



Harrison College Ltd

Safer Recruitment Policy

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1. Policy Statement

Harrison College is committed to safeguarding and promoting the welfare of children and young people. We expect all staff, governors, trustees, volunteers, contractors, agency staff and visitors to share this commitment. We recognise that safer recruitment is a vital part of creating a safeguarding culture that deters, identifies, and rejects unsuitable individuals from working with children.

Safer recruitment (SR) practices are designed to ensure that the hiring process is fair, transparent, and free from discrimination while also safeguarding our students and vulnerable individuals.

This document is intended for all College staff who are responsible for the appointment of staff (on whatever employment basis), volunteers and Directors. It summarises their key responsibilities with regards to the recruitment process (including the recruitment procedures to safeguard children).

This safer recruitment policy is in line with the KCSIE 2026 Part three Safer Recruitment, the Human Rights Act 1998, Protection of Freedoms Act 2012 and the Equality Act 2010. It adheres to applicable legislation such as Crime and Policing Act 2026, Children's Act 1989 and 2004, Education Act 2002 (Section 175 and related duties, Safeguarding Vulnerable Groups Act 2006, The School Staffing (England) Regulations 2009, The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions, the Education and Skills Act 2008 and considers the 2020 amendments to the ROA 1974, as well as following Ministry of Justice and Gov.uk guidance.

This policy includes the whole process from application stage through to pre-appointment vetting checks. All recruitment and selection processes will be conducted in accordance with statutory guidance contained within Keeping Children Safe in Education 2026 and relevant safeguarding legislation.

The college will ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training. (Part three KCSIE 2026). In each selection process at least one member of the college recruitment team will hold an up-to-date qualification in safer recruitment.

2. Purpose

The purpose of this policy is to:

- Ensure the college recruits suitable individuals to work with children and vulnerable students
- Prevent unsuitable people from gaining access to children.
- Ensure all required pre-employment checks are completed.
- Maintain accurate safeguarding records.
- Promote a culture of vigilance and ongoing safeguarding.
- Meet statutory duties under KCSIE 2026 and associated legislation.
- Ensure that the College meets its commitment to safeguard and promote the welfare of children and make it clear to all applicants that all staff and volunteers are expected to share this commitment.
- To recruit the most suitable person for the role.
- To treat all candidates fairly.
- To ensure the reputation of the College as an employer is enhanced.

3. Scope

This policy applies to all staff, volunteers, agency and supply staff, contractors, directors and anyone working on behalf of the college to provide learning and internships to our students. It applies to visitors to the college in certain situations.

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4. Roles and Responsibilities

Board of Directors

The Board of Directors will ensure that:

- Effective safeguarding and safer recruitment procedures are in place.
- Recruitment practices comply with KCSIE 2026.
- Appropriate resources are allocated to support safer recruitment.
- The Single Central Record (SCR) is maintained and regularly monitored.

Principal, Designated Safeguarding Lead and Head of HR

The Principal will, in collaboration with the DSL and Head of HR:

- Ensure safer recruitment procedures are implemented.
- Oversee recruitment and vetting processes.
- Ensure all required checks are completed before appointment.
- Monitor compliance with safeguarding requirements.

Recruitment Panel Members

At least one person involved in the interview process will have completed appropriate safer recruitment training where required by regulation. Both the Principal and the DSL will be the required minimum staff to complete Safer Recruitment training alongside other senior leaders where applicable. All staff involved in recruitment whatever their role or input must read and understand Part 3 of KCSIE 2026.

5. Safer Recruitment Process

1. Advertising

All advertisements will:

- Include the college's commitment to safeguarding and child protection and reference the college's Safeguarding and Child Protection policy.
- State that safeguarding checks will be undertaken.
- Make clear that appointments are subject to satisfactory vetting checks.
- Signpost applicants to the college website and provide a link to the Harrison College application form

2. Application Process

The college will;

- Only accept fully completed Harrison College application forms.
 - CV's can only be accepted alongside the application form.

The Application Form will require;

- personal details, current and former names, current address and national insurance number,
- 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 (see below for further information),
- 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 statement that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

The applicant will be encouraged to visit the site during college open hours to familiarise themselves with the working practices and culture required of a specialist Post 16 educational establishment. Information packs and adverts will use inclusive language and state Harrison College's commitment to diversity and equality.

The college has a duty to make reasonable adjustments to ensure that people with disabilities can access and participate in work. Prior to interview candidates will be asked if there are any reasonable adjustments or requirements that we need to be aware of. College will make reasonable adjustments if requested by the candidate.

3. Shortlisting

Prior to interview, the college will undertake and make clear that:

- References may be sought and scrutinised and must include their latest employer as well as the current or last employer for those applicants working with children or in an educational establishment. References allow college to obtain factual information to support appointment decisions and allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.
 - The reference(s) must be completed by the Headteacher/Principal or persons in the senior position (such as HR) with authority and responsibility for dealing with references.
 - Education references will not be accepted from persons not in the accountable position (as above) such as Heads of Department, SENDCo's, line managers etc.

The college will

- always verify any information with the person who provided the reference,
- ensure electronic references originate from a legitimate source,
- contact referees to clarify content where information is vague or insufficient information is provided,
- compare the information on the application form with that in the reference and take up any discrepancies with the candidate,
- establish the reason for the candidate leaving their current or most recent post,
- ensure any concerns are resolved satisfactorily before appointment is confirmed.
- explore employment gaps or anomalies at interview stage or prior to interview.
- undertake online searches as part of due diligence to identify incidents or issues that are publicly available.

A self-declaration form will be issued for applicants to complete and sign, this will include;

- if they have a criminal history,
- if they are included on the children's barred list,
- if they are prohibited from teaching,
- if they are prohibited from taking part in the management of an independent school, information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted,
- if they are known to the police and children's local authority social care,
- if they have been disqualified from providing childcare and any relevant overseas information.

When asked to provide references, Harrison Colleges should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. They should not include information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious.

4. Interview Process

Interviews will be carried out including 2 senior staff at least. This will include the Principal alongside a Director or Head of HR. At least one will have a current Safer Recruitment qualification. They will:

- Assess suitability to work with children and vulnerable students.
- Include safeguarding-related questions.
- Include checks around applicants physical and mental capacity to carry out the role
- Explore attitudes towards child protection and providing a safe culture within the Harrison College Post 16 Specialist Business Mission and Values (see below)
- Investigate any concerns arising from references or application information, including gaps in employment, missing information and declaration sections

- The application form will be witnessed and signed and any additions and changes made will be signed and authorised as a true record of statements.
- Keep robust, accurate and confidential records of the process and evidence supplied

There are certain values, beliefs and characteristics that the College regard as intrinsic to the success of the individual and they must align with our mission and aims. The best way to gather information in these areas is to ask questions regarding:

- a) Character, personality and key qualities they will bring to the team
- b) The challenges they have faced and how they have reacted and overcome them
- c) What are their strengths, key skills and abilities and what do they enjoy doing best at work.
- d) Attitude to SEN, disabilities and equality, inclusivity and individual need
- e) Career development and the impact this has on living fulfilling lives

6. Pre-Appointment Checks

All offers of employment are conditional upon satisfactory completion of required checks. This is a legal requirement that must be carried out when appointing individuals to engage in regulated activity relating to children and vulnerable students. The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: Special Post-16 institutions.

It covers the importance of ensuring the correct pre-appointment checks are carried out. These checks will help identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). These checks are part of the wider whole college safeguarding procedures and required as a Special Post-16 institution to carry out verification of the candidate's mental and physical fitness to carry out their work responsibilities.

We will complete the following:

Identity Verification

To be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available or verification of identity using approved documents such as driving licence, passports etc.

Enhanced DBS Check

An enhanced Disclosure and Barring Service (DBS) check will be undertaken including children's barred list information, for those who will be engaging in regulated activity with children as applicable for a SPI.

Before using the Update Service, college must:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check,
- confirm the DBS certificate matches the individual's identity,
- examine the original certificate to ensure that it is valid for employment with the children's workforce,
- ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information.

Right to Work

Verify the person's legal right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then the college will seek advice on the GOV.UK website. If the person has lived or worked outside the UK, we will make any further checks we consider appropriate

Qualifications Check

- Verify professional qualifications, as appropriate to the role and any Professional registration checks will be made and evidenced.

Professional Status Checks

Where employing teachers Special Post-16 institutions should contact teaching.status@education.gov.uk to check that the individual is not prohibited from teaching.:

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- **Qualified Teacher Status (QTS)** - the DfE's Check a teacher's record should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- **Teacher prohibition checks** - a prohibition from teaching check should be carried out for anyone employed in teaching work at a post-16 specialist college if the role falls within the definition of teaching work. The check confirms whether the individual has been prohibited from teaching by the Teaching Regulation Agency. Keeping children safe in education 2026 includes this as part of safer recruitment arrangements for relevant teaching posts
- **Section 128 checks** - a Section 128 check relates to whether a person is prohibited from taking part in the management of an independent educational institution, including certain specialist post-16 institutions.

Overseas Checks

Additional checks will be undertaken for individuals who have lived or worked outside the UK, and undergo the same checks as all other staff working in colleges which includes obtaining an enhanced DBS check. The Home Office provides guidance on criminal records checks for overseas applicants which can be found on GOV.UK. Any other checks can be made as applicable and may include obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database.

Unsatisfactory DBS Checks

If any information is uncovered by the Enhanced DBS checks the Principal and the Board of Directors will need to give careful consideration as to whether the offer of employment can continue. Factors to consider will include:

- the seriousness of any offence and relevance to the post applied for
- how long ago the offence occurred
- whether it was a one-off incident or a history of incidents
- the circumstances around the incident,
- What was the applicant's explanation, and have their circumstances changed?
- Was the offence disclosed by the applicant?
- whether the individual accepted responsibility for their actions

Copies of DBS certificates and any detailed criminal record information disclosed during recruitment should only be retained where there is a valid reason and should not normally be kept for longer than six months. Where the college chooses to retain a copy, there should be a valid reason for doing so. This period allows for the resolution of any disputes or complaints.

7. Single Central Record (SCR)

Harrison College will maintain a Single Central Record of pre-appointment checks and regulations covering all individuals required by KCSIE 2026 and legislation. The SCR will be monitored regularly by the Principal reporting to the Directors through the use of CPOM's StaffSafe.

The SCR will record:

- Identity checks
- Enhanced DBS checks
- Children's barred list checks
- Prohibition from teaching checks
- Overseas checks
- Qualification checks
- Right to work checks
- Section 128 checks where appropriate
- Dates checks were completed

The SCR will be monitored regularly by the directors through the use of CPOM's StaffSafe.

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8. Agency and Supply Staff

College must obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as we would otherwise perform on any individual who will be working at the college (or who will be providing education on the college's behalf, including through online delivery). The written confirmation from agencies will include verification of checks required for recruitment, right to work and safeguarding checks. On arrival, the college should also check that the person presenting themselves for work is the same person on whom the checks have been made. We will verify identity upon arrival by requesting evidence of their driving licence, passport or other relevant document.

Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at or for the college, which has disclosed any matter or information, or any information was provided to the employment business, then the college must obtain a copy of the certificate from the agency so we can discuss and decide the information contained within.

9. Volunteers / mentors / internship staff

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a college 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. Where this applies, we should obtain an enhanced DBS check with children's barred list information.

The level of checking for volunteers will be based on the nature of the activity undertaken, whether the activity constitutes regulated activity, and whether the role is supervised or unsupervised. Enhanced DBS checks will be obtained where required by law.

When organising internship placements, if the person (mentor/link worker/supervisor etc) providing the teaching, training, instruction or care or supervision will be doing so frequently or for more than three days in a 30-day period, this is seen as a regulated activity, and we will adhere to the regulations as above. We further ensure that the placement provider has policies and procedures in place to protect students from harm and we obtain an enhanced DBS check with children's barred list information. Please see the Internship processes for further information.

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 and provisions.

10. Contractors (please see further information within the Safeguarding and Child Protection Policy)

The college will ensure that:

- Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children.
- Contractors engaging in regulated activity relating to students will require an enhanced DBS check (including children's barred list information).
- For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.
- Are appropriately vetted where required.
- Work under suitable supervision where necessary.
- Comply with safeguarding procedures whilst on site.

11. Board of Directors (Governance)

Directors will undergo checks in accordance with KCSIE 2026 and relevant legislation, including enhanced DBS checks and Section 128 checks where applicable.

12. Trainee Teachers

The college will obtain written confirmation from training providers that all required safeguarding and suitability checks have been completed before placement commences. Where they are salaried then the college will carry out the same checks within regulated activity requirements. This includes an Enhanced DBS and barred list checks.

13. Ongoing Safeguarding Responsibilities

Safer recruitment does not end once an individual is appointed.

The college will:

- Maintain a culture of safeguarding vigilance.
- Provide safeguarding induction for all staff.
- Deliver regular safeguarding and child protection training.
- Ensure staff understand professional boundaries and the Staff Code of Conduct.
- Encourage staff to self-report relevant matters that may affect their suitability to work with children.

14. Managing Safeguarding Concerns About Staff

Concerns about staff conduct will be managed in accordance with:

- KCSIE 2026 Part 4
- Whistleblowing Policy
- Local Authority Designated Officer (LADO) procedures where applicable.

Low-level concerns will be recorded, reviewed, and managed appropriately.

15. Legal Reporting Duties

The college will fulfil all legal reporting obligations, including:

- Referrals to the Disclosure and Barring Service where required.
- Referrals to the Teaching Regulation Agency where appropriate.
- Cooperation with safeguarding partners, police, social care and regulatory bodies.
- Retention and disposal of recruitment records in accordance with UK GDPR, Data Protection law (2018) and KCSIE requirements.

16. Monitoring and Review

This policy will be:

- Reviewed annually.
- Updated following changes to legislation or statutory guidance.
- Approved by the Board of Directors.