

ACET Safer Recruitment Policy

DATE:	September 2026
POLICY LEAD:	Chief People Officer
APPROVED BY:	Executives



Excellence



Equity



Empowerment

DOCUMENT CONTROL		
Policy Level	Trust	
Approved By	Executive	
Approval Date	August 2026	
This policy remains valid until it is reviewed and replaced; it does not expire by date alone. Policies are reviewed annually, or sooner if required by statutory or legislative changes, in line with best practice		
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Version Number	Date Issued	Updated Information
V2	October 2024	Updated to new format and minor updates to terminology. Updated references to KCSIE 2024. Updated recruitment process to reflect it is now online via an ATS, My New Term.
V3	September 2025	Updated references to KCSIE 2025. Added clarity around how we handle information about criminal convictions.
V4	August 2026	Fully rewritten policy in line with new KCSIE 2026 guidance and updated ACET Child Protection and Safeguarding Policy.
V5	September 2026	Added a short clarification in the volunteers section to make it explicit that existing volunteers who move into regulated activity must obtain the appropriate DBS and barred list checks before undertaking that activity.

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1. Purpose

Aston Community Education Trust (ACET) is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, governors, trustees, agency workers, contractors and visitors to share this commitment.

The Trust recognises that safer recruitment plays a critical role in safeguarding children by helping to deter, identify and reject individuals who may pose a risk to children or who are otherwise unsuitable to work in an education setting.

This policy sets out the Trust's approach to safer recruitment and selection and should be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Whistleblowing Policy, Disciplinary Policy and associated safeguarding procedures.

2. Scope

This policy applies to all appointments made by ACET, including:

- permanent and temporary employees;
- agency workers;
- supply staff;
- apprentices;
- volunteers;
- governors and trustees where relevant checks are required;
- contractors;
- peripatetic teachers;
- sports coaches;
- tutors; and
- any other individuals engaged to undertake work within an academy.

3. Roles and Responsibilities

The Board of Trustees is responsible for approving and monitoring the Trust's safer recruitment arrangements and ensuring compliance with statutory requirements.

The Chief Executive Officer and Chief People Officer are responsible for ensuring appropriate systems, procedures, guidance and support are in place across the Trust to enable compliance with safer recruitment requirements.

Principals are responsible for implementing this policy within their academy and ensuring recruitment, selection, vetting and safeguarding checks are carried out in accordance with this policy and current statutory guidance.

Managers involved in recruitment are responsible for following safer recruitment procedures, identifying and escalating concerns and ensuring safeguarding remains central throughout the recruitment process.

Human Resources will provide professional advice, support and quality assurance throughout the recruitment process. Accountability for appointment decisions remains with the appointing Principal.

4. Regulated Activity

The Trust recognises that determining whether a role constitutes regulated activity is a fundamental part of safer recruitment and safeguarding compliance.

Regulated activity is defined in legislation and includes specified work with children, including teaching, training, instructing, caring for or supervising children, providing advice or guidance relating to wellbeing, undertaking personal or intimate care, driving a vehicle solely for children or carrying out overnight activity.

In most cases, roles within ACET will constitute regulated activity. This includes teaching staff, support staff, leaders and many other roles where individuals work regularly in educational settings and have direct or indirect access to children. The Trust's default position is therefore that roles will be treated as regulated activity and will require an enhanced DBS certificate with children's barred list information.

This approach reflects the Trust's safeguarding responsibilities and legislative changes introduced through the Crime and Policing Act 2026, which strengthened the circumstances in which individuals working with children are considered to be undertaking regulated activity.

Where a Principal considers that a role may not constitute regulated activity, advice must be sought from Human Resources before recruitment commences. No decision to treat a role as non-regulated activity should be made without such advice. The rationale for the decision, together with the safeguarding checks required for the role, must be clearly documented.

5. Recruitment Planning

Before recruitment begins, the Principal will ensure that:

- there is a legitimate business need to fill the vacancy;
- an up-to-date job description is in place;
- an appropriate person specification has been prepared;
- safeguarding responsibilities have been clearly identified;
- the level of safeguarding checks required has been determined; and
- the selection process has been planned appropriately.

6. Advertising Vacancies

All recruitment advertisements will include a statement outlining the Trust's commitment to safeguarding and promoting the welfare of children.

Advertisements will make clear that appointments are subject to satisfactory pre-employment checks, including an enhanced DBS certificate and children's barred list check where required.

Job descriptions and person specifications will clearly identify safeguarding responsibilities relevant to the role.

7. Applications

All applicants must apply through the Trust's recruitment platform, MyNewTerm, and complete the application process in full. CVs will not be accepted as a substitute for a completed application, although they may be submitted as supplementary information where requested.

The application process is designed to obtain a full employment, education and training history together with details of qualifications, professional memberships and relevant experience.

Applicants must provide explanations for any gaps in employment, education or training history and disclose any information relevant to their suitability to work with children.

The Principal, supported by Human Resources, will ensure that applications are scrutinised carefully. Any inconsistencies, unexplained gaps, anomalies or concerns identified during the recruitment process will be explored further and appropriately documented.

Applicants will be informed that:

- safeguarding and promoting the welfare of children is everyone's responsibility;
- appointments are subject to satisfactory pre-employment checks;
- online searches may be undertaken on shortlisted candidates;
- providing false, misleading or incomplete information may result in an application being rejected or an offer of employment being withdrawn.

8. Shortlisting

The Principal will ensure that shortlisting is undertaken objectively (by at least two people) against the published person specification. Records of the shortlisting process will be retained.

Applications will be reviewed to identify:

- unexplained gaps in employment or education;
- inconsistencies or discrepancies;
- repeated short periods of employment;
- safeguarding concerns; and
- issues requiring further exploration at interview.

Any concerns identified during shortlisting will be recorded and explored with the candidate.

9. Online Searches

In accordance with statutory guidance, online searches may be undertaken on shortlisted candidates as part of the Trust's due diligence process.

The purpose of online searches is to identify information that may be relevant to a candidate's suitability to work with children or their ability to uphold public trust and confidence.

Any concerns identified will be considered objectively, discussed with the candidate where appropriate and recorded as part of the recruitment process.

10. References

References will be sought for shortlisted candidates prior to interview wherever possible.

References will be obtained directly from the referee and will be scrutinised for consistency with the application and any other information available.

Any discrepancies, anomalies or concerns will be explored and resolved before an appointment is confirmed.

In accordance with statutory guidance, references will include relevant safeguarding information, including substantiated safeguarding allegations that meet the criteria for disclosure.

References will not include allegations that have been found to be false, malicious, unfounded or unsubstantiated.

11. Interviews and Selection

The Principal will ensure that all selection processes assess a candidate's suitability to work with children.

Interview panels will explore:

- employment history;
- qualifications and experience;
- safeguarding knowledge;
- gaps or anomalies identified during shortlisting;
- information arising from references or online searches.

Safeguarding-focused questions will form part of every interview process.

At least one member of the interview panel will have completed appropriate safer recruitment training in accordance with statutory guidance.

12. Pre-Employment Checks

An offer of employment (including agency engagements, voluntary roles and other appointments where appropriate) will be conditional upon the satisfactory completion of all relevant pre-employment checks.

The Principal, supported by Human Resources, must be satisfied that all required checks have been completed and are satisfactory before an individual commences work.

The checks required will vary according to the role and may include:

- verification of identity;
- enhanced DBS certificate;
- children's barred list check where required;
- verification of professional qualifications;
- verification of professional status where relevant;
- right to work checks;
- prohibition from teaching checks;
- Section 128 checks;
- overseas criminal record checks where appropriate;
- childcare disqualification checks where applicable;
- health declaration and fitness to work assessment where appropriate; and
- verification of employment history and references.

No individual will be permitted to commence work until all relevant checks have been completed and any concerns appropriately resolved.

13. Disclosure and Barring Service (DBS) Checks

The Trust is committed to carrying out DBS checks in accordance with legislation, statutory guidance and DBS requirements. The level of DBS check undertaken will be determined by the nature of the role and

whether it constitutes regulated activity. In most cases, roles within ACET will require an enhanced DBS certificate with children's barred list information.

Where information is disclosed through a DBS check, the Principal will work with Human Resources to undertake an appropriate risk assessment before any appointment is confirmed. Any decision to appoint where information is disclosed must be fully documented and supported by a clear rationale.

14. Prohibition, Section 128 and Other Checks

The Principal will ensure that any additional checks required by law or statutory guidance are completed before appointment.

These may include:

- prohibition from teaching checks (all teaching posts);
- prohibition from management checks (Section 128)*;
- checks relating to qualified teacher status;
- overseas criminal record checks;
- checks relating to professional registration bodies; and
- any other safeguarding checks required by legislation or statutory guidance.

Where concerns arise from any such check, advice must be sought from Human Resources before a decision is made.

* Section 128 checks must be conducted on all management posts. These are defined as any leadership post, any TLR holder, any support staff post on or above above Band H, and any governance role.

15. Single Central Record

Each academy will maintain a Single Central Record (SCR) in accordance with statutory requirements. An SCR will also be maintained for centrally employed ACET staff.

The Chief People Officer is responsible for ensuring appropriate Trust-wide systems and processes are in place for maintaining the SCR.

Principals are responsible for ensuring that all required information relating to individuals working within their academy is recorded accurately and in a timely manner.

The SCR will be subject to periodic quality assurance and audit activity to ensure compliance with statutory guidance and Trust requirements. Any omissions, inaccuracies or concerns identified through audit processes must be addressed promptly and are the responsibility of the Principal.

16. Agency and Supply Staff

The Principal will ensure that written confirmation is received from the supplying organisation confirming that all required recruitment and safeguarding checks have been completed before an individual commences work within the academy.

This confirmation must include verification that:

- identity checks have been completed;
- the appropriate DBS check has been completed;
- barred list checks have been undertaken where required;

- right to work checks have been completed; and
- any other checks required for the role have been satisfactorily completed.

The academy must verify the identity of agency and supply staff upon arrival.

Where concerns arise regarding safeguarding checks or suitability, advice must be sought from Human Resources before the individual is permitted to work.

17. Volunteers

The Trust recognises the valuable contribution that volunteers make to academy life and is committed to ensuring that appropriate safeguarding arrangements are in place.

The Principal is responsible for ensuring that the role of each volunteer is assessed to determine the level of safeguarding checks required.

In accordance with current legislation and statutory guidance, Principals must obtain sufficient information to determine whether a volunteer's activities constitute regulated activity and maintain an accurate record of the frequency and nature of those activities. This assessment should take account of the cumulative number of days on which a volunteer undertakes relevant activity and must be reviewed over any rolling 30-day period.

The Trust recognises that, following changes introduced through the Crime and Policing Act 2026, supervision arrangements alone may not remove the requirement for safeguarding checks where an individual undertakes activities that fall within the definition of regulated activity.

Where a volunteer teaches, trains, instructs, cares for or supervises children on more than 3 days within any 30-day period, or undertakes relevant activity overnight with the opportunity for face-to-face contact with children, the role will normally be treated as regulated activity. In such circumstances, the Principal must ensure that the appropriate safeguarding checks, including an enhanced DBS certificate and children's barred list check where required, have been completed before the volunteer commences the activity.

Volunteer arrangements must be reviewed whenever the frequency, duration or nature of the volunteer's activities changes to ensure that the safeguarding arrangements and level of vetting remain appropriate.

Where a volunteer is assessed as operating below the regulated activity threshold, the Principal must ensure that an appropriate risk assessment is completed and recorded, setting out the safeguarding controls and supervision arrangements that will be implemented. Where an existing volunteer's role changes and becomes regulated activity, the appropriate enhanced DBS certificate and children's barred list check must be obtained before the volunteer undertakes that activity.

All volunteers will receive safeguarding information appropriate to their role and will be expected to comply with academy and Trust safeguarding procedures at all times.

18. Contractors, Tutors and Other Third-Party Providers

The Principal will ensure that contractors, peripatetic teachers, sports coaches, tutors and other third-party providers are assessed to determine the safeguarding requirements applicable to their role. Before work commences, the Principal must be satisfied that appropriate safeguarding and vetting checks have been completed.

Where individuals undertake regulated activity, the academy must obtain evidence that the required safeguarding checks, including enhanced DBS and children's barred list checks where applicable, have been completed.

Visitor management arrangements and safeguarding requirements relating to contractors, visitors and external providers are set out within the Trust's Child Protection and Safeguarding Policy.

19. Ongoing Vigilance

Safer recruitment does not end when an appointment has been made.

Principals are responsible for maintaining ongoing vigilance regarding the suitability of staff, volunteers, agency workers, contractors and other individuals working within their academy. Any concerns regarding conduct, professional boundaries, safeguarding practice or suitability to work with children will be managed in accordance with the Child Protection and Safeguarding Policy, Staff Code of Conduct, Disciplinary Policy, Whistleblowing Policy and Managing Allegations Procedures.

The Trust is committed to promoting a culture of vigilance, professional curiosity, openness and shared responsibility for safeguarding children.

All staff have a responsibility to raise concerns where they believe an individual may pose a risk to children or where safeguarding standards are not being maintained.

20. Monitoring and Review

This policy will be reviewed annually or sooner where changes in legislation, statutory guidance or Trust arrangements require.

The Chief People Officer will maintain oversight of safer recruitment compliance across the Trust and will report significant issues, risks or trends through appropriate governance arrangements.

Principals are responsible for ensuring compliance with this policy within their academy and for implementing any actions arising from audits, reviews, safeguarding inspections or quality assurance activity.