



The Complete Works Policies

Safer Recruitment and Recruitment Policy

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1. Aim

The recruitment steps outlined below are based on Part 3 of statutory guidance *Keeping Children Safe in Education* (KCSIE).

This policy ensures that individuals responsible for recruitment and selection at The Complete Works (TCW) always hire and promote the most appropriate applicant or employee in a fair, transparent, and consistent manner free from discrimination.

TCW aims to create a structure and process to facilitate the recruitment and retention of high-calibre staff and to:

- Ensure that recruitment processes are safe, robust, and fit for purpose.
- Appoint the best person for each position.
- Ensure equality of opportunity for all applicants.
- Offer career development prospects and create opportunities for employees to apply for internal promotion.
- Ensure compliance with relevant employment legislation and statutory safeguarding guidance.
- Promote TCW's ethos and values.
- Meet TCW's operational requirements and strategic aims.

At least one member of every recruitment panel must have completed accredited Safer Recruitment Training (renewed every 2 years). TCW aims to secure equality of opportunity in all its activities, and all staff should demonstrate a positive approach towards equality in employment.

We are committed to ensuring all recruitment adheres to employment legislation, safer recruitment guidelines, and is fair and accessible to all. The safety of our students is paramount, and we are fully committed to safeguarding and promoting their welfare. We believe our students deserve a broad range of role models reflecting the diversity of our society; therefore, we welcome applications from all backgrounds, ethnicities, gender identities, sexual orientations, and individuals with disabilities or neurodiverse conditions.

The recruitment panel will act reasonably in making decisions about the suitability of a prospective employee based on the required recruitment checks.

2. Statutory Framework & Exemption Status

TCW complies fully with the Disclosure and Barring Service (DBS) Code of Practice and ensures that all applicants are treated fairly and assessed on their skills, qualifications, and suitability for the post. We actively welcome applications from a diverse range of candidates, including those with criminal records, provided their background does not present a risk to the safety and well-being of students.

Rehabilitation of Offenders Act 1974: All posts at TCW involve work with children and are exempt from the Rehabilitation of Offenders Act 1974 by virtue of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013, 2020, and 2023).

Protected (Filtered) Offences: Candidates are not required to disclose, and TCW cannot take into account, any spent convictions or cautions that are "protected" (filtered out) under Ministry of Justice guidelines.

Regulated Activity: For roles involving direct, regular contact with students, it is an offence under the Safeguarding Vulnerable Groups Act 2006 to apply for or engage in regulated activity if barred by the DBS.

Safer recruitment is a continuing set of practices to help make sure all staff and volunteers are suitable to work with our students. It's a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.

Regulated activity means a person who will be:

Safer Recruitment Policy

- Responsible, regularly in a school or college, for teaching, training, instructing, caring for or supervising young people
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with young people
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

3. Definition

Safer recruitment is a continuing set of practices to ensure all staff and volunteers are suitable to work with our students. It is a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.

Regulated activity includes any person who will be:

- Responsible, regularly in a school or college, for teaching, training, instructing, caring for, or supervising young people;
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with young people;

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

4. Policy Links

This policy supports/complements the following policies:

- Safeguarding and Child Protection Policy (inc. KCSIE)
- Equality and Diversity Policy
- Disciplinary Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Pay Policy
- Data Protection Policy

5. Advertisement

When advertising roles, TCW will make clear:

- The job evaluation review form would need to be completed by the hiring manager and HR department
- The school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken for all successful candidates.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 2020. If the role is exempt, certain spent convictions and cautions are 'protected' and do not need to be disclosed; if disclosed, they will not be taken into account.

Advertisements must use a variety of media to reach a broad cross-section of potential applicants and must include:

- Job title
- Salary
- Significant benefits applicable to the position

- Minimum qualifications required for the position
- Specific skills and/or experience required
- Key features of the position (e.g., part-time, fixed-term, full-time)
- Closing date for applications

Care will be taken to avoid specifying requirements that are potentially discriminatory. Vacancies will be advertised in appropriate formats, including online platforms. Vacancies will be advertised internally and/or externally. TCW may, on occasion, restrict advertising to internal candidates to provide continuous development for existing staff.

All internal candidates will be selected for an interview using the same criteria as external candidates. All advertisements will be written in non-discriminatory language. Employees on family-related leave (e.g., maternity/paternity leave) will receive notification of all posts advertised during their period of leave.

6. Job Description

Where job descriptions are used to assist in drafting job adverts, TCW will ensure the details are concise, clear, and relevant to the role. Job descriptions and person specifications will:

- Be concise and role-specific.
- Clearly differentiate between essential and desirable criteria.
- Include an explicit statement on safeguarding responsibilities.

7. Applications

Candidates for all posts will be asked to complete a standard application form. Internal applicants must complete an expression of interest form. Lone CVs will not be accepted.

Application forms will require candidates to provide:

- personal details, current and former names, current address
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment,
- qualifications, the awarding body and date of award
- details of referees/references and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- A declaration of any relationship to any existing staff member or Trustee within TCW. (No employee will interview a person to whom they are related.)

Application forms will seek only information necessary for the selection process. Completed forms are confidential and accessible only to those directly involved in the recruitment process. Equality and diversity monitoring information will be detached or hidden from shortlisting panels. It is TCW's policy not to communicate further with applicants other than those who are shortlisted. A note to this effect is included in the details sent out to applicants. Applicants details will be recorded at the point of receipt. Any information relating to data collected for equality and diversity recruitment monitoring will be hidden from all those involved in the recruitment and selection process. The information collected will be solely used for equality monitoring.

At each stage, applicants will be kept informed of timelines and next steps. Decisions to accept or reject applications will be approved by HR. Written offers of employment are strictly conditional subject to satisfactory completion of all pre-employment checks.

8. Shortlisting/Selection Tests

A shortlist of candidates will be drawn up based on the essential and desirable criteria in the job description and person specification. Reasonable notice will be given to ensure candidates have sufficient time to prepare.

Our shortlisting process will involve two stages for some of the roles.

Stage 1 - Initial Questions | Remote Interview (30 minutes). Panel requirement: 1 person - Safer Recruitment Trained

- This will be a short, informal initial conversation and should not exceed 30 minutes.
- A set of initial questions will be provided to the panel member in advance.
- The purpose of this stage is to establish the candidate's understanding of the role, clarify our expectations, and give the candidate an opportunity to ask any initial questions they may have.

Stage 2 - Unseen Task & Panel Questions (1 hour+). Panel requirement: 2 people - At least one panel member should be Safer Recruitment Trained

- This will follow a similar format to our previous interviews.
- Candidates will complete an unseen task followed by a series of panel questions.
- Please note that the tasks and questions will be new for this interview process.

At least two members of staff will:

- Consider any inconsistencies, gaps in employment, and reasons provided.
- Explore any potential safeguarding or suitability concerns.

Online Searches: In line with KCSIE, online searches will be conducted by the HR team on shortlisted candidates prior to interview to identify any publicly available concerns or issues. This search aims to identify any incidents or issues that have occurred and are publicly available online, which TCW may wish to explore with the candidate during the interview.

Self-Declaration: Shortlisted candidates will be asked to complete a confidential self-declaration regarding their criminal record and suitability to work with children prior to interview. This allows candidates to share relevant information to be discussed during the interview stage. The declaration includes:

- Criminal history (convictions, cautions, reprimands, warnings).
- Inclusion on the Barred List.
- Teacher prohibition or sanction status.
- Information regarding criminal offences committed overseas.

9. Prior to the interview

Prior to the interview, the criteria for the position should be identified. Criteria that aren't relevant should be avoided.

10. Internal Interview

TCW supports internal promotion through fair, transparent, and non-discriminatory processes.

- **Disciplinary/Performance:** Active disciplinary warnings or Performance Improvement Plans (PIPs) will be considered during selection and may affect the outcome of an application.
- **Direct Appointments & Variations:** Flexible working, family leave returns, reasonable adjustments, restructures, or redeployments may be managed directly where legally justified, documented, and approved by HR without constituting a general vacancy.

- Bank to Salaried Teachers: Bank teachers may express interest in becoming salaried teachers upon:
 - Successful completion of induction (5 training sessions, 2 observations).
 - Meeting Teacher Standards (no more yellow standards than blue; no red standards).
 - Working as a teacher at TCW for a minimum of 6 calendar months with appropriate lesson volume.
- 10.2 Salary Teacher Deadlines:
 - *Internal:* Expressions of interest must be submitted to HR by 1st April. Internal interviews must be completed prior to May half-term for a Summer 2 start. Interviews after this date are for an August/September start.
- 10.3 Extended Probation Eligibility: employees on an extended probation period are ineligible to apply for internal vacancies until their probation review has taken place and they have formally passed their probation.
- 10.4 Internal Interview Concerns: Panels evaluating internal applicants have a responsibility to address any safeguarding or capability concerns that arise during the interview process. Concerns may be referred to line management or escalated via HR/Safeguarding policies

11. External Interview

External candidates must complete all pre-employment checks (including DBS) by Wednesday 20th May for a Summer 2 start; otherwise, start dates will be deferred to September.

Please note: we cannot confirm a start date for any applicant until we have received a satisfactory DBS.

12. Appointments

11.1 All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify candidate identity (photo ID, proof of address, birth certificate, name changes).
- Obtain completed consent and personal details documentation.
- Verify professional qualifications
- Verify right to work in the UK (retained for the duration of employment).
- Obtain an Enhanced DBS certificate with Barred List information for staff in regulated activity before or as soon as practicable after appointment.
- Require new staff to register with the DBS Update Service (at the employee's expense) and maintain subscription.
- Verify prohibition from teaching status via the DfE's Check a teacher's record portal.
- Verify Section 128 prohibition from management for relevant leadership, line management, and Trustee roles.
- Obtain at least two satisfactory written references (requested prior to interview where possible).
- Verify mental and physical fitness to carry out the role.
- Conduct overseas criminal checks / Certificates of Good Conduct and letters of professional standing for candidates who have lived or worked abroad for 3 months or more in the last 10 years.

12.1 DBS Certificate Handling & Data Storage

- Secure Storage: TCW does not keep copies of DBS certificates.
- Single Central Record (SCR): Only the DBS check date, check level, certificate reference number are permanently recorded on the SCR until that employee leaves the company

11.2 Resilience and Stress Management

At TCW, we recognise that working with children and young people who may have experienced trauma and other adverse experiences can be emotionally demanding. Staff must therefore demonstrate resilience, maintain appropriate professional boundaries, manage stress effectively, and use healthy coping strategies.

As part of our recruitment process, candidates will be assessed on their ability to manage the emotional and professional demands of the role, including their capacity to respond to challenging situations with resilience, professionalism, compassion and sound judgement.

11.3 Meeting requirements of the role

All appointments will be made strictly on merit and related to the requirements of the job. The candidate who meets the criteria will be offered the post, providing minimum acceptable standards have been met. If none of the candidates are considered suitable, the recruitment team will review the advertising/shortlisting/interviewing process and/or the Job Description itself and if necessary re-advertising the vacancy. If the post is re-advertised without material changes to the Job Description, previous applicants may still apply. The emphasis for filling a post should be on putting the “right person” in the job and not the person being available at the “right time” and the need to fill the post.

There may be an occasion where a candidate demonstrates potential through their application but appears nervous or is affected by extenuating circumstances during the interview, the panel may, at its discretion, offer an additional assessment or discussion to fairly evaluate their suitability for the role, while continuing to meet all safer recruitment requirements.

11.4 Keeping of records

Interview records for unsuccessful candidates are retained for 6 months. Appointed candidates receive copies of safeguarding procedures, handbooks, and schedules. External repeat applications are not accepted within a 6-month period. Interview records for unsuccessful candidates must be retained for six months following the interviews.

All appointed candidates will be provided with a copy of TCW’s safeguarding procedures, company handbook, and term dates.

We do not accept external repeat applications within a 6-month period.

13. Additional Safer recruitment and Safeguarding checks

When appointing new staff, we will also:

- Ask them to complete various forms, Consent forms (GDPR Regulations), and other personal information documentation
- Ask them to attend the Induction programme that ensures a “safeguarding children” culture is adopted and embedded into continuing practice
- Specify if the role has a probationary Period (only applies to salaried staff)
- Complete the Safeguarding course and Prevent training course (renewed every 2 years)
- Complete the Safer Recruitment Training course (*if applicable to the role - renewed every 2 years*)

How to ensure the ongoing safeguarding of children and the legal reporting duties on employers

This section explains the importance of safeguarding vigilance beyond the recruitment process and as part of the whole school or college approach to safeguarding. 422. Safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures and consequentially enshrined in its ethos. See Part one and Part two of this guidance for information about providing a coordinated whole school and college approach to safeguarding

14. Seeking references and checking employment history

TCW will obtain references after completion of a successful interview/s and acceptance of the role. Any concerns raised will be explored further with referees and taken up with the candidate at the interview.

When seeking references TCW will:

- Not accept open references, testimonials, or candidate-provided copies.
- Obtain references directly from the referee.
- Ensure the primary reference is from the current or most recent employer, completed by a senior designated person (for school settings, confirmed by HR/Headteacher regarding disciplinary investigations).
- Obtain references from previous employers where the candidate worked with children if not currently working with children.
- Compare information on the application form against reference responses to reconcile discrepancies.
- Keep a written record of any telephone conversations held to clarify vague or incomplete written references.

15. Vetting Concerns and Disclosures. If a vetting check(s) raises a concern

Where a self-declaration or DBS certificate reveals criminal history, a formal Disclosure Risk Assessment is conducted by a member of the HR department and senior leadership prior to confirming any appointment and will take into consideration the following:

Evaluation Criteria	Risk Assessment Focus
Offence Gravity	The nature, seriousness, and legal classification of the offence.
Time Elapsed	The candidate's age at the time of offending and years elapsed since.
Pattern of Offending	Whether the incident was isolated or part of a recurring pattern.
Role Relevance	Direct relevance to duties, levels of supervision, and access to children.

Rehabilitation	Evidence of remorse, personal change, and professional development.
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16. Existing staff

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect to the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

17. Agency and third-party staff

In the case of any employee working at the school who is sourced from an agency or third-party organisation, the school will obtain written notification from the organisation confirming that they have carried out the same checks as the school would otherwise perform on any individual who will be working at the school, or who will be providing education on the school's behalf, including through online delivery. Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate if necessary.

TCW will inspect photographic identity upon arrival to ensure the individual presenting for work is the person checked. Where an agency DBS contains disclosures, TCW must obtain a copy of the certificate before the individual commences work.

For further information please view our visitors policy.

18. Volunteers

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity.

TCW will obtain an enhanced DBS check with children's barred list information. Where an individual meets the period condition (more than 3 days in a 30-day period) by volunteering at multiple settings, TCW will work with the other settings to decide who should apply for the enhanced DBS check with barred list information, and that information should then be supplied by the individual to each setting.

Volunteers may also choose to join the DBS Update Service at the point that a DBS check is applied for. This is free for volunteers and allows portability of a DBS check across different education settings.

Volunteers not in regulated activity

Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. 388. Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so schools and colleges

should undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.

The risk assessment should consider:

- the nature of any work with children,
 - what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers,
 - whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and
 - where the role is not regulated activity, whether another level of DBS check might be appropriate, such as: an enhanced DBS check without barred list information, for volunteers who would be in regulated activity but do not volunteer frequently, or a basic DBS check for any other volunteer who may have access to children.
- Details of the risk assessment should be recorded

19. Trustees

All Trustees must undergo standard vetting checks, including an Enhanced DBS check, right to work check, Section 128 check, and sign relevant disclosure/conflict of interest forms. Trustees in regulated activity will undergo Barred List checks. The Chair of Trustees' DBS check is countersigned via the Secretary of State/DfE processes as required

20. Trainee and student teachers

Teacher trainees must undergo full pre-employment checks (including Enhanced DBS and Barred List checks). For fee-funded trainees, TCW obtains written confirmation from the training provider that all statutory checks have been carried out. The school will ensure that enhanced DBS certificates and barred list checks are obtained on all salaried candidates for initial teacher training who are in regulated activity.

21. Training

All staff involved in recruitment must receive appropriate Safer Recruitment training aligned with KCSIE guidance. All staff attend mandatory weekly training sessions held on Thursdays. All staff involved in the recruitment process must have appropriate training and be aware of their responsibilities under the relevant legislation. This policy directly endorses and supports the mandatory guidance in the Keeping Children Safe in Education (KCSIE) document.

22. Induction and probation period of new/existing staff

All new starters, permanent or temporary, are put on the induction programme depending on their role. The purpose of an induction programme is to:

- Help the new employee to settle quickly into the job
- Demonstrate the importance the school attaches to the individual's development
- Provide training and information about policies and procedures
- Support individuals appropriately
- Provide opportunities for new members of staff to raise concerns
- Enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately
- Raise awareness of Safeguarding and promoting the welfare of children e.g. anti-bullying, racism, internet safety, health and safety etc.
- Clarify safe practice and standards of conduct and behaviour expected of staff and students in their establishment
- Confirm and discuss other relevant procedures (disciplinary, capability, whistleblowing)

- Provide appropriate level of child protection training according to the role

All staff must read Part 1 of Keeping Children Safe in Education. For teachers, this familiarisation process is in addition to completing the statutory induction process.

In terms of our probation period, please refer to our Probation Policy.

All new staff is required to attend the induction programme which is outlined below:

- Induction day
- Tuesday – Must complete five training sessions; Planning a Good lesson, Marking & Progress, Managing Behaviour, Understanding SEN, and lastly professionalism & Reports.
- Thursday – Whole school weekly training

23. Contract Issuance and Signature

All external employment contracts must be sent to the successful candidate's personal email address and signed electronically. This ensures proper record-keeping, secure delivery, and compliance with onboarding procedures.

24. Recording and retaining information

As a school it is a legal requirement to record and maintain records of pre-appointment checks on the Single central record. This is an electronic document that only the HR/ DSL and Headteacher have access to.

Our school aims to ensure that all personal data collected about staff, students, parents, trustees, visitors, and other individuals is collected, stored, and processed by the General Data Protection Regulation (GDPR). For further information, please refer to our Data Protection policy.

25. Single Central Record

The DfE Statutory Guidance for Schools and Colleges, 'Keeping Children Safe in Education, requires all schools to produce and maintain a Single Central Record of Recruitment and Vetting Checks (SCR). This requirement has been in place since 2007.

SCR records information for:

- All staff employed by the school – e.g. teachers, teaching assistants, cleaners, administrative staff etc
- Trainee teachers on salaried routes
- Supply teachers / casual workers – either employed through the school or an agency
- All those in regular contact with children including volunteers
- All Trustees
- Contractors who visit the school frequently or intensively
- All people brought into school to provide additional teaching/training / instruction e.g. sports coaches and music teachers

Details of an individual are removed from the SCR once they no longer work at the schools outlined by The Key for School governors. It is the HR department's duty to fulfill the duty of maintaining the SCR which is then signed by the Headteacher once a term. All records will be kept with the HR department.

26. Providing References

This section sets out TCW's procedure for providing employment references for current and former employees. The aim is to ensure that all references are factual, consistent, appropriately authorised and compliant with applicable legal and regulatory requirements, including *Keeping Children Safe in Education (KCSIE) 2026*.

Responsibility

All requests for employment references relating to current or former TCW employees must be referred to and completed centrally by HR. Individual employees or managers must not provide formal employment references on behalf of TCW unless specifically authorised to do so.

Content of References

References provided by TCW will be factual and, where appropriate, may include confirmation of the employee's dates of employment, job title or roles held, and relevant information concerning disciplinary or safeguarding matters, where this is appropriate, lawful and supported by accurate records.

Safeguarding and Disciplinary Disclosures

Where a safeguarding concern or disciplinary matter has been substantiated and has resulted in a relevant formal finding or outcome, this information may be disclosed in an employment reference where it is lawful, relevant, proportionate and supported by verified records.

TCW will not disclose allegations that have been found to be unsubstantiated, false or without a formal finding, unless there is a lawful and appropriate basis for doing so. All disclosures will be handled sensitively and in accordance with applicable data protection, employment and safeguarding requirements.

HR will ensure that references are accurate, objective and consistent with information held on the employee's personnel record and any relevant safeguarding documentation.

26. Retention of Recruitment Records

Maintain records of the recruitment and selection process, including interview notes and reasons for decisions, for a minimum of six months for unsuccessful candidates. This practice supports transparency and accountability.

27. Monitoring and Review

- This policy is monitored on an ongoing basis to evaluate its effectiveness and ensure appropriate steps can be taken to eliminate unlawful discrimination.
- This policy is reviewed on an annual basis to ensure the aims of the policy are carried out in accordance with TCWs equality obligations.

If you have any suggestions or comments regarding this policy, please email suggestions@tcw.org.uk.

Review log

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Approved by:	Amrit Claire