



Safer Recruitment Policy

Approved by:	Lauren Meston	Date: 16/08/2026
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Introduction

Future Pathways is committed to safeguarding and promoting the welfare of every young person who attends our alternative provision. Safer recruitment is a central part of that commitment. Robust recruitment, selection and pre-appointment checking help deter unsuitable people, identify applicants who may pose a risk, and ensure that those appointed have the skills, values, behaviours and suitability required to work safely with children and young people.

This policy replaces the previous Safer Recruitment Policy and reflects Keeping Children Safe in Education (KCSIE) 2026, which comes into force on 1 September 2026. Until that date, KCSIE 2025 remains the operative statutory guidance. Future Pathways will apply the most current statutory requirements in force at the time of each recruitment exercise.

Purpose and aims

The aims of this policy are to:

ensure that safeguarding is embedded throughout recruitment and selection rather than treated as a single DBS check

deter people who are unsuitable to work with children from applying to Future Pathways

identify and reject applicants who are unsuitable, prohibited or barred from the work they would be required to undertake

ensure recruitment decisions are fair, consistent, evidence-based and appropriately recorded

ensure all required pre-appointment checks are completed before a person begins unsupervised work or regulated activity, except where a lawful and documented risk-managed exception applies

maintain an accurate Single Central Record and appropriate personnel records

apply equivalent safeguarding expectations to agency staff, contractors, volunteers, trainees and other adults working on behalf of Future Pathways

support an ongoing culture of vigilance through induction, probation, supervision, safeguarding training and low-level concern procedures.

Legal and guidance framework

This policy has been reviewed with regard to current legislation and national guidance, including:

Keeping Children Safe in Education 2026, particularly Part Three: Safer Recruitment

Working Together to Safeguard Children 2026

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, including current filtering rules

Education Act 2002 and relevant school staffing / independent school requirements where applicable to the legal status of the provision

Equality Act 2010, including section 60 restrictions on pre-employment health questions and the Public Sector Equality Duty where applicable

Immigration, Asylum and Nationality Act 2006 and current right-to-work requirements

Data Protection Act 2018 and UK GDPR

Childcare Act 2006 and Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, where applicable

Disclosure and Barring Service guidance and Department for Education guidance on regulated activity and barred-list checks.

Where a particular statutory requirement depends on Future Pathways' precise registration or legal status, Future Pathways will apply the requirement that governs the setting and will follow KCSIE safer-recruitment principles as the minimum safeguarding standard.

Scope

This policy applies to recruitment and engagement of employees and, where relevant, agency and supply staff, self-employed workers, contractors, volunteers, trainees, work-experience supervisors and other adults who work in or on behalf of Future Pathways. The level of checking will be determined by

the role, the nature and frequency of contact with children, and whether the activity is regulated activity.

Responsibilities

Lauren Meston, Managing Director, has overall organisational responsibility for ensuring that Future Pathways maintains effective safer-recruitment arrangements. Recruitment responsibilities may be delegated to appropriately trained staff, but safeguarding accountability remains with senior leadership and the relevant proprietor/governance arrangements.

Everyone involved in recruitment must understand that safeguarding is a shared responsibility. Recruitment documentation, discussions, decisions and checks must be accurate, confidential, proportionate and capable of audit.

Safer recruitment training and recruitment panels

Future Pathways will ensure that people involved in recruitment and employment of staff who work with children receive appropriate safer-recruitment training. The substance of that training will, as a minimum, cover Part Three of the current KCSIE guidance.

Where regulations applicable to the setting require a trained recruiter on an interview panel, at least one interviewer will have completed safer-recruitment training. As Future Pathways good practice, at least one appropriately trained person should be involved in every recruitment exercise for a role involving contact with young people.

Recruitment decisions will not be made by one person alone wherever reasonably practicable. Shortlisting should be carried out by at least two people and, where possible, the same people should remain involved through interview to support consistency.

Planning the recruitment exercise

Before advertising a role, Future Pathways will define the role clearly and assess its safeguarding requirements. The job description and person specification should identify:

- the duties, responsibilities, experience, skills, attitudes and behaviours required
- the extent of contact with young people
- whether the role involves regulated activity with children
- the level of DBS check for which the role is legally eligible
- whether a children's barred-list check is required
- whether a teacher-prohibition, section 128 or other professional-status check is applicable
- any essential qualifications, registrations or licences
- the safeguarding responsibilities attached to the post.

Advertising vacancies

Advertisements and recruitment information will make Future Pathways' commitment to safeguarding clear. For roles involving regulated activity, applicants will be told that it is an offence for a person who is barred from engaging in regulated activity with children to apply for the role.

Recruitment materials should explain that appropriate pre-employment safeguarding checks will be undertaken and that shortlisted candidates may be subject to an online search as part of due diligence. Future Pathways' Safeguarding and Child Protection Policy and policy on recruitment of ex-offenders will be provided or signposted to applicants.

Applications

Future Pathways will normally require a completed application form. A curriculum vitae may be accepted in addition to, but not instead of, the information required by the application process. Applicants should provide sufficient information to establish:

- full personal details, including current and former names where relevant
- current address and National Insurance number where appropriate
- present or most recent employment and reason for leaving
- a full employment, education and relevant voluntary-work history since leaving school, with reasons for gaps
- relevant qualifications, awarding bodies and dates

appropriate referees

the personal qualities, experience and safeguarding suitability relevant to the role.

Application forms will include a declaration that the information provided is complete and accurate. Material dishonesty or deliberate omission may result in withdrawal of an offer, disciplinary action or referral to an appropriate authority.

Shortlisting and self-declaration

Shortlisting will be against the published person specification and will be carried out consistently. The panel will examine the application for unexplained gaps, frequent changes of employment or location, discrepancies, anomalies and other matters requiring clarification.

Only shortlisted candidates will be asked to complete an appropriate self-declaration concerning criminal-record information or other information that may make them unsuitable to work with children, subject to current Ministry of Justice disclosure and filtering rules. This may include relevant criminal history, barred status, teacher prohibition, section 128 restrictions where applicable, relevant overseas information and other matters specified in current KCSIE guidance.

The self-declaration is not a substitute for formal vetting checks. It provides an opportunity to discuss relevant information at interview before the DBS process is complete.

Online searches of shortlisted candidates

As part of due diligence, Future Pathways will consider carrying out a search using an online search engine on shortlisted candidates. Candidates will be informed in advance that this may take place.

The purpose is to identify publicly available information about incidents or issues that may be relevant to safeguarding or suitability and that should be explored at interview. Searches will not be used to trawl for irrelevant personal information or to make decisions on the basis of protected characteristics. Any relevant finding will be assessed fairly, recorded proportionately and discussed with the candidate where appropriate.

References and employment history

References are an important safeguarding check and will be obtained directly from referees. Future Pathways will, where possible, obtain references before interview so that concerns or discrepancies can be explored during selection.

Future Pathways will:

normally obtain two appropriate references, including the current or most recent employer

not accept open references or testimonials addressed “to whom it may concern” as a substitute for a verified reference

not rely on a candidate to obtain the reference on Future Pathways’ behalf

ensure a reference is provided by a suitably senior person with authority to comment; where a school or college provides the reference, safeguarding/disciplinary information should be appropriately authorised

seek a reference from the last employer where the applicant worked with children if the applicant is not currently working with children

verify the identity and legitimacy of the referee and the source of electronic references

contact the referee where information is vague, incomplete or inconsistent

compare references with the application and discuss discrepancies with the candidate

establish the reason for leaving the current or most recent employment

resolve safeguarding concerns satisfactorily before confirming appointment.

When Future Pathways provides a reference, it will provide factual information in accordance with KCSIE. Substantiated safeguarding allegations that meet the harm threshold may be included where relevant and factual. False, unfounded, unsubstantiated or malicious allegations will not be included. Low-level concerns will only be referenced where KCSIE permits this, for example where they relate to matters that would ordinarily be included such as misconduct or poor performance.

Selection and interview

All appointments will involve an appropriate selection process. For roles involving direct work with young people, candidates will normally be interviewed face-to-face in person or through a live visual

electronic link where appropriate. The panel will use structured questions and will test both competence and safeguarding suitability.

Interview questions and discussion will include, where relevant:

motivation for working with children and young people

understanding of safeguarding responsibilities and professional boundaries

experience of responding to safeguarding concerns, disclosures, challenging behaviour or vulnerable young people

attitudes to authority, boundaries, equality, SEND, trauma and inclusion

gaps or anomalies in employment history and reasons for frequent changes of role or location

issues arising from references, self-declaration or online due-diligence searches

the candidate's ability to work safely within an alternative-provision environment and maintain appropriate professional boundaries.

Any concern arising during selection must be explored and recorded. A candidate will not be appointed simply because a vacancy is difficult to fill.

Conditional offer and pre-appointment checks

Any offer of employment or engagement will be conditional upon satisfactory completion of all checks required for the role. Before appointment, Future Pathways will complete and record the checks that apply, including:

verification of identity

verification of the person's right to work in the United Kingdom

an enhanced DBS certificate, with children's barred-list information where the role is regulated activity and the check is legally permitted/required

a separate children's barred-list check where lawful and necessary because a person is to begin regulated activity before the enhanced DBS certificate is available

teacher-prohibition and relevant historic GTCE sanctions where the person will carry out teaching work and the requirement applies

a section 128 check for management positions where applicable to an independent school, academy or free-school context

further checks considered appropriate for individuals who have lived or worked outside the UK

verification of professional qualifications, registrations or licences required for the role

verification of mental and physical fitness to carry out the responsibilities of the role, at the appropriate stage and in compliance with the Equality Act 2010

any childcare-disqualification declaration/check required by law for relevant childcare roles

satisfactory references and resolution of discrepancies or safeguarding concerns.

No check will be treated as a tick-box exercise. Information will be considered in context and recruitment decisions, including the rationale for proceeding or not proceeding, will be recorded.

Disclosure and Barring Service checks

Future Pathways will use the current Disclosure and Barring Service (DBS) terminology and processes. The former Criminal Records Bureau (CRB) no longer exists. The level of DBS check requested will be the level for which the role is legally eligible and necessary.

For regulated activity with children, Future Pathways will ensure the appropriate enhanced DBS check with children's barred-list information is obtained, subject to the statutory rules applying to the role and provider. It is a criminal offence for a barred person to engage in regulated activity and for an organisation knowingly to permit a barred person to do so.

Where the DBS Update Service is used, Future Pathways will obtain the applicant's consent, view the original DBS certificate and carry out the appropriate status check in accordance with current DBS guidance.

Starting work before a DBS certificate is available

The normal expectation is that all required checks are completed before the person starts work.

Exceptionally, where the law permits a person to begin before the enhanced DBS certificate is available, Future Pathways will not allow the person to undertake regulated activity unless the required separate

children's barred-list check has been completed and a written risk assessment has been approved by a senior leader.

Any risk assessment will consider the role, previous checks, references, identity, supervision, access to children, working arrangements and any other relevant information. Supervision or restrictions will be clearly recorded and reviewed until the outstanding check is received. This exception will not be used where the role or provider category requires the full enhanced DBS with barred-list information before work begins.

Changes to regulated activity from 1 September 2026

Future Pathways will apply the regulated-activity rules in force at the time. From 1 September 2026, the previous supervision exemption for volunteers in specified activities with children is removed. A volunteer who is engaging in regulated activity will therefore require an enhanced DBS check with children's barred-list information in accordance with the new requirements. Future Pathways will review existing volunteer arrangements where necessary before this change takes effect.

Teacher prohibition and section 128 checks

Where a person will carry out teaching work in a setting to which teacher-prohibition requirements apply, Future Pathways will check the Department for Education's Check a teacher's record service, or the current equivalent, before appointment.

Where a section 128 direction is relevant because an individual will participate in management of an independent school, academy or free school, the appropriate check will be completed and recorded. Future Pathways will determine applicability by the actual responsibilities of the role rather than job title alone.

People who have lived or worked outside the UK

Applicants who have lived or worked outside the UK will undergo the same checks as other applicants. In addition, Future Pathways will make further checks considered appropriate so that relevant events occurring outside the UK can be considered. The nature of these checks will depend on the countries concerned and the information that can reasonably be obtained.

A DBS check does not provide a complete record of criminal history outside the UK. Overseas criminal-record information, professional standing, references or other relevant evidence may therefore be required. Any inability to obtain an overseas check will be risk assessed and documented rather than assumed to be satisfactory.

Identity, right to work and qualifications

Original or otherwise legally acceptable evidence will be checked in accordance with current government requirements. Identity documents must be consistent with the information supplied during recruitment, including any previous names. Right-to-work checks will be completed using the current Home Office process. Qualifications and professional registrations that are essential for the role will be verified with the awarding or registering body where appropriate.

Health and fitness

Future Pathways will ensure that a successful applicant is medically fit to perform the responsibilities of the role, while complying with the Equality Act 2010. Health or disability questions will not be used unlawfully during initial selection. Reasonable adjustments will be considered throughout recruitment and employment.

Single Central Record

Future Pathways will maintain an accurate Single Central Record (SCR) of pre-appointment checks to the extent required by the legislation and regulatory framework applying to the setting. As a safeguarding minimum, the SCR will clearly show the status and date of relevant checks for staff and other categories of worker who must be recorded.

For staff, the SCR will record, as applicable:

identity check

enhanced DBS check and whether children's barred-list information was included

standalone barred-list check where one was lawfully undertaken

teacher-prohibition check

section 128 check for relevant management roles where applicable

further checks for people who have lived or worked outside the UK

right-to-work check

required professional qualifications

the date each check was completed or certificate obtained

confirmation required for agency and third-party staff, including the date confirmation was received and whether relevant DBS information was provided.

Future Pathways may also record additional non-statutory information, such as volunteer checks, childcare-disqualification information, safeguarding/safer-recruitment training dates and the identity of the person completing each check. The SCR may be electronic or paper but must be accurate, secure, current and readily available for legitimate inspection.

Agency and third-party staff

Before an agency, supply or other third-party worker begins, Future Pathways will obtain written confirmation from the supplying organisation that all required checks have been completed and that the person is suitable for the work to be undertaken. The information required will reflect KCSIE and the legal status of the setting and role.

Future Pathways will check the identity of the individual on arrival and ensure that the person presented is the person for whom assurances were received. Any safeguarding information disclosed on a DBS certificate that the agency is required to communicate will be considered before the individual starts.

Contractors and self-employed workers

Contractors and self-employed workers who may have contact with young people will be subject to proportionate safeguarding arrangements based on the activity they undertake. Future Pathways will establish whether the work constitutes regulated activity, what DBS/barred-list check is legally available and necessary, and what level of supervision is required.

No contractor known to be barred from regulated activity will be permitted to engage in regulated activity with children. Contractors for whom appropriate checks or assurances have not been obtained will not be allowed unsupervised access to young people.

Volunteers

All volunteers will undergo a risk assessment to determine the nature and frequency of their contact with young people and the checks required. From 1 September 2026, a volunteer engaging in regulated activity will require an enhanced DBS check with children's barred-list information in accordance with the removal of the supervision exemption.

For volunteering that is not regulated activity, Future Pathways will consider whether an enhanced DBS check without barred-list information is lawful and appropriate, alongside references, identity, supervision, role boundaries and other safeguarding measures.

Trainees, students and work experience

For trainee teachers and students placed at Future Pathways, the provider responsible for the placement may carry out the relevant checks. Future Pathways will obtain the assurances required by KCSIE and will verify identity on arrival. Where Future Pathways is the employer, it will complete the checks required of an employer.

When young people undertake work experience, Future Pathways will assess safeguarding arrangements and will only seek DBS checks on workplace supervisors where the legal criteria for regulated activity and DBS eligibility are met. Blanket DBS requirements will not be imposed where they are not legally justified.

Visitors

Visitors are not recruited as staff merely because they enter the premises. Future Pathways will operate proportionate visitor controls, including identity checks, signing-in, badges and supervision as appropriate. Visitors who are undertaking work or activity that brings them within safer-recruitment or

regulated-activity requirements will be managed under the relevant section of this policy rather than ordinary visitor arrangements.

Induction, probation and ongoing safeguarding culture

Safer recruitment does not end when an appointment is made. New staff will receive safeguarding induction before or immediately on commencing duties, including:

the Safeguarding and Child Protection Policy and the identity of the DSL/DDSL team

KCSIE Part One and other required safeguarding information

Staff Code of Conduct and professional boundaries

Low-Level Concerns Policy and allegations procedures

Online Safety and Mobile Phone Policy

whistleblowing arrangements

behaviour, attendance, absconding/leaving-without-permission and relevant emergency procedures

the safeguarding vulnerabilities associated with alternative provision.

Probation, supervision and line-management arrangements will be used to confirm ongoing suitability, professional conduct and competence. Concerns arising after appointment will be managed under the appropriate safeguarding, low-level concern, disciplinary or allegations procedure and referrals to the LADO, DBS, Teaching Regulation Agency or other authority will be made where required.

Information from criminal records or safeguarding checks

A criminal record does not automatically prevent appointment unless the person is barred/prohibited or another legal restriction applies. Relevant information will be considered through a documented risk assessment that takes account of the nature, seriousness, relevance, circumstances and age of the matter; patterns of offending; time elapsed; the responsibilities of the role; explanations offered; and the need to protect young people.

Future Pathways will comply with the Rehabilitation of Offenders Act framework, DBS filtering rules and data-protection requirements. Information that an employer is not legally entitled to consider will not be used in recruitment decisions.

Record keeping and retention

Recruitment records will be maintained securely and access will be restricted to those with a legitimate need. The rationale for significant safeguarding decisions will be recorded clearly.

Copies of DBS certificates are not required simply to maintain the SCR. If Future Pathways retains a DBS certificate, there must be a valid reason and it will not normally be retained for longer than six months, in line with KCSIE and data-protection requirements. A record may be retained that the check was undertaken, the result and the recruitment decision.

Identity, right-to-work and qualification evidence will be retained in accordance with legal, regulatory and organisational retention requirements. Unsuccessful applicant information will be retained only for an appropriate and defensible period.

Equality, reasonable adjustments and fair recruitment

Future Pathways will recruit fairly and without unlawful discrimination. Candidates will be assessed against the requirements of the role. Reasonable adjustments will be considered for disabled applicants. Safeguarding checks will be applied consistently while recognising that the type of check must be lawful and proportionate to the actual role.

Breaches and concerns about the recruitment process

Any concern that a required check has been omitted, incorrectly recorded or completed at the wrong level must be reported immediately to Lauren Meston, Managing Director, or another appropriate senior leader. The person's duties will be reviewed and a safeguarding risk assessment completed while the issue is resolved.

Deliberate falsification of recruitment or safeguarding information may result in withdrawal of an offer or disciplinary action and may be referred to the police, DBS, professional regulator, LADO or other relevant body where appropriate.

Monitoring and review

The Managing Director will ensure that safer-recruitment systems, recruitment files and the Single Central Record are periodically audited. This policy will be reviewed at least annually and sooner following a significant change in legislation or KCSIE, an inspection finding, a serious safeguarding incident, an identified recruitment failure or a change to Future Pathways' legal/registration status.

Related Future Pathways policies

Safeguarding and Child Protection Policy

Low-Level Concerns Policy

Staff Code of Conduct

Whistleblowing Policy

Equality and Diversity Policy

Data Protection Policy

Online Safety and Mobile Phone Policy

Children in Care Policy

Health and Safety Policy.

Reference guidance

Department for Education - Keeping Children Safe in Education 2026, Part Three: Safer Recruitment

HM Government - Working Together to Safeguard Children 2026

Disclosure and Barring Service - current eligibility, identity-checking and Update Service guidance

Department for Education - Check a teacher's record / children's barred-list guidance

Home Office - current right-to-work guidance

Ministry of Justice - Rehabilitation of Offenders Act disclosure guidance.

Appendix 1 - Pre-appointment safer recruitment checklist

Check / requirement	Completed / date	Evidence / initials
Role assessed for contact with children / regulated activity		
Job description and person specification include safeguarding requirements		
Safeguarding statement included in advert		
Application form complete; CV not used as sole application		
Employment history and gaps reviewed		
Shortlisted candidate self-declaration completed		
Online due-diligence search considered/completed and relevant findings recorded		
Two appropriate references requested/received and verified		
Reference/application discrepancies resolved		
Structured safeguarding interview completed		
Identity verified		

Right to work verified		
Enhanced DBS completed at correct level		
Children's barred-list check completed where required		
Teacher-prohibition check completed where applicable		
Section 128 check completed where applicable		
Overseas checks completed/risk assessed where applicable		
Qualifications/professional registrations verified		
Health/fitness requirements completed at lawful stage		
Childcare-disqualification requirements completed where applicable		
All concerns resolved before appointment confirmed		
Single Central Record updated		
Personnel file evidence complete		
Safeguarding induction arranged/completed.		

Appendix 2 - Safer recruitment interview prompts

The exact questions should be adapted to the role. The following prompts may support, but do not replace, professional judgement:

What attracts you to working with young people in an alternative-provision setting?

What does professional curiosity mean to you in safeguarding practice?

Describe a situation where a young person disclosed something that concerned you. What did you do?

How would you respond if a colleague's behaviour towards a young person made you uncomfortable but did not obviously meet the harm threshold?

How do you maintain professional boundaries when a young person seeks a highly personal or dependent relationship with you?

What would you do if a young person asked you to keep a safeguarding disclosure secret?

How would you balance a trauma-informed approach with clear boundaries and expectations?

How would you respond if you disagreed with a senior colleague's safeguarding decision?

What risks do young people in alternative provision commonly face online, in the community or through exploitation?

Please explain any gaps, anomalies or frequent changes in your employment history.

Appendix 3 - Single Central Record audit prompts

Is every person who must appear on the SCR included?

Are identity, DBS, barred-list, right-to-work, qualification and overseas-check fields complete where applicable?

Are teacher-prohibition and section 128 checks recorded for relevant roles?

Are dates of checks/certificates recorded consistently?

Are agency and third-party assurances recorded with the date received?

Are former staff removed in accordance with the applicable SCR rules while personnel records are retained appropriately?

Can each SCR entry be evidenced from the recruitment/personnel file?

Are any blank fields explained rather than left ambiguous?

Are periodic SCR audits documented and actions followed through?

Do volunteer arrangements reflect the regulated-activity rules effective from 1 September 2026?

Approval

Signed: *L. Meston*

Lauren Meston - Managing Director, Future Pathways

Date: 16/08/2026

Next review due: 15/08/2027