

ST DOMINIC'S GRAMMAR SCHOOL

VERITAS

SAFER RECRUITMENT AND SINGLE CENTRAL RECORD POLICY

EYFS to Sixth Form

CONTROLLED DOCUMENT	DETAIL
Academic year	2026-27
Effective from	1 September 2026
Review date	August 2027, or sooner if law or guidance changes
Policy owner	Headmaster
Approval	Proprietor, advised by the Governing Body
Applies to	All recruitment and engagement from EYFS to Sixth Form
Status	Mandatory

Safeguarding first

No appointment or engagement may proceed unless the School is satisfied that the individual is suitable to work with children and every check required for the role has been completed, verified and recorded. The stricter EYFS commencement rule applies where relevant.

Document control and quick-reference principles

Non-negotiable controls

- At least one member of every appointment panel must have completed appropriate safer-recruitment training.
- The School's application form is required; a curriculum vitae must not be accepted on its own.
- Shortlisting must normally be undertaken by at least two people, with gaps, inconsistencies and safeguarding concerns explored.
- A documented online search will be considered for every shortlisted candidate and candidates will be told that this may occur.
- No unconditional offer may be made. All offers remain conditional on satisfactory completion of the checks applicable to the role.
- From 1 September 2026, supervised volunteers are not exempt from regulated activity merely because they are supervised. Required enhanced DBS and children's barred-list checks must be completed.
- For EYFS work, no new employee may start before the required enhanced criminal-record check is received; all relevant volunteers require enhanced and barred-list checks.
- The Single Central Record (SCR) must be accurate, complete, current, readily retrievable and supported by personnel-file evidence.

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1. Purpose and scope

St Dominic's Grammar School (the School) is committed to safeguarding and promoting the welfare of every pupil. This policy establishes a rigorous, fair and auditable process for recruiting, selecting, checking, appointing and monitoring adults who work with or around pupils from EYFS to Sixth Form.

It applies to employees, workers, agency and third-party supply staff, contractors, volunteers, trainee teachers, apprentices, work-experience placements, members of the Proprietor body and Governing Body, and any other adult for whom the School is responsible for checking suitability. It applies to permanent, fixed-term, casual, zero-hours and temporary arrangements, whether paid or unpaid.

This policy should be read with the Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-level Concerns Policy, Allegations Management Procedure, Data Protection Policy, Equality and Equal Opportunities Policy, Whistleblowing Policy and Visitors Procedure.

2. Legal and regulatory framework

The School will have regard to the law and guidance in force at the relevant time, including:

- Keeping Children Safe in Education 2026 (KCSIE), in force from 1 September 2026, particularly Part Three and the relevant provisions of Parts One, Two and Four;
- the Education (Independent School Standards) Regulations 2014, especially Part 4 (suitability of staff, supply staff and proprietors) and paragraph 21 (the register/SCR);
- the Early Years Foundation Stage statutory framework for group and school-based providers, effective 1 September 2026;

- the Safeguarding Vulnerable Groups Act 2006, as amended, including the 2026 removal of the supervision exemption from regulated activity for volunteers;
- the Childcare Act 2006 and Disqualification under the Childcare Act 2006 statutory guidance;
- the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, DBS filtering rules and the DBS Code of Practice;
- the Education Act 2002, Education and Skills Act 2008, Children Act 1989 and Children Act 2004;
- the Equality Act 2010, Immigration, Asylum and Nationality Act 2006, UK GDPR and Data Protection Act 2018;
- Prevent duty guidance, Working Together to Safeguard Children, Home Office right-to-work guidance and DfE guidance on overseas criminal-record checks; and
- the ISI inspection framework and handbook in force for association independent schools, under which safeguarding practice and compliance with the Standards are evaluated.

If legislation or statutory guidance changes during the policy year, the School will apply the new requirement from its commencement date and update this controlled document promptly.

3. Principles

- Safeguarding is embedded at every stage and is not a final administrative check.
- Selection decisions are based on merit, competence, values and suitability to work with children.
- Applicants are treated consistently and lawfully, with reasonable adjustments where required.
- Information is verified from original or reliable primary sources and discrepancies are resolved before appointment.
- A clear audit trail records who completed each decision and check, when, by what method and with what outcome.
- Personal and criminal-offence data are processed lawfully, securely, proportionately and only for legitimate purposes.

4. Responsibilities

4.1 Proprietor and Governing Body

The Proprietor has ultimate legal responsibility for ensuring that the School complies with the Independent School Standards and safeguarding duties. The Governing Body advises, supports and challenges the Proprietor and monitors implementation. Together they will ensure that:

- effective policies, competent staff and sufficient resources are in place;
- the Headmaster is held to account for operational compliance;
- members of the Proprietor body undergo all legally required checks;
- the SCR and a sample of supporting files are independently audited at least termly, with findings and actions recorded; and
- any material failure is corrected immediately and escalated appropriately.

4.2 Headmaster

The Headmaster is responsible for implementing this policy, authorising recruitment, ensuring appropriate panel composition and training, deciding exceptional risk matters, and confirming that no person begins work contrary to this policy. The Headmaster may delegate administration but not accountability.

4.3 DSL

The DSL advises on safeguarding aspects of recruitment; contributes to role design, questions and risk decisions where appropriate; ensures relevant concerns are shared lawfully; and is consulted where online searches, references, disclosures or employment history raise safeguarding issues. The DSL does not replace the Headmaster or panel's recruitment responsibility.

4.4 Recruitment administrator and recruiting managers

The designated recruitment administrator maintains the recruitment file and SCR, verifies documentary evidence, obtains confirmations and prevents deployment until authorised. Recruiting managers and panel members must follow this policy, declare conflicts, preserve confidentiality and record defensible evidence-based decisions.

5. Recruitment planning and authorisation

Before advertising or engaging an agency, the recruiting manager must obtain written authorisation from the Headmaster or delegated member of the Senior Leadership Team. The recruitment plan must identify the role, status, work location, age

groups, level of contact, whether it is regulated activity, management responsibility, EYFS relevance, qualifications and checks required.

The job description must state the individual's safeguarding responsibility. The person specification must include suitability to work with children, relevant behaviours and essential qualifications. Any conflict of interest or relationship with a candidate must be declared and managed before shortlisting.

6. Advertising and candidate information

Advertisements, recruitment pages and agency briefs must state the School's commitment to safeguarding, that the post is exempt from the Rehabilitation of Offenders Act 1974 where applicable, and that appropriate pre-employment checks will be required. Candidate information will explain the checks, online-search process, privacy information, conditional nature of any offer and how reasonable adjustments may be requested.

No CV-only applications

Every candidate must complete the School's application form. A CV may supplement, but never replace, the form. Incomplete forms must be resolved before shortlisting.

7. Application, employment history and self-disclosure

The application form will require a full chronological education and employment history, reasons for leaving, explanation of all gaps, current and former names, relevant qualifications, referees and declarations relevant to suitability. The School will not ask for health information before an offer except where lawful and necessary to support the recruitment process or determine whether an intrinsic function can be performed.

Shortlisted candidates must complete a confidential self-declaration of relevant criminal information, children's barred-list status, prohibition from teaching or management, childcare disqualification where applicable, overseas information and any other matter relevant to suitability. Candidates must not disclose protected convictions or cautions. Deliberate concealment or materially false information may result in withdrawal of an offer or disciplinary action.

8. Shortlisting and online searches

At least two people should shortlist against the same published criteria. They will scrutinise employment history, reasons for leaving, gaps, repeated changes, inconsistencies and evidence of suitability. Issues must be recorded and explored at interview or before an offer.

In accordance with KCSIE 2026, the School will consider a proportionate online search for each shortlisted candidate as part of due diligence. Candidates will be informed. Searches will use publicly available information, be limited to identifying matters relevant to safeguarding or professional suitability, and avoid protected-characteristic information unrelated to the role. Wherever practicable, a person outside the decision-making panel will conduct the search and pass only relevant findings to the panel. Findings, source, date and outcome will be recorded; the candidate will have an opportunity to respond.

9. References, assessment and interview

9.1 References

- Normally obtain two references, including the current or most recent employer; for work with children, seek a reference from the most recent relevant child-employment employer where this is not the same.
- Obtain references directly from the referee's professional contact details before interview where practicable. Do not rely on open references or testimonials supplied by the applicant.
- Ask whether the referee is satisfied that the applicant is suitable to work with children, whether any safeguarding concerns or substantiated allegations exist, the applicant's role and dates, reasons for leaving, disciplinary history relevant to suitability, and whether the referee recommends appointment.
- Verify the referee's identity and authority, compare references with the application and resolve discrepancies by direct contact. Electronic references must be verified as genuine.
- Factual references alone do not remove the School's obligation to make further enquiries where information is incomplete or concerning.

9.2 Selection and interview

At least one panel member must have completed safer-recruitment training. The panel will use structured questions and objective scoring, while retaining scope to probe gaps, motives, values, boundaries, attitude to safeguarding, handling of concerns, disciplinary or allegation information and online-search findings. Identity will be checked at interview, normally face-to-face. Any remote stage must be followed by reliable in-person identity verification before appointment.

Selection activities may include teaching, presentations, written tasks or interaction with pupils, subject to safeguarding controls. Pupils must not carry responsibility for the appointment decision. Panel notes must provide a clear record of evidence and reasons.

10. Conditional offer and appointment decision

Only the Headmaster or authorised delegate may approve an offer. Every offer must be in writing and conditional on satisfactory completion of all checks applicable to the role. The panel must not treat a criminal record, disability, protected characteristic or overseas history as automatically adverse; it must undertake an individual, lawful and evidence-based assessment.

Core check	Required action before appointment
Identity	Verify original, current photographic identity and address evidence; reconcile all names and dates.
Employment history and references	Resolve all gaps and discrepancies; verify references directly.
Right to work	Complete the prescribed check before employment and repeat before any time-limited permission expires.
Qualifications	Verify qualifications legally or operationally required for the role, including EYFS qualification status where relevant.
Health and fitness	After conditional offer, establish mental and physical fitness to perform the role, with reasonable adjustments.
DBS/barred list	Obtain the correct level for the activity and act on the original certificate; apply 2026 volunteer and EYFS rules.
Prohibition checks	Teaching prohibition and section 128 management prohibition where applicable.
Overseas checks	Complete additional appropriate checks for relevant periods lived/worked overseas.
Childcare disqualification	Inform relevant staff of the duty to disclose; establish that no disqualification applies or that a waiver is held.
SCR and file	Record each check, date and checker; retain supporting evidence lawfully.

11. Identity, right to work, qualifications and fitness

The School will follow current DBS identity-checking and Home Office right-to-work guidance. Originals or approved digital services will be used as permitted. Names, dates of birth and addresses must be consistent across documents; changes of name require evidence. Copies of identity, right-to-work and required qualification documents will be signed/dated or electronically authenticated and retained on the personnel file.

Required qualifications and professional status will be checked with the awarding or regulatory body where necessary. For EYFS deployment, qualification level, content and paediatric first-aid status will be established separately from identity checks and recorded for ratio purposes.

Health questions will normally follow a conditional offer. The School will consider reasonable adjustments and will not make discriminatory assumptions. Occupational-health advice may be obtained with consent. Fitness information is confidential and kept separately with restricted access.

12. DBS and children's barred-list checks

The level of check must be determined by the duties, not the job title. A children's barred-list check may be requested only where the person will engage in regulated activity or another lawful entitlement applies. It is a criminal offence to knowingly permit a barred person to engage in regulated activity, and for a barred person to seek or undertake it.

12.1 New employees

For regulated activity, the School will obtain an enhanced DBS certificate including children's barred-list information. The applicant must present the original certificate. The School will check identity, certificate authenticity and any disclosure, record the certificate number and date, and make a documented suitability decision.

12.2 Update Service and existing certificates

A certificate issued for another employer or an Update Service status check may be accepted only after a documented decision confirms identity, workforce, level, barred-list status and absence of relevant new information. The School may require a new certificate at any time. Update Service use does not replace any other check.

12.3 Starting before a certificate is received

EYFS absolute rule

A new employee whose work falls within the EYFS requirement must not start employment before the required enhanced criminal-record check has been received. There is no risk-assessment exception.

Outside EYFS, starting before the enhanced DBS certificate is received is exceptional. It requires the Headmaster's written approval, a satisfactory separate barred-list check where legally permitted and required, completion of all other checks, a signed Appendix C risk assessment, close supervision, restricted duties and daily review until the certificate is seen. A person may never start if identity, right to work or a required barred-list check is outstanding.

12.4 Disclosures and retention

A disclosure will be assessed confidentially against relevance, seriousness, circumstances, age and time elapsed, pattern, explanation, rehabilitation, safeguarding risk and available safeguards. The candidate may respond. A DBS certificate copy is not required for the SCR. If exceptionally retained, a valid reason will be documented and the copy destroyed securely no later than six months, while the fact of the check, outcome and decision may be retained.

13. Teaching, management and childcare checks

13.1 Prohibition from teaching

For anyone who carries out teaching work as defined in law, the School will use the Teaching Regulation Agency service to check prohibition orders, interim prohibition orders, Secretary of State directions and any other restriction available through the service. The check will be completed before teaching begins and recorded on the SCR.

13.2 Section 128 management prohibition

A section 128 direction prohibits or restricts participation in the management of an independent school. The School will check all relevant management positions, including the Headmaster, members of the Senior Leadership Team, teaching positions with departmental leadership where within the statutory definition, and members of the Proprietor body. The result and date will be recorded.

13.3 Childcare disqualification and EYFS suitability

The School will identify staff within scope of the Childcare Act 2006 disqualification arrangements, explain what must be disclosed and obtain appropriate declarations. A disqualified person must not be employed in relevant provision unless Ofsted has granted a waiver. Staff must report without delay any event that may affect suitability or disqualification status. The School will take appropriate action and make required notifications.

14. Applicants who have lived or worked outside the UK

Every applicant receives the same UK checks regardless of nationality or residence. In addition, the School will make further checks it considers appropriate so that relevant events overseas can be considered. The decision will reflect the countries, duration, dates, age at residence, role and reliability of available evidence.

- overseas criminal-record certificates or certificates of good conduct where obtainable;
- direct confirmation from overseas employers and professional regulators;
- for teachers, information from the relevant overseas professional authority about sanctions or restrictions, where available;
- certified translations and verification of authenticity; and
- where evidence cannot be obtained, a documented risk assessment identifying enquiries made, alternative evidence, supervision and whether the residual risk is acceptable.

Holding an overseas or UK teaching qualification is not evidence of safeguarding suitability. Immigration and right-to-work checks remain separate.

15. Agency and third-party supply staff

Before any supply person works, the School must receive written notification from the agency or third party confirming that it has completed the checks the School would otherwise perform, including enhanced DBS and barred-list information where required, and that it has obtained the certificate and relevant information. The notification must identify the individual and disclose whether the certificate contains information. The School must see the original certificate where it contains information and will consider it before deployment.

On first arrival, the School will verify photographic identity against the agency confirmation. Supply staff must be entered on the SCR even if they work for only one day. The School retains safeguarding responsibility on site and will share concerns with the agency while managing safeguarding processes under KCSIE.

16. Contractors and self-employed persons

The contract owner must determine whether the work is regulated activity or allows opportunity for contact with pupils. The School will obtain written assurance that the contractor has completed lawful checks at the appropriate level, verify identity on arrival and record the arrangement. A contractor who has not undergone the required check must not engage in regulated activity and must be subject to effective supervision and physical/operational controls. Emergency attendance does not remove this duty.

Self-employed persons cannot obtain an eligible check through themselves; the School or a suitable umbrella body must arrange any check for which the role is eligible. Contract terms must require immediate disclosure of suitability concerns and cooperation with allegations and referral processes.

17. Volunteers

2026 regulated-activity change

From 1 September 2026, supervision no longer removes a volunteer role from regulated activity. The School must not rely on the former "supervised volunteer" exemption.

The School will complete a written role assessment, identity check, references or other suitability enquiries appropriate to the role, and an enhanced DBS certificate including children's barred-list information for every volunteer engaging in regulated activity. In EYFS, the School must obtain enhanced criminal-record and barred-list checks for every relevant person aged 16 or over, including volunteers, as required by the 2026 framework. Volunteers and students must not be left unsupervised unless the School has lawfully determined and evidenced that this is permitted.

The School will not request a barred-list check where it lacks legal entitlement. Where a volunteer role is not regulated activity, any enhanced DBS check must be legally eligible and proportionate. Existing volunteers will be reconsidered when duties change, information arises or updated law requires a new check.

18. Trainee teachers, apprentices, work experience and pupils placed elsewhere

For salaried trainee teachers employed by the School, the School carries out checks and includes the trainee on the SCR. For fee-funded trainees, the training provider is responsible for checks; the School will obtain written confirmation that all required checks were completed and suitability established. The School may record fee-funded trainees as good practice.

For young people undertaking work experience at the School, the School will consider the nature, frequency and supervision of contact, age and vulnerability, and any legal entitlement to checks. For adults supervising pupils on work experience away from School, the School will comply with KCSIE 2026 and request checks where the statutory conditions are met. It will obtain safeguarding assurance from placement providers and act on concerns.

19. Proprietor, Governing Body and governance roles

All members of the Proprietor body must undergo the checks required by the Independent School Standards and KCSIE, including identity, enhanced DBS, barred-list information where entitled, section 128 and overseas checks as applicable. Checks for the chair and other members will be arranged by the legally specified person or authority. Required details will be recorded on the SCR.

Members of the Governing Body who are not members of the Proprietor body will undergo checks appropriate to their legal status, duties and contact with pupils. No governance title or honorary position displaces safeguarding requirements.

20. Visitors, speakers, alternative provision and host arrangements

The School does not require DBS checks for ordinary visitors where there is no legal entitlement. Visitors must be identified, signed in, given safeguarding information and supervised according to risk. Visiting speakers are subject to the School's Prevent and suitability procedures. Visiting professionals whose employer has checked them must present identity and, where relevant, written assurance.

Before commissioning alternative provision, the School will obtain written confirmation of safeguarding arrangements and checks, visit or otherwise assure itself of suitability, and monitor the placement. Where the School arranges host-family accommodation for a pupil, it will apply KCSIE requirements, including enhanced DBS with barred-list information for the responsible adults where required, consideration of other persons aged 16 or over, overseas checks and a written safeguarding assessment.

21. Single Central Record

The School will maintain one readily retrievable SCR covering EYFS to Sixth Form. It is a live compliance record, not a substitute for the personnel file. It must be accurate, legible, internally consistent and available without delay to the Proprietor, authorised governors and inspectors.

The SCR must cover all staff, salaried trainee teachers, agency and third-party supply staff even for one day, and all members of the Proprietor body. The School may include volunteers, contractors, fee-funded trainees, governors and other adults in clearly identified non-statutory sections.

For staff, the SCR must state whether each mandatory check was carried out or certificate obtained and the date. It must also record, where applicable, relevant qualifications, right to work, overseas checks, teaching prohibition, section 128 and whether the post involves relevant activity. For supply staff, it must record receipt and date of agency confirmation and whether enhanced DBS details were supplied. Appendix B is the operational matrix.

21.1 Administration and audit

- Only trained authorised staff may amend the SCR; access is role-based.
- Entries must be made from verified evidence, not assumptions, and before deployment.
- Corrections must preserve an audit trail; no mandatory field may be silently deleted.
- The recruitment administrator checks the SCR against each appointment file before start.
- The Headmaster or delegate reviews completeness monthly; an independent governor/proprietor audit is completed at least termly.
- Errors affecting suitability or deployment are escalated immediately to the Headmaster and DSL, with the person removed from unsupervised/regulated duties where necessary.

22. Recruitment records, confidentiality and data protection

Recruitment information will be processed under the School's privacy notices and retention schedule. Access is limited to those who need it. Criminal-offence and health data receive enhanced protection. The School will keep sufficient evidence to demonstrate compliance while avoiding unnecessary copies.

Record	Normal control
Successful candidate file	Application, history, references, selection notes, check evidence, decisions and contract retained under the School retention schedule.
Unsuccessful candidate file	Normally retained for six months after the process, longer only where justified (for example litigation hold).
Identity/right to work/qualifications	Verified copies retained on the personnel file in line with KCSIE and immigration requirements.
DBS certificate copy	Not routinely retained; if justified, securely destroyed within six months. Certificate number/date and decision may be recorded.
Online-search material	Retain only relevant, proportionate evidence and decision record; delete irrelevant protected or personal material.
SCR	Maintained as a live controlled record with secure access and audit trail.

23. Induction, probation and ongoing suitability

Safer recruitment continues after appointment. Before or at induction, every person will receive role-appropriate safeguarding information, including the Child Protection and Safeguarding Policy, Staff Code of Conduct, identity of the DSL, KCSIE Part One or Annex A as determined by the School, whistleblowing, low-level concerns and allegations procedures. Understanding will be recorded.

Probation, supervision and appraisal will consider conduct, professional boundaries and safeguarding practice. Staff must disclose promptly any arrest, charge, caution, conviction, order, professional restriction, barred-list status, disqualification, overseas event or other change that may affect suitability. The School may repeat checks where law requires, permission expires, duties change, information arises or a risk assessment justifies it.

24. Concerns, allegations, low-level concerns and referrals

Information discovered during recruitment or employment that may indicate risk will be shared promptly with the Headmaster and DSL and handled under the relevant safeguarding procedure. Where a concern or allegation relates to the Headmaster, it must be reported to the Chair of the Proprietor/Governing Body as specified in the Safeguarding Policy; where it relates to the Proprietor, the statutory route will be followed.

The School will refer a person to the DBS when the statutory conditions are met, including where it removes or would have removed a person from regulated activity because they harmed or posed a risk of harm. It will consider referral to the Teaching Regulation Agency for serious teacher misconduct and make any required police, local authority designated officer or regulatory notification. Settlement, resignation or agency status does not remove referral duties.

25. Breaches and whistleblowing

A breach may expose pupils to harm and the School to regulatory action. Staff must report errors, omissions, pressure to bypass checks or suspected falsification immediately to the Headmaster, DSL or through the Whistleblowing Policy. No person will suffer detriment for raising a genuine concern. Deliberate or reckless breach may be disciplinary misconduct and may lead to contract termination or referral.

26. Monitoring, training and review

All staff involved in recruitment will receive role-appropriate training and updates. The Headmaster will report at least termly to the Proprietor and Governing Body on recruitment activity, SCR assurance, delayed checks, risk decisions,

agency/contractor compliance, referrals and remedial actions, without unnecessary personal data. This policy is reviewed annually and sooner after legislative or guidance change, a serious incident, audit finding or organisational change.

Appendix A — Appointment checklist

Stage	Required evidence / decision	Complete
Authorise	Vacancy and recruitment plan approved; regulated activity, EYFS, management and check status determined.	☐
Prepare	Current job description/person specification; safeguarding wording; panel conflicts declared.	☐
Advertise	Safeguarding, exemption and checks statements included; privacy/adjustment information supplied.	☐
Apply	School application form complete; full history and gaps provided.	☐
Shortlist	Two shortlists where practicable; objective scoring; gaps and discrepancies identified.	☐
Due diligence	Candidate informed; proportionate online search completed/considered and outcome recorded.	☐
References	Direct, verified references obtained and compared; concerns resolved.	☐
Interview	Safer-recruitment-trained panel member; identity seen; safeguarding questions and explanations recorded.	☐
Offer	Written conditional offer only; no deployment promise before clearance.	☐
Checks	All applicable checks in Appendix B completed, verified and satisfactory.	☐
Decision	Any disclosure/overseas evidence gap assessed; Headmaster authorisation recorded.	☐
Record	SCR completed; personnel evidence filed; start permission issued.	☐
Induct	Safeguarding induction and policy acknowledgements completed.	☐

Appendix B — SCR and pre-appointment check matrix

Person / check	Minimum record and action
All staff and salaried trainees	Identity; enhanced DBS and barred list where required; right to work; qualifications where required; overseas checks; teaching prohibition and section 128 where applicable; dates and checker; relevant-activity status.
Agency / third-party supply	Written agency confirmation received and date; whether enhanced DBS certificate information was provided; identity checked on arrival; certificate seen where disclosure exists. Include even for one day.
Proprietor body	All checks required by ISSR/KCSIE, including identity, enhanced DBS, barred list where applicable, section 128, right to work where employed, overseas checks and dates.
Volunteers	Role assessment; identity; references/enquiries; enhanced DBS with barred list for regulated activity. From September 2026 supervision is not an exemption. Apply EYFS 2026 rule. May be in non-statutory SCR section.
Contractors	Contractor assurance, identity, correct DBS/barred-list status where eligible, supervision/control decision, date and checker.
Fee-funded trainees	Provider confirmation of all checks and suitability; identity on arrival. SCR entry optional but recommended.
Governors who are not proprietors	Checks appropriate to legal status and duties; recommended non-statutory SCR section.
Common SCR evidence fields	Full name; role; start date; check result/status; completion/certificate date; checker; notes limited to necessary compliance information.

SCR terminology

The legislation calls the record the “register”; KCSIE commonly calls it the Single Central Record. This policy uses SCR. The School must follow mandatory fields in the current law and KCSIE rather than any obsolete template.

Appendix C — Exceptional pre-DBS start risk decision (non-EYFS only)

This form must never be used to permit an EYFS employee to start before the required enhanced check is received, or to permit any person to begin without identity, right-to-work or a required barred-list check.

Question	Record
Individual / role / proposed start	
Why delay occurred and why an early start is essential	
Regulated activity and age groups	
Separate barred-list check: result and date	
Other checks completed and satisfactory	
Known disclosures, gaps or concerns	
Exact duties prohibited or restricted	
Named supervisor and supervision arrangements	
Access, timetable, technology and premises controls	
Review frequency and end date	
Residual risk and reasons it is tolerable	
Headmaster approval / date	
DSL consultation / date (where relevant)	
Certificate received, reviewed and final decision	

Appendix D — Agency / contractor assurance

Required confirmation	Agency / contractor response
Individual's full name, role and assignment dates	
Identity checked and date	
Right to work checked and date	
Enhanced DBS level, certificate date and number	
Children's barred-list information obtained where legally required	
Whether the DBS certificate contains information	
Teaching prohibition / section 128 / qualifications checked where applicable	
Overseas checks completed and outcome	

Required confirmation	Agency / contractor response
References and employment history checked	
Childcare disqualification / EYFS suitability considered where applicable	
Agency/contractor confirms suitability to work with children	
Name, role, signature and date of authorised confirmer	

The School will verify photographic identity on first arrival and will not deploy the individual until assurance is complete and satisfactory.

Appendix E — Termly safer-recruitment assurance review

- ☐ Reconcile the SCR to payroll, staff list, leavers, agency bookings, volunteers, contractors, trainees and members of the Proprietor body.
- ☐ Sample personnel files across teaching, EYFS, support, supply and governance roles; trace each SCR date to source evidence.
- ☐ Check that barred-list entitlement and regulated-activity decisions reflect the September 2026 legal change.
- ☐ Confirm that no EYFS employee started before the required enhanced check was received and all relevant EYFS volunteers were correctly checked.
- ☐ Review overseas-check decisions, delayed/non-EYFS DBS risk assessments and time-limited right-to-work permissions.
- ☐ Check panel safer-recruitment training, online-search records, reference verification and resolution of gaps/discrepancies.
- ☐ Confirm supply and contractor assurances, identity-on-arrival records and certificate review where disclosures existed.
- ☐ Record errors, immediate safeguarding controls, owner, deadline and closure evidence; report themes to the Proprietor and Governing Body.

Approval

Approval role	Name	Date
Chair of the Governing Body	Sir M Griffiths	30-8-2026
Headmaster	P McNabb	23-8-2026

Authoritative sources

- Department for Education, Keeping Children Safe in Education 2026 (effective 1 September 2026).
- Education (Independent School Standards) Regulations 2014, Part 4 and Schedule.
- Department for Education, Early Years Foundation Stage statutory framework for group and school-based providers (effective 1 September 2026).
- Department for Education, Disqualification under the Childcare Act 2006 statutory guidance.
- Disclosure and Barring Service eligibility, identity-checking, filtering and Code of Practice guidance.
- Home Office right-to-work and overseas criminal-record checks guidance.
- Independent Schools Inspectorate inspection framework and handbook in force for 2026–27.

Policy review note: external guidance should be checked at the point of use. If a source is amended, the current version prevails.