

Safer Recruitment Policy

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Equality and Inclusion Statement

Apex Specialist Education and all learning centres are committed to equality, inclusion, belonging and respect. This statement applies to every school policy and guides our work across all learning centres.

We promote equality of opportunity, value diversity and work to eliminate discrimination, harassment and victimisation. In accordance with the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, we provide an inclusive education that enables all pupils to participate fully, overcome barriers, develop their potential and achieve positive outcomes.

We recognise diversity as a strength to be respected, celebrated and reflected throughout school life. We strive to ensure everyone feels safe, valued, represented and that they belong. This commitment informs our governance, leadership, safeguarding, curriculum, provision and practice.

Our Commitment:

We are committed to:

- Eliminating discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

Putting our Commitment into Practice:

The Proprietor, Governing Board and Leadership Team will:

- Consider equality implications and the impact of decisions, policies and practice on people with protected characteristics.
- Embed equality, accessibility and inclusion in the development and review of curriculum, provision and policies.
- Identify and seek to reduce or remove barriers to participation, learning, attendance, wellbeing and engagement.
- Promote belonging, positive relationships and high aspirations, particularly for pupils experiencing disadvantage or additional barriers.
- Respond to prejudice-based and discriminatory behaviour, including through safeguarding procedures where relevant.
- Monitor the implementation and impact of equality and inclusion across all learning centres.

Our commitment encompasses the protected characteristics identified in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

All members of our school community share responsibility for upholding equality, inclusion, belonging and respect in their conduct, relationships and implementation of school policies.

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1. Recruitment and Selection Process

All safer recruitment procedures operate within a single, central safeguarding framework across all learning centres, ensuring consistent application of checks, standards and oversight across Healey Learning Centre.

This policy applies to Healey Learning Centre, operated by Apex Specialist Education as one independent school across Rochdale, Stockport and Altrincham. It is based on Part 3 of Keeping Children Safe in Education 2026 and Part 4 of the Education (Independent School Standards) Regulations 2014. It must be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct and procedures for allegations and low-level concerns.

Those involved in recruiting and appointing people to work with children will receive appropriate safer recruitment training covering, as a minimum, Part 3 of Keeping Children Safe in Education 2026. At least one member of every interview panel will have completed safer recruitment training. Training will be refreshed to reflect changes in requirements.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Key reference sources: Keeping Children Safe in Education 2026 (September 2026), Part 3; Education (Independent School Standards) Regulations 2014, Schedule, Part 4; Safeguarding Vulnerable Groups Act 2006, Schedule 4, as amended; Equality Act 2010; Rehabilitation of Offenders Act 1974 and applicable Exceptions Order; current DBS guidance and Code of Practice.

Official guidance: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Independent school standards: <https://www.legislation.gov.uk/uksi/2014/3283/schedule>

The Headteacher, Robert (Bob) Cochrane, is responsible for ensuring appointments are safe and properly authorised. Recruitment administrators obtain and record checks, identify omissions and refer concerns before any start is approved. The Proprietor retains oversight of compliance and ensures that the SCR is audited regularly and any gaps are corrected promptly.

Callan Glean is the whole-school Designated Safeguarding Lead (DSL) and overall coordinator of safeguarding. The centre DSLs are Abbie Chadwick-Wood at Altrincham, Joanne Taylor at Stockport and Nadine Sawicki at Rochdale. Their safeguarding role supports recruitment and induction; it does not transfer the Headteacher's usual responsibility for managing allegations against staff.

Recruiters must declare personal relationships and conflicts of interest. An appropriately independent person will make decisions where a conflict exists. This policy covers employees, agency and third-party staff, volunteers, contractors, trainees, governors and proprietors according to their roles.

The policy will be reviewed at least annually and sooner following relevant changes to law or guidance, a safeguarding incident or an audit finding. Formal approval and review dates must be recorded by the school.

1.1. Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974 under the applicable Exceptions Order. Applicants will receive clear guidance on the information they must disclose. Protected cautions and convictions must not be requested or taken into account in recruitment decisions.

1.2. Application Forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- We will only accept a curriculum vitae (CV) alongside a full application form. A CV on its own will not be accepted.

Application forms will obtain names and previous names, relevant qualifications, teacher reference number where applicable, full education and employment history since leaving school, explanations for gaps, reasons for leaving and appropriate referees. Candidates must declare relevant relationships with existing staff, governors or proprietors.

The school will explain how recruitment information is used and retained through its privacy information. Before a conditional offer, questions about health or disability will be limited to lawful purposes, such as arranging reasonable adjustments to the selection process.

1.3. Shortlisting

Our shortlisting process will involve at least 2 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 an appropriate self-declaration of information relevant to their suitability to work with children. This will be requested after shortlisting, with clear instructions on lawful disclosure

and DBS filtering rules, and discussed with the candidate where necessary. Depending on the role, relevant information includes:

- Criminal convictions and cautions that are lawfully disclosable for the role, excluding protected convictions and cautions
- Whether they are barred from regulated activity with children, where the role involves that activity
- Whether they are prohibited from teaching or subject to an interim prohibition order, where the role involves teaching work
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Whether they are subject to a section 128 direction prohibiting participation in the management of an independent school, where relevant to the role
- Relevant conduct, restrictions or current investigations that may affect their suitability to work with children. Contact with the police or children's social care as a victim, witness, parent or person receiving support does not in itself indicate unsuitability
- Whether they have been disqualified from providing childcare, where relevant
- Sign a declaration confirming that the information supplied is accurate and complete. The school will verify the candidate's identity and confirm the declaration at interview, retaining an auditable signed or securely authenticated electronic record.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Any online search will be proportionate, consistent and limited to publicly available information relevant to suitability for the role. The school will check that information relates to the correct person, record relevant findings securely and give the candidate an opportunity to explain concerns. It will not seek access to private accounts or base decisions on protected characteristics.

1.4. Seeking References and Checking Employment History

We will seek references before interview wherever possible and obtain and evaluate satisfactory references before a new employee starts work. Concerns will be explored directly with the referee and discussed with the candidate before an appointment is confirmed.

- When seeking references we will:
- Not accept open references
- Obtain references directly from referees, verify their identity and professional contact details independently, and clarify any unclear or incomplete answers

- Obtain a reference from the current employer, completed by a senior person with appropriate authority. Where the referee is school based, ensure the Headteacher confirms the reference's accuracy in relation to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Normally, two suitable references will be obtained, including those required above. Where a candidate has not previously been employed, appropriate professional or educational referees will be agreed and the reasons recorded. Personal references alone do not replace the necessary checks.

References should provide factual, relevant information about substantiated safeguarding concerns that meet the harm threshold and suitability to work with children. Allegations found to be false, unfounded, unsubstantiated or malicious must not be included. Low-level concerns will not routinely be included; where they meet the threshold for misconduct or poor performance, any inclusion must be lawful and consistent with the safeguarding policy.

The school will verify the reasons for leaving previous employment and resolve material discrepancies, including unexplained gaps, before the person starts.

1.5. Interview and Selection

When interviewing candidates, we will:

Explore gaps, inconsistencies and reasons for leaving previous roles fairly, giving candidates an opportunity to explain career breaks and changes without assumptions about their personal circumstances

Explore safeguarding knowledge, professional boundaries, motivation to work with children, attitudes towards children with SEND and responses to safeguarding scenarios, including reporting concerns about colleagues

Keep a clear record of the evidence considered, concerns resolved and reasons for the selection decision. Any observed interaction with pupils will be appropriately supervised and planned so that an unchecked candidate does not undertake regulated activity

2. Pre-appointment vetting checks

These checks form part of the school's wider safeguarding regime and the ongoing safeguarding of children following appointment.

The school will maintain a single central record (SCR) covering the required checks across all three centres. This includes all staff, including supply staff even when they work for one day, and members of the legal proprietor body. Required checks, completion dates and verification will be recorded; supporting evidence will be held securely in the appropriate personnel or recruitment file.

The SCR will record the applicable identity, enhanced DBS, children's barred list, prohibition from teaching, qualifications, right-to-work, overseas and section 128 checks, together with the relevant dates. Supply staff entries must include the required agency confirmations and certificate-copy information. A clearly recorded reason will support any check that is not applicable.

Only authorised staff will access recruitment and vetting records. The SCR must not contain details of criminal offences or medical information. DBS certificate copies will normally be destroyed securely within six months; the school may retain a limited record of the check, certificate reference, date, recruitment decision and checker. Any exceptional longer retention must be justified under the DBS Code of Practice and data protection requirements.

Recruitment records will be handled under the UK GDPR and Data Protection Act 2018, as amended, with appropriate conditions for criminal-offence and special-category data. Access and retention will be limited to what is necessary. Any supplementary record of volunteer checks will be distinguished from the statutory SCR requirements.

2.1. New Staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain and inspect an appropriate enhanced DBS certificate, including children's barred list information where the role is regulated activity. Complete the check before work starts wherever possible. Any lawful exception must follow the controls below; possession of an old certificate alone is not sufficient clearance
- Where a start before receipt of a new enhanced DBS certificate is exceptionally permitted, complete all other required checks, including a separate children's barred list check for regulated activity, before work begins. The Headteacher must approve a written risk assessment specifying supervision, restrictions, the outstanding check and review dates. The certificate must be followed up promptly. This exception cannot be used for work covered by the Early Years Foundation Stage framework
- Verify fitness to carry out the responsibilities of the post, after a conditional offer, with appropriate occupational health advice and reasonable adjustments where needed. Disability or a health condition is not in itself a reason to reject an applicant
- Verify the right to work in the UK using an authorised checking method, undertake any required follow-up checks, and retain the prescribed evidence for the duration of employment

and two years afterwards

- Verify their professional qualifications, as appropriate
- Check prohibition and interim prohibition orders for anyone undertaking teaching work, whether or not the person holds qualified teacher status. Use the appropriate Department for Education checking service and consider any other relevant restrictions
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that a person taking part in the management of the independent school is not subject to a section 128 direction

Management includes the Headteacher, deputy and assistant headteachers, relevant teaching department heads and people with governance or other delegated management responsibilities. The school will assess the actual responsibilities of the role rather than relying only on its title.

Overseas checks supplement the required UK checks. Where an overseas check is unavailable, the school will document its attempts, obtain other reliable evidence where possible and assess the risk before deciding whether an appointment can proceed. A risk assessment cannot waive a mandatory UK check or prohibition. Relevant documents must be authenticated and translated where necessary.

Where childcare disqualification requirements apply to the role or setting, the school will complete the relevant checks and act on any disqualification or waiver conditions. These requirements will not be applied indiscriminately to roles outside their scope.

Regulated activity with children is determined by the duties, setting and frequency of the work under Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended. It includes:

- Teaching, training, instructing, caring for or supervising children, giving advice or guidance on their physical, emotional or educational wellbeing, or driving a vehicle only for children, where the applicable frequency conditions are met
- Work in a specified establishment such as a school that meets the statutory conditions and gives an opportunity for contact with children. Supervision does not exempt a volunteer undertaking qualifying activity from regulated activity
- Relevant personal care, or healthcare provided by or under the direction or supervision of a regulated healthcare professional, even on one occasion. Relevant personal care includes assistance with eating or drinking because of illness or disability, or toileting, washing, bathing

or dressing because of age, illness or disability

Frequency includes activity carried out frequently or on more than three days in a 30-day period. A qualifying overnight activity between 2am and 6am involving the opportunity for face-to-face contact may also meet the definition; the overnight condition does not apply in the same way to driving-only activity. Occasional or temporary non-teaching work in a school may fall outside regulated activity. The school will use the full statutory definition and current DBS guidance for borderline roles.

Before using the DBS Update Service, the school will obtain consent, verify identity, inspect the original certificate and ensure that its workforce, level and barred list coverage are appropriate. It will record the status check and obtain a new certificate when necessary. A status check does not replace other pre-appointment checks.

Any adverse information will be assessed individually by the Headteacher or other appropriate unconflicted decision-maker. The assessment will consider its relevance to the role, seriousness, circumstances, pattern, time elapsed, the person's explanation and evidence of changed behaviour. Protected information must not be considered. A barred or prohibited person cannot be appointed to a role from which they are legally excluded.

Before duties begin, all staff will receive safeguarding induction and access to the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, behaviour procedures, whistleblowing arrangements and procedures for allegations and low-level concerns. Induction will cover the DSL and centre contacts, reporting routes, children missing or absent from education, online safety including filtering and monitoring, and pupils' individual vulnerabilities.

All staff will read Part 1 of KCSIE 2026 and any further sections relevant to their role. The school will check understanding, provide updates at least annually and use supervision and probation to monitor conduct and suitability. Supply staff, volunteers and contractors will receive induction proportionate to their duties.

2.2. Existing Staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- An individual returns following a break in service and fresh checks are required. The school will assess any applicable exception for recent employment in a school or college against the statutory three-month conditions; it will not treat 12 weeks as automatically equivalent to three calendar months

The school will make a referral to the Disclosure and Barring Service where the statutory duty is met: the individual has been removed from regulated activity, or would have been removed had they not left, and one or more of the following applies:

- The school considers that the person has engaged in relevant conduct that harmed, or placed at risk of harm, a child or vulnerable adult
- The person has received a caution or conviction for a relevant offence under the applicable barring legislation
- The school considers that the harm test is satisfied, meaning the person may harm, cause harm, put at risk of harm, attempt to harm or incite another to harm a child or vulnerable adult
- The duty applies to paid and unpaid roles. Resignation, retirement, expiry of a contract, a settlement agreement or withdrawal from work does not remove the duty. The school will gather sufficient information and refer as soon as the conditions are met; it will not wait for another organisation to discharge the school's responsibility.

Staff must promptly report relevant changes that could affect their suitability, including relevant restrictions, barring or prohibition and safeguarding concerns. The Headteacher will assess the implications fairly and seek appropriate advice. DBS certificates do not have a fixed expiry date; fresh checks will be based on legal requirements, changed circumstances or suitability concerns, rather than an assumed universal renewal period.

Concerns or allegations about staff, including low-level concerns, must be reported promptly to Robert (Bob) Cochrane as Headteacher and usual case manager, following Sections 6.3–6.6 of the Safeguarding and Child Protection Policy. Callan Glean remains the overall safeguarding coordinator. A concern about Callan or a centre DSL must be reported to the Headteacher.

Concerns about the Headteacher must be referred to the appropriate nominated proprietor representative. Where that route is conflicted, inappropriate or involves the proprietor, advice must be sought directly from the Local Authority Designated Officer (LADO). The person who is the subject of a concern must not manage or investigate it.

Child safeguarding concerns must be reported verbally without delay to the DSL or a deputy and recorded through CPOMS, normally on the same working day. Anyone without access must use the school's approved reporting route or form and speak directly to the appropriate safeguarding lead. Concerns must not be emailed. Adult-allegation and low-level-concern records will be held securely with access restricted to the authorised case manager and other people with a legitimate need to know.

The school will follow the LADO and allegation-management procedures and consider a Teaching Regulation Agency referral for relevant serious teacher misconduct. A referral to the LADO, police, agency or another body does not discharge the school's own statutory DBS referral duty.

2.3. Agency and Third-Party Staff

When employing someone via an agency, Apex Specialist Education will:

- Obtain written notification from the agency or third-party organisation that it has carried out the same checks that Healey Learning Centre would otherwise perform on any individual who will

be working at the school or providing education on the school's behalf, including through online delivery.

- Obtain written confirmation identifying the individual and confirming that the appropriate enhanced DBS certificate and all other required checks have been obtained and assessed as satisfactory.
- For regulated activity, obtain confirmation that children's barred list information has been checked before the individual begins work. No barred person will be permitted to undertake regulated activity.

Check the identity of the person arriving for work against the person named in the agency's written confirmation before allowing them to begin their duties.

These arrangements apply to supply and third-party staff under Part 3 of Keeping Children Safe in Education 2026 and the independent school standards.

Under paragraph 19 of the Education (Independent School Standards) Regulations 2014, the school must also receive a copy of the enhanced DBS certificate where the agency has obtained one, including where it contains no disclosed information. Agency contracts must require the supply of the certificate copy. The school will verify the applicable certificate timing requirements and any lawful recent-employment exception, rather than accepting a general assurance alone.

Agency staff will be added to our single central record (SCR); even if they're only employed at Apex Specialist Education for 1 day.

The following information will be added to the SCR:

- Written confirmation that the agency has carried out the relevant checks and obtained the appropriate certificates
- The date that confirmation was received
- Whether a copy of the enhanced DBS certificate has been received, together with the required dates and the school's identity check

The SCR will meet Part 3 of KCSIE 2026 and paragraph 21 of the independent school standards. Information about convictions or medical conditions will not be entered on the SCR.

When an agency worker's engagement ends, remove them from the active SCR and retain any necessary historic evidence in accordance with the school's retention arrangements. If the worker returns, obtain current confirmation and reassess the required checks before they start.

Administrative staff must refer incomplete checks or adverse information to the Headteacher before a placement is authorised. A commercial need to fill a vacancy does not override a statutory check or prohibition.

Appendix A details the checks we would carry out with the agency

Agency staff will receive the relevant safeguarding induction before working with pupils. The school will work with the agency on any allegation or suitability concern and will not simply end an

assignment without considering investigation, information sharing and referral duties. A replacement worker must be checked and approved in their own right.

2.4. Contractors

Please note we have a dedicated 'Contractor Checks' policy, which should be read in conjunction with this policy.

This guidance has been drawn up to ensure the effective safeguarding of children where contractors are used by Apex Specialist Education. This will apply to all contractors irrespective of whether they are appointed by Apex Specialist Education or directly by the school leaders.

All staff responsible for arranging or overseeing contractors must ensure that the required checks and practical safeguarding controls are in place before work begins.

Measures will be proportionate to the work, access to pupils and safeguarding risks, without replacing checks required by law.

Safeguarding measures to be considered will include any or all of the following depending on the outcomes identified by Apex Specialist Education leaders:

- Segregate: keep contractors' work areas separate from pupils wherever possible
- Supervise: arrange appropriate supervision of any permitted contact with pupils
- Code of conduct: To require contractors to observe a code of conduct
- Regulate Access: To regulate access to the premises
- Checks: verify identity on arrival and obtain the level of DBS and barred list checks required for the actual role

Please consult the full policy for further details.

Contractors undertaking regulated activity require an enhanced DBS check with children's barred list information. For contractors whose work provides an opportunity for regular contact with children but does not constitute regulated activity, the school will ensure that an enhanced DBS check without children's barred list information has been completed. An unchecked contractor must not undertake regulated activity or work unsupervised where they could have contact with pupils. Supervision must not be used to avoid a legally required barred list check.

For self-employed contractors, the school will verify the appropriate certificate, including where the contractor has obtained it through an authorised registered organisation. Professional visitors will have their identity checked and appropriate confirmation obtained that their employer has completed relevant checks. Routine visitors and parents attending events do not automatically require DBS checks; access and supervision will be controlled according to risk.

2.5. Trainee/student Teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary

checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

The school will check the trainee's identity on arrival, provide safeguarding induction and agree reporting arrangements with the provider. Salaried trainees will be included on the SCR. For fee-funded trainees, the written assurance will be retained securely; recording these assurances on the SCR is optional.

2.6. Volunteers

We will:

- Never allow an unchecked volunteer to undertake regulated activity or leave an unchecked volunteer unsupervised with pupils
- Obtain an enhanced DBS certificate with children's barred list information for volunteers undertaking regulated activity, including where their work is supervised
- For volunteers whose work is not regulated activity, record a risk assessment of their role, contact with children and appropriate supervision. Obtain an enhanced DBS check without barred list information where the role is eligible and this is appropriate. Do not request barred list information where there is no legal eligibility

From 1 September 2026, supervision no longer exempts a volunteer's qualifying work from regulated activity. The school will review existing volunteer roles and ensure that children's barred list checks have been completed for those now within regulated activity. It will not rely on an earlier decision that a supervised volunteer required only an enhanced check without barred list information.

An enhanced DBS check with barred list information will normally be required. Any permitted use of a standalone barred list check must meet the specific KCSIE 2026 conditions, including the provisions for existing volunteers with a recent enhanced check and no break in service. The evidence and reason will be recorded. Work across more than one setting must be considered when assessing frequency, with clear agreement about who obtains the check.

Volunteers will receive role-appropriate induction, supervision and guidance on reporting safeguarding concerns, professional boundaries and confidentiality. Their continuing suitability will be reviewed when duties or circumstances change.

2.7. Governors and Proprietors

The school will obtain an enhanced DBS check for governors and members of the proprietor body, using the lawful route applicable to their role.

Children's barred list information will be requested only where the person's duties involve regulated

activity, not merely because they hold a governance position.

Where the proprietor is an individual, or a body with a chair, the required checks for the individual proprietor or chair of the legal proprietor body must be arranged through the Department for Education's applicable process. The chair of a separate advisory governing board is not automatically the chair of the legal proprietor body.

The school will establish and record its legal proprietor arrangements and ensure that the responsible person arranges all required checks on the other members of that body. These include:

- A section 128 check for participation in management, including governors with retained or delegated management responsibilities
- Identity
- Right to work in the UK, as required by the independent school standards and the person's role
- Other checks deemed necessary if they have lived or worked outside the UK

Required checks on the legal proprietor body will be recorded on the SCR under KCSIE 2026 and the independent school standards. The school will complete the relevant Department for Education notifications and approval processes when proprietor arrangements change. Any person prohibited under section 128 must not take part in management.

3. Staff Working in Alternative Provision Settings

Appendix B contains our Alternative Provision paperwork (pack), which includes multiple safeguarding checks pre and post commission. This is to ensure that staff engaging in regulated activity within these settings are thoroughly checked.

Alternative provision (AP) can offer significant benefits for students with social, emotional, and mental health (SEMH) needs. These benefits stem from the tailored, flexible, and supportive nature of AP, which is designed to meet the unique challenges faced by students who may not thrive in traditional mainstream or even standard special school environments. Carefully selected AP, enables us to utilise specialists and broaden our curriculum, to further support pupils. For example, utilising practical or hands-on activities can engage students who struggle with traditional classroom learning, boosting their confidence and motivation.

Before a placement begins, the school will obtain written confirmation that the provider has completed the appropriate safeguarding checks on individuals working there that the school would otherwise undertake. Callan Glean, whole-school DSL and lead for alternative provision, will coordinate safeguarding assurance with the Headteacher and relevant centre DSL. The school retains responsibility for the pupil's safeguarding and education throughout the placement.

The commissioning agreement must require the provider to notify the school of changes in staffing that could affect safeguarding risk, as well as safeguarding incidents or suitability concerns. The school will verify assurances, visit and review provision according to risk, and ensure that any provider

required to register as an independent school is registered.

The placement plan will specify attendance reporting and immediate follow-up of unexpected absence, named safeguarding contacts, information sharing, curriculum and SEND support, transport responsibilities and review arrangements. Appendix B records approval and continuing oversight; it does not replace an individual pupil placement plan.

4. Adults who Supervise Pupils on Work Experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

For pupils under 16, assess whether the duties and frequency of an adult's supervision amount to regulated activity and ensure the appropriate enhanced DBS and children's barred list checks are completed where required. Supervision of the adult does not create an exemption for qualifying regulated activity. Other employees at the workplace do not automatically require checks simply because a pupil is present.

An enhanced DBS check with barred list information must not be requested solely because an adult supervises a 16- or 17-year-old on work experience. If a pupil aged 16 or over undertakes work experience in a school or college, assess their own duties against DBS eligibility and regulated activity rules. DBS checks cannot be obtained for children under 16. Suitable supervision, safeguarding information and an accessible way for pupils to raise concerns are required for every placement.

5. Pupils Staying with Host Families

For school-arranged homestays in the UK, the school will establish which adults provide the care and accommodation and obtain the appropriate enhanced DBS check with children's barred list information where their role is regulated activity. The school will consider whether an enhanced DBS check is necessary for other household members aged 16 or over; barred list checks require separate legal eligibility.

For homestays overseas, the school will agree and document appropriate suitability assurances with its partner organisation before the visit. A UK DBS check cannot provide equivalent checks on adults living overseas. Pupils and parents will receive clear information about reporting concerns, emergency contacts and alternative arrangements if a placement becomes unsafe.

Where a homestay may constitute private fostering, the school will ensure that the relevant local authority is informed. This generally concerns a child under 16, or a disabled child under 18, cared for and accommodated for 28 days or more by someone who is not a parent, person with parental responsibility or close relative. Safeguarding concerns must be reported immediately regardless of the length of the arrangement.

Appendix A: Agency Checks

Agency name: _____ Agency contact: _____

Worker name: _____ Role and centre: _____

Assignment dates: _____ Regulated activity: Yes / No

Complete each applicable check with its outcome and date. Explain any item that is not applicable. Do not record medical diagnoses, criminal-offence details or copies of identity documents on this form; retain necessary supporting information separately with restricted access.

Check	Outcome and date	Evidence or notes
References and employment history		Suitable references obtained; material gaps and concerns resolved.
Identity		Identity verified by the agency; school also checks on arrival.
Enhanced DBS		Correct level and workforce; record certificate date and reference securely. Copy supplied to the school.
Children's barred list		Required before regulated activity begins. Record completion and outcome.
Fitness for the duties of the role		Confirm fitness and necessary workplace adjustments through an appropriate confidential route; do not list medical conditions here.
Right to work in the UK		Appropriate check completed and any follow-up date identified.
Overseas checks		Record countries, checks or assurances obtained and resolution of any evidence gaps.
Professional qualifications		Qualifications verified where required for the role; teacher reference number where applicable.
Prohibition from teaching		For anyone undertaking teaching work, including relevant interim orders.

Check	Outcome and date	Evidence or notes
Childcare disqualification		Only where the duties and setting bring the role within scope.
Section 128 direction		Required where the person participates in management of the independent school.
Recruitment suitability assessment		Confirm relevant concerns were resolved, including consideration of online searches and any findings.

In relation to the enhanced DBS check:

DBS assurance	Outcome and date	Evidence or notes
Appropriate enhanced certificate obtained and assessed by agency?		Confirm level, workforce and barred list coverage where required.
Any disclosed information requiring school consideration?		If yes, refer securely to the Headteacher before approval. Do not reproduce offence details on this form.
Certificate timing or lawful recent-employment exception verified?		Record the basis for meeting paragraph 19 requirements and any applicable exception.
Copy of enhanced DBS certificate supplied to this independent school?		Required where obtained, whether or not the certificate contains disclosed information.

Signature of agency checker:

Date:

For school to complete

School verification	Outcome	Date and checker
Written confirmation of all required checks received and assessed as satisfactory?		
Agency confirmation retained securely?		
Copy of enhanced DBS certificate received?		
Certificate readable, matches worker, and appropriate to role?		
Any adverse information assessed by the Headteacher and appointment decision recorded? A risk assessment cannot override barring or prohibition.		
Certificate copy stored securely with a destruction date, normally within six months?		
Identity checked against agency confirmation before duties begin?		
Required information and dates entered on the SCR?		

Signature of school checker:

Date:

Headteacher approval where required: _____ Date: _____

Safeguarding induction completed by: _____ Date: _____

Start authorised by: _____ Date: _____

Appendix B: Alternative Provision (external) Paperwork

Complete before commissioning a placement and update at each review or significant change.

Record the evidence seen and resolve outstanding safeguarding checks before a pupil attends. Keep pupil and staff information secure.

Provider name and address: _____

Registration status and verification: _____

Pupil name or secure reference: _____ Centre: _____

Placement dates and timetable: _____

Provider lead and DSL contact: _____

School placement lead and centre DSL: _____

Purpose of placement and link to pupil plan: _____

Parent/carers and pupil consultation recorded: _____

Pre-placement checks

Check	Evidence and outcome	Date and checker
Provider identity, registration where required, and suitability of the provision verified.		
Written assurance of appropriate checks on staff obtained, including enhanced DBS and barred list checks for regulated activity under the 2026 rules.		
Provider agrees to notify the school of staffing changes affecting safeguarding risk and relevant concerns without delay.		
Safeguarding policy, DSL arrangements, staff training, allegations and low-level-concern procedures checked.		
Attendance reporting agreed, including immediate notification and follow-up of unexpected absence.		
Curriculum, SEND support, communication needs and reasonable adjustments agreed with the pupil's plan.		
Premises, supervision, behaviour support, restrictive intervention, health and safety and emergency arrangements assessed.		

Check	Evidence and outcome	Date and checker
Transport, handover, first aid, medication and relevant individual risk assessments agreed.		
Information-sharing arrangements, secure contacts and incident-reporting routes agreed.		
Visit or other assurance activity completed; any outstanding actions resolved and evidenced.		
Review dates, responsible people and arrangements for ending an unsafe or unsuitable placement agreed.		

Actions and approval

Outstanding action, responsible person and deadline: _____

Evidence that required actions are complete: _____

Callan Glean or authorised safeguarding reviewer: _____ Date: _____

Headteacher approval: _____ Date: _____

First review date: _____ Next visit or assurance activity: _____

Ongoing review

Review date and people involved: _____

Attendance, engagement, progress and pupil/parent feedback: _____

Safeguarding incidents, staffing changes and updated checks: _____

Continued suitability, actions and any changes to the placement plan: _____

Decision and responsible person: _____

Next review date: _____ Signed: _____