

## Safer Recruitment Policy

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## 1. Purpose and scope

Red Balloon of the Air (RBAir) is committed to ensuring that all learners accessing our provision remain safe. A key element of this commitment is the organisation's policy and practice regarding the recruitment and retention of staff, trustees and volunteers.

This policy governs the appointment of all RBAir employees (permanent and temporary) and all volunteers (including RBET trustees).

## 2. Policy statement and provision

### 2.1. Responsibility for Implementation

The DSL (Designated Safeguarding Lead) and nominated RBET trustee are responsible for ensuring good safe recruitment practice, i.e. that no 'unsuitable' person is employed by RBAir or works as a trustee or volunteer.

### 2.2. Statutory requirements

The Safeguarding Vulnerable Groups Act (2006) established the Independent Safeguarding Authority (ISA) to make decisions about individuals who should be barred from working with children and to maintain a list of these individuals. The Protection of Freedoms Act (2012) merged the ISA with the Criminal Records Bureau (CRB) to form a single, new, non-departmental public body called the Disclosure and Barring Service (DBS).

Under the Safeguarding Vulnerable Groups Act (2006) it is an offence for an employer to knowingly employ someone in a regulated position if that person is barred from such work. It is also an offence for the individual who has been barred to apply for a regulated position (one which involves spending regular time working with children).

The Protection of Freedoms Act (2012) reduced the scope of 'regulated activity' by focusing on whether the work is unsupervised (in which case it counts as 'regulated activity') or supervised. The new definition of regulated activity came into force on 10 September 2012 and was issued in conjunction with guidance on the level of supervision required to take work out of the scope of regulated activity.

The Safeguarding Vulnerable Groups Act (2006) also imposed the legal requirement on employers to refer to the ISA (now DBS) information about employees or volunteers who (may) have harmed children while working for them.

In 2013 (updated on numerous occasions, most recently September 2025) the DfE issued further statutory guidance: 'Keeping Children Safe in Education'. Compliance with this guidance (for independent schools) is required under section 157 of the 2002 Education Act.

### 2.3. Practice

As required within this statutory guidance, RBAir will ensure that it:

RBAir operates safe recruitment procedures to ensure compliance with statutory duties to check staff and volunteers working with children, makes proportionate decisions on any additional checks required, and ensures that all recruitment panel members are properly trained (KCSiE 2025, Part 3, paras 282–290).

RBAir will ensure that in pursuing safe recruitment procedures it does not discriminate against anyone for reasons of disability. In accordance with the 2010 Equality Act we will do all that we can to ensure any applicants with a disability suffer no discrimination whatsoever, and that, should they be appointed, they are supported to carry out their duties effectively (See Equality Information and Objectives Policy).

**RBAir will ensure that no person who is known to pose a risk of harm to children engages in any 'regulated activity' or is engaged by the organisation in any role regardless of whether that role involves engagement in regulated activity.**

Regulated activity is defined as 'having the opportunity for contact with children', specifically through:

- teaching, training, caring for or supervising young people including all work carried out within a school;
- providing advice or guidance on the wellbeing of young people;
- driving a vehicle that is being used solely for the purpose of transporting young people.

## 3. Checks on new staff

DfE regulations for schools contain a statutory duty that schools must obtain a barred list check with an enhanced criminal records check for newly appointed staff. The DBS check is only statutorily required for staff who within the three months before their appointment have not worked in:

- a school in England in a post which brought them into regular contact with children or any post they were appointed to since 12 May 2006;

- an FE college in England in a position which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18.

However, whilst an employee may begin employment, RBAir practice is that, unless the DBS is portable, a new DBS will be applied for, and a barred list check will always be carried out (even for staff transferring from current employment in regulated activity).

KCSiE (Sept 2025) states that: 'For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.'

## 4. Recruitment procedure

### 4.1 Advertising

- Careful consideration should be given to the advert for the role. Adverts must be enticing, engaging, and exciting for the reader, while at all times being truthful and accurate. The advert should contain key details such as location, summary of the role, salary/salary range, and how to apply.
- Suitable discussion must be held and recorded to show where the advert will be placed. Consideration should be given to which recruitment sites would be most appropriate for advertising the post.
- Ensure adverts avoid any wording that may be unclear or could be open to legal challenge. Apart from very limited and lawful exemptions, advertisements must not discriminate on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- No one should ever be appointed solely on the basis of their CV. Application forms must be completed by each person wishing to be considered for a role within RBAir.
- The application process should be clear, concise, and easy to follow, making effective use of resources such as job descriptions, candidate briefing papers, annual reports, and the school website. Care should be taken to ensure the accuracy and veracity of all aspects of the advert. Safeguarding and safer recruitment procedures will be applied to all applicants in line with statutory guidance (DfE, 2025, KCSiE Part 3).

- Wherever possible, all vacancies will be advertised simultaneously internally and externally. Steps will be taken to ensure that knowledge of vacancies reaches under-represented groups.
- All vacancy advertisements will include:
  - A clear statement of RBAir's commitment to safeguarding and promoting the welfare of children;
  - A notice that safeguarding checks will be undertaken;
  - A statement indicating whether the post is exempt from the Rehabilitation of Offenders Act 1974;
  - A reminder that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity with children;
  - Appropriate statements on safeguarding and on equality and diversity.
- Applicants will be provided with RBAir's Safeguarding and Child Protection Policy. Where the post involves regulated activity, information provided will clearly state that it is an offence to apply if the applicant is barred from such activity.

## 4.2 Longlisting

- For roles attracting a large number of applicants, typically 40 or more, a longlisting process may be used to sift the initial tranche of application forms. This process can consider straightforward criteria such as whether the form was completed correctly, the presence of numerous spelling mistakes, a very brief personal statement, or whether any required forms were missing. This step can be omitted if the number of applicants is manageable.

## 4.3 Shortlisting

- All applicants who remain in the process at this stage, after the possible use of the longlisting process, will be scrutinised via the candidate shortlisting grid. Only candidates' initials will be entered across the top, with all the required person specification details listed down the side. Ideally it will be the interview panel who individually complete this grid and then meet to discuss notes, findings and who they want to call for an interview. Ideally, for a day of interviews, no more than seven candidates should be called. Consideration should be given to extend the interview to two days if more than seven are shortlisted. Alternatively, the shortlisting team can revisit the criteria and reduce the number of candidates further.
- Every shortlisted candidate should show no gaps in their employment - care must be taken by anyone involved in shortlisting to ensure that any gaps are noted and marked for question and clarification with the relevant candidates.

- Our shortlisting process will involve at least two people and will:
  - consider any inconsistencies and look for gaps in employment and reasons given for them ;
  - explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- complete a self-declaration of their criminal record and other relevant information that may make them unsuitable to work with children. This includes:
  - Criminal history
  - Inclusion on the children's barred list
  - Prohibition from teaching or managing an independent school
  - Relevant offences committed outside the UK
  - Any known police or social care involvement
  - Any disqualification under the Childcare Disqualification Regulations

This declaration will be discussed at interview prior to DBS results being available.

- We will also carry out an online search of shortlisted candidates as part of our due diligence process to help identify any issues or incidents that are publicly available online. Candidates will be informed of this as part of the shortlisting process.

#### **4.4 Post-shortlisting and pre-interview**

- All shortlisted candidates will be contacted and invited to interview. Candidates that have not been shortlisted should be contacted to say that they have been unsuccessful. The interview panel, including recruiting manager(s), should decide if just an interview on its own will provide enough information for them to choose the right candidate(s). Consideration should be given to the use of one or more of the following:
  - a presentation by the candidate to the panel;
  - a written exercise to be completed at interview;
  - an observed lesson/programme;
  - a psychometric test;
  - a group exercise;
  - an in-tray / time management exercise;
  - any other suitable test or method to gain valuable insights into the candidate's ability to deliver on the role.

- All candidates must receive any relevant paperwork regarding the interview process and what will be expected of them in a timely and accurate manner. The HR Team and recruiting staff must be careful to avoid any jargon or wording which only an existing staff member would understand.
- A suitable list of questions should be written to ensure the candidates are able to demonstrate their knowledge, skills, attitudes and experience to be successful in post. The questions should cover a range of topics and scenarios specific to the advertised role and the questions **must** contain at least one safeguarding question **and** a question which ensures any issues as noted on a DBS check are explored. If there are any unexplained gaps in employment, these must be explored.
- A pack containing all shortlisted application forms and relevant applicant details should be produced for each panel member. This should also include a blank questions template onto which the candidate's answers are recorded. Best practice is that notes taken from an interview are hand-written and not input onto a laptop.

## 4.5 Interview

The interview is a key part of RBAir's recruitment process. It is also an opportunity to demonstrate to candidates that the safety of our young people is paramount and that RBAir has a robust and effective culture of safeguarding across the organisation.

- Upon entering an RBAir building, candidates will see information on our Safeguarding Team and information about reporting concerns. They will sign in and receive an RBAir visitor's badge.
- The interview panel will consist of at least two, though ideally three, staff and/or RBET trustees. One of the panel **must** be trained in Safer Recruitment. A suitable introduction should be given by one of the panel to ensure that each candidate is aware of the process and how the interview will be conducted alongside standard safety / fire safety instructions.
- The candidate's attitude to and knowledge of safeguarding will be explored via scenarios and direct questioning. The importance of safeguarding as 'everyone's responsibility' will be discussed, along with the RBAir approach of 'it could happen here' and the need for staff vigilance.
- RBAir intends to demonstrate its robust safeguarding culture at interview and to check the candidate is in alignment with our careful approach. This is intended to deter unsuitable candidates and reassure those candidates who have the best interests of learners at heart.

- Each of the panel should use their question template to record the candidate's answers. Panel members should not write down any scores to questions whilst with any candidate. Care should be taken to shield the questions from the candidates. Each candidate should not be able to see any paperwork about any other candidates.
- Candidates should be given the chance to ask their own questions at the end of the interview. They should also be told what the next steps are and when they are likely to hear the outcome of their interview .
- The interview process will use a structured format agreed in advance by the panel. Questions will include:
  - Motivation for working with children
  - Exploration of safeguarding knowledge
  - Probing of any employment gaps or frequent changes in roles or location
  - Discussion of the self-declaration
- Areas of concern will be fully explored and recorded. Interviews may also include learner involvement, where appropriate, such as observations or supervised interaction, as good practice.

## 4.6 Appointment

All interviewed candidates should be contacted with their outcome - ideally the successful candidate first. This allows for a regrouping and reconsideration of other candidates if the successful person turns down the offer.

## 4.7 Pre-employment checks

Any offer of employment will be made subject to the satisfactory completion of pre-employment checks. The Chair of the interviewing panel will ensure that the following actions are pursued:

- Verify the candidate's identity - photographic ID and proof of address should be seen except where, for exceptional reasons, none is available. The DBS requires that a person's identity has been properly verified for the purposes of an application for an enhanced criminal records check.
- Check (prior to appointment) with the recruiting manager that suitable and relevant qualifications required for the post are held by the applicant.
- Verify the person's right to work in the UK - if there is uncertainty about whether an individual needs permission, the UK Border Agency's immigration enquiry bureau at [UKBAPublicenquiries@ukba.gsi.gov.uk](mailto:UKBAPublicenquiries@ukba.gsi.gov.uk) will be contacted. We will keep a copy of this

verification for the duration of the member of staff's employment and for two years afterwards.

- If the disclosure is not considered sufficient to establish suitability to work in a school (because it would not cover offences committed abroad, but only those on the police national computer), RBAir will obtain whatever evidence of checking is available from the person's country of origin (or any other countries in which he or she has resided) and will do so before the appointment is made. There is no definite specification as to how long the applicant would need to have lived outside the UK for such checks to be sought, but the NSPCC advises three months and RBAir will follow that advice (NB The Home Office has published updated guides on what checks are available from different countries; a UK national returning to the UK after working in a foreign country should be asked to obtain a certificate of good conduct or equivalent from the country in question and extra references should be requested for applicants from countries which do not provide criminal record checks).
- Access an enhanced DBS check including barred list information for those who will be engaging in regulated activity.
- Verify the candidate's medical fitness - it is the statutory responsibility of employers to satisfy themselves that individuals have the appropriate level of physical and mental fitness before an appointment offer is confirmed. Potential appointees will be asked to complete a form asserting they are physically and mentally able to meet the requirements of the post for which they have applied.
- Ensure a prohibition check is pursued - QTS (Qualified Teacher Status) is not a requirement for teachers in the independent sector, but schools must now check that anyone employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State. The check is completed via the secure access portal on the 'Teacher Services' webpage and can be undertaken on individuals who do not have QTS by searching by name on the list of banned people (this applies to those appointed to teach on or after 1 April 2012). Any prohibition from work made by the now defunct GTCE (General Teaching Council for England) remains current and any position who has been subject to disciplinary proceedings by that body will not be considered for work within the organisation.
- Check whether any 'teacher restrictions' have been imposed by any European Economic Area (EEA) Authorities responsible for regulating the teaching profession. Restrictions imposed by other EEA authorities do not prevent an individual from taking up a teaching position in England, but any RBAir recruitment panel will consider the restriction when considering a candidate's suitability for appointment.

*The above checks will be completed before a person takes up a position. An enhanced disclosure must be obtained before, or as soon as practicable after, appointment. Pending arrival of an enhanced disclosure, the proprietor or Head of Centre of RBAir has the discretion to employ the person with appropriate safeguards, provided those safeguards (e.g. supervision) are clearly stated, the postholder is informed of the safeguards and they are reviewed at fortnightly intervals. A note must be placed on the Single Central Register (SCR) to this effect.*

References will always be sought, ideally prior to the interview and always before appointment. KCSiE (Sept 2025) states that: ‘The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.’

Two references will be taken up, including a request for any reason why the applicant should not be employed for work with children. This should ideally happen before the interview so that any questions arising from the references can be explored in the interview itself. If a reference is taken over the telephone, detailed notes will be taken, dated and signed. A subsequent hard copy will also be requested. References will be read on receipt to check that all specific questions have been answered satisfactorily, with appropriate follow-up where required. References not received in good time before appointment will be chased by telephone and alternative referees must be sought if needed.

References sent by email should come from a business account. If the provider does not have access to a business account and uses a personal ‘server’ (e.g. they may be retired), then telephone calls will be made to ascertain the legitimacy of the provider and the reference.

Where there have been gaps in an applicant’s employment history, the appointing panel must satisfy themselves, either through references or at interview, that the reason(s) for those gaps is/are legitimate.

Should a reference (or references) arrive after the interview and indicate gaps in service or any other issue that requires further interrogation, then a member of the interviewing panel will meet with the potential appointee to seek confirmation regarding their suitability for appointment.

All posts will be offered subject to suitable references, if these are not yet received, and initially on a probationary period. If there are any concerns, particularly of any threat to learners’ welfare or safety, then employment with RBAir may be terminated immediately

during that period. If the probationary period is successfully completed, then the employee will move on to a permanent contract providing appropriate employment rights. Were there subsequently to be concerns re practice, they would be dealt with through the RBAir's identified processes (see Safeguarding and Child Protection Policy, Whistleblowing Policy and Dealing with Allegations of Abuse against Staff Policy).

RBAir will refer anyone who has harmed or is considered to pose a risk of harm to a child and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left, to the DBS immediately. 'There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty' (KCSiE Sept 2025).

Staff in a management position will be checked to ensure that they are not barred from holding a management position. The regulations state that this applies to:

- Head of Centres;
- staff on the leadership team (including non-teaching staff);
- teaching posts with departmental headship.

### **DBS Update Service**

Staff may be required, as part of their employment conditions, to subscribe to the DBS Update Service. This allows RBAir to carry out status checks to ensure no new information has been added to the certificate. Before using the service, we will:

- obtain the individual's consent;
- check that the certificate matches the individual's identity;
- confirm the certificate is at the appropriate level and relates to the children's workforce.

This service supports portability of DBS checks and reduces duplication across schools.

## **3.8. Childcare Disqualification Checks**

While the Childcare (Disqualification) Regulations 2018 and the Childcare Act 2006 primarily apply to staff working with children under the age of eight, RBAir acknowledges this statutory framework and confirms that it does not currently provide education or care for children in this age group.

Therefore, the Childcare Disqualification arrangements do not apply to our setting at present. Should our provision in the future extend to include children under eight years old,

appropriate disqualification checks will be implemented in line with the latest statutory guidance (Disqualification under the Childcare Act 2006, 2023).

## **4. Procedures applied to trustees**

The Chairs of RBET Trustees, together with all full members of the RBET trustee group, will be subject to an enhanced DBS check. Checks will be carried out prior to appointment, or as soon as practicable after appointment.

Any new RBET trustee will be checked against the new 'prohibition from management' list. It is noted that, 'A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools' (KCSiE Sept 2025).

## **5. Procedures for agency and third-party staff**

Due to the specialised nature of the provision, RBAir does not employ agency staff to work with children.

We will obtain written notification from any third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **6. Procedures for volunteers**

RBAir understands that schools are not legally permitted to request a Barred List Check on a volunteer who, because they are regularly supervised, is not in regulated activity and that there is no duty for an enhanced criminal records check to be obtained, although a Head of Centre may take the decision that it is prudent to seek such a check. KCSiE (Sept 2025) advises that regulated activity is 'not including work done by supervised volunteers'. Given the vulnerable nature of the RBAir learner cohort, we will always seek an enhanced DBS check when a volunteer will be in close contact with learners.

The Head of Centre (or a member of staff to whom that responsibility is delegated) will undertake a risk assessment and utilise their professional judgement and experience to decide whether further checks should be sought in the case of all volunteers.

In reaching that decision they should consider:

- the nature of the work with children;

- what the establishment knows about the volunteer including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability.

If a volunteer is to work in regulated activity, then the Head of Centre must decide what supervisions are required. The person carrying out such supervision must:

- be in regulated activity themselves;
- provide that supervision regularly on a 'day-to-day' basis.

The Head of Centre must assure themselves that the level of supervision is, 'reasonable in all the circumstances to ensure the protection of children' (KCSiE Sept 2025).

## 7. Safer recruitment checks for contractors

At RBAir, all contractors engaged to work with or around our learners must undergo appropriate safer recruitment checks. This part of the policy outlines the checks required for contractors engaged in both regulated and non-regulated activities to ensure that we meet statutory safeguarding requirements and protect our learners from harm.

### 7.1. Contractors in regulated activity

Contractors who are engaged in *regulated activity* – activities that involve teaching, training, supervising or caring for children, and which are unsupervised and take place regularly must meet the following criteria:

- **Enhanced Disclosure and Barring Service (DBS) check with Children's Barred List check:** All contractors in regulated activity will undergo an enhanced DBS check carried out by RBAir that includes a check against the Children's Barred List.
- **Verification of identity:** Contractors must provide proof of their identity, including photographic ID and supporting documents, in line with current DBS identity checking guidelines.
- **Right to work in the UK: Contractors** must provide documentation confirming their legal right to work in the UK.

- **References:** At least two professional references must be obtained, one of which must be from the contractor's most recent employer. These references must confirm the contractor's suitability to work with children.
- **Safeguarding training:** Contractors must complete relevant child safeguarding training and demonstrate an understanding of RBAir's safeguarding policies and procedures before commencing work.

## 7.2. Contractors in non-regulated activity

Contractors who are **not engaged in non-regulated activity** – activities that do not involve direct supervision or care of children and are supervised or infrequent – must meet the following criteria:

- **Enhanced or Basic DBS check:** Depending on the nature of the work and level of contact with learners, an enhanced or basic DBS check may be required. The decision will be made following a risk assessment by RBAir's Safeguarding Team.
- **Verification of identity: Contractors** must provide photographic ID to confirm their identity, as well as supporting documents to verify their right to work in the UK.
- **Risk assessment and supervision: Contractors** in non-regulated activity will be subject to a risk assessment to determine the level of supervision required while on site. They must always be supervised by a member of staff if working in areas where they may come into contact with learners.
- **References:** At least two professional references must be obtained, one of which must be from the contractor's most recent employer.
- **Safeguarding Awareness:** While contractors in non-regulated activity are not legally required to undertake full safeguarding training, RBAir requires that all contractors are made aware of the Centre's safeguarding policies and procedures. Contractors must be briefed on how to report any safeguarding concerns they may have, even if they are not directly working with children.
- **Basic safeguarding awareness training:** Contractors who, though in non-regulated activity, may have occasional or indirect contact with learners (e.g. those working at the Centre's site) may be required to undergo basic safeguarding awareness training. This training will ensure they understand how to identify and report any concerns regarding child welfare to the Designated Safeguarding Lead (DSL).

### 7.3. Provision of contractor's own DBS check

Contractors in **non-regulated activity** must provide their own DBS check. However, the following conditions must be met to ensure the check is appropriate and reliable.

- **Appropriate level of check:** The DBS certificate provided must be of the correct level for the role. For non-regulated activity, an enhanced or basic DBS check may be sufficient, depending on the risk assessment conducted by RBAir.
- **DBS Update Service:** Contractors who provide their own DBS check are encouraged to be registered with the DBS Update Service. This will allow RBAir to verify the current status of their DBS check online and confirm that no new information has come to light since the check was issued.
- **Date of DBS certificate:** The DBS certificate must have been issued within the last 12 months, or the contractor must be registered with the DBS Update Service. RBAir reserves the right to request a new DBS check if the existing certificate is deemed too old.
- **Verification of identity:** The contractor must provide photographic identification (such as a passport or driving license) to confirm that the DBS certificate belongs to the individual presenting it.
- **Risk assessment:** If a contractor provides their own DBS check, RBAir will conduct a risk assessment to determine the level of supervision required and whether any additional safeguarding measures should be put in place.
- **Employer-specific DBS checks:** If the DBS check was conducted for a previous employer, RBAir may accept it provided all other conditions are met. However, we reserve the right to conduct our own DBS check if necessary.

### 7.4. Additional safeguarding measures for all contractors

- **Supervision:** Contractors who do not have a barred list check or are engaged in non-regulated activity must never be left unsupervised with learners.
- **Contractual safeguards:** All contractors must agree to the terms of a written contract which outlines their responsibilities regarding child protection and safeguarding while working at RBAir.

- **Ongoing monitoring:** RBAir reserves the right to carry out further checks on contractors at any point during their engagement if any safeguarding concerns arise or if additional work is undertaken that requires further scrutiny.

## 7.5. Responsibilities of contractors

Contractors have a responsibility to:

- provide the necessary documents and information promptly to facilitate the required checks;
- comply with RBAir's safeguarding policies and procedures while working at the Centre;
- report any concerns relating to the safety or wellbeing of learners to the Designated Safeguarding Lead.

## 8. Any instances where learners are to be supervised by staff from another organisation

In any such circumstance the DSL will seek proof from the other organisation, be that school or other agency, that appropriate checks have been sought regarding any staff supervising regulated activity.

If another 'provider' (e.g. activity centre, stables, gymnasium) is to be used, written confirmation must be sought, received and filed from that provider confirming that all staff have been appropriately checked.

RBAir is fully aware that we remain responsible for the safeguarding arrangements for our learners at all times, regardless of whether we place them with other organisations for any period of time.

## 9. Contractors working on any site

We will ensure that any contractor, or any employee of the contractor, who is to work at the Centre has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- an enhanced DBS check with barred list information for contractors engaging in **regulated activity** ;

- an enhanced DBS check, not including barred list information, for all other contractors who are **not in regulated activity** but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than six months.

We will check the identity of all contractors and their staff on arrival at the school.

If contractors are working on site where RBAir learners are in attendance and they do not have a DBS check, appropriate risk assessments will be carried out and assurances sought from the employer that the contractors pose no threat to the safety of learners. All efforts will be made to ensure that contact with learners is kept to an absolute minimum and that learners are made aware of their own responsibilities to pursue 'safe behaviour'. Should there be any concern whatsoever regarding the behaviour of a contractor (in terms of their engagement with learners), then that person will be asked to leave the site immediately and the employer asked to provide different personnel to complete the work programme.

## 10. Single Central Register (SCR) – legal requirements

Although RBAir does not presently have registered school status, we operate to meet the statutory requirements one would expect. RBAir keeps a Single Central Register (SCR); and as such there is evidence to demonstrate to inspectors that we have carried out the range of checks required by the law. A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications will be kept within a personnel file that is maintained for that member of staff. Schools do not have to keep copies of vetting documents in order to fulfil the duty of maintaining the SCR although there must be a record that these checks were made.

An entry will be made for all current members of staff, RBET trustees, the proprietor, RBET staff and any individuals who work in regular contact with children including volunteers, fixed-term staff and those employed as third parties.

KCSiE (September 2025) states that the SCR may be kept in paper or electronic format. We will record the SCR electronically but will ensure it can be printed should inspectors require a paper version.

For independent schools, The Education (Independent School Standards) (England) Regulations (2014) describe the requirements of the SCR.

In addition to the required checks listed above, RBAir will also record:

- the name of the person who completed each check;
- the date on which each check was completed;
- the date and nature of any safer recruitment training undertaken by relevant staff.

## 12. Safer Recruitment Training

- RBAir ensures that at least one member of every recruitment panel has completed accredited Safer Recruitment training in line with statutory guidance (KCSiE 2025, Part 3).
- A record of all staff and trustees who have completed this training is maintained by the Head of Admin. This information is recorded in the organisation's central Training Log, reviewed and updated annually.

**The following members of staff have undertaken Safer Recruitment training:**

- *Hannah Curry – Head of Centre*
- *Liz Smart – Assistant Headteacher*
- *Pookie Russell – Head of Administration*
- *Andrew Wilson – Head of Maths*
- *Sarah Clarke – Link Mentor Lead*
- *Samantha Coles – Administrator & Exams Officer*
- *Alison Bigglestone – SENDCo*
- *Rachel Curry – Therapist Lead*

## Appendix A: Legislative and Statutory Guidance Mapping – Safer Recruitment Policy

Policy Section	Key Requirements / Points	Relevant Legislation / Statutory Guidance
2.2 Statutory Requirements	Barred list checks, regulated activity, employer referral duties	Safeguarding Vulnerable Groups Act 2006; Protection of Freedoms Act 2012; DBS Guidance

<b>Policy Section</b>	<b>Key Requirements / Points</b>	<b>Relevant Legislation / Statutory Guidance</b>
2.2 Statutory Requirements	Compliance with independent school safeguarding duties	Education Act 2002, s.157
2.3 Practice	Safe recruitment procedures, proportionate checks, recruitment panel training	Keeping Children Safe in Education (KCSiE) 2025, Part 3, paras 282–290
2.3 Practice	Equality in recruitment	Equality Act 2010
3 Checks on New Staff	DBS checks, barred list checks for new staff	SVGA 2006; Protection of Freedoms Act 2012; KCSiE 2025
4.1 Advertising	Non-discriminatory adverts, clear information for applicants	Equality Act 2010; KCSiE 2025
4.2 Longlisting / 4.3 Shortlisting	Objective candidate assessment, safe recruitment	KCSiE 2025
4.7 Pre-employment Checks	Identity verification, right to work, qualifications, medical fitness, DBS, prohibition checks, references	KCSiE 2025; Rehabilitation of Offenders Act 1974 (exemptions for regulated activity); Teacher Misconduct: Prohibition Guidance 2015; Education Act 2002, s.157
5.8 Childcare Disqualification Checks	Checks for staff working with children under 8; future compliance if provision changes	Childcare Act 2006; Childcare (Disqualification) Regulations 2018; Disqualification under the Childcare Act 2006: Statutory Guidance 2023
6 Trustees	Enhanced DBS, section 128 prohibition checks	KCSiE 2025; Education (Independent School Standards) Regulations 2014 & 2019
7 Agency / Third-party Staff	Assurance of checks, identity verification	KCSiE 2025
8 Volunteers	Supervision, risk assessment, enhanced DBS where appropriate	KCSiE 2025

<b>Policy Section</b>	<b>Key Requirements / Points</b>	<b>Relevant Legislation / Statutory Guidance</b>
9 Contractors	Regulated vs non-regulated activity, DBS, supervision, risk assessment	KCSiE 2025; SVGA 2006; Protection of Freedoms Act 2012
11 SCR	Maintaining single central register, recording checks and safer recruitment training	KCSiE 2025; Education (Independent School Standards) Regulations 2014 & 2019