
    - Employee personnel files
    - Agency/Contractor's Compliance and Vetting Forms
    - Letters of assurance

10. MANAGING GAPS AND LATE CHECKS

Gaps

1. Identify and confirm if check required
2. If not required, record as "N/A"
3. If required:
    - Review file
    - Investigate reason for gap
    - Take corrective action
    - Update the SCR

Late checks

1. Confirm the correct start date
2. Verify whether the check is required
3. If required:
    - Record explanation in Notes column
    - Review documentation
    - Implement corrective action

11. RISK ASSESSMENTS

Risk assessments must be completed where:

- Checks are delayed
- Information is pending
- Concerns are identified

Risk assessments must:

- Be completed by HR and/or Principal / School Office Manager
- Be fully documented and signed
- Clearly outline safeguarding control measures
- Be stored securely and referenced in SCR

12. ESCALATION, BREACH AND NON-COMPLIANCE

Where non-compliance is identified:

- Immediate corrective action must be taken by Principal/ School Office Manager/ Admin Team.
- Issue must be escalated to HR and senior leadership immediately.
- A safeguarding risk assessment must be completed.

Serious breaches may result in:

- Formal investigation
- Disciplinary action
- Escalation to external bodies where required (e.g. Local Authority, regulatory)

Repeated/systemic failures will be treated as a serious safeguarding concern.

13. TRAINING REQUIREMENTS

Safer Recruitment training and SCR training is required for:

- The OHC&AT Executive Senior Leadership Team
- Principals / Heads of College
- Senior Leadership Teams (Academies and College)
- Designated Safeguarding Leads (DSLs)
- Recruiting Managers (Academies, College and Central Teams)
- School Office Managers/ College Operations Manager
- School/College Admin Teams who support the recruitment process
- OHC&AT HR and Governance Team members involved in safer recruitment, and responsible for SCR oversight and quality assurance

Training must be refreshed every two years, or sooner where significant legislative or statutory changes occur. All training must reflect:

- Current legislation
- Statutory guidance
- OHC&AT policies and procedures
- Updates from *Keeping Children Safe in Education (KCSIE)*

Training is mandatory. All relevant employees must attend training when invited and ensure they remain up to date with safer recruitment best practice and safeguarding expectations.

14. INSPECTION READINESS

The SCR must:

- Be inspection-ready at all times
- Be available immediately upon request

Schools/College must demonstrate:

- Effective recruitment processes
- A clear audit trail
- Consistent safeguarding compliance

15. DATA PROTECTION AND RECORD RETENTION

All SCR-related records must be:

- Stored securely.
- GDPR compliant.

- Retained and disposed of in line with the Information and Records Retention Policy.

16. MONITORING AND GOVERNANCE

- Governors must receive termly oversight reports.
- Regular internal audits must be conducted.
- External audits may be commissioned where required.

17. POLICY REVIEW

This policy will be reviewed annually and in response to:

- Legislative changes
- Audit findings
- Safeguarding concerns

18. RELATED POLICIES AND DOCUMENTATION

Child Protection, Adult Protection and Safeguarding Policy
Data Protection Policy
Equality, Diversity and Inclusion Policy
Information and Records Retention Policy
Recruitment and Selection Policy
Staff Code of Conduct
Staff Privacy Notice
Visiting Speaker Policy