Safeguarding: Safer Recruitment Policy and Procedure

United Kingdom
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COGNITA

Alleyn's Hampstead Senior

Contact names	
Head	Aidan Sproat-Clements
SCR Champion	Tamara Zedginidze
Deputy Head (Pastoral)	Trent Stickland
Deputy Head (Academic)	Katharine Harney
Deputy Head (Strategy & Innovation)	Dan Grossman
DSL	Vanessa Waysome
Assistant Head & DDSL	Josh Wilkinson
Assistant Head & DDSL	Ariana Oliver
Cognita Director of Education	Sarah Reynolds
Cognita (Proprietor)	CEO Europe & N America Cognita 3rd Floor 41/42 Eastcastle Street London W1W 8DU

KEY FACTS:

There are seven steps to safer recruitment:

1. **Safer Recruitment Training**
   a. NSPCC Safer Recruitment e-learning Online Portal *(to provide the interviewer with the context and knowledge to explore their safeguarding responsibility)*

2. **Role Profile and Advertisements**
   a. Safeguarding commitment statement to be included in both Role Profile and Job advertisement *(to deter unsuitable personnel)*

3. **Scrutinising, Shortlisting and Interviewing**
   a. Application form (*to be used as main tool for scrutinising*)
   b. Internet search (*to gather any public domain information*)
   c. Full employment and education history (*to provide previous experience*)
   d. Gaps in employment history (*to be noted for further exploration*)
   e. Taking up references (*to verify previous experience*)
   f. Concerns from a reference (*to be noted for further exploration*)
   g. Invitation to interview letter with Self Declaration form (*to prepare for interview*)
   h. Preparing for the interview (*Selection Process and Interview Panel*) including any declarations on Self Declaration
   i. Verify identity
   j. Verify professional qualifications
   k. Interview Notes (*Scope of Interview, Outcome and Regrets*)

4. **Offer letter and Contract of Employment** *(specific reference is made to professional expectations to safeguard the company)*
   a. Terms and Conditions of Employment
   b. Probation
   c. Rehabilitation of Offenders
   d. Disciplinary and Performance Improvement Procedure
   e. Standards and Policies:
      A. Ofsted Framework
      B. Keeping Children Safe in Education
      C. Independent School Standards and Guidance for Independent Schools
   f. Safeguarding Declaration

5. **Background Checks** *(in addition to pre-interview checks, the following checks ensure the person is who they state they are and complies with our safeguarding requirements)*
   a. References
   b. Identity check
   c. Right to Work
   d. Enhanced Disclosure and Barred List check (and Additional Social Media Check)
   e. Overseas criminal records checks (*if applicable*)
   f. Letter of Professional Standing (*if applicable*)
   g. Prohibition from Teaching check (*if applicable*)
   h. Prohibition from Management check (*if applicable*)
   i. Disqualification declaration *(if applicable)*
   j. Medical fitness

6. **Recording and Monitoring New Starters** (*to evidence all background checks have been completed and suitably returned)*
   a. SCRT – updated for all new starters
   b. New Starter Checklist *(to be completed and filed on employee file)*
   c. Risk Assessment Form *(to be completed online on SCRT)*
   d. Annual Staff Declaration (*Safeguarding and Compliance Record*)
   e. Change of Employment (please refer to the SCR Guidance and FAQ for transfer of employees or change in user status for compliance on SCRT)

7. **Probation Period & Induction**
   a. The school's attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns
   b. Required safeguarding training is completed during the probationary period (in accordance with the Regional Safeguarding Policy) Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment

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Related documentation	
Related documentation	Safer Recruitment Toolkit (Employee and Non-Employee)
	SCR Guidance Template
	Regional Safer Recruitment Oversight Arrangements
	Right to Work Guidance

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1. Purpose

1.1. The Safer Recruitment Policy explicitly details Cognita's position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.

1.2. Cognita follows the UK Guidance on Safeguarding Children and Safer Recruitment in Education (2006), its replacement Keeping Children Safe in Education (September 2026), Disqualification under the Childcare Act 2018, the Independent Schools Regulatory Commentary for the Inspection of Schools (2020 & 2026), Working Together to Safeguard Children (February 2019), the Hugh Davies QC; Southbank International School Recommendations (2014) and the Group benchmark of best practice for all its schools globally.

2. Applicability

2.1. The following policy and procedure must be used for the recruitment and selection of all staff throughout the Cognita UK Group of Schools except if they should not be complaint with legal requirements in the country of employment.

3. Definitions and Scope

3.1. This Safer Recruitment Policy sets out our safeguarding responsibilities as an organisation recruiting staff to work with students and also provides group-wide, consistent and best practice recruitment procedures.

3.2. This policy must be read by any member of staff who is actively involved in the recruitment and selection of staff or who has a lead role in the safeguarding/child protection of students in a school. These members of staff are deemed to be part of the "Cognita Recruitment Community".

3.3. For compliance purposes, a signed copy of the SCR Champion Induction Checklist will need to be completed and retained in the employee file, for record-keeping purposes of anyone who is required to have read, understood and taken accountability for the contents of this document as well as completed all relevant training.

3.4. Safeguarding is an ongoing process and will continue throughout employment. Safer Recruitment is only the first step in the whole Safeguarding cycle and must be embraced as part of our wider commitment to Safeguarding and Child Protection.

4. Policy

4.1. Across the Cognita Group, we share a common objective to help keep students safe by contributing to:

- providing a safe environment for students to learn and
- taking appropriate action to keep them safe (where a risk is identified)

4.2. Achieving this objective requires systems designed to:

- prevent unsuitable people working with students
- promote safe practice and challenge poor and unsafe practice
- identify instances where there are grounds for concern and take appropriate action
- contribute to effective partnerships to provide services to students who may require third party intervention
- Create a culture and environment where staff feel comfortable, if appropriate, to discuss matters outside of work, which may have implications for the safeguarding of students in the workplace

4.3. Cognita continually implements strategies to ensure the best people are employed. The Seven Steps to Safer Recruitment have been created to deter and prevent unsuitable personnel from applying and/or being recruited. In order to achieve the aim, it requires recruiting teams, hiring managers, Heads of schools and any staff member deemed to be part of the Cognita Recruitment Community to adhere to the Seven Steps to Safer Recruitment.

4.4. Hiring Manager's and school leaders must be clear about the expectations they place on staff, including where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of students in school.

4.5. Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.

4.6. When implementing Cognita's Safer Recruitment policy the Hiring Manager and schools will be mindful of and act in accordance with the school's Preventing Extremism and Radicalisation Policy. By complying with safer recruitment best practice techniques as set out in this policy and by ensuring that there is an on-going culture of vigilance within our schools, we aim to promote a culture of tolerance and respect and minimise the risk of students and/or members of staff being drawn into terrorism.

Equal Opportunities

4.7. Our policy is to treat job applicants and employees in the same way regardless of their gender, marital status, age, race, sexual orientation, gender reassignment, religion, pregnancy/maternity or disability and the sole criteria for selection or promotion will be an applicant's suitability for the role.

4.8. In turn, we expect our staff to recognise and respect the many different racial groups, religious cultures and languages represented by the children who attend our nurseries and schools, in order to help them to develop positive attitudes to diversity and to equip them to prevent them from being drawn into extremism or terrorism.

4.9. Our curriculum and activities will aim to utilise the richness this brings to the classroom and our organisation.

Levels of Responsibility

4.10. It is the Hiring Manager's responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Role Profile for the role. Templates for Role Profiles are available on the Safer Recruitment Toolkit.

4.11. There are a number of recruitment related activities which require personnel to sign the relevant SCR Champions Checklist, which clearly articulates the role and responsibility for which they are accountable.

4.12. The vacancy must be added to the Recruitment Module on Cognita People, by completing a Requisition and must be approved prior to any recruitment activity including advertising, engaging with external agencies, interviewing or making verbal or written job offers. This is to ensure the new position and recruitment costs are within the approved budget.

4.13. Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

Professional Standards

4.14. Strict confidentiality must be maintained at all times by those who participate in the recruitment process. Confidential documents containing applicant details, application form, interview notes, employment offers etc. must be securely filed away in accordance with the Document Retention Policy.

4.15. Declaration of close personal or financial relationships with any applicant must be made to the Hiring Manager. Anyone in this category will not be allowed to participate in the recruitment decision (this excludes ordinary working relationships).

5. Related Policies, Guidelines, Templates and Forms

- Disciplinary Policy
- Equality and Diversity Policy
- Performance Improvement Policy
- Preventing Extremism and Radicalisation Policy (Education Policy)
- Safeguarding and Child Protection Policy and Procedure, including allegations against adults
- Whistleblowing Policy (included in the Code of Conduct for Staff and Volunteers)
- Code of Conduct for Staff and Volunteers including Acceptable Use Policy (Education Policy)

6. Step 1: Safer Recruitment Training

6.1. It is best practice for those involved in the Recruitment Process to have successfully completed Safer Recruitment Training and have obtained the Certificate in Safer Recruitment by NSPCC (link below). At least one of the Interview Panel Members must have completed Safer Recruitment Training.

6.2. We believe Safer Recruitment Training further strengthens and safeguards students in schools by helping to deter and prevent abuse, this is also a mandatory requirement for all Cognita employees who have a lead role in the safeguarding/child protection of students in a school. Refresher training must be completed every two years.

6.3. The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) and needs to be refreshed every two years, via; https://learning.nspcc.org.uk/training/safer-recruitment-education

7. Step 2a: Role Profiles

7.1. Role Profiles, including the Person Specification should be reviewed for each new vacancy and must include the main duties, responsibilities, experience and behaviours specific to the needs of the role, using the Role Profile Templates.

7.2. Role Profiles must set out the safeguarding requirements of the role (setting out the extent that the role will involve contact with children and whether the individual will be engaging in regulated activity relevant to children). It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:

- To comply with safeguarding policies, procedures and code of conduct
- To demonstrate a personal commitment to safeguarding and student/colleague wellbeing
- To ensure that any safeguarding concerns or incidents are reported appropriately in line with policy
- To engage in safeguarding training when required

8. Step 2b: Advertisements

8.1. When advertising a role, either internally or externally, it is important to outline the requirements in terms of the duties and responsibilities, the experience/background needed, and the personal qualities sought, including setting out the safeguarding responsibilities of the post.

8.2. The advertisement should then be written to reflect these in a way that makes the position attractive to applicants, but also has sufficient benchmarks to dissuade those who clearly do not have the required skills from applying.

8.3. Cognita actively encourages internal moves and promotion, but also reserves the right to advertise externally in the quest to find the best person for the job. This decision should be made between the Hiring Manager and the Head.

8.4. Advertisements should always include the following abridged Commitment Statement which sets out Cognita's commitment to safeguarding children:

> *"Cognita Schools are committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment. Safer recruitment practice and pre-employment background checks will be undertaken before any appointment is confirmed."*

8.5. Advertisements should include reference to the Safeguarding and Child Protection Policy and Procedure, including allegations against adults and details on how to access this. The policy/guidelines on employment of ex-offenders should be included, within the Advertisement/Application Guidelines.

9. Step 3a: Scrutinising and Shortlisting

9.1. External Applicants and Internal Non Employees, must complete Cognita's Application Form available via the Recruitment Module or Toolkits to apply for a vacancy in order to comply with the Safer Recruitment Policy. Internal Employees may apply for vacancies by submitting an Expression of Interest in the form of a cover letter including a personal statement specifying how they are suitable for the role.

9.2. Scrutinising, and shortlisting should be carried out by a minimum of 2 people, at least one of whom should have completed the recommended Safer Recruitment Training.

9.3. Applicant information should be scrutinised consistently, to help shortlist the right candidates. The following information, included on Application Review Form, available on the SCR Toolkits must be used:

- Full employment history, since age 16, including education, employment and voluntary work
- Gaps longer than 3 months detailed
- Two professional reference contacts from two separate employers, including the most recent employment working with children (if different)
- Additional references if applicable
- Consent to contact references

10. Step 3b: Interviewing

10.1. A basic social media search via google must be completed for all shortlisted candidates.

10.2 References should requested using the Employer Reference Request Templates and Reference Request Email using the templates available on SCR Toolkits for all shortlisted candidates prior to the interview as follows:

- Teaching colleagues: two written references
- Non-Teaching school based colleagues: at least one written reference, this does not have to be from the current or most recent employer at this stage

10.2. References should be from a senior person with appropriate authority within the organisation. If the referee is school or college based, the reference should be signed by the headteacher or principal as accurate in respect of any disciplinary investigations.

10.3. Where possible, best endeavours must be made to ensure these are received and scrutinised before the interview. Any vague or insufficient information contained in a reference must be clarified with the referee.

10.4. The Invite to Interview Email should be sent with the Self Declaration Form, that needs to be completed and sent prior to the interview. Any declarations on this form need to be reviewed and clarified during the interview.

10.5. Applicants should be asked to bring three original documents, a copy of which must be kept on the employee file and the person verifying the documents must sign and date the copies; one of which needs to be the evidence proving their Right to Work in the UK.

10.6. It is mandatory to have a minimum of two interviewers; in some cases there may be more depending on the role. At least one member of the panel should have completed NSPCC Safer Recruitment Training.

10.7. Interview Panels should agree and understand the required standard for the role they are appointing and agree the relevant set of questions that will be asked during the interview. They must also identify any issues they want to explore further from the application information and pre-employment checks completed.

10.8. Clear notes must be made, using the Interview Questions Template and Safeguarding questions must be asked during the interview process. This information is stored for a maximum of 6 months and may be used to provide feedback to candidates if requested, or in case of any complaints.

10.9. The panel must assess the candidate's suitability against the selection criteria based on the interview notes.

11. Step 4: Offer letter & Contract of Employment

11.1. There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children. Both documents must record that the offer is subject to the receipt of satisfactory background checks.

11.2. The Template Offer Letter and Contract of Employment must be used in order to satisfy the conditions of employment relating to safeguarding.

11.3. The initial period of employment enables an observed judgement of an applicant's suitability to work with children and capability for the role. Please refer to Step 7: Probationary Period Including Induction for further information.

11.4. All shortlisted candidates are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act.

11.5. Teaching staff are expected to conduct themselves in line with the following:

- the DfE professional standards in England

11.6. All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

12. Step 5: Background Checks

12.1. The detailed Safer Recruitment Procedure for Background Checks is set out in Appendix 1, and include:

- Digitally signed Application forms, including a personal statement (CV's can be accepted in addition to an application form
- Basic Social Media Check prior to Interview and Advanced Social Media Check after offer is accepted
- Acceptable References, all references must be verified with the referee
- Confirmation of Medical fitness
- Enhanced DBS, Barred Checklist, Overseas checks
- Identity and Right to work checks
- Prohibition from Teaching and/or Management, and Disqualification confirmation

12.2. An offer of employment must be conditional upon all background and pre-employment checks being completed.

12.3. All checks must be completed and recorded in writing, retained on the employee's employee file, independent of the shortlisting and interviewing panel. A summary of the checks must be recorded on the Single Central Record (SCR).

12.4. All background and pre-employment checks as applicable to the role, must be completed before an applicant takes up the post, this may result in delaying the commencement of employment. As a reminder, DBS for checks on volunteers are free.

12.5. Any exceptional permission to appoint without all background and pre-employment checks being completed is the responsibility of the Head and subject to a Risk Assessment (see Appendix 2 for further details) including steps to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips).

12.6. If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Hiring Manager, and Head, supported by SCR Champion. Any disclosure information relating to a conviction should be notified to the relevant signatories as per the Risk Assessment Flow for careful consideration and review of suitability to the post.

12.7. A decision not to appoint someone due to their conviction(s) should be clearly documented, so if challenged, the decision can be defended, in line with the appropriate policies. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The Chair of Proprietors will be notified of any reporting to relevant authorities and/or regulators.

12.8. Please use the New Starter & Probation Checklist as relevant for Employees and Non Employees for all colleagues.

13. Step 6: Recording & Monitoring New Starters

13.1. Schools must keep a The Single Central Record (SCR) to evidence they have carried out the range of checks required by law on and include:

- All staff directly employed at the School
- All long term supply, agency staff and daily supply
- Trainee or student teachers
- All who are engaged in "Regulated Activity" including Volunteers
- Personnel who are not staff members but provide regular teaching or instruction such as tutors, coaches, Peris
- Regular contract staff such as caterers and cleaners
- Visitors and Central Head Office staff who visit on a "Regular" basis
- Proprietors, Governors, Education Advisors

13.2. SCR must include all involved in "Regular" and "Regulated Activity". For non-employees not in Regular and/or Regulated Activity, who do not need to be recorded on SCR, checks must be completed and documentary evidence retained.

13.3. Regularly is once a week, on four or more days in a 30-day period or overnight.

13.4. "Regulated Activity" refers to:

- teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once
- work for a limited range of establishments (known as "specified places" which includes schools and colleges) with the opportunity for contact with children

13.5. The SCR must contain the following fields:

- Full name, position and start date
- Identity check
- Medical fitness declaration
- Enhanced DBS
- Barred List Check (aka as List 99)
- Qualifications
- References
- Right to Work in the UK
- Overseas checks (if applicable)
- Disqualification from childcare (if applicable)
- Prohibition from Teaching (if applicable)
- Prohibition from Management check (if applicable)
- Social Media Check
- Employment History - Application Form
- Additional Notes
- Registration with Education Workforce Council (Wales – if applicable) expiry date to be included in Additional Notes
- Risk Assessments (if applicable)

13.6. Risk Assessments (refer to Appendix 2 for further details) can only be raised for some of the background checks and in exceptional circumstances, when a check has not been fully completed as follows, they will need to be discussed, reviewed on a regularly basis and closed off as soon as possible, with reasonable mitigation in place:

- DBS check
- Overseas check
- Letter of Professional Standing
- Disclosure on Disclosure and Barring Certificate

13.7. All Risk Assessments must be categorised as one of: Low, Medium or High, as per the guidance in Appendix 2 and decisions based on the category.

13.8. For any changes in position, location and/or employment status, due consideration must be given to existing checks and if necessary complete new and/or additional checks as relevant.

SCR Governance

13.9. **New Starters:** The Head is responsible for ensuring all new employees and non-employees checklists are checked, signed and recorded on SCR. Where checks are not fully completed, Risk Assessments must be signed prior to the commencement date.

13.10. **Fortnightly:** The Head is responsible for undertaking fortnightly sampling of files to ensure compliance to this policy, using the Heads Checklist and uploaded to the SCR. These are available on SCR Toolkits.

13.11. Annually: The Head is responsible for completing OASR (Oversight and Safer Recruitment) checks to ensure compliance to the OASR Governance.

14. Step 7: Probation Period & Induction

14.1. An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:

- Provide training and information about the School and Cognita's policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children's welfare, including child protection.
- Support individuals in a way that is appropriate for the role to which they have been appointed;
- Confirm the conduct that is expected of staff (Cognita's Code of Conduct for Staff and Volunteers including Acceptable Use Policy)
- Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities
- Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately.

14.2. Induction Checklists available on SCR Toolkits provide guidance on the content and nature of what must be covered. This may depend upon the role and previous experience of the new member of staff.

14.3. This Induction Checklist should be completed for each member of staff and filed in the employee file – it provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of the school/Cognita's commitment to safeguarding our students..

14.4. The induction programme must include all Training as required on the Training Matrix, to ensure new staff understand their safeguarding responsibilities and school/Cognita's commitment to safeguarding and promoting the welfare of children.

14.5. The new member of staff will be required to complete the Staff Annual Declaration upon joining the school and on an annual basis.

14.6. All new starters employment is subject to a probationary period, further details of which are available in the Probation Policy.

14.7. The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is satisfied that the new starter fully understands and embraces the school's safeguarding philosophy and understands their own personal accountability. This understanding must be confirmed by the line manager on the Probation Review form.

14.8. The Probation Review Form must be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.

14.9. Any information regarding an applicant that comes to light through the recruitment and selection process must be discussed between the Head and school SCR champion.

14.10. The obligation regarding the legal duty to refer a "cause for concern" extends beyond the recruitment and selection process and applies to all staff during the employment, volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers. All such instances will be disclosed to the signatories on the Risk Assessment flow so that the Proprietor exercises their duty appropriately. In addition, all such instances will be disclosed to any external inspector as required. This process may also be exercised via twice-yearly safeguarding review meetings, undertaken by external reviewers.

14.11. We also follow the Teacher Misconduct: The Prohibition of Teachers (April 2018) where referral to the Teaching Regulation Agency is required.

14.12. Where a formal process has been completed for those registered on Education Workforce Council, a notification is required to be sent to them.

15. Safer Recruitment Procedure for Non-Employee Groups

15.1. In order to safeguard the students in our care we require a similar rigorous approach to recruitment for all non-employee Groups.

15.2. Schools are responsible for obtaining written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly, completing a Level Check Form.

15.3. Where the agency or third-party organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school, which has disclosed any matter of information, or any information was provided to the agency or third-party organisation, the school must obtain a copy of the certificate from the agency or third-party organisation.

15.4. Where the position requires a children's barred list check, this must be obtained by the agency or third-party organisation by obtaining an enhanced DBS certificate with barred list information, prior to the appointment of the individual.

15.5. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the third-party organisation have confirmed the checks have been undertaken.

15.6. The school is responsible for completing checks for other Non Employee Groups such as visiting professionals; self employed, work experience and volunteers. Please refer to the additional guidance for Non Employees available in the SCR Toolkit for further guidance on checks required.

15.7. Under no circumstances should any non-employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity.

16. Safer Recruitment Procedure – Visitors

16.1. To safeguard students in our care, robust process needs to be followed for all individuals who are not on SCR, refer to Section 12 for details.

16.2. All visitors should report to Reception and sign in using a current ID Lanyard issued by employer organisation and photographic evidence.

16.3. Upon signing in, visitors will be issued with a badge, and advised of safeguarding, health and safety and fire safety procedures and signposted to relevant facilities they are able to access. School badges must be worn at all times with current lanyards (where applicable) and should be:

- Green – current Cognita staff with green lanyard
- Green – current Cognita staff with temporary pass, issued centrally
- Green – Healthcare professionals with green lanyard from employer organisation such as NHS
- Red – other visitors

16.4. Visitors on red badge should be escorted from point of contact and fully supervised at all times.

16.5. Visitors departing should sign out from Reception and hand back their badges.

16.6. Any visitor who is not wearing a badge or is on red badge and unaccompanied should be challenged politely and escorted to Reception to complete the safer recruitment procedure for visitors.

17. Compliance

17.1. All those involved in the Recruitment process or who have a lead role in the safeguarding/child protection of student in a school, will need to complete SCR Champion Induction checklist and sign to state they have read understood the policy and completed all relevant training.

17.2. Those who are nominated as being responsible for the issue of lanyards, will ensure these are returned and destroyed as part of the Off Boarding process for those leaving employment. Temporary pass will include expiry dates.

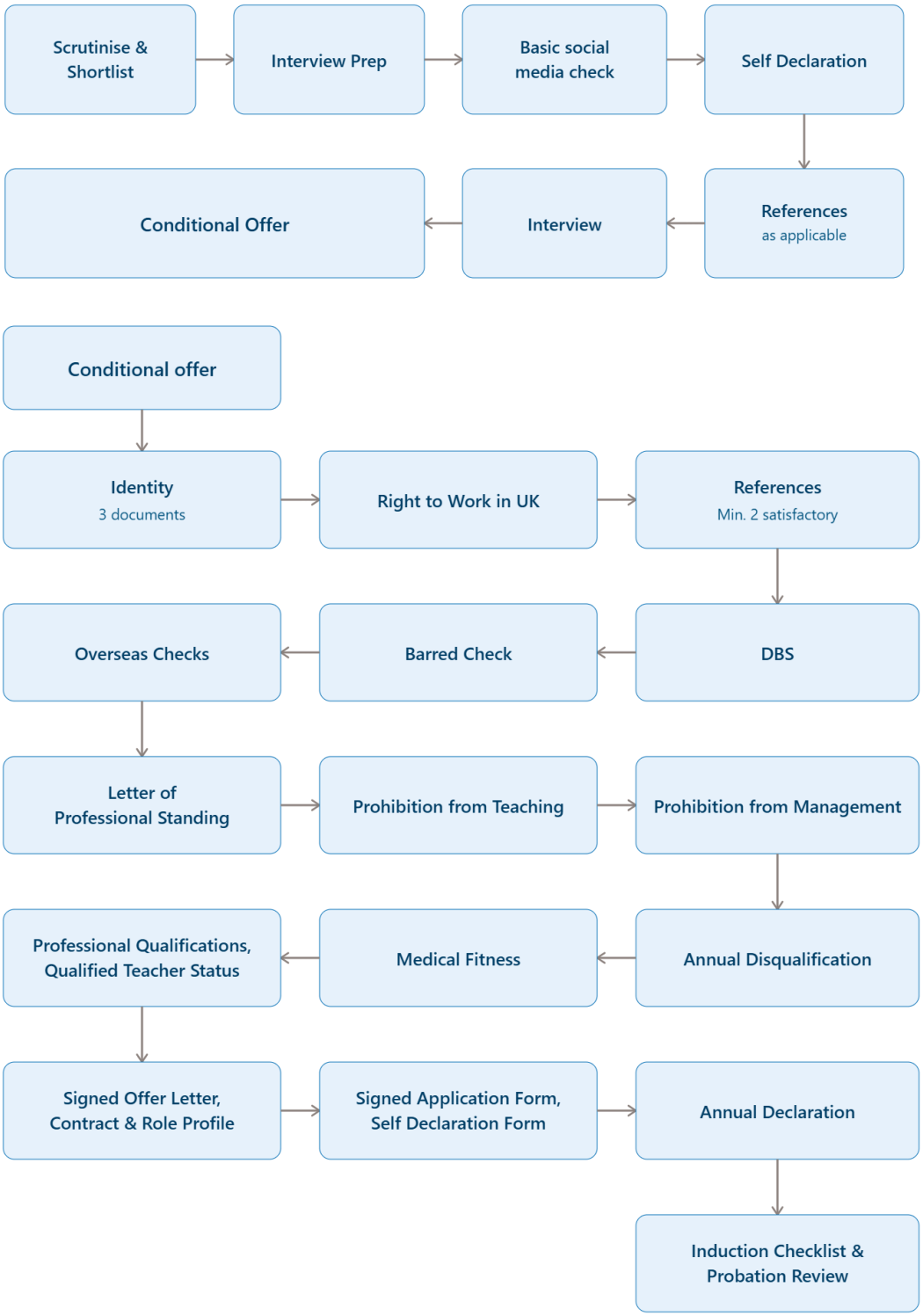
17.3. Regular sampling as identified in OASR Governance will be completed and remedial action taken as necessary.

17.4. If any provision of this Policy is or becomes illegal, void or invalid, that shall not affect the legality and validity of other provisions.

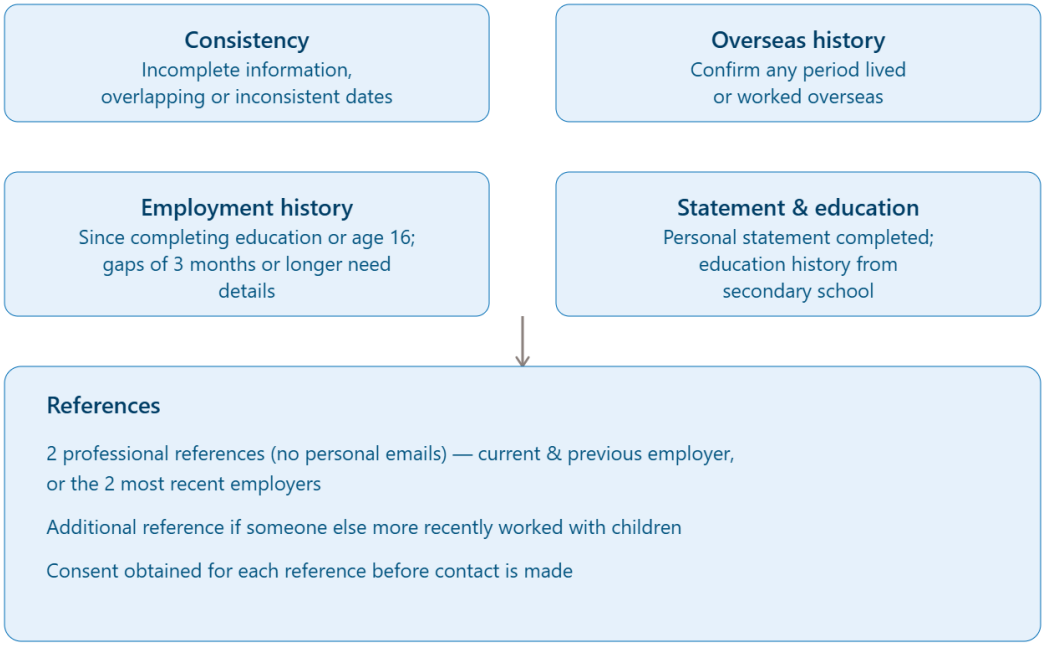
17.5. Appendix 5 details guidance for unsuccessful candidates, for whom parts of the Safer Recruitment Process would have been completed.

Appendix 1: Background Checks

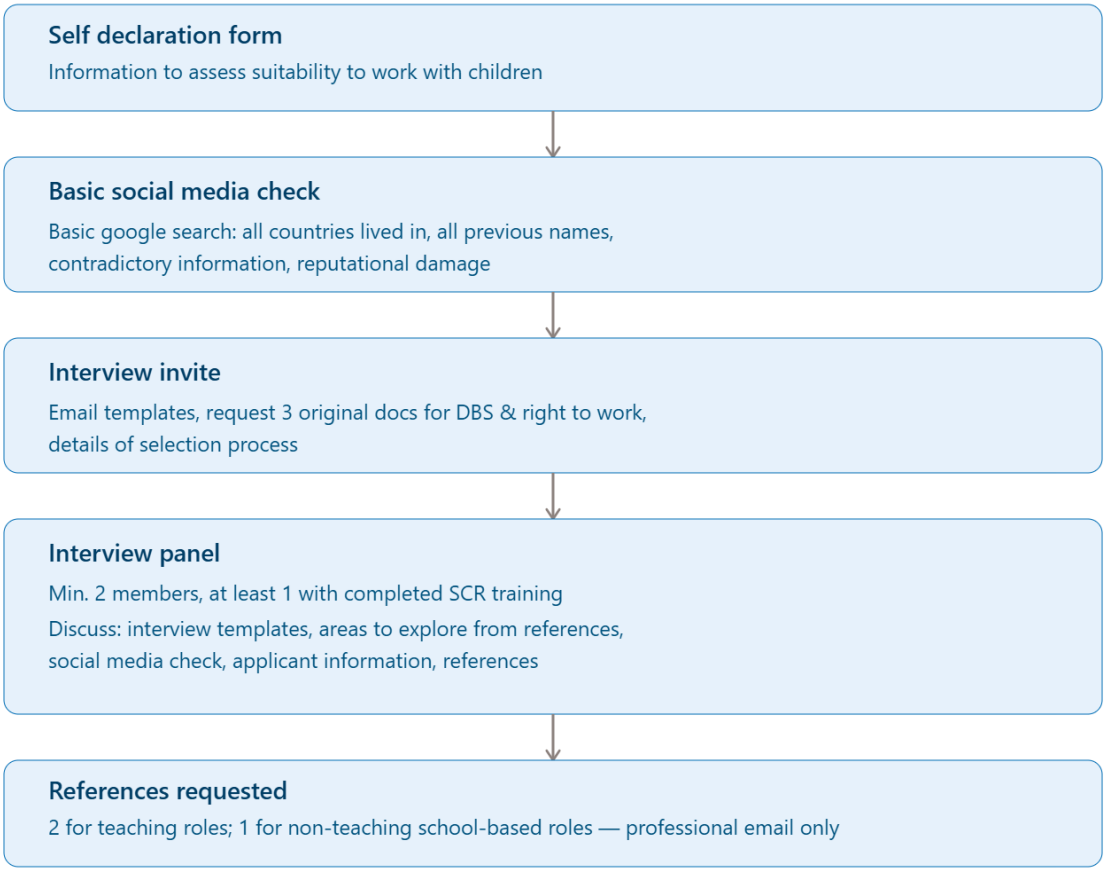
1. Summary



2. Scrutinising Applicant Information & Shortlisting

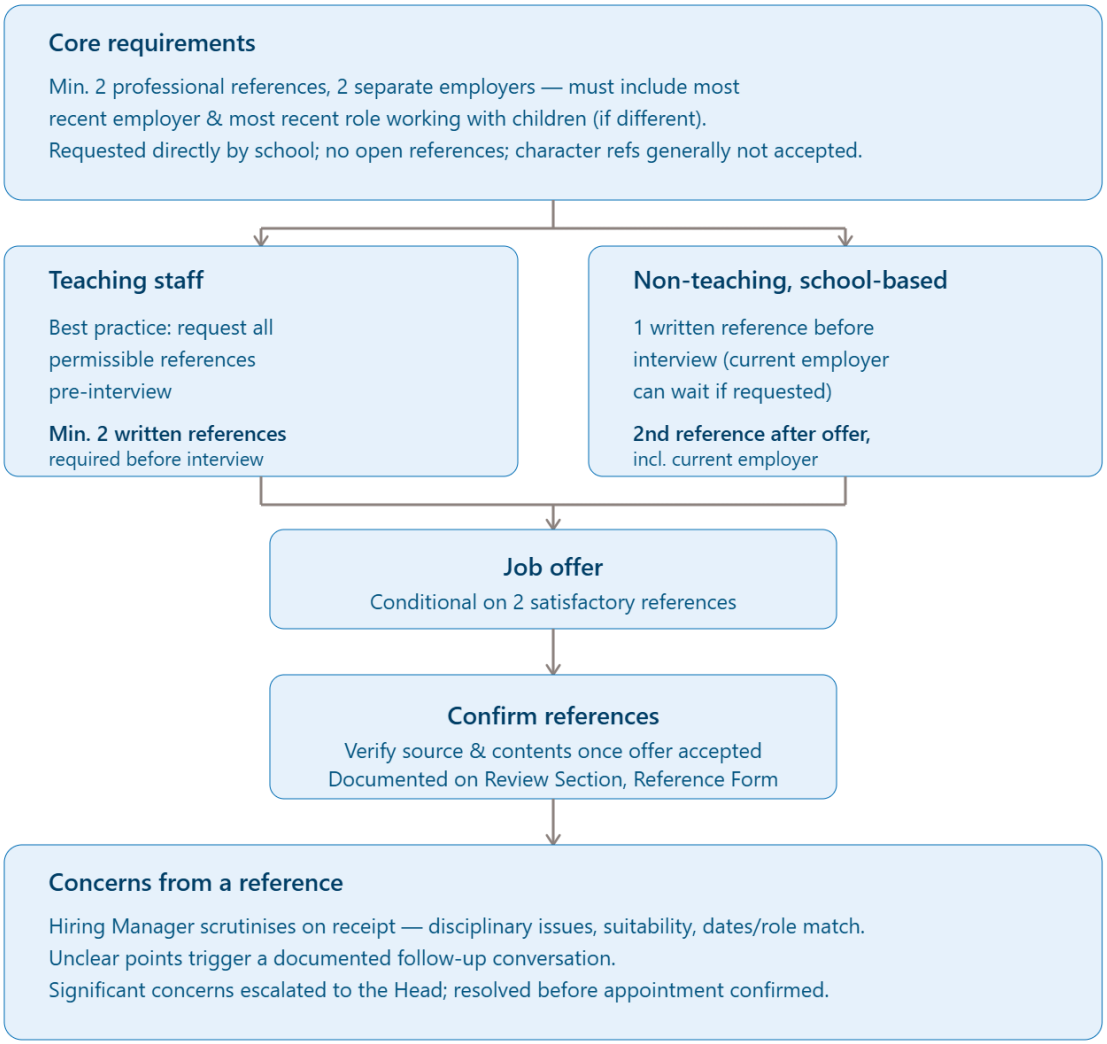


3. Interviewing Preparation

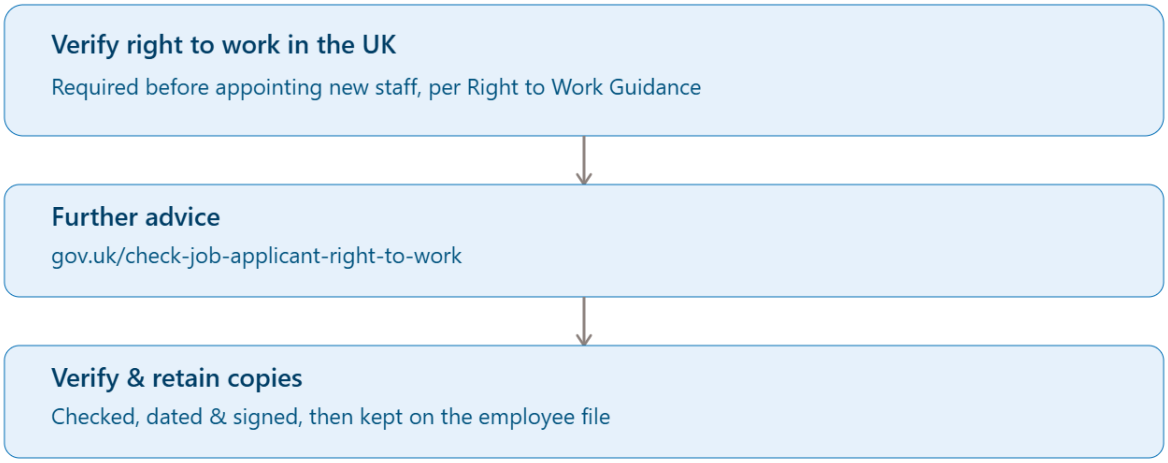


4. Scope of Interview, Outcome & Regrets

5. References



6. Right to Work



7. ID

3 original documents required
Corroborate full name, date of birth & permanent address; min. 1 photographic

Proof of identity
Photographic form

Proof of address
Not required under Route 1

Right to work
Evidence for the UK

Not permissible
Photocopies, or documents downloaded from online portals

April 2025 update — Route 1
Proof of address no longer required; 3 documents confirming name & date of birth acceptable e.g. biometric passport, photocard licence, birth certificate

Name changes
Documentary evidence required (marriage, deed poll, adoption, statutory declaration)

Record-keeping
Copies signed, dated & filed on the employee file by the verifier

8. DBS & Barred Checks

Enhanced DBS & Barred Check — Regulated & Regular Activity
Required before start date

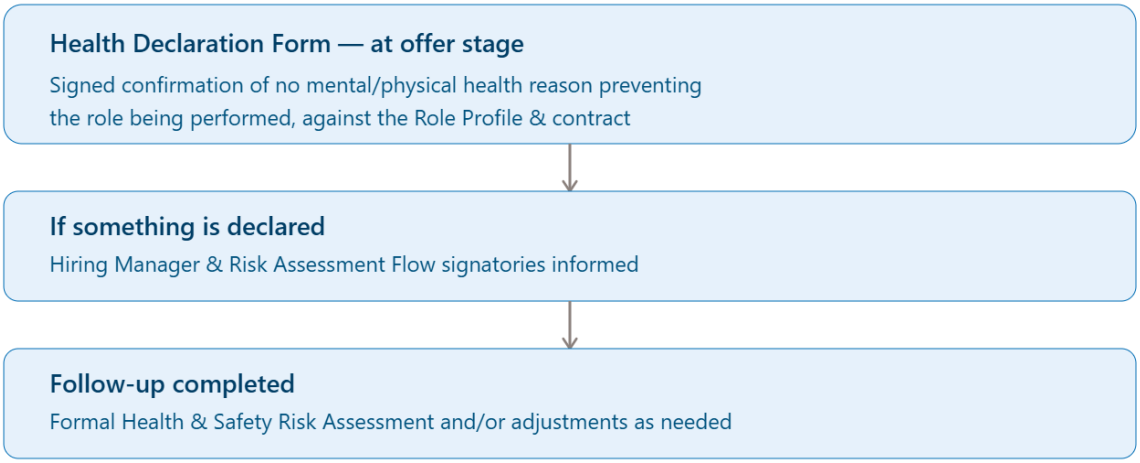
Employees

Non-Employees:	agency / supply / contractor / PERI — obtained by school or verified on Level Check form with agency or 3rd party
Volunteers:	3+ days in a 30-day period, or overnight, or once a week

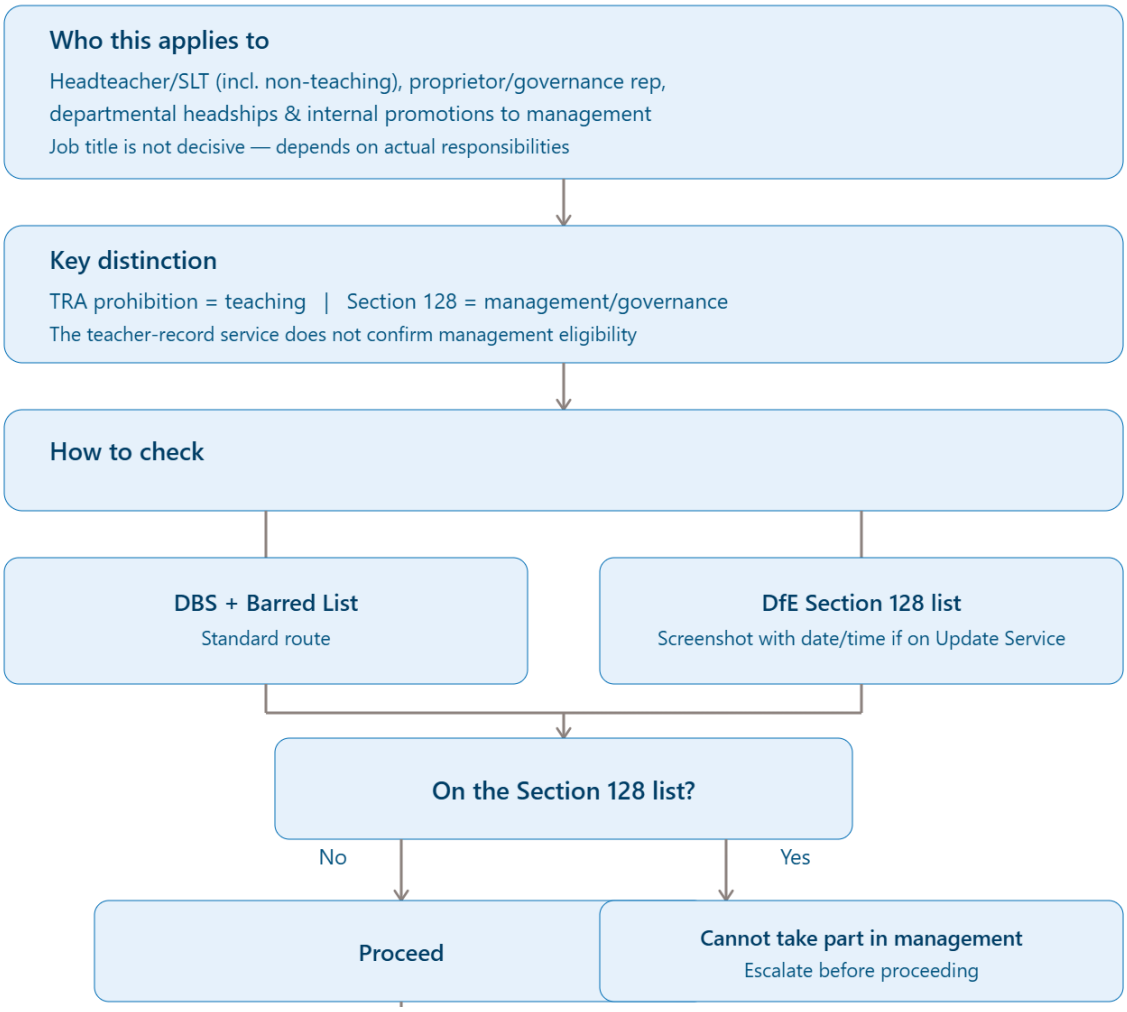
Standalone barred check
Via DfE "check a teacher's record" service, used when:

DBS processing:	standalone check before the full certificate returns
On DBS Update Service:	valid if a recent enhanced DBS (without barred list) already exists, no break in service

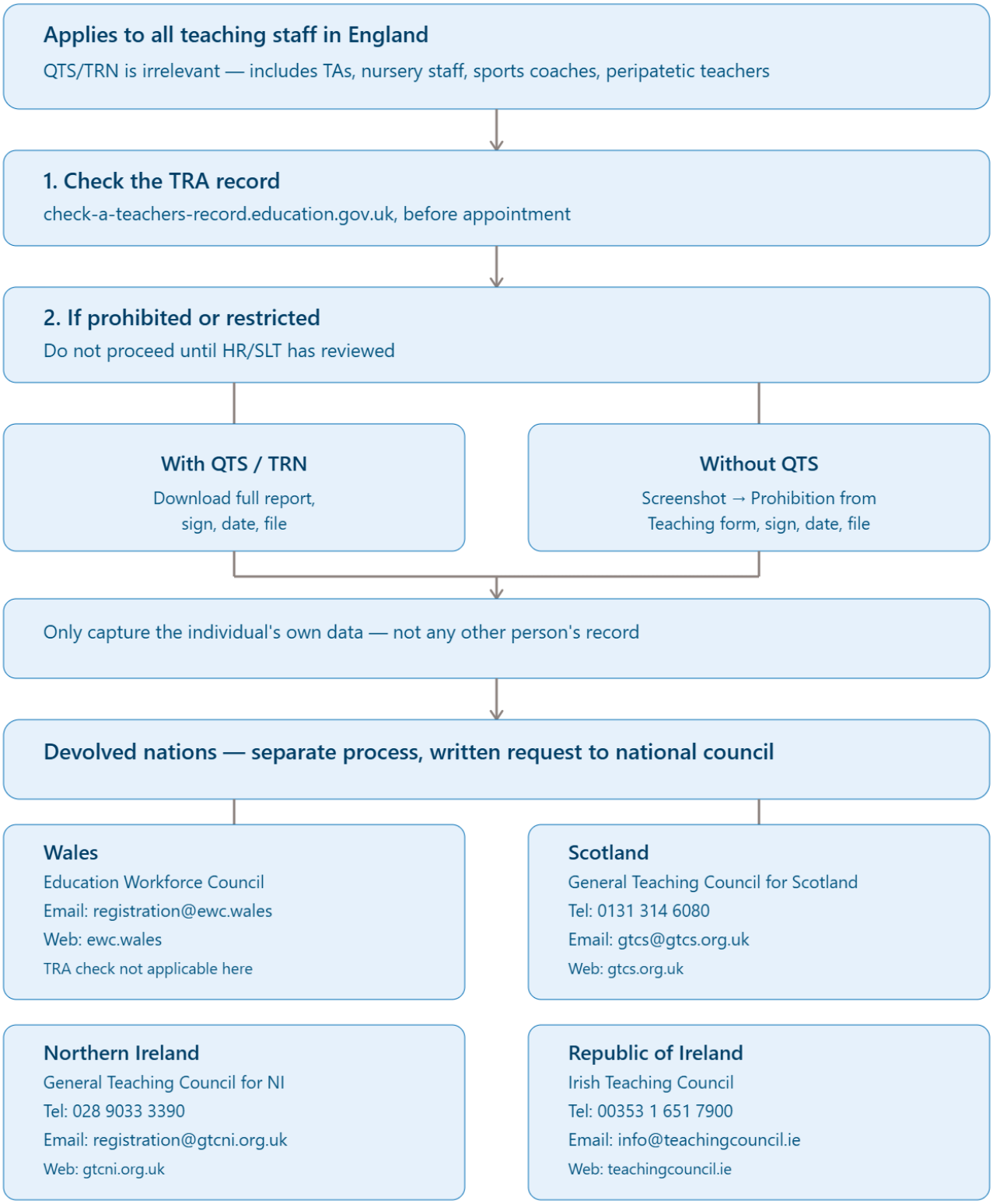
9. Medical Fitness



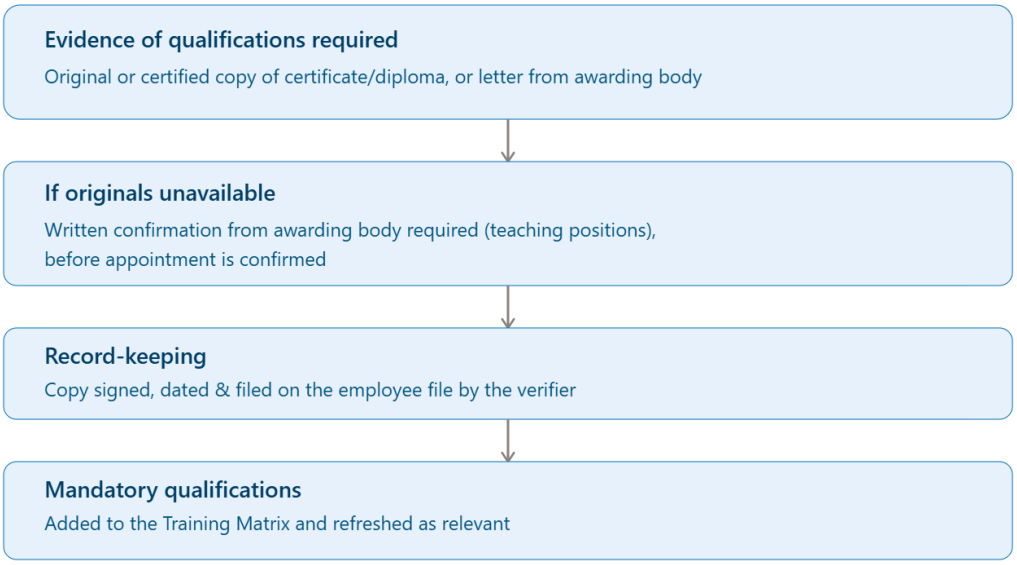
10. Prohibition from Management



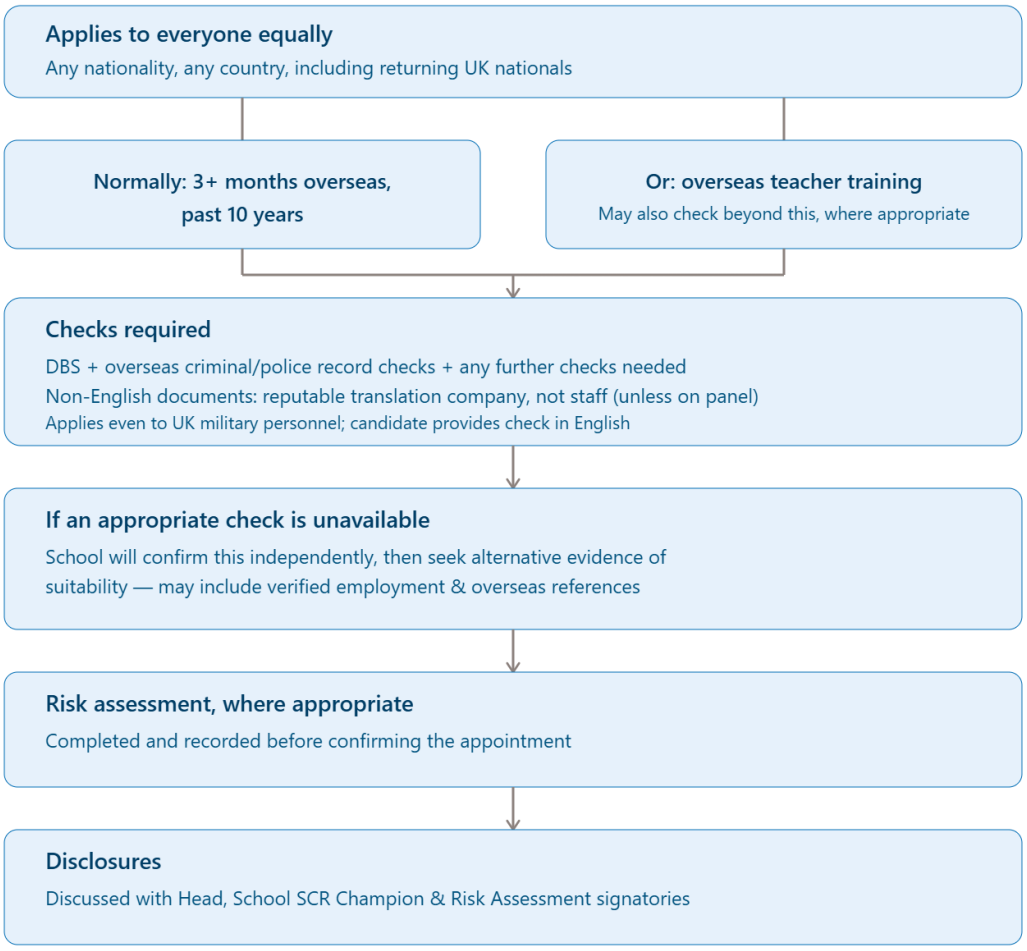
11. Prohibition from Teaching



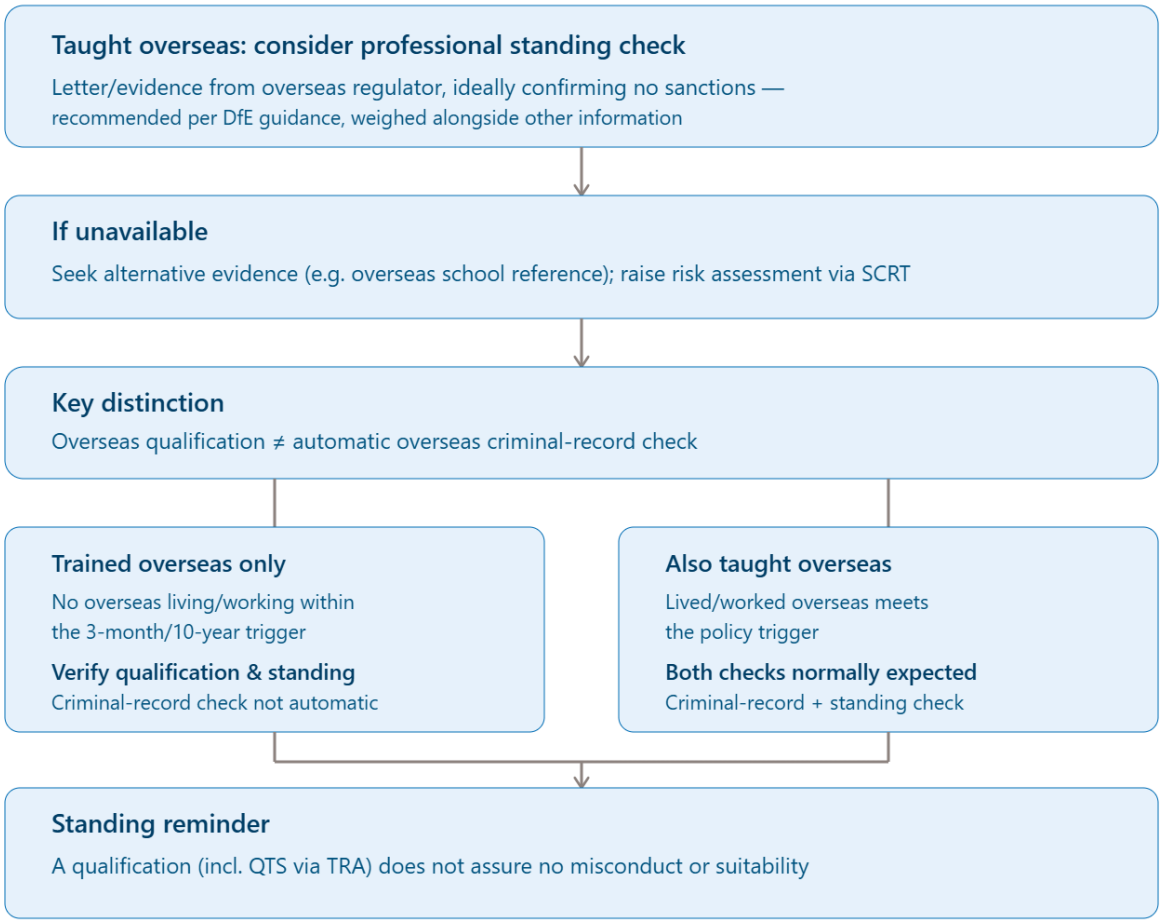
12. Professional Qualifications



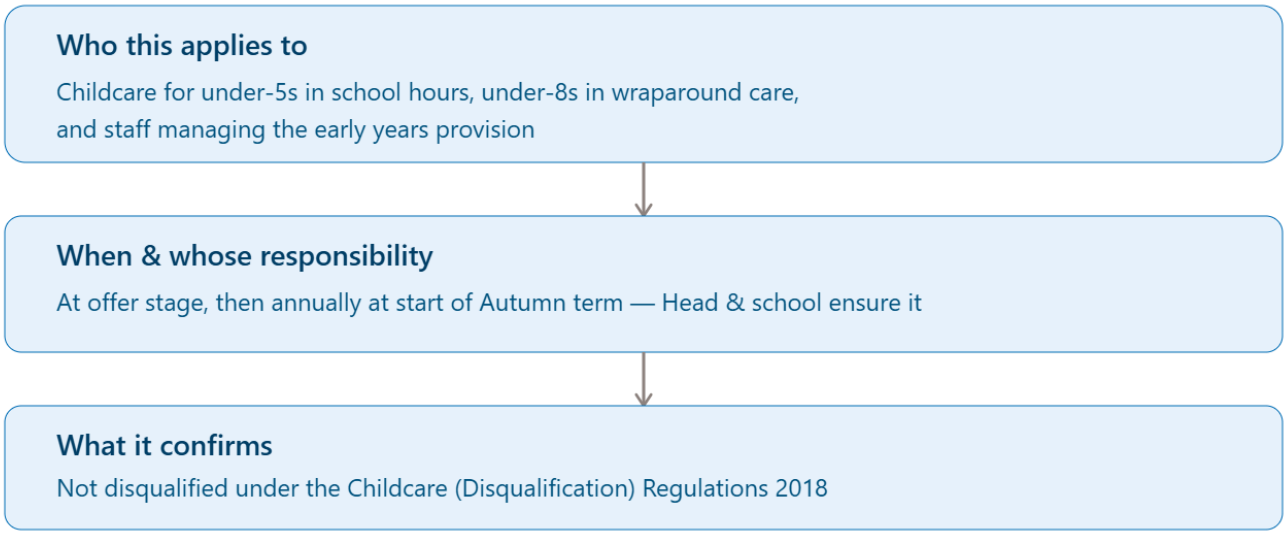
13. Overseas Checks



14. Letter of Professional Standing



15. Disqualification



Appendix 2: Recording & Monitoring New Starters

1. New Starters

1.1 All pre-employment checks should be completed prior to commencement and non-negotiable where indicated.

1.2 Please use the starter checklists available on SCR Toolkits for employees and non-employees.

1.3 If any of the checks required are not fully compliant with the standard process this must be documented on a Risk Assessment on the SCRT, Risk Assessment section, whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the Head to enable a full audit trail.

2. Recording on SCR

2.1 Reference should be made to who should be included on SCRT, Section 12 of the main policy.

2.2 All fields on SCRT must be completed prior to commencement, with reference to Risk Assessment where all checks have not been completed.

2.3 If operating from a multi-site school and sharing staff all information listed above should be recorded on both schools' SCRTs.

2.4 Only one location, single registered school or School Support Centre should be responsible for; holding the full employee file of a staff member, obtaining the necessary documents and for undertaking any appropriate checks.

2.5 The primary location is responsible for providing written confirmation of the checks to the other sites, together with any applicable risk assessments for multiple locations.

2.6 The Head at the second site is then responsible for reviewing the data and for documenting any site-specific risk assessments on the basis of the information provided and their acceptance that all the necessary checks for the post within their school have been completed to their standard.

2.7 Where necessary they should also undertake additional checks applicable to the arrangements at their school if the original risk assessment does not provide an appropriate mitigation for that site. If any additional check is required, the second school will complete the check and ask for the primary school to retain the information on file.

2.8 Best practice recommends completion of SCRT should be completed by personnel different to those that completed the check to demonstrate robust governance processes. Where the checker adds the information to the SCRT, the New Starter & Probation checklist must be signed by the Head. There should be a nominated person responsible for adding confirmation of checks to SCRT, with a back-up person in case required.

2.9 The school must be able to print out the SCRT using the available reports on SCRT.

2.10 All fields must be completed on SCRT in SCR Tracker:

- Confirm the check is required by switching the appropriate tab to green
- the dates as per the table below
- the checker's initials
- if there is no requirement to see documentation (e.g. an overseas check is not required) the appropriate tab should be switched to grey as no field should be left incomplete.

2.11 Table below indicates information that should be included on SCRT as per ISI:

SCR Field	All Employees Non Employees	3rd Party Contractors Agency & Supply
All checks	Date check was completed and verified as acceptable	Date of review of the Check form, confirming checks completed as required by Cognita
Update Service for DBS	Date Enhanced Certificate was seen (Update Service check to be recorded in Additional Notes)	
Additional Notes	❖ DBS Update Check, if on Update Service ❖ DBS checks re-done, new date ❖ EWC Registration & Expiry	❖ Any changes in circumstances or additional checks ❖ Change in Employee Type or Additional Role
Additional Notes – Changes in Role/Location/Employee Type	❖ Additional checks completed ❖ Confirmation of checks transferred ❖ 3rd Party or Agency moving to employee contract or additional role, start date with Cognita (original hire date would be start date of the contract)	

2.12 All documents should be dated, signed with a print name to state they are a "copy of the original" so that there is no doubt on record.

2.13 The school may also record other information deemed relevant, for example, whether staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements, dates of which safeguarding and safer recruitment training was undertaken and the name of the person who carried out each check.

3. Staff Annual Declaration

3.1 On an annual basis all staff will be required to complete the Staff Annual Declaration which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration with regard to DBS.

3.2 Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter "N/A" against the relevant entry on the Declaration before signing and returning it.

4. Change of Employment

4.1 Where an employee's role changes, the Hiring Manager must give due consideration to the relevant checks now appropriate for the new role and complete these as required. For example:

- Has the existing member moved to a position involving regulated activity?
- Has the existing member moved to a position requiring Prohibition from Management?

4.2 If a member of staff moves from a position involving regulated activity into non-regulated activity only, ongoing relevant checks should be monitored and recorded.

4.3 In all cases the SCRT should be updated accordingly.

4.4 All paperwork and checks associated with a change of employment must be filed in the employee file and a note of the change recorded on the SCRT. Further guidance on changes of employment and related checks is available on SCR Guidance Document.

Appendix 3: Risk Assessment Guidance

1. Risk Assessment Overview

1.1 Risk Assessment can only be raised, for some of the checks and only in exceptional circumstances.

1.2 All other pre-employment checks must have been completed.

1.3 Where a check is not completed, prior to raising Risk Assessments instead of postponing start date, the following should be considered:

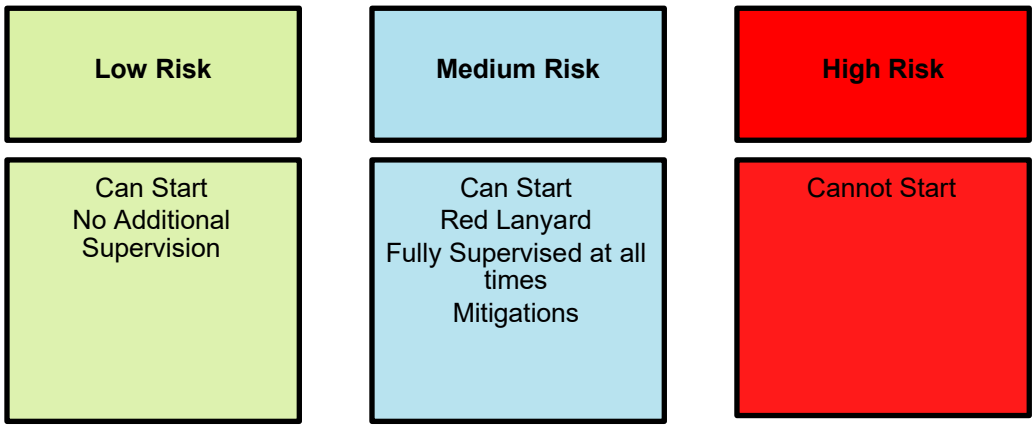
- Is the Appointment necessary to allow service provision to continue
- The candidate will have no unsupervised contact with children
- The candidate will have no access to sensitive records

1.4 Decisions should be based on whether this is considered, High, Medium or Low.

1.5 Risk Assessments should be signed prior to commencement by both signatories as per Risk Assessment Flow, with fortnightly reviews undertaken to close off Risk Assessment as soon as possible.

1.6 Where supervision is required, a list of all dates, signed by supervisor will be retained on employee file to demonstrate robust processes.

1.7 List of mitigations put in place depending upon level of risk in relation to the specific responsibilities of the role, needs to be included in the Risk Assessment Notes on SCRT.



2. DBS

2.1 Where a DBS check is not completed, a Cognita application must have been made and a separate Barred Check completed.

2.2 Does the candidate have a previous Enhanced DBS, and if so what is the issue date?

2.3 Is the issue date on previous Enhanced DBS less than 3 months, and from an Education Setting? If yes, a check is not legally required as per KCSIE, although Cognita will instigate a new one, therefore given sufficient information, this can be categorised as low risk

DBS		
Low Risk	**Medium Risk**	**High Risk**
Start no supervision	**Start on Red Lanyard fully supervised**	**Cannot Start**
They have a previous Enhanced DBS certificate The gap is less than 3 months between working at a previous employer in an Education Setting and commencement date	There is a gap of more than 3 months between working at a previous employer in an Education Setting and commencement date or candidate will have no unsupervised contact with children or access to sensitive records There is sufficient information on other pre-employment checks	There is a gap of more than 3 months between working at a previous employer in an Education Setting and commencement date There is no previous Enhanced DBS certificate There is insufficient information in the other pre-employment checks

2.4 Any Risk Assessments for DBS, need to be reviewed every 2 weeks on the DBS portal to check what stage the application is at. The earliest we are able to escalate the check, is when it is at Stage 4 for 60 days or more. Please note we are unable to escalate the delay in receiving the check. Risk Assessments must be closed permanently once the certificate has been viewed.

2.5 Where a certificate is not received after 2 weeks of the issue date, the candidate will need to request for a duplicate to be issued, a duplicate will only be issued if this is within 93 days of issue date.

2.6 Registration on Update Service can only be done within 30 days of receipt of certificate.

3. Overseas Check

3.1 Where an overseas check is required, but not completed, evidence must be provided demonstrating that the check has been applied for and is being processed.

3.2 Where the candidate has stated, it is impossible to obtain the check, Cognita must check this against Guidance on the application process for criminal records checks overseas (Criminal records checks for overseas applicants - GOV.UK (www.gov.uk)) to verify this and retain a copy in the file as evidence.

3.3 Risk Assessments for outstanding overseas checks, must be reviewed and followed up with the candidate every two weeks.

3.4 If the candidate provides evidence, where they have submitted the request, and been rejected, this needs to be confirmed by Cognita before permanently closing the Risk Assessment and confirming as check completed on SCRT else it will show as non-compliant.

Overseas Check		
Low Risk	**Medium Risk**	**High Risk**
Start no supervision	**Start on Red Lanyard fully supervised**	**Cannot Start**
Cognita has verified with Guidance via Gov.uk that the check is not being issued by the relevant country And Employment Reference from overseas employer has been received	Evidence that an application has been made and is being processed All other pre-employment checks have been completed	Possible to obtain overseas check No Evidence to prove the application has been submitted and is under process

4. Letter of Professional Standing

4.1 Where a Letter of Professional Standing is required and not completed, Is there sufficient evidence to demonstrate that every effort has been made to obtain the check or alternates in place of the check?

Letter of Professional Standing		
Low Risk	**Medium Risk**	**High Risk**
Start no supervision	**Start on Red Lanyard fully supervised**	**Cannot Start**
Cognita has verified with relevant authorities that the check is unobtainable and reference from overseas employer has been obtained	Evidence that the check in under process and alternates are being sought	No Evidence to demonstrate checks were being made

The duration and nature of teaching time spent overseas is less than 12 months and more than 5 years ago All other checks are complete	All other pre-employment checks have been completed	

5. Disclosure

5.1 In the case of a Disclosure, before reaching a decision on whether to confirm employment, the following should be considered:

- Did the applicant disclose this on the Self Declaration form, and if so, was this discussed at the interview
- Is the applicant barred from appointment and is the declaration relevant to the role
- Does the nature of the role allow the applicant to potentially re-offend
- Circumstances surrounding the declaration, seriousness, length of time since it occurred, is there a pattern to the behaviour or was this a one-off
- Have the personal circumstances changed

5.2 Assessing the Risks on Disclosures or Declarations:

- Did the applicant declare this on DBS Application
- Do they agree with the information on the DBS certificate
- Were any offenses work related or committed within the context of a work setting
- Were any offenses committed within the last 2 years
- What is their attitude to the offenses now
- Would they do anything differently now
- Have the circumstances changed since the conviction
- Are there any mitigating circumstances
- Can they demonstrate any efforts not to re-offend
- Can safeguards be implemented to reduce or remove the risk
- What supervision is available

5.3 Decisions should be based on whether this is considered, High, Medium or Low after reviewing the above considerations:

- Can protective measures be put in place to render the risk low?
- An outline of protective measures, e.g. Risk Management Plan such as limited access to sensitive information, additional supervision, change of work location, temporary diversion of low-risk tasks or training

Appendix 4: Unsuccessful Candidates, External and Internal

1. External Candidates

1.1 The Hiring Manager should collate interview notes for all candidates and forward to those responsible for the recruitment process. The Central HR Team will be responsible for these for Head Office based roles.

1.2 The Application pack including the following, should be retained for six months, as they will provide justification on the event of a potential complaint about the selection process:

- Application Form
- Self Declaration Form
- References
- Qualifications, ID Documents
- Interview Notes
- Additional Notes made relating to Basic Internet and/or Social Media checks or any other clarifications and notes

1.3 All hard copies of the above should be shredded; all electronic copies should be deleted.

2. Internal Candidates

2.1 The Hiring Manager should collate interview notes for all candidates and forward to those responsible for the recruitment process. The Central HR Team will be responsible for these for Head Office based roles.

2.2 The Application pack including the following, should be retained on the employee file, as they will provide justification on the event of a potential complaint about the selection process:

- Application Form and/or Expression of Interest
- Self Declaration Form
- References
- Qualifications, ID Documents
- Interview Notes
- Additional Notes made relating to Basic Internet and/or Social Media checks or any other clarifications and notes

2.3 The employee file would be subject to the Data Retention Policy.

COGNITA