



St Hilary's Prep School Policy

Recruitment, Selection and Disclosures Policy and Procedure Including EYFS

School	St Hilary's School
Policy owner	Business Manager / Headmaster
Approved / reviewed	September 2026
Next review	September 2027, or earlier if legislation or statutory guidance changes

1. Introduction

St Hilary's School actively promotes democracy, the rule of law, individual liberty and mutual respect for those with different faiths and beliefs. These are fundamental British Values which underpin all that we offer, as does our School Motto 'Not for oneself but for all.'

St Hilary's School is committed to safeguarding and promoting the welfare of children. All staff, governors, volunteers, contractors, agency workers and other adults working in or for the School share this commitment. Safer recruitment is a fundamental part of the School's safeguarding arrangements.

This policy sets out the School's recruitment, selection and pre-employment checking procedures. It should be read alongside the School's Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-Level Concerns Policy and other relevant safeguarding procedures.

2. Statutory and regulatory framework

The School will comply with the requirements of Keeping Children Safe in Education 2026 (KCSIE 2026), as amended from time to time, and will have regard to other relevant statutory guidance and legislation.

- Keeping Children Safe in Education 2026 – particularly Part Three: Safer Recruitment and Annex C.
- The Disclosure and Barring Service (DBS) guidance on eligibility for criminal record checks and regulated activity with children, including the changes effective from 1 September 2026.
- The Early Years Foundation Stage (EYFS) statutory framework, where applicable.
- The Education (Independent School Standards) Regulations 2014, where applicable.
- The Equality Act 2010 and associated duties concerning reasonable adjustments and fair recruitment.
- The Rehabilitation of Offenders Act 1974 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended.
- The UK General Data Protection Regulation and Data Protection Act 2018.

- Right to Work requirements and relevant immigration legislation.

3. Principles of safer recruitment

- Safeguarding and promoting the welfare of children will be considered at every stage of recruitment and selection.
- Recruitment advertising and candidate information will make the School's commitment to safeguarding clear.
- The School will obtain sufficient information to make a fair and informed assessment of each candidate's suitability.
- Candidates will be assessed against the published person specification and job requirements.
- The School will not appoint solely on the basis of a DBS check. DBS information forms one part of a wider suitability assessment.
- All information considered in recruitment decision-making, and the decisions made, will be recorded clearly and retained in accordance with the School's data retention arrangements.
- Recruitment processes will be applied fairly and consistently and reasonable adjustments will be made where required.

4. Recruitment and advertising

- Advertisements and recruitment literature will state the School's commitment to safeguarding and promoting the welfare of children.
- Where appropriate, advertisements will state that the successful candidate will be required to complete the relevant DBS and other safeguarding checks before taking up the post.
- Job descriptions and person specifications will identify safeguarding responsibilities and the skills, experience, knowledge and behaviours required for the role.
- The School will ensure that recruitment materials do not unlawfully discriminate and will make clear that safeguarding suitability is an essential part of the selection process.

5. Application forms and shortlisting

All applicants must complete the School's application form. A CV may be submitted in addition to the application form, but a CV will not be accepted as a substitute for the School's application form.

- The application form will obtain a full employment and education history, including dates, employers, roles and reasons for leaving, with explanations for gaps.
- Applicants will provide relevant qualifications, professional status and other information required for the role.
- Applicants will provide details of referees, including the current or most recent employer and, where relevant, the most recent employer where the applicant worked with children.
- The School will scrutinise applications for discrepancies, unexplained gaps, repeated changes of employment, or other information requiring clarification.
- Shortlisting will be against the person specification and will be carried out consistently.
- The School may undertake an online search of shortlisted candidates as part of due diligence. Candidates will be informed that such a search may be carried out. The purpose is to identify

publicly available information relevant to suitability; it will not be used as a substitute for other checks.

- Shortlisted candidates will complete the School's safeguarding self-declaration before appointment, covering relevant criminal history and other matters that may affect suitability to work with children, including prohibition, barring and childcare disqualification matters where applicable.

6. References

References are an important part of the School's safeguarding process and will normally be obtained for shortlisted candidates before interview. References will be obtained directly from the referee and will not be accepted from relatives or from people acting solely as personal friends.

- The School will normally seek at least two satisfactory references, one from the current or most recent employer.
- Where an applicant has previously worked with children but is not currently doing so, the School will seek a reference from the most recent employer where the applicant worked with children.
- References will be scrutinised and compared with the application and other information provided by the candidate.
- Any discrepancies, omissions or concerns will be explored with the candidate and, where appropriate, the referee.
- References will seek factual information relevant to suitability to work with children, including relevant disciplinary information and substantiated safeguarding concerns or allegations that meet the harm threshold.
- The School will not request or rely upon information in references about allegations that are unsubstantiated, unfounded, false or malicious, except where there is a lawful and relevant basis for considering other information.
- Written references will normally be verified verbally or by another appropriate method so that the School is satisfied as to their authenticity and the identity of the referee.

7. Interview and selection

- There will normally be at least two interviewers. At least one interviewer involved in safer recruitment will have completed appropriate safer recruitment training.
- Candidates will be assessed consistently against the requirements of the role.
- Interview questions will explore suitability for the post and, where relevant, motivation to work with children, professional boundaries, attitudes to authority and discipline, safeguarding awareness, emotional resilience and the ability to respond appropriately to children's needs.
- Any concerns or inconsistencies arising from the application, references, online search or interview will be explored.
- Where a teaching or other practical role requires it, candidates may be asked to undertake a lesson, task or other assessment.
- The School will keep a clear record of the information considered, questions asked where relevant, material responses, concerns identified and the recruitment decision.

8. Identity and qualification checks

- The School will verify the identity of the successful candidate using appropriate original documents or other lawful verification arrangements.
- Qualifications and professional status relevant to the role will be verified with the awarding body or appropriate professional source where necessary.
- For teachers, the School will use the Department for Education's 'Check a teacher's record' service as appropriate to verify QTS, teacher induction/probation and prohibition information.
- The School will verify the candidate's right to work in the UK before employment begins.

9. DBS and other pre-employment checks

The level of DBS check will be determined by the actual duties and eligibility of the role, using current DBS and DfE guidance. The School will not request a higher level of DBS check than the role is legally eligible for.

- Where a role is regulated activity with children, the appropriate Enhanced DBS check with Children's Barred List information will be obtained.
- The School will consider the new regulated-activity arrangements effective from 1 September 2026 when accepting volunteers (e.g. Parents, Grandparents or College Students who may come and read with the children) or appointing visiting specialists such as Speech and Language Therapists. The removal of the supervision exemption means that in some cases, they may now fall within regulated activity.
- For the purposes of the new rules, relevant activity is generally carried out often enough where it occurs on more than 3 days in any 30-day period, or once overnight between 2am and 6am where there is an opportunity for face-to-face contact, subject to the detailed DBS eligibility rules.
- A barred person must not undertake regulated activity with children, and the School will not knowingly permit this.
- The School will check the DBS certificate and record the required information on its Single Central Record. The School will not routinely retain a copy of a DBS certificate unless there is a lawful reason to do so.
- Where an applicant subscribes to the DBS Update Service, the School may, with the applicant's consent, carry out the required status check where the statutory conditions are met.
- The School may make other checks required for the role, including prohibition from teaching, prohibition from participation in management, childcare disqualification and overseas checks.

10. EYFS requirements

For staff and volunteers working in the EYFS, the School will comply with the EYFS statutory framework as well as KCSIE and DBS requirements.

- A person must not commence work in an EYFS setting until the School has received the required enhanced DBS certificate including Children's Barred List information where the role is eligible.
- The School will not rely solely on supervision as a reason for treating an EYFS role as outside regulated activity where the statutory criteria are met.

- Suitability checks and relevant disqualification requirements will be completed before the person begins the relevant EYFS duties.

11. Appointment pending completion of checks

The School's preferred position is that no person begins work until all required pre-employment checks have been completed. Where a check is outstanding and the law and applicable guidance permit the person to start, the Headmaster may authorise the individual to start subject to a documented risk assessment and appropriate safeguards.

- The relevant DBS application must have been submitted.
- Any required Children's Barred List check must have been completed before the person undertakes regulated activity.
- All other required checks must have been completed, including identity, references and applicable prohibition or management checks.
- The risk assessment must specify safeguards, restrictions and supervision arrangements and be reviewed regularly until the outstanding check is completed.
- The EYFS restriction in section 10 applies and is not overridden by this general provision.

12. Health and medical information

The School will comply with the Equality Act 2010 and relevant employment law. Health information will be requested only where lawful and necessary. A pre-employment health questionnaire may be requested after a conditional offer where appropriate to establish fitness for the role and identify reasonable adjustments. No appointment will be withdrawn solely on the basis of health without proper consideration of medical evidence, the requirements of the role and reasonable adjustments.

13. Criminal records and protected information

The School will comply with the Rehabilitation of Offenders Act 1974 and the Exceptions Order. Candidates will only be required to disclose convictions and cautions that they are legally required to disclose. Protected convictions and cautions will not be requested or taken into account.

Where criminal record information is disclosed, the School will consider it fairly and proportionately, taking account of the nature of the offence, relevance to the role, circumstances, age at the time, time elapsed, pattern of behaviour and any other relevant information. A criminal record will not automatically prevent appointment.

14. Prohibition, management and childcare disqualification checks

- The School will undertake the appropriate teacher prohibition checks for applicants for teaching roles and any other roles for which such checks are required.
- Where a person will participate in the management of an independent school, the School will undertake the required Section 128 check.
- The School will obtain the appropriate childcare disqualification declaration/checks for staff and others where the EYFS or other applicable childcare provisions require them.

15. Overseas applicants and overseas history

Where a candidate has lived or worked outside the UK, the School will make any additional checks appropriate to the role and the candidate's circumstances. The School will not limit this process to EEA countries.

- The School will seek criminal record information from the relevant overseas authorities where reasonably available and appropriate.
- The School may seek alternative evidence of suitability where an overseas criminal record check is unavailable.
- The School will verify relevant professional restrictions or prohibitions affecting a teacher or other regulated professional where appropriate.
- Immigration and right-to-work documents will be checked as required.

16. Volunteers

Volunteers are valued members of the School community but must be assessed for suitability in the same safeguarding framework as other adults working with children.

- The School will assess each volunteer role to determine whether the activity is regulated activity with children.
- Following the removal of the supervision exemption from 1 September 2026, a volunteer may be in regulated activity even where a member of staff is present and supervises them, if the relevant activity is undertaken often enough or overnight.
- A volunteer in regulated activity with children will be subject to the appropriate Enhanced DBS check with Children's Barred List information.
- A volunteer who is not in regulated activity may still be subject to an appropriate DBS check where legally eligible and where the School's risk assessment indicates that this is appropriate.
- For volunteers not in regulated activity, the School will undertake a written risk assessment and determine appropriate safeguarding measures, which may include identity checks, references, an appropriate DBS check, induction, a code of conduct and supervision.
- Ad hoc or one-off activities will be assessed on their actual nature and frequency rather than automatically being classified as exempt.
- Volunteers will not be left unsupervised with children where the School's risk assessment does not permit this.

17. Governors

All governors will be subject to the safeguarding and suitability checks required for their role. This will include identity verification, DBS checks where required, Section 128 checks where applicable to management participation, and appropriate overseas checks where relevant.

18. Supply staff and agency workers

- Staff employed directly by the School will undergo the School's safer recruitment process.
- Before using agency or supply staff, the School will obtain written confirmation from the supplying organisation that the required checks have been completed, including the appropriate DBS check, identity, right to work, qualifications and prohibition checks as applicable.

- The School will record the required information on the Single Central Record and will obtain sufficient information about any disclosed concerns to make a safeguarding decision.

19. Contractors and other agency staff

- Contractors who may have contact with children will be assessed according to their role and duties.
- Where contractors are supplied by an organisation, the School will obtain written assurance that appropriate checks have been completed and will verify identity on arrival where appropriate.
- Where a contractor is not subject to the required checks, the School will use appropriate controls, which may include restricting access, arranging work outside pupil hours and/or providing appropriate supervision.
- Emergency contractors will be subject to proportionate safeguarding measures and will not be permitted unsupervised access to children unless appropriately checked and eligible.

20. Work experience and placement students

- The School will assess the duties of students and work-experience participants individually.
- A young person undertaking work experience is not automatically required to have a DBS check merely because they are present in the School. However, the School will assess the role, age of the individual, nature and frequency of contact with children and whether regulated activity criteria are met.
- Where an adult is supervising a child undertaking work experience, the School will consider whether that supervision falls within regulated activity and whether an Enhanced DBS check with Children's Barred List information is required.
- Placement providers and training institutions will provide appropriate evidence of checks where they are responsible for the placement individual.

21. Visiting speakers and external providers

- The School will undertake appropriate due diligence on visiting speakers and external providers, including an online search where appropriate.
- The School will consider Prevent and safeguarding risks associated with the proposed activity.
- Identity will be checked on arrival and the School's signing-in procedures followed.
- Speakers and visitors who have not been appropriately checked will not be left unsupervised with pupils.
- The School reserves the right to stop an activity and remove pupils if safeguarding concerns arise.

22. Host families

Where pupils are accommodated by host families, the School will undertake appropriate safeguarding due diligence and risk assessment and will ensure that arrangements comply with relevant safeguarding, DBS and other legal requirements. Responsibility for the welfare of children will not be delegated solely on the basis of an informal family-to-family arrangement.

23. Induction and safeguarding culture

All new staff and relevant volunteers will receive induction appropriate to their role. This will include safeguarding and child protection procedures, the Staff Code of Conduct, the procedure for reporting concerns, online safety expectations, whistleblowing, low-level concerns and other policies relevant to the role.

The School will ensure that staff understand their safeguarding responsibilities and that recruitment decisions support a culture in which safeguarding is prioritised.

24. Single Central Record and recruitment records

- The School will maintain a Single Central Record containing the required information for staff, relevant volunteers, governors and other persons as required by KCSIE.
- Recruitment records will demonstrate the checks undertaken, dates, outcomes and any risk assessments or decisions made.
- Records will be stored securely and handled in accordance with data protection requirements.

25. Referrals and DBS duties

Where the School has a legal duty to make a referral to the DBS, the School will do so in accordance with current DBS guidance. The School will also make referrals to other relevant professional or safeguarding bodies where required.

26. Review of policy

This policy will be reviewed at least annually and sooner where there is a material change to legislation, statutory guidance, DBS eligibility rules, EYFS requirements or School practice.

Appendix 1 – Application Form: Safeguarding and Recruitment Requirements

The School's application form should collect the following information and should be used consistently for all candidates.

- Identity and contact details.
- Position applied for and source of advertisement.
- Full education, qualification and professional history relevant to the role.
- Full chronological employment history, including part-time and voluntary work where relevant, with dates and reasons for leaving.
- Explanations for gaps in employment, education or training.
- Details of current or most recent employer and relevant referees.
- Details of relevant experience and personal qualities against the person specification.
- Whether the applicant has lived or worked outside the UK and, where relevant, the countries and dates.
- Relevant professional registration, QTS or other status.
- A declaration concerning relationships or conflicts of interest with governors or employees where appropriate.
- The appropriate Rehabilitation of Offenders declaration, making clear that protected convictions/cautions must not be disclosed.
- A statement that appointment is conditional upon satisfactory completion of all required pre-employment and safeguarding checks.

Appendix 2 – Reference Request: Safeguarding Questions

References should be obtained directly from the referee. The following questions should be used or incorporated into the School's reference form:

- Please confirm the candidate's dates of employment, position and reason for leaving.
- Please comment on the candidate's suitability for the post and, where relevant, their suitability to work with children.
- Please confirm whether the candidate has been subject to any disciplinary sanction that is currently live and, where relevant, provide factual details.
- Please confirm whether the candidate has been subject to disciplinary action involving safeguarding or the safety and welfare of children, where the information is relevant and lawful to disclose.
- Please confirm whether there are any substantiated safeguarding concerns or allegations relating to the candidate that meet the relevant harm threshold and are relevant to their suitability to work with children. If yes, please provide factual details.
- Please identify any other relevant information that the School should take into account when assessing the candidate's suitability to work with children.
- Please provide the referee's name, position, organisation, contact details and confirmation of the authenticity of the reference.

The School will not seek or rely upon unsubstantiated, unfounded, false or malicious allegations as though they were established safeguarding concerns.

Appendix 3 – Shortlisted Candidate Safeguarding Self-Declaration

This declaration should be completed by shortlisted candidates before appointment. The School will explain the purpose of the declaration and will handle information confidentially and in accordance with data protection requirements.

- I confirm that the information I have provided in my application and during the recruitment process is complete and accurate.
- I confirm that I am not prohibited or barred from working with children in circumstances relevant to the post.
- I confirm that I am not prohibited from teaching, where this applies to the post.
- I confirm that I am not prohibited from participating in the management of an independent school, where this applies to the post.
- I confirm whether I am subject to any childcare disqualification relevant to the duties of the post.
- I understand that the School will undertake the required DBS and other safeguarding checks and may seek clarification about information relevant to my suitability to work with children.
- I will immediately notify the School if circumstances arise which may affect my suitability to work with children.

Candidate name: _____

Position: _____

Signature: _____

Date: _____

Appendix 4 – Recruitment Compliance Checklist

Check	Completed / Date	Notes / evidence
Application form completed and scrutinised		
Shortlisting against person specification recorded		
Shortlisted candidate safeguarding self-declaration completed		
Online search considered / completed and outcome recorded		
Interview completed and safeguarding questions considered		
Identity verified		
Qualifications / professional status verified		
References obtained and scrutinised		
References verified/authenticated		
Right to work verified		
DBS level assessed for role		
DBS check completed / Update Service check completed where applicable		
Children's Barred List check completed where required		
Teacher prohibition check completed where applicable		
Section 128 check completed where applicable		
Childcare disqualification check completed where applicable		
Overseas checks completed where applicable		
Health/fitness requirements addressed lawfully where applicable		
Risk assessment completed for any outstanding check		
Single Central Record updated		
Recruitment decision and information considered recorded		
Headteacher / authorised sign-off completed		

Appendix 5 – Key References

- Department for Education, Keeping Children Safe in Education 2026 (in force from 1 September 2026).
- Disclosure and Barring Service, Regulated activity with children – updated September 2026.
- Disclosure and Barring Service, Eligibility for Roles working with children – September 2026.
- Disclosure and Barring Service, Eligibility for Enhanced with Barred List DBS checks with children – September 2026.
- Department for Education, Early Years Foundation Stage statutory framework – September 2026.