ALMA EDUCATION

Safer Recruitment Policy

Approval date:	August 2026
Review date:	August 2027
Version:	1.0
Approved by:	 Melanie Steel, Director of Education
Approved by:	Laura Kay, Advisory Board

Contents

Statement of Intent
1. Legal Framework and Related Policies
2. Definitions
3. Roles and Responsibilities
4. Planning, Advertising and Shortlisting
5. Invitation to Interview
6. Pre-Interview Checks
7. Requesting, Checking and Providing References
8. Content of References
9. Previous Disciplinary Action
10. Use of Data and Confidentiality
11. The Interview
12. After the Interview
13. Remote Recruitment
14. Pre-Appointment Checks
15. Right to Work Checks
16. Identification Checking Process
17. After the Pre-Appointment Checks
18. Single Central Record (SCR)
19. Safer Recruitment Training
20. Safeguarding
21. Monitoring and Review

Statement of Intent

Alma Education has implemented this policy to support recruitment and employee selection. It sets out Alma's recruitment procedure and how Alma ensures safer recruitment is considered at every level of the recruitment process, for every learning mentor, member of staff and volunteer.

The safety and protection of Alma's learners is always at the forefront of Alma's concerns, which is why this policy aims to embed a robust safeguarding culture into Alma's recruitment practices, appropriate to a provision where staff often work 1:1 with learners in homes and community settings.

Legislation and Statutory Guidance
Rehabilitation of Offenders Act 1974
Children Act 1989
Education Act 2002
Sexual Offences Act 2003
Children Act 2004
Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026)
Education and Skills Act 2008
Equality Act 2010
UK GDPR and Data Protection Act 2018
Amendments to the Exceptions Order 1975, 2013 and 2020
DBS Code of Practice (Nov 2015)
Protection of Freedoms Act 2012
Keeping Children Safe in Education (2026)
Non-School AP Voluntary National Standards (Aug 2025)

1. Legal Framework and Related Policies

This policy has due regard to all relevant legislation and statutory guidance, including, but not limited to, the legislation and guidance listed in the table above.

This policy has due regard to guidance including, but not limited to, the following:

- DfE 'Staffing and employment advice for schools'
- Disclosure and Barring Service 'ID checking guidelines for Standard/Enhanced DBS check applications'

- Home Office 'Right to work checks: employing EU, EEA and Swiss citizens'
- DfE 'Keeping children safe in education'
- DfE 'Recruit teachers from overseas'
- Disclosure and Barring Service 'Regulated activity with children in England and Wales'
- Home Office 'Employer's guide to right to work checks'

This policy operates in conjunction with the following Alma policies and records:

- Child Protection and Safeguarding Policy
- Complaints Policy
- Staff Code of Conduct
- Single Central Record
- Data Protection and Privacy Policy
- Prevent Duty Policy

2. Definitions

'Regulated activity' includes:

- As a result of their work or volunteering, being responsible, on a frequent basis, for teaching, training, instructing, caring for or supervising learners, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.
- Working on a regular basis for a limited range of establishments (known as 'specified places'), or in connection with the purposes of the establishment, with the opportunity for contact with children.
- Engaging in intimate or personal care, healthcare, or any overnight activity, even if this happens only once.

Regulated activity does not include paid work which is occasional and temporary and does not involve teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.

Because almost all of Alma's staff work directly and regularly with learners, whether 1:1 in a learner's home, in the community or at an Alma hub, Alma treats every learning mentor role as regulated activity.

A 'standard DBS' provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.

An 'enhanced DBS' provides the same information as the standard DBS, plus any additional information, for example interviews and allegations, held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed. The role being applied for

must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.

An 'enhanced DBS with barred list check' is required for people working or seeking to work in regulated activity with children. This check allows for additional checks as to whether the person appears on the children's barred list, along with a check of the Police National Computer records plus additional information held by the police as above. This check can also include information as to whether an individual is subject to a section 128 direction.

The 'children's barred list' is a list maintained by the DBS which covers individuals who are unsuitable to work with children and vulnerable adults.

A 'section 128 check' provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school, which includes some alternative provision settings. Alma applies this check to anyone in a senior leadership role where it is relevant.

'Safer recruitment' is the safeguarding and protection of learners during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

3. Roles and Responsibilities

The Advisory Board

The Advisory Board, in its advisory role, will:

- Agreeing and monitoring effective policies to ensure recruitment at Alma is in accordance with the legislation outlined above.
- Seeking assurance that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.
- Seeking assurance that appropriate checks have been carried out on staff, volunteers, contractors and any agency workers working with Alma.
- Seeking assurance that those involved with the recruitment and employment of staff have received appropriate safer recruitment training, the substance of which covers, at a minimum, the content of Part 3 of KCSIE.
- Seeking assurance that at least one member of the recruitment panel has undergone safer recruitment training.
- Seeking assurance that all members of the recruitment panel understand their role, whether advisory or decision-making.
- Reviewing how vacancies are advertised, and whether this maximises the opportunity to attract the right candidates.
- Monitoring Alma's SCR to ensure that the necessary vetting checks for staff are carried out.

- Seeking assurance that equal opportunities are established and implemented throughout the recruitment process.

The Director of Education

The Director of Education will:

- Overall responsibility for the day-to-day management of the recruitment process.
- Ensuring appropriate checks have been carried out on prospective staff, volunteers and contractors.
- Ensuring that appropriate supervision of staff and volunteers is organised, and promoting the safety and wellbeing of learners generally and throughout the recruitment process.
- Leading recruitment panels and interviews.
- Ensuring that the successful candidate receives appropriate training, for example safeguarding and induction.
- Ensuring that all relevant staff members are familiar with this policy.
- Ensuring that at least one member of any recruitment panel has completed up-to-date safer recruitment training.
- Ensuring that any recruitment data kept is handled in accordance with the Data Protection and Privacy Policy.
- Determining the salary of the successful candidate, and accommodating the needs of new staff with reasonable adjustments where necessary.

During recruitment, and especially during the initial stages, the Director of Education and the recruitment panel will be watchful of candidates displaying the following characteristics:

- No understanding or appreciation of children's needs
- Expressing that they want the role to meet their own needs at the expense of children
- Using inappropriate language in relation to children
- Expressing extreme views or views that do not support safeguarding practices
- Displaying unclear boundaries with children
- Providing vague answers when asked about their experience and being unable to explain gaps in their employment

The recruitment panel

The recruitment panel is responsible for:

- Creating the advert and ensuring it meets all necessary requirements.
- Shortlisting candidates with the aim of identifying those with the potential to effectively undertake the role.
- Ensuring that the interview addresses safeguarding practices, motivation for working with children, and understanding of Alma's approach.

- Ensuring that references have been received and properly scrutinised prior to interview, and that information is not contradictory, unclear or incomplete, with clarification requested when appropriate.
- Ensuring that references include confirmation of whether the referee is satisfied with the applicant's suitability to work with children, and the facts of any substantiated safeguarding concerns or allegations that meet the harm threshold.
- Asking previous employers of new staff members whether the individual has been subject to capability procedures in the previous two years.
- Where possible, ensuring that the same people carry out shortlisting and interviewing.

The recruitment panel comprises the Director of Education and at least one other appropriate person, with at least one member having completed up-to-date safer recruitment training.

The DSL

The DSL is responsible for:

- Deciding when it is appropriate or necessary to disclose any safeguarding concerns or allegations as part of a reference, in line with KCSIE.
- Discussing the suitability of a candidate with the Director of Education when a reference has disclosed safeguarding concerns or prior allegations.

4. Planning, Advertising and Shortlisting

The job information and associated documents will be published online. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.

Once a vacancy has been identified, Alma will allow an appropriate amount of time for planning and structuring the recruitment process.

The Director of Education and Advisory Board will:

- Decide on the recruitment timeframe.
- Decide who will be involved in the process and their roles.
- Prepare the documents provided to candidates, including the job description, person specification and application form, ensuring these contain a clear message about safeguarding, the checks that will be carried out, and that references will be sought.
- Ensure that application packs state that candidates must be willing to sign a self-declaration form to obtain information about staff disqualification.

Advertising

Alma will consider the following when advertising for a role:

- The skills, abilities, experience, attitude and behaviours required for the post

- The safeguarding requirements, including the extent of contact with learners and whether the role involves regulated activity

Advertisements will include:

- A statement of Alma's commitment to safeguarding and promoting the welfare of learners, making clear that safeguarding checks will be undertaken.
- The safeguarding responsibilities of the post, as set out in the job description and person specification.
- Information on whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Vacancies are advertised with due consideration to fair and inclusive recruitment, ensuring the advertisement reaches a wide range of candidates. Advertisements will contain a statement of commitment to equal opportunities and will include, or link to, a job description, person specification and closing date. Contact details for the Director of Education and information about the application process will be clearly outlined.

Alma may use social media for recruitment, and if doing so, will ensure the advertisement reaches the right people and communicates Alma's approach effectively.

Application forms

Application forms will be accessible on Alma's website.

Where the role involves regulated activity, applicants will be reminded in the application form, or elsewhere in the information provided, that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to children.

Alma will also provide a copy of the Child Protection and Safeguarding Policy and information on the employment of ex-offenders in the application pack.

Applicants will be required to provide:

- Personal details, including current and former names, current address, and National Insurance number
- Details of current or most recent employment, including the reason for leaving
- Full employment history since leaving school, including education, employment and voluntary work, alongside explanations for any gaps
- Qualifications, the awarding body and the date of the award
- Details of references
- A statement of personal qualities and experience relevant to the post, and an explanation of why the candidate believes they meet the person specification

Alma will only accept a CV alongside a completed application form; a CV on its own will not be accepted.

Shortlisting

When shortlisting candidates for interview, all application forms will be considered. Shortlisting criteria will be agreed in advance by the recruitment panel.

Candidates who are shortlisted will meet all the essential aspects of the person specification. Alma will ensure that the shortlisting process is as systematic as possible, and that the recruitment panel reads through all applications. Each member of the panel will create their own shortlist, which will then be collated and discussed. Candidates will be assessed against the same shortlisting criteria to ensure a fair process.

Where applicable, Alma will use the application form to make clear that shortlisted candidates may be subject to online searches.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or disclosure of any information making them unsuitable to work with children, including whether they are prohibited from teaching. This information will not be requested in the application form used to decide who should be shortlisted.

Only shortlisted candidates will be asked to disclose any relevant information, including:

- If they have a criminal history.
- If they are included on the children's barred list.
- If they are prohibited from teaching.
- If they are prohibited from taking part in the management of an independent school.
- Information about any criminal offences committed in any country, in line with the law as applicable in England and Wales.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.

Applicants will sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will be required to physically sign a hard copy of the application at the point of interview. The self-declaration gives candidates the opportunity to share relevant information for discussion at interview, before the DBS certificate is received.

When shortlisting candidates, Alma will:

- Ensure that at least two people carry out the shortlisting proceedings, ideally the same two people who will conduct the interview.

- Assess whether there are any inconsistencies or gaps in the candidate's employment history and consider the reasons given for them.
- Explore all potential concerns.

Alma will consider carrying out an online search as part of its due diligence on shortlisted candidates, to identify any incidents or issues that are publicly available online. Alma will inform shortlisted candidates that online searches may take place and that aspects of the search may be explored with the applicant at interview where relevant.

Requests for further information from candidates will be replied to promptly. All applicants will be informed in writing whether they have been shortlisted.

5. Invitation to Interview

Before interview invitations are sent, the recruitment panel will ensure that application packs are sent and include:

- A copy of the advertisement
- A comprehensive job description
- A comprehensive person specification
- Any equal opportunities material
- A brief outline of Alma, its approach and aims
- Any relevant Alma policies, for example the Child Protection and Safeguarding Policy

Once a shortlist has been confirmed, candidates to be invited for interview will be contacted by the Director of Education and suitable interview times agreed. The recruitment panel will ensure that all shortlisted candidates receive information about the interview arrangements, how they will be conducted, the areas that will be explored, and what documents they should bring.

6. Pre-Interview Checks

The recruitment panel will complete the necessary pre-interview checks, including:

- Requesting two references from each shortlisted candidate directly from the referees, where possible, one relating to the role in which the candidate worked with children
- Verifying that the candidate has qualifications or experience relevant to the post
- Checking references against application forms and noting down discrepancies or concerns, and following up these concerns with referees
- Checking and, where necessary, following up candidates' self-declaration forms

7. Requesting, Checking and Providing References

Requesting references

Once a candidate, including an internal candidate, has been shortlisted, references will be requested and scrutinised by the recruitment panel before interview, where possible. Any concerns will be resolved satisfactorily before confirming an appointment. References will always be requested directly from the referee and from a senior person with appropriate authority, rather than a colleague. Alma's standard request form will always be used to obtain references.

References will be requested in written form from the candidate's current employer. If the candidate is unemployed, verification of their most recent period of employment and reasons for leaving will be obtained from their previous employer. Wherever possible, at least one reference will be from employment through which the candidate worked with children.

If the applicant has never worked with children, Alma will ensure that a reference from their current employer is received. If the candidate is a school leaver or has not been in work for over two years, a character reference will be requested.

Where a candidate is applying for a role with teaching or curriculum responsibilities, information about any capability procedures in the previous two years, and the reasons for these, will be requested from their current or former employer.

Concerns raised following a candidate's references will be explored further with the referee where appropriate and discussed with the candidate at interview.

Alma will ensure that references have been completed by a senior person with appropriate authority. If the referee is school or organisation based, the reference should be confirmed as accurate in respect of any disciplinary investigations.

When obtaining and checking references, Alma will:

- Not accept open references, for example 'to whom it may concern'.
- Not rely on applicants to obtain their own reference.
- Ensure any references are from the candidate's current employer and completed by a senior person with appropriate authority.
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed.
- Secure a reference from the relevant employer from the last time the applicant worked with children, where applicable.
- Always verify any information with the person who provided the reference.
- Ensure electronic references originate from a legitimate source.
- Contact referees to clarify content where information is vague or insufficient.
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate.

- Establish the reason for the candidate leaving their current or most recent post.
- Ensure any concerns are resolved satisfactorily before appointment is confirmed.

Checking references

References will be checked on receipt to ensure that all questions have been answered satisfactorily and that information is not contradictory or incomplete. Alma will always verify any information with the person who provided the reference, and will contact the referee for further clarification where appropriate. The reference will be compared for consistency with the information on the candidate's application form, and any discrepancies discussed with the candidate at interview.

Where a reference appears incomplete or other concerns arise, Alma will carry out one of the following actions:

- Call the referee to discuss the reference further
- Email the referee a copy of the reference for confirmation of its accuracy

The recruitment panel will ensure that any past disciplinary action or allegations disclosed as part of a reference are considered carefully when assessing the candidate's suitability for the role. Where this involves safeguarding or potential safeguarding concerns, the DSL will be consulted. The recruitment panel will ensure that the information provided in a reference does not contain information about concerns or allegations which are unsubstantiated, unfounded, false or malicious.

Before deciding not to appoint a candidate based on an unsatisfactory reference, the recruitment panel will consider whether HR advice is necessary. Once a decision is made, the Director of Education will record it on the recruitment file as the reason for non-appointment.

Providing references

Any member of staff who provides a reference is responsible for checking the content to ensure that it only contains factual and verifiable statements. If there is any doubt about whether to include information, caution will be exercised and it will be omitted. Alternatively, advice will be sought from the Director of Education.

References will only be provided once written consent has been obtained from the person requesting a reference.

The member of staff providing a reference will follow this policy's procedures and the prospective employer's requests as far as is reasonably possible.

The Director of Education will decide in exceptional circumstances if a reference cannot be provided, or if certain questions asked by the prospective employer cannot be answered, seeking HR advice where appropriate.

Staff members will make the Director of Education aware when they have been asked to provide a personal reference, for example for a current or former colleague. The staff member will make clear within the reference that it is a personal one, not written for or on behalf of Alma, and will use their own paper or an email address unaffiliated with Alma.

Details of any capability procedures in the previous two years, and the reasons for these, will be provided if requested.

Alma will ensure that any reference provided confirms whether Alma is satisfied with the applicant's suitability to work with children, and will only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold. Any concerns or allegations which do not meet the harm threshold and which have been found to be false, unfounded, unsubstantiated or malicious will not be included in any reference.

8. Content of References

Basic information will always be expected in references received and provided, for example skills, knowledge, duties undertaken, experience of working with children, and personal characteristics, as well as any information relating to safeguarding. Further relevant comments will be made as far as is reasonably possible in line with the employer's requests, provided they are verifiable and objective.

References will contain only factual and verifiable information and will not include speculation or hearsay. The person providing the reference will ensure all comments have a factual basis and that an impression is not given which is misleadingly positive or negative. Performance issues or concerns which have not been discussed or raised with the employee beforehand will not be mentioned.

All staff providing references will be made aware that information provided verbally to a prospective employer is subject to the same duties as written information, and will avoid making verbal statements unless necessary or appropriate.

9. Previous Disciplinary Action

The recruitment panel will ensure that any references requested include a section asking for any past disciplinary action or allegations to be disclosed. Any disclosures will be carefully considered when assessing the candidate's suitability for the role, in line with this policy.

Information from DBS checks will not be included in references provided by Alma. Information regarding criminal offences from other sources will not be included, unless the Director of Education deems it appropriate and HR advice has been sought.

When providing references, the disclosure of information about past disciplinary action or allegations not relating to safeguarding will be provided where it is deemed appropriate, for example where it is relevant to the staff member's suitability for the role. Information relating to disciplinary action will generally only be disclosed if penalties or sanctions remain in place.

Allegations which were proven to be false, unsubstantiated or malicious will not be included in a reference, including a history of repeated concerns or allegations found to be false, unsubstantiated or malicious. The member of staff providing the reference will make no comment on their own personal views about the veracity of allegations.

If an allegation exists which has yet to be investigated, or an investigation is incomplete, the Director of Education will seek HR advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

10. Use of Data and Confidentiality

Personal data relating to references will be handled in line with the Data Protection and Privacy Policy. All references will be properly addressed and marked private and confidential.

In accordance with the Data Protection Act 2018 and the UK GDPR, personal information will be processed fairly and lawfully, and will be kept safe and secure, for example in locked, non-portable containers or, for electronic information, password protected. Access will be strictly controlled and limited to those entitled to see it as part of their duties.

Information relating to an individual's health and sensitive personal data, for example information relating to ethnicity, religion or trade union membership, will not be disclosed as part of a reference unless express consent has been received from the individual for this purpose.

The person requesting a reference will be offered the opportunity to see it before it is sent, unless the Director of Education decides this is not appropriate. If the person raises comments about the reference before it is sent, the member of staff responsible will consider the comments and, if they decide to leave it unchanged, record the reasons why.

11. The Interview

During the interview process, candidates will be asked standard questions and their responses recorded for ease of comparison by a designated note-taker on the interview panel. Any concerns raised through contact with referees will be discussed with the candidate at this stage. The recruitment panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children.

The recruitment panel will agree structured questions for the interview. Interview questions seek to:

- Find out what attracted the candidate to the post and their motivation for working with children.
- Explore their skills and ask for examples of experience of working with children relevant to the role.
- Look at any gaps in employment, or where the candidate has changed employment or location frequently, and ask about the reasons for this.
- Seek examples of the candidate's previous experience.

Interviews will also be used to explore potential areas of concern to determine the applicant's suitability to work with children. The candidate can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.

Areas that may raise concerns and lead to further enquiry include:

- Implication that adults and children are equal.
- Lack of recognition or understanding of the vulnerability of children.
- Inappropriate idealisation of children.
- Inadequate understanding of appropriate boundaries between adults and children.
- Indicators of negative safeguarding behaviours.
- Attempts to push or overstep boundaries.
- Consistent rule-breaking behaviour.

Candidates shortlisted for interview will be given the opportunity to complete a self-disclosure form before their interview, to give the interview panel time to consider the information provided.

All information considered when making a decision will be clearly recorded along with decisions made.

The candidate will be given the opportunity to discuss any concerns or ask any questions. The process will always comprise a face-to-face or video interview.

12. After the Interview

After the interview has been completed, the recruitment panel will:

- Assess all candidates' performance using the same agreed criteria.
- Ask the successful candidate to provide proof of identification and qualifications for Alma's records, and to complete the DBS check as soon as possible.
- Contact and provide feedback to unsuccessful candidates, based on evidence of their performance against the person specification.

All information considered in decision making will be clearly recorded along with decisions made. Interview notes and assessment materials will be held securely for an appropriate amount of time after the interviews, in case any aspect of the recruitment process is challenged.

After choosing a successful candidate, Alma will:

- Make a conditional offer of employment to the candidate, subject to the completion of the mandatory pre-employment checks.
- Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
- Complete the relevant pre-appointment checks.

Any spent or filtered convictions declared on the candidate's self-declaration form, or declared at interview, will not affect an offer of employment already made; however, Alma will undertake the relevant assessments to determine whether the candidate is suitable to work with Alma.

13. Remote Recruitment

Alma will follow all the requirements set out in this policy when recruiting remotely, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this. The Director of Education will select a suitable online platform through which online interviews may take place, taking into account ease of use, privacy measures and suitability for the purpose. Online interviews will be conducted in line with the Data Protection and Privacy Policy at all times.

Staff members conducting an online interview will ensure they understand how to operate the relevant functionalities of the online interview platform, and will ensure privacy settings are adjusted appropriately.

Alma will be aware of, and have due regard for, the potential risks associated with online communication, for example ease of anonymity, and will ensure it takes suitable precautions, such as encrypting data where possible.

Alma will communicate its expectations to candidates regarding the use of the online platform in good time before the interview.

- The candidate will participate with both video camera and microphone enabled at all required times.
- The candidate will participate in a suitable setting, a quiet area with a neutral background.
- The candidate will keep personal information which is not relevant to the recruitment process private, and will not ask staff members to share any such private information.
- Where necessary, the candidate will be aware that Alma will record the online interview, and will be required to consent to this for the interview process to continue.

When recording an online interview, prior permission will be acquired from the candidate in writing, and all members of the interview will be notified before the interview commences and again once they have joined, before recording commences. If the candidate does not consent to

recording, Alma will consider whether the interview can still take place in line with Alma's safeguarding and records management responsibilities.

Alma will not discriminate against candidates who are recruited remotely; they will be considered fairly alongside any candidates who are not recruited remotely.

If a candidate refuses to interview remotely, Alma will consider whether alternative arrangements for an in-person interview are possible.

14. Pre-Appointment Checks

All appointments will be conditional on satisfactory completion of the mandatory pre-employment checks. These checks seek to identify whether there is anything that would make the candidate an unsuitable appointment for working with children.

When appointing new staff, Alma will:

- Verify the candidate's identity, for example checking the name and birth date on a birth certificate and verifying any name changes.
- Obtain an enhanced DBS check with children's barred list information, for candidates engaging in regulated activity, including volunteers.
- Obtain a separate children's barred list check if the individual will start work in regulated activity before the DBS certificate is available.
- Verify a candidate's mental and physical fitness to carry out their specific role.
- Verify the person's right to work in the UK.
- Make further checks as appropriate on any individual who has lived or worked outside the UK.
- Verify professional qualifications, as appropriate.
- Ensure that an applicant employed to carry out teaching or curriculum-related work is not subject to a prohibition order issued by the Secretary of State.

Barred list information will not be requested for anyone who is not engaging in, or seeking to engage in, regulated activity.

The recruitment panel will use the DfE's check a teacher record to make prohibition, direction, restriction and children's barred list checks where relevant.

The recruitment panel will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented so that Alma can defend its decision if challenged.

Alma will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness 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 and at the time of the incident
- Whether the individual accepted responsibility for what happened

If Alma has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act 2006 for Alma to allow the individual to carry out any form of regulated activity.

In line with KCSIE, Alma will not require candidates to have an enhanced DBS certificate or undergo checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the candidate has worked in a UK school or college in a post which brought them into regular contact with children, because the candidate will have already undergone this process in their previous position.

Volunteers

For all volunteers, Alma will undertake a written risk assessment and use professional judgement and experience when deciding what checks, if any, will be required.

All volunteers engaging in regulated activity will be required to provide Alma with an enhanced DBS check with a barred list check. Existing volunteers in regulated activity do not need to be re-checked if they already have a DBS check including barred list information; however, Alma may decide to conduct a repeat DBS check. Alma will only request barred list information for volunteers in regulated activity.

Candidates who have lived outside the UK

For candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary, including an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

Alma will make any further checks that it deems appropriate so that any relevant events occurring outside the UK can be considered, for example obtaining proof of past conduct from the professional regulating authority in the country in which the candidate worked, where available.

Where this information is not available, Alma will seek alternative methods of checking suitability, and/or undertake a risk assessment to support informed decision making on whether to proceed with the appointment.

If a candidate is unable to provide the correct documentation, they cannot submit a DBS check, because the right to work in the UK cannot be established.

Agency and third-party staff

Where any individual working with Alma is sourced from an agency or third-party organisation, Alma will obtain written notification from the organisation confirming that they have carried out

the same checks Alma would otherwise perform. In respect of the enhanced DBS check, Alma will ensure that written notification confirms the certificate has been obtained.

Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate.

Alma will obtain a copy of the enhanced DBS certificate from the agency or third-party organisation before the person is due to commence work.

Existing staff

If a member of staff moves from a post that was not regulated activity to one that is, the relevant checks will be carried out. A new check will also be carried out where there has been a break in service of 12 weeks or more, or where there are concerns about an individual's suitability to work with children.

Where an existing member of staff is moving into regulated activity, or where there is a concern about a member of staff's suitability to work with children, the recruitment panel will carry out further checks. An investigation will be carried out to gather enough evidence to establish whether an allegation has a foundation.

Alma 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 harm.
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence.
- The individual is deployed to another area of work not in regulated activity, or has been suspended, dismissed or has resigned.

Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity, and as soon as possible after resignation, removal or redeployment.

Contractors

Alma will ensure that any contractor, or employee of a contractor, working with learners 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. Under no circumstances will a contractor for whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

Alma will set out its safeguarding requirements in the contract between the contractor's organisation and Alma. If a contractor is self-employed, Alma will consider obtaining the DBS check, or request to see the certificate, and will always check the identity of contractors on arrival.

Visitors

Alma will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as learners' relatives. The Director of Education will use professional judgement about the need to escort or supervise such visitors.

Where a visitor attends in a professional capacity, Alma will check their identification and be assured that the visitor has had the appropriate DBS check for the activity they are there to carry out, or that the visitor's employer has confirmed appropriate checks have been carried out.

15. Right to Work Checks

Alma will obtain evidence that all candidates for a position have the legal right to live and work in the UK, either by conducting a manual document-based check, using an Identity Service Provider, or through the government's online portal. The offer of employment will normally be made conditional on the individual having, and continuing to maintain, the legal right to live and work in the UK for the role in which they will be employed.

When conducting a manual, document-based check, Alma will ensure that the documents received from candidates are acceptable in line with government guidance, from the appropriate list: List A for candidates with a permanent right to work in the UK, or List B for candidates with a temporary right to work. Checks on documents will be conducted in line with section 16 of this policy.

Alma will obtain proof of candidates' immigration status in the UK, and will contact the Home Office in the circumstances set out in government guidance where a statutory excuse must be established.

Alma will not make assumptions about a person's right to work in the UK, or their immigration status, on the basis of their race, ethnicity, nationality, length of residence in the UK or background. All candidates, including British citizens, will have their right to work in the UK checked.

Where a candidate's right to work is time-limited, Alma will conduct a follow-up check in advance of its expiry. Alma may use a certified digital identity service provider to conduct right to work checks on candidates.

16. Identification Checking Process

When checking the validity of identifying documents, Alma will ensure that this is done in the presence of the holder, for example in person or via a live video link, and will be in physical possession of the original documents. Alma will only accept valid, current and original documentation in its physical form, and will not accept photocopies or documentation printed from the internet.

Alma will request documents with photographic identity, such as a passport, and compare this against the candidate's likeness. Alma will not accept documents that are not in the candidate's current name as recorded on the application form.

Alma will ensure that the candidate declares all previous name changes and provides documentary evidence to support the name change. Alma will always aim to check the name on the candidate's birth certificate to validate their identity.

Alma will compare the candidate's address history with any other information the candidate has provided, such as their CV, and will ensure that all letters and statements provided are recent, for example within a three-month period.

Alma will keep a dated record of every document checked for the duration of the candidate's employment and for a further two years after they have left Alma. This will be a hard copy or scanned format which cannot be manually altered, and will be made available to the appropriate authorities if and when requested.

In line with the UK GDPR and Data Protection Act 2018, Alma will only retain copies of DBS certificates where there is a valid reason for doing so, and only for as long as is needed to consider the information provided, this will not be for longer than six months. When information is destroyed, Alma may keep a record of the fact that vetting was carried out, the result of this vetting, and the recruitment decision taken.

17. After the Pre-Appointment Checks

Once the pre-employment checks have been completed, the recruitment panel will:

- Agree a start date with the candidate.
- Destroy the completed self-declaration forms.
- Submit contractual paperwork, including the completed DBS check, copies of identification, references, proof of qualifications, a pre-employment health questionnaire, application form and emergency contacts.
- Add the required details of the checks carried out to Alma's SCR.

18. Single Central Record (SCR)

Alma will maintain and regularly update the SCR.

All new staff and volunteers who work regularly with learners will be added to the record.

The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained (for documents seen by Alma, this is the date the document was seen, not the date it was issued):

- An identity check
- A standalone children's barred list check

- An enhanced DBS check with children's barred list check, requested or certificate provided
- A prohibition from teaching check, where relevant
- Further checks on people living or working outside the UK
- A check of professional qualifications
- A section 128 check, where relevant
- A check to establish the person's right to work in the UK

For any staff sourced through an agency, Alma will include whether written confirmation has been received that the agency has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received.

If checks are carried out on volunteers, this will be recorded in the SCR.

The details of individuals will be removed from the SCR once their engagement with Alma ends.

19. Safer Recruitment Training

The Advisory Board will seek assurance that those involved with the recruitment and employment of staff to work with children have received safer recruitment training, the substance of which will, at a minimum, cover the content of Part 3 of KCSIE.

As a measure of good practice, Alma will ensure that this training is renewed every two years.

Staff and Advisory Board members involved in the recruitment process will have an awareness of information regarding:

- The recruitment and selection process
- Pre-appointment and vetting checks, regulated activity and recording of information
- Other checks that may be necessary for staff, volunteers and others
- How to ensure the ongoing safeguarding of children and legal reporting duties on employers

20. Safeguarding

For references provided to Alma, the candidate's suitability will always be assessed with particular regard paid to their suitability to work with children. The DSL will be consulted where appropriate.

The DSL recognises that Alma's duty to disclose safeguarding concerns overrides any other duties to an employee, and will ensure Alma complies with its safeguarding obligations. The DSL will ensure records are kept of all allegations against staff in line with the most up-to-date version of KCSIE.

For all safeguarding allegations, excluding those proven to be malicious, a clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached, will be kept on the confidential personnel file of

the accused member of staff. Accurate information based on these records will be given in response to future requests for a reference, where appropriate. Safeguarding information will not be given where the allegation was found to be false, unsubstantiated or malicious.

21. Monitoring and Review

This policy is reviewed annually by the Director of Education and the Advisory Board, or sooner if required by changes in legislation or statutory guidance. Any necessary amendments will be communicated to all staff. This policy was approved by Melanie Steel, Director of Education, in August 2026 and is due for review in August 2027.