

The Golden Thread Alliance

Safer Recruitment Policy

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| Date Reviewed | <i>Autumn 2025</i> |
| Next Review Date | <i>Autumn 2026</i> |

This policy has been adopted by all schools within The Golden Thread Alliance

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Policy Statement

This policy has been adopted by the Board of Trustees of The Golden Thread Alliance to provide a policy framework for the recruitment and selection of colleagues to all posts within the approved staffing structure of The Golden Thread Alliance. The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children and young people and requires all colleagues, volunteers, agency and third-party colleagues to share and demonstrate this commitment.

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in ensuring that recruitment procedures are free from unlawful discrimination in line with the Equality Act 2010. The Board of Trustees also fully appreciate the importance of fair, open and effective procedures to enable The Golden Thread Alliance to recruit people with the right skills, aptitudes and attitudes.

The Board of Trustees of The Golden Thread Alliance will ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), DfE Keeping Children Safe in Education (KCSIE), DfE Working Together to Safeguard Children-2018, Disqualification under the Childcare Act (DUCA) 2006 and related updates, the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in managing the personal data of job applicants in line with the General Data Protection Regulations (GDPR).

All colleagues, Board of Trustees and volunteers are expected to share a commitment to safeguard children and vulnerable groups and, as part of that commitment, follow 'Safer Recruitment' guidance in line Keeping Children Safe in Education – statutory guidance for schools and colleges.

As part of our commitment to safeguarding children and vulnerable groups, Enhanced DBS checks and/or Barred List checks on all posts must be carried out where they are required.

All colleagues and Board of Trustees involved in recruitment and selection decisions are required to work in ways that are entirely consistent with this policy at all times.

The Golden Thread Alliance will ensure that all selection panels will comprise at least one member who has successfully completed safer recruitment training. In addition, The Golden Thread Alliance will ensure that training is provided for all colleagues and Board of Trustees involved in the recruitment and selection of colleagues and that it is appropriate to their role. This forms part of the School Staffing (England) Regulations 2009.

Guidance Note:

More information about posts which require an Enhanced DBS and how to check the Barred List can be found at www.gov.uk/disclosure-barring-service-check.

As united as we are different.

1. Scope

This Policy applies to all employees, along with volunteers, contractors and agency staff working within The Golden Thread Alliance where appropriate.

2. Adoption Arrangements and Date

This policy was adopted by The Golden Thread Alliance in Autumn 2022 and supersedes any previous Recruitment Policy.

This policy will be reviewed by The Golden Thread Alliance annually or earlier to reflect any changes in guidance or notable incident. This will involve consultation with the recognised unions, where necessary.

3. Equal Opportunities Statement

The Golden Thread Alliance is committed to ensuring that each stage of the recruitment and selection process is accessible to all. We will review the recruitment policy and procedure regularly to ensure that it takes account of the Equality Act 2010 and does not discriminate against applicants on the grounds of race, religion or belief, disability, age, pregnancy and maternity, gender reassignment, marriage and civil partnership, sex or sexual orientation.

4. 'Prevent'

The Golden Thread Alliance has a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015") to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

In carrying out its obligations under 'Prevent' The Golden Thread Alliance will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The Golden Thread Alliance will not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partnership status, disability or age.

5. Prior to Advertising

When a vacancy occurs, the Headteacher will review the need for the post and consider all options (internal and external) before deciding that there is a need to recruit. If there is a need to recruit, the job description and person specification should be reviewed prior to seeking the approval of the Chief Operating and Financial Officer, or Deputy Chief Financial Officer, to commence recruitment.

Consideration should also be given to the working hours and contractual arrangements for each post to ensure that posts are open to applicants wishing to work on a part-time or job-share basis where possible and practical.

6. Job Description

The job description is a statement of purpose and scope and defines both the job role and expectations. It will:

- Summarise the job purpose/impact
- Set out key responsibilities and accountabilities
- Set out reporting and line management arrangements

An up-to-date job description and person specification will be available for each vacancy advertised.

Managers will refer to the Professional Standards for Teachers and to the Teachers' Pay and Conditions Document (which sets out the expected attributes of Main Scale, Post Threshold, Advanced Skills and Excellent Teachers) when creating job descriptions for teaching posts.

All job descriptions should clearly state to what extent the role will involve contact with children, whether they will be engaged in regulated activity relevant to children, and the post holder's responsibility for promoting and safeguarding the welfare of children and young people.

7. Person Specification

The person specification is a description of the qualifications, experience, knowledge, skills, competencies and other attributes of the ideal person to fill the role.

It can classify each attribute as either 'Essential' to do the job or as a 'Desirable' attribute for the post holder to have and indicate how each attribute will be assessed e.g. application form, interview, reference, test etc.

All attributes should be measurable and quantifiable and should take care not to unlawfully discriminate against particular groups of people, either directly or indirectly.

8. Advertising

All vacant posts will be advertised in a fair, open and honest manner and will be advertised by means of The Golden Thread Alliance website or internal email as a minimum. In most cases, vacant posts will be advertised externally. All adverts need to ensure that shortlisted candidates are informed that they will be subject to an online check, following the changes to KCSIE.

All adverts should include the safeguarding responsibilities of the post as set out in the job description and person specification and state whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. This means that when applying for certain jobs, activities, some spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the [Ministry of Justice website](#).

The Golden Thread Alliance

To demonstrate to potential job applicants our commitment to safeguarding and the welfare of children, the following statement should be included on any relevant advertisements and documentation sent out to applicants:

The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children and young people and expects all colleagues and volunteers to share this commitment. This post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020 and therefore is subject to an Enhanced DBS Disclosure. In line with KCSIE guidance, paragraph 220, all candidates who are shortlisted will be subject to an online search. This search is not part of the shortlisting process itself and all shortlisted candidates will have the opportunity to address any issues of concern resulting from the search.

9. Applications

All applicants must complete the relevant application form in full to enable the panel to shortlist in a fair and objective manner. Applicants will no longer be asked to complete a separate Criminal Convictions Self Disclosure form as part of their application. Due to changes in the latest version of Keeping Children Safe in Education, this will be done at the shortlisting stage to ensure that processing of criminal data is targeted and proportionate. Please see 11. Shortlisting for more information.

The Golden Thread Alliance may reasonably decide to reject an application where incomplete and/or ambiguous information is provided. As stated in Keeping Children Safe in Education, applications by CV or letter alone will not be considered, and all short-listed applicants are required to sign and date their application at interview.

The Golden Thread Alliance should include a statement in the application form, or elsewhere in the information provided to applicants, that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. The Golden Thread Alliance should also provide a copy of the school's child protection policy, and policy on employment of ex-offenders in the application pack or refer to a link on its website.

10. Shortlisting

Shortlisted candidates will be asked to complete a separate Criminal Convictions Self-Disclosure form and must be signposted to publicly available guidance and support on which cautions or convictions they must disclose and be given time to obtain advice. This information is available on the [Ministry of Justice website](#).

Candidates will be required to declare any unspent convictions or conditional cautions, any spent adult cautions (simple or conditional) or convictions that are not protected as defined by either the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended in England, Scotland and Wales, or the Rehabilitation of Offenders (Northern Ireland) Order 1978 as amended in Northern Ireland.

Candidates will also be asked to declare:

- Whether they have ever been known to any Children's Services department or Police as being a risk or potential risk to children.
- Whether they have ever been the subject of any investigation and or sanction by a professional body due to concerns about their behaviour towards children.
- Whether they have any overseas convictions; and
- Whether they are included on the DBS Children's Barred List
- If the role involves working with pupils under five and/or pupils under eight in wraparound care whether they have any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).

Failure to declare relevant information may disqualify the candidate from the appointment and, if appointed, may render the individual liable to immediate dismissal without notice.

A new addition to Keeping Children Safe in Education 2022 is for shortlisted candidates to be subject to an 'online' search. Applicants should have been made aware of this requirement prior to or at the time of application. Such checks can be carried out via online search engines; however, this is only with regards to information that is within the public domain. The aim of the search is to ensure there is no information held in the public domain relating to the candidate that would make the school question their suitability to work with children and/or could harm the reputation of the school should the candidate become part of the school's workforce. The search can be carried out by a member of the People Team who is not part of the recruitment process, with any information collated being recorded and passed to the recruitment panel. The candidate should be asked to explain any findings by the recruitment panel either prior to (if deemed appropriate), or during the interview process. The recruitment panel will then carry out a risk assessment as required. This process will be carried out for all shortlisted candidates regardless of the job role being applied for.

It is recommended that at least two people are involved in the shortlisting process, one of whom should be the line manager. At least one person involved in the process should have completed safer recruitment training.

All shortlisting decisions will be made with clear reference to the skills and qualities set out in the person specification.

The equal opportunities monitoring form will be separated from the main application form to reduce any likelihood of conscious or unconscious bias.

11. References

In order to comply with Keeping Children Safe in Education, it is the policy of The Golden Thread Alliance that all references will be obtained, and concerns resolved, before confirming an appointment. This will be done either by letter seeking to verify the skills, experience, competencies and employment history of the applicant, or by a standard reference form.

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It is The Golden Thread Alliance's practice, with the consent of the applicant, to take up references before interview for all posts. If applicants have indicated that they do not consent to references being sought prior to interview, further information should be sought, and agreement obtained where possible.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. Any discrepancies or anomalies will be verified with the reference provider and addressed during the applicant's interview.

Specific questions should be included to explore the applicant's suitability to work with children and, if the referee has any concerns, they should be asked to give their reasons.

In order to comply with the Equality Act 2010, reference requests sent prior to an offer of employment will not request details of attendance or absence however; further information will be requested and compared with the medical questionnaire following the applicant's acceptance of a conditional offer of employment – see 14 below.

Applicants will be required to specify the details of two referees, one of which should be the current or most recent employer and completed by a senior person. References will only be obtained directly from the referee: testimonials or open references (those addressed 'To whom it may concern') will not be considered. References from family members will not be accepted. Referees will be provided with a copy of the job description and person specification to assist them in their response.

References for candidates working in an education setting will be sought from the Headteacher where possible or another Senior Leader who is able to provide accurate information in respect of disciplinary action and any safeguarding concerns. In other settings, it would be appropriate to seek a reference from the line manager of the applicant. Electronic references must originate from a legitimate source. All references will be verified and referees will be contacted to clarify vague or insufficient information.

Where a candidate is not currently working in a school or childcare setting but has done so in the past, one reference should be from their most recent children's workforce employer in line with Safer Recruitment guidelines.

We reserve the right to request that the applicant provides alternative referees where the initial referees are deemed inappropriate for our purposes e.g. where the current or most recent employer is not provided.

We will seek to confirm whether the candidate has been subject to any formal disciplinary procedures within the last two years and to establish any details, outcomes or 'live' sanctions which are in place.

We will compare information on a candidate's application form with that in the reference to identify any inconsistencies and take up any discrepancies with the candidate.

In cases where there have been disciplinary concerns which involved children or safeguarding that have been substantiated, the referee will be required to confirm details.

In accordance Keeping Children Safe in Education, cases in which an allegation is proven to be false, unsubstantiated or malicious should not be included in employer references.

When recruiting to teaching posts, we will seek to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

In the case of recruitment to all other posts, we will ask referees to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

12. Interview and Selection

The Golden Thread Alliance is committed to ensuring that all interviewees are assessed according to their ability to meet the criteria of the job description and person specification and to fulfil their obligation regarding keeping children safe.

Applicants may have indicated on their application form that they have a disability and, in order to promote fairness and to meet our obligations under the Equality Act 2010, the letter of invitation will encourage applicants to contact The Golden Thread Alliance if they require any adjustments to enable them to attend the interview.

Candidates are required to bring evidence of relevant qualifications to the interview where the original documents must be checked, and signed and dated copy retained. When attending for interview, each candidate should be asked to sign a copy of their application form and their self-disclosure form in the presence of the person undertaking the document and identity checks.

The interview panel will include at least one member who has undertaken safer recruitment training in accordance with the School Staffing (England) Regulations 2009 and should not include an employee where one of the applicants is a relative, partner or close friend. The interview will include questions in relation to safeguarding.

The panel will take notes during the interview to enable a scoring matrix to be completed and, at the conclusion of the interviews; the panel will consider each of the candidates against the criteria for the post before reaching their decision.

Specifically, when interviewing candidates, the panel:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently
- Explore questions arising from references that have been provided
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

13. Pre-employment Checks

All offers of employment will be conditional on the successful completion of the pre-employment checks listed below and will include confirmation of salary, start date and any information that the successful applicant needs to provide before commencing employment e.g. DBS form and pre-employment questionnaire.

All offers of employment will be subject to and conditional upon:

- Enhanced DBS check
- DBS Barred list check where applicable (i.e. if working in regulated activity)
- Verification of identity including Date of Birth
- Verification of entitlement to work in the UK
- Verification of any relevant qualifications including checking the TRA's Employer Access Service to verify Qualified Teacher Status
- Receipt of two satisfactory references
- Prohibition checks for those in teaching work and those with previous teaching experience (including unqualified teachers, HLTA's, ATs etc.)
- A Section 128 Prohibition from Management check for all colleagues employed in management positions, members, trustees and local governors. Whilst they are not employees, from September 2019, Keeping Children Safe in Education also recommends that maintained school governors have Section 128 checks, as a Section 128 direction prohibits someone from serving as a maintained school governor.
- Overseas checks as appropriate including-
- Obtaining an enhanced DBS certificate with barred list information even if the teacher has never been to the UK.
- Criminal records checks for overseas applicants – Home Office guidance can be found here and for teaching positions From 1st January 2021, the Teacher Regulation Agency will no longer maintain a list of EEA teachers with sanctions.
- Criminal records checks for overseas applicants – Home Office guidance can be found on GOV.UK; and for teaching positions
- Obtaining a letter (via the applicant) from the professional regulating authority 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.
- Disqualification checks under the 2018 Childcare Disqualification Regulations for individuals employed to work in reception classes, or in wraparound care for children up to the age of 8 in schools providing childcare.
- Satisfactory pre-employment health clearance, verifying physical and mental fitness to carry out their work responsibilities.
- Online search to identify if there are any concerns which would lead the school to question the candidate's suitability to work with children, which will have been discussed with the candidate either before or at the interview

If these are not satisfactory an offer of employment may be withdrawn or where an individual has commenced work, employment may be terminated.

13.1 Right to Work

In order to comply with the Asylum and Immigration Act 1996 – Prevention of Illegal Working – interview candidates will be asked to bring certain documentation to the interview which shows their eligibility to work in the UK. No offer of employment can be made unless one of the original documents listed on the Home Office Right to Work Checklist is produced.

The candidate's original documents must be checked, and a signed and dated copy retained in line with The Golden Thread Alliance retention policy. Documents relating to unsuccessful candidates will be retained with the interview papers and destroyed six months from the date on which the position was offered and accepted by the successful candidate.

The [Home Office Right to Work Checklist](#) shows the acceptable identity documentation as currently defined by the Home Office.

13.2 DBS and Barred List Checks

All those directly employed by Schools and Academies in paid positions are required to obtain an enhanced Disclosure and Barring Service (DBS) check.

It is an offence to employ, in a school or academy, an individual who is barred from working with children. A check against the Children's Barred List will be requested as part of the enhanced DBS Disclosure for all employees working in regulated activity i.e. having unsupervised, frequent, or intensive contact with children.

It is The Golden Thread Alliance's practice that individuals obtain a satisfactory enhanced DBS check before commencing work. In exceptional circumstances where the applicant is required to commence work before the full disclosure certificate is received, where working in regulated activity, a barred list check must be carried out before employment commences and a risk assessment and supervision must be in place until a satisfactory DBS check is obtained.

The Golden Thread Alliance will obtain an enhanced DBS certificate (including barred list information) for all volunteers who are working in regulated activity.

The Golden Thread Alliance will obtain an enhanced DBS certificate for all Members, Trustees and Local Governors. A check against the Children's Barred List will only be carried out for Members, Trustees and Local Governors if they are engaging in regulated activity in addition to their governance duties.

For existing colleagues, The Golden Thread Alliance will carry out new checks when an individual working within the Trust moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children or where there has been a break in service of 12 weeks or more or there are concerns about an individual's suitability to work with children.

In cases where we are notified that a DBS check is positive for criminal convictions, cautions, warnings etc, the contents of the certificate will be discussed with The Golden Thread Alliance's People Director.

13.3 Regulated Activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a Factual note on regulated activity in relation to children: scope. Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.² Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;³
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

²The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

³It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.

13.4 Prohibition of Teachers

The Golden Thread Alliance will verify that anyone appointed or who may on occasions be required to carry out teaching work (including TA's, HLTA's and unqualified teachers) has not been prohibited from doing so

by the Secretary of State in accordance with the Teachers' Disciplinary (England) Regulations 2012. All those in teaching work, or those with previous teaching experience, will require a prohibition check. Teaching and Support colleagues will be checked on the Check A Teachers Record page on the DfE website.(formerly known as the Employer Access Service/Teacher Regulation Agency self-service portal) to ensure that they have the required teaching qualifications, have successfully completed statutory induction where it is necessary i.e., for teachers who obtained QTS after May 1999, and have not been prohibited from teaching. Checks will also be made against previous names.

A person who is prohibited must not be appointed to a role that involves teaching work.

13.5 Section 128 Management Checks

Section 128 directions are made by the Secretary of State under Section 128 of the Education and Skills Act 2008, barring individuals from taking part in the management of Independent schools, Academies and Free Schools. The Golden Thread Alliance will undertake a Section 128 check for those taking up management positions to ensure they are not prohibited under the provisions. This includes Board of Trustees, Directors, Members, Trustees and Local Governors. Management positions are also likely to include, but are not limited to, Headteachers and Deputy/Assistant Headteachers. This check shall also be undertaken on colleagues who are internally promoted or transferred to management positions.

13.6 Overseas Checks

In accordance with Keeping Children Safe in Education, The Golden Thread Alliance will ensure that individuals who have lived or worked outside the UK will undergo the same checks as all other colleagues in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity), even if the individual has never been to the UK.

In addition, The Golden Thread Alliance will make any further appropriate checks so that any relevant events that occurred outside the UK can be considered. The same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or rest of the world will be applied. This should include:

- obtaining a criminal record check for time spent abroad where by reason of the individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work and/or where the individual has lived outside of the UK for a period of more than six months in the last five years. Further information on how to obtain such a check can be found at: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> for teaching positions obtaining a letter (via the applicant) from the professional regulating authority 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. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

The overseas checks will be carried out in addition to obtaining an enhanced DBS check as the DBS check alone is not sufficient to establish the candidate's suitability to work with children.

Since 6 April 2017 for all Tier 2 Visa applicants, it is a requirement that they must provide a criminal record certificate from any country where they have lived for 12 months or more (whether continuously or in total) in the last ten years.

13.7 Proof of Qualifications

Proof of qualifications will be checked to ensure that they match with the candidate's application form. The name of the qualification, awarding institution, date of qualification and candidate name will be checked. A signed and dated copy of the certificate will be retained as evidence of when the check was carried out, and by whom.

In the case of teachers, Qualified Teacher Status (QTS) will be checked via the Teacher Regulation Agency's Self Service Portal at <https://teacherservices.education.gov.uk/>

In the event of any concerns regarding the validity of the qualification, a candidate may be required to obtain confirmation or clarification in writing from the exam board or awarding institution.

13.8 Follow-up References

If required, following a written conditional offer of employment to the successful candidate, a supplementary reference request may be sent to their original referees. This is an opportunity to request information about sickness absence and attendance records which cannot be requested prior to an offer of employment in order to comply with the Equality Act 2010.

The offer of employment is conditional of both parts of the reference being satisfactory.

13.9 Pre-Employment Medical History Questionnaire

The Golden Thread Alliance will require all successful applicants to complete a medical history questionnaire to verify their medical fitness. There is also a requirement for schools to ensure that colleagues appointed to teaching posts have the necessary physical and mental fitness to teach under the Education (Health Standards) (England) Regulations 2003.

Completed medical history questionnaires will be considered in conjunction with the follow-up references which specifically explore sickness absence and attendance issues and, where appropriate, further advice about fitness to carry out a role will be sought from Occupational Health. In order to comply with the Equality Act 2010, reasonable adjustments will be made to enable a candidate to take up their role.

In circumstances where the candidate is assessed as medically unfit to carry out the role, or where it is not possible to make reasonable adjustments, an offer of employment may be withdrawn.

13.10 Childcare Disqualification

The Golden Thread Alliance will ensure that colleagues, who work in childcare provision, or who are directly concerned with the management of such provision, will have the appropriate checks carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018. The Childcare Disqualification check only applies to colleagues engaged to provide early years childcare i.e. colleagues working directly with children under five years of age or those providing 'wrap around' care with children up to eight years of age.

Checks will include: -

- Completion of a self-disclosure form prior to interview that asks whether the individual has any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).
- Requesting an up-to-date enhanced DBS certificate (with barred list check for those who will engage in regulated activity)
- Cross referencing the results of the checks with the list of relevant offences at [Disqualification under the Childcare Act 2006 - statutory guidance Appendices \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674212/disqualification-under-the-childcare-act-2006-statutory-guidance-appendices.pdf) that would disqualify someone.

14. Withdrawal of Offers

In the event that the pre-employment checks are unsatisfactory, or where the identity, qualifications or right to work in the UK of a successful candidate cannot be verified, The Golden Thread Alliance will consider withdrawing the conditional offer of employment. Where the successful candidate has started in post and information becomes available which would have caused the offer to be withdrawn, employment may be terminated. In these circumstances advice should be sought from The Golden Thread Alliance's People Team.

15. Single Central Record

In accordance with the terms of the School Staffing (England) Regulations (as amended), The Golden Thread Alliance will retain details of recruitment and vetting checks undertaken in a Single Central Record (SCR). Details of each individual academy will be recorded on a separate Single Central Record that is accessible for inspection. This data will be collated, used and stored and deleted in line with GDPR.

16. Complaints

An individual who feels that their treatment during the recruitment and selection process is unfair may raise a formal complaint. This can be done by writing to the Headteacher, Chief Executive Officer or the Chair of Trustees setting out the key points of their complaint. The complaint will be investigated in line with The Golden Thread Alliance's Complaints Procedure.

Existing employees of The Golden Thread Alliance should raise their concerns through the Grievance Procedure.

17. Induction

Induction is essential in ensuring that new employees are properly equipped for work, their role in the life of The Golden Thread Alliance and feeling part of The Golden Thread Alliance community.

The Golden Thread Alliance will put in place an induction programme for all colleagues joining The Golden Thread Alliance. This will vary taking into account previous experience and the nature of the role but will ensure that all colleagues and volunteers receive guidance on safe working practices and the safeguarding policies of The Golden Thread Alliance.

18. Record Keeping

Accurate and contemporaneous records including copies of application forms and interview notes will be kept throughout the process and will be retained for a minimum of six months from the appointment date in line with The Golden Thread Alliance's document retention schedule.

At the end of the appointment process all copied identity documentation (passport/birth certificate etc.) relating to unsuccessful candidates should be securely destroyed however, copies of application forms, interview, references, details of any online checks and any resulting risk assessments carried out and details of scoring should be retained for six months. All personal data will be stored and destroyed in line with GDPR.

Please note that original and copy DBS forms must not be retained on personal files and that the details should, instead, be recorded on the Single Central Record. Details of any online checks do not need to be recorded on the Single Central Record.

In the case of a DBS containing disclosures, should it be appropriate to retain a copy for the purpose of completing a risk assessment, the copy should not be kept for longer than six months. When the DBS copy is destroyed, the risk assessment shall be the record of the fact that vetting was carried out, the result and the recruitment decisions made.

19. Existing Colleagues

If The Golden Thread Alliance has concerns about an existing colleague's suitability to work with children, The Golden Thread Alliance will carry out all the relevant checks as if the individual was a new employee. The Golden Thread Alliance will also do this if an individual, moves from a post that was not regulated activity into work which is considered to be regulated activity.

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

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and

- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

20. Agency and Third-Party (supply staff)

The Golden Thread Alliance will obtain and retain written notification from any agency, or third party organization used to supply staff they use that the organisation has carried out all required pre-appointment checks as set out in Keeping Children Safe in Education including written notification that an enhanced DBS certificate has been obtained, either by the employment business or another such business), on any individual prior to working at The Golden Thread Alliance that The Golden Thread Alliance would otherwise perform. Where applicable, the written notification must also confirm whether the enhanced DBS certificate included a check of the children's barred list. A copy of the enhanced DBS certificate must be seen by The Golden Thread Alliance on arrival.

Where the position requires a barred list check, this must be obtained by the agency or third party prior to appointing the individual. The Golden Thread Alliance will also check that the person presenting themselves for work is the same person on whom the checks have been made by verifying their identity on arrival.

21. Contractors

The Golden Thread Alliance will ensure that any contractor, or any employee of the contractor, who is to work at The Golden Thread Alliance has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular or close contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, or whether checks are required, consideration should be given to the nature, frequency and level of access to children, irrespective of the number of sites worked across. .

Under no circumstances should a contractor in respect for whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity. The Golden Thread Alliance is responsible for determining the appropriate level of supervision depending on the circumstances, and a risk assessment must be in place for any contractors on whom checks are determined as not necessary.

If an individual working at The Golden Thread Alliance is self-employed and in regulated activity,, The Golden Thread Alliance should consider undertaking necessary Safer Recruitment checks, including obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS for themselves.

The Golden Thread Alliance will always check the identity of contractors and their staff on arrival at The Golden Thread Alliance to ensure they are the individuals on whom checks have been completed.

22. Trainee/Student Teachers

Where applicants for initial teacher training are salaried by The Golden Thread Alliance, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

23. Volunteers

The Golden Thread Alliance will:

- Require all new volunteers to complete an application form
- Carry out safer recruitment checks including references before commencing in a volunteer role.
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out checks as appropriate for any individuals who have lived or worked outside of the UK

24. Members, Trustees and Governors

All Trustees, Local Governors and Members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chair of the Board will have their DBS check countersigned by the secretary of state.

All, Trustees, Local Governors and Members will also be required to have a Section 128 check (to check prohibition on participation in management under Section 128 of the Education and Skills Act 2008).

All Trustees, Local Governors and Members must provide proof of Right to Work in the UK.

25. Duty to Refer to the DBS

The Trust will make a statutory referral to the DBS if a colleague or volunteer:

- is dismissed or removed from regulated activity because they have harmed a child or pose a risk of harm, or
- resigns or otherwise leaves their role in circumstances where they would have been dismissed had they not left.

This duty applies regardless of whether the individual is known to be on a barred list at the time.

25. Confidentiality and Data Protection

The Golden Thread Alliance recognises its obligations under the General Data Protection Regulation and associated legislation, and the rights of Employees with regards to the personal data held on them.

All records relating to the recruitment process will be gathered, processed, held and shared in accordance with the requirements of the General Data Protection Regulation and Data Protection Act.

Please refer to The Golden Thread Alliance's Data Protection Policy and Privacy Notice for further details.

26. Internal Recruitment

Existing colleagues are not required to complete a full application form, as this information will be on file. Existing colleagues can submit a letter expressing their interest in the post. They must outline their skills and experience, explaining why they believe they should be considered for the post.

Internal applications shall be treated the same as external applications, including being subject to shortlisting and interview processes. References for internal candidates will be scrutinised to the same degree as external candidates. Where possible, the reference should be provided by a current colleague who is not interviewing the candidate, such as their line manager.

27. Recruitment of Ex Offenders

The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children. As part of our safer recruitment practice, we ensure that all vetting and employment decisions involving applicants with criminal records comply with Keeping Children Safe in Education (KCSIE), the DBS Code of Practice, and relevant legislation including the Rehabilitation of Offenders Act 1974 (Exceptions Order). This means that, where a role involves regulated activity, applicants are required to disclose relevant convictions and cautions if shortlisted for employment in one of our schools.

We recognise the importance of fair, consistent, and lawful treatment of applicants who may have criminal records and ensure that disclosures are handled sensitively, securely, and only when legally required.

27.1 Protections and Exemptions

Relevant offences' will always be disclosed on a DBS certificate, and should always be included in self-declarations – see the [government's list](#) for further details.

It is a criminal offence for any person who is barred from working with children to apply for a position in a school. The Golden Thread Alliance will make a report to the DBS and/or the police as appropriate, if it receives an application from a barred person.

'Protected offences' are certain old or minor offences that may not be disclosed on a DBS check. Guidance as to whether a caution or conviction is 'protected' can be found in:

- The Ministry of Justice's [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#)
- The government's tool to [check whether to disclose cautions or convictions](#)

Applicants **should not** list any 'protected' offences on their self-declaration form, and we will not take them into account if we are made aware of them. Applicants should not disclose any cautions or convictions that are classed as 'protected' under the current DBS filtering rules.

The Golden Thread Alliance follows the latest DBS filtering guidance (post-2020 amendments), which removed the 'multiple conviction rule' and filters all reprimands and youth warnings. Protected matters will not be considered even if they are disclosed

Shortlisted applicants are required to complete a self declaration form to disclose all relevant convictions, cautions, reprimands, or warnings that are not protected under current DBS filtering rules. This information is:

- requested after shortlisting only
- viewed only by those responsible for safeguarding or recruitment
- managed in line with data protection requirements unless needed in a safeguarding investigation.

Protected cautions and convictions are those filtered by the DBS and must not be disclosed or considered

27.2 Responsibilities

27.2.1 The Headteacher

- Uphold The Golden Thread Alliance's commitment to the fair treatment of all job applicants
- Make sure all job application forms contain clear and relevant information about what cautions or convictions applicants are expected to disclose, and what safeguarding checks The Golden Thread Alliance will carry out, and at what stage in the application process
- Make sure staff involved in the recruitment process have received appropriate guidance and training about their legal duties in employing ex-offenders, and assessing the relevance and circumstances of offences

27.2.2 Colleagues involved in the recruitment process

- Treat applicants fairly, including in relation to any history of offending
- Maintain privacy for applicants, making sure that information about applicants' criminal records won't be seen by anyone outside of the recruitment process
- Make sure that all shortlisted applicants complete a self-declaration form before the interview stage, and that all job offers are conditional, subject to appropriate safeguarding checks
- Hold discussions with applicants about their disclosures, where relevant, and make decisions about suitability based on the circumstances and background of offences
- Seek specialist legal/HR advice where relevant

27.2.3 All job applicants

- Familiarise themselves with the requirements for self-disclosure, and whether they have any previous convictions or cautions that must be disclosed
- Complete self-declaration forms honestly and completely, disclosing all required spent and unspent convictions and cautions (excluding 'protected' offences)
- Participate in disclosure discussions following either or both of their self-declaration and DBS check

27.3 The process for disclosing and assessing previous convictions

All application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

27.3.1 Self-declaration

All shortlisted applicants will be asked to complete a self-declaration form before the interview stage. Applicants must complete these forms accurately, and reveal all relevant convictions, as well as any other information that would make them unsuitable to work with children. Failure to reveal any relevant information could lead to the withdrawal of an offer of employment.

All job application forms will include information about this requirement.

Applicants will not be asked for information about previous convictions or cautions before this stage, and any such information that is disclosed before shortlisting stage won't be taken into account in the shortlisting process.

We will store all sensitive personal data securely, only share it with relevant staff members, and destroy it securely when we no longer need it.

Self-declaration forms will be reviewed by a colleague who is not involved in making recruitment decisions, and any irrelevant information will be deleted; for example, 'protected' convictions that legally can't be taken into account.

Further disclosure discussions (see sub-section 4.3) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

The self-declaration form will only ask for information the school is legally permitted to request under the ROA Exceptions Order.

27.3.2 DBS Checks

Successful candidates are subject to DBS and other safeguarding checks, as set out in statutory guidance, Keeping Children Safe in Education. Staff should consider whether:

- The checks reveal any new information that might prohibit or otherwise make a candidate unsuitable for the role
- The checks match any information disclosed in an applicant's self-declaration

Further disclosure discussions may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

27.3.3 Disclosure Discussions

Where a disclosure or the results of a DBS check reveal that an applicant is barred from the role or ineligible to be employed in that role, their recruitment process will not proceed any further, and they will be informed that they legally cannot be considered for the job.

In all other cases, previous convictions will not necessarily prevent applicants from being employed by The Golden Thread Alliance. Colleagues will determine, with support from HR specialists, whether disclosures warrant a discussion between The Golden Thread Alliance and the candidate.

Where relevant, disclosure discussions will happen as part of the interview process and take the applicant's explanation into consideration. For example, we will consider:

- 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
- Whether the applicant accepted responsibility for their actions

It will then be assessed whether applicants' previous convictions or cautions make them unsuitable for the role.

We will not ask applicants about protected convictions and cautions.

- A section 128 check will be requested for all roles that relate to the management of the school including but not limited to governors, trustees, directors and headteachers.

If discrepancies arise between an applicant's self-declaration and their DBS certificate, a discussion will be held with the applicant to clarify the information, and a documented risk assessment will be completed before any decision is made.

27.4 Data Protection and Handling Disclosure Information

We comply fully with the DBS Code of Practice and data protection legislation. We will:

- not retain copies of DBS certificates
- store only essential information (certificate number, date, level of check, outcome)
- maintain secure, restricted access to sensitive information
- destroy any disclosure information securely when no longer required

28 Related Documents

This policy should be read alongside:

- Child Protection and Safeguarding Policy
- Data Protection Policy
- Equal Opportunities Policy



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As united as we are different.