educate
SUPPORTING EDUCATION FOR THE NEXT GENERATION

U-Educate

Safer Recruitment Policy

Issue Date: September 2026

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1. Purpose and statement of commitment

U-Educate is committed to safeguarding and promoting the welfare of children through safe, fair and rigorous recruitment. No commercial objective, staffing pressure or urgent booking overrides a mandatory safeguarding check or a decision that an individual is unsuitable to work with children.

This policy establishes recruitment, vetting, clearance, deployment, ongoing suitability, information-sharing and escalation arrangements for staff supplied to schools, colleges, alternative provision and other educational settings. It is designed to support host settings in meeting Keeping Children Safe in Education (KCSIE) 2026 while recognising that U-Educate is an employment business and not automatically the operator of the host setting.

2. Scope and linked policies

This policy applies to directors, recruitment consultants, compliance staff, employees, agency workers, supply teachers, teaching assistants, tutors, mentors and other personnel engaged or supplied by U-Educate. Different checks apply depending on the role, regulated-activity status, age group, location and applicable law.

Read alongside U-Educate's Safeguarding and Child Protection Policy, Staff Code of Conduct, Allegations/Low-Level Concerns procedures, Whistleblowing Policy, Data Protection Policy and Health, Safety and Welfare Policy. Host schools retain their own statutory safeguarding, induction and single central record obligations.

3. Legal and guidance framework

Keeping Children Safe in Education 2026, particularly Parts One, Three and Four; Working Together to Safeguard Children 2026.

Safeguarding Vulnerable Groups Act 2006; Protection of Freedoms Act 2012; Police Act 1997 and DBS eligibility rules.

Education Act 2002 and relevant school staffing / independent school standards requirements as applicable to the receiving setting.

Employment Agencies Act 1973; Conduct of Employment Agencies and Employment Businesses Regulations 2003.

Rehabilitation of Offenders Act 1974 and Exceptions Order, including current filtering rules; Equality Act 2010.

Immigration, Asylum and Nationality Act 2006 and current right-to-work guidance; UK GDPR and Data Protection Act 2018.

Legal requirements take precedence over internal check-frequency preferences. Compliance staff must consult current government guidance where eligibility or a statutory exception is uncertain.

4. Governance, accountability and training

Directors provide oversight and sufficient resources. The Agency Safeguarding Lead (ASL) owns safeguarding escalation, allegations coordination and annual policy review. The Compliance Lead maintains the recruitment-check matrix, clearance decisions, expiry alerts, file audits and written assurances. Recruitment consultants must not place a candidate before documented compliance approval.

Staff conducting interviews, vetting, online searches or placement decisions receive role-appropriate safer recruitment, safeguarding, discrimination, data protection and allegations training, refreshed when guidance or responsibilities change. Concerns about the ASL are escalated through the senior-leadership route in the Safeguarding and Child Protection Policy; external referral remains available where internal reporting is compromised.

5. Recruitment process: advertising, application, shortlisting, online searches and interview

Advertisements and role descriptions will state U-Educate's commitment to safeguarding, the relevant checks and the need to disclose information lawfully required for an exempt role. Job descriptions identify duties, qualifications, supervision and whether regulated activity is expected.

Applicants must submit a complete application history, including employment and education chronology, reasons for leaving relevant roles, and explanations of material gaps or inconsistencies. A CV may support but must not replace the required structured information. The application asks for relevant declarations in accordance with the Rehabilitation of Offenders Act and current filtering rules; applicants must not be asked to disclose protected or filtered matters.

Shortlisting is based on objective criteria. Any inconsistencies, unexplained gaps, frequent changes of employment or safeguarding-relevant information are explored and recorded without discriminatory assumptions.

For shortlisted applicants, U-Educate may conduct proportionate online searches of publicly available information as part of safeguarding due diligence. Candidates will be informed that such searches may take place. Searches must have a clear safeguarding purpose, avoid unnecessary intrusion and protected-characteristic bias, and distinguish verified facts from speculation. Material concerns must be discussed with the candidate before a suitability decision, unless doing so would compromise a safeguarding investigation.

Interviews will include identity confirmation, examination of employment history, safeguarding and professional-boundary questions, scenarios relevant to the role, and discussion of concerns or discrepancies. At least one interviewer should have current safer recruitment training. Interview notes and decisions will be recorded securely.

6. Identity, right to work, qualifications and professional status

U-Educate will verify identity using current DBS identity-checking guidance and check the person presenting for placement matches the individual vetted. Right to work must be established using a legally permitted method before employment or engagement as required; expiry and repeat-check requirements will be tracked where applicable.

Relevant qualifications and professional registrations will be checked with issuing bodies or authoritative services where practicable. For teaching appointments, U-Educate will undertake the applicable teacher status and prohibition checks using the Department for Education's current checking service. Additional restrictions or directions (including section 128 checks) will be assessed only where legally relevant to the actual role; a section 128 check is not a universal requirement for every supply worker.

For overseas qualifications, equivalence or recognition may be assessed through UK ENIC or the appropriate regulator; translation alone does not prove qualification validity. Professional status and safeguarding suitability are separate matters.

7. References, employment history and suitability

U-Educate will seek at least two appropriate references, including a recent employer and, where available, the most recent employer in work with children. References should be obtained directly from an authoritative source and verified where necessary. Open references or testimonials alone are insufficient.

References will be checked for employment dates, role, suitability for working with children and safeguarding concerns, to the extent lawful and appropriate. Discrepancies will be followed up and recorded. A candidate must not be cleared until reference requirements and any lawful exceptions or alternative evidence have been evaluated and approved by the Compliance Lead and ASL where safeguarding implications arise.

U-Educate will seek explanations for significant employment gaps, dismissals, disciplinary issues or changes in role and will consider them fairly, using corroborating evidence where necessary. Employment history alone must not be treated as proof of misconduct.

8. DBS, children's barred list and overseas checks

The level of DBS check must reflect the actual role and statutory eligibility. For a role in regulated activity with children, an enhanced DBS check including children's barred list information is required before appointment to that regulated activity, subject only to any applicable lawful arrangements; U-Educate will not deploy a barred person into regulated activity. Enhanced checks without barred-list information will be used only where eligible and appropriate. A barred-list check must not be requested where the role is ineligible.

Where a candidate subscribes to the DBS Update Service, U-Educate may use it only with the candidate's consent, identity verification and confirmation that the existing

certificate is of the correct workforce, type and level for the role. The original certificate must be seen where required. A clear Update Service status is not a substitute for checks that fall outside its scope.

U-Educate's preferred assurance standard may include periodic DBS or Update Service status reviews; however, the previous policy's annual new-certificate rule and quarterly barred-list checks are not universal statutory requirements. Any internal refresh cycle must be lawful, role-appropriate and documented.

Where a candidate has lived or worked outside the UK, U-Educate will assess whether overseas criminal-record information or other suitable evidence is needed, taking account of the countries, periods, recency, availability and risks. A fixed "three months in four years" rule is not a universal KCSIE legal threshold. Where satisfactory information cannot be obtained, the risk and placement decision must be documented; no unsupported assurance will be issued.

DBS certificates containing information are assessed individually by authorised staff, considering relevance, seriousness, age of matters, representations, safeguarding risk and applicable filtering law. Disclosure of information does not automatically determine suitability. Certificates and sensitive information will be handled under the Data Protection Policy and DBS code of practice.

9. Health declarations, equality and reasonable adjustments

U-Educate will not use broad pre-offer health questionnaires to screen out applicants. Health-related enquiries before an offer will be limited to those permitted by the Equality Act 2010, including identifying reasonable adjustments for assessment. After a conditional offer, proportionate information may be requested to assess occupational requirements and reasonable adjustments, with appropriate confidentiality and consent.

10. Safeguarding induction and KCSIE 2026

Before undertaking a relevant placement, agency workers must read KCSIE 2026 Part One in full and confirm understanding; the shorter overview is supplementary and not a replacement. They must receive information on reporting concerns, child-on-child abuse, online safety, low-level concerns, allegations, whistleblowing, professional boundaries and confidentiality, proportionate to their role.

The host setting must provide its local safeguarding induction, including DSL/deputy contacts, child protection policy, behaviour policy, staff code of conduct, emergency procedures and any pupil-specific information necessary for safe delivery. U-Educate will confirm this arrangement at placement and respond if induction is missing or inadequate.

11. Placement authorisation and written assurance to host settings

No worker may be confirmed as fully cleared until a named authorised compliance decision-maker has checked the applicable evidence and recorded a pass, exception

or rejection with rationale. Recruitment consultants cannot override a compliance hold.

Before the worker starts, U-Educate will provide the host setting with written notification that the checks the school or college would otherwise be required to undertake have been completed, specifying any material qualification or exception and confirming the relevant DBS and barred-list arrangements. If an enhanced DBS certificate contains information, U-Educate will follow KCSIE requirements concerning the host setting obtaining a copy and secure handling. The host setting must verify the identity of the person arriving.

U-Educate will provide a named contact for safeguarding concerns, the role, assignment dates and any necessary restrictions or supervision arrangements. It will not provide a misleading "all checks complete" assurance while mandatory checks remain outstanding. Any legally permissible exceptional arrangement requires documented legal basis, host approval, risk assessment, supervision and a decision by authorised leaders; it cannot circumvent a barred-list prohibition.

12. Ongoing suitability, breaks in service and redeployment

U-Educate will maintain accurate records of certificate status, right-to-work expiry, professional restrictions, safeguarding training and material suitability changes. Workers must disclose relevant changes affecting their eligibility or suitability promptly, subject to applicable law.

Following a substantial break in service, U-Educate will reassess identity, recent work history, references, criminal-record information and other checks according to elapsed time and risk. The previous policy's six-month reapplication trigger may be retained as an internal review point but is not itself a statutory KCSIE rule. A fresh placement cannot proceed if essential evidence is stale, incomplete or unsuitable.

13. Allegations, low-level concerns and safeguarding escalation

Any concern that a worker may have harmed a child, may pose a risk of harm, may have committed a relevant offence or may be unsuitable to work with children must be reported immediately to the host setting's designated case manager and U-Educate's ASL. A concern that does not meet the harm threshold must still be recorded and managed as a low-level concern in line with KCSIE Part Four and the host setting's policy.

Where the harm threshold is met or may be met, the host setting's case manager and U-Educate will coordinate prompt LADO consultation, ordinarily within one working day. U-Educate will escalate independently if the host setting fails to act. Immediate danger is reported to police/children's social care without delay. Internal disciplinary or commercial decisions must not obstruct statutory enquiries.

U-Educate will preserve records, cooperate with investigations, avoid premature findings, consider interim placement safeguards and review the worker's suitability.

Where the statutory DBS referral duty is triggered, U-Educate will ensure the relevant dutyholder makes the referral and will make its own referral where its duty applies. Teacher misconduct referrals to the Teaching Regulation Agency will be considered where applicable.

14. Safeguarding concerns discovered during recruitment

If an application, reference, online search, disclosure or interview reveals a credible safeguarding concern, the matter must be escalated to the ASL before any placement. The ASL will assess immediate protective action, whether statutory advice or referral is required, whether information may lawfully be shared with another employer or authority, and how the decision is recorded. Candidates will be treated fairly, but children's safety takes priority.

15. Data protection, confidentiality and retention

Recruitment records will be accurate, secure, access-controlled and retained according to a documented schedule, applicable law and any relevant litigation hold. DBS certificate information must not be copied or retained unnecessarily; where certificates are retained, DBS retention requirements will be followed, ordinarily no longer than six months after the recruitment decision unless a lawful exception applies. The compliance record may retain permitted metadata, decision and check dates without retaining full certificate content.

Safeguarding information may be shared without consent where there is a lawful basis and it is necessary and proportionate to protect children. Information-sharing decisions, recipients, reasons and outcomes will be documented. Privacy notices must explain relevant processing and rights.

16. Contractors, volunteers and non-standard assignments

For volunteers, contractors, online tutors, one-to-one tutoring, outreach and alternative provision assignments, U-Educate will determine the correct legal relationship, duties, level of contact, supervision and check eligibility before placement. Requirements must not be assumed identical for every role. Contracts with host settings will clarify safeguarding responsibilities, reporting, supervision and information-sharing arrangements.

17. Complaints, whistleblowing and protected disclosures

Candidates, workers and host settings may raise concerns about recruitment decisions, unsafe practices or safeguarding without fear of retaliation. Staff may use U-Educate's whistleblowing procedure and may approach external safeguarding agencies where internal escalation is inappropriate. Complaints about discrimination, confidentiality or recruitment fairness will be investigated separately from, but coordinated with, safeguarding action.

18. Audit, quality assurance and review

The Compliance Lead will undertake periodic risk-based file audits, including identity, right to work, references, DBS eligibility, barred-list checks, professional status, online-search records, induction confirmations and written host assurances. Findings will be tracked to closure and significant themes reported to Directors. Any discovered gap in mandatory checks will trigger an immediate placement risk review and necessary withdrawal or protective action.

This policy will be reviewed annually, after significant safeguarding incidents or whenever legislation or KCSIE guidance changes. Directors will formally approve revisions, with version control and evidence that staff have been informed.

Appendix A – Pre-placement compliance checklist

- ☐ Role description, duties, host setting and regulated-activity determination recorded.
- ☐ Application and full employment history reviewed; gaps explained.
- ☐ Identity verified and right to work confirmed.
- ☐ Interview completed and safeguarding suitability evaluated.
- ☐ Two suitable references obtained and verified; exceptions approved and recorded.
- ☐ Appropriate DBS certificate / Update Service evidence verified; children's barred-list check where eligible and required.
- ☐ Professional qualification, QTS / prohibition and any role-specific restrictions checked.
- ☐ Overseas checks and risk assessment completed where indicated.
- ☐ KCSIE 2026 Part One read and acknowledgement recorded; host induction arranged.
- ☐ Compliance Lead approval recorded; written assurance issued to host; identity match on arrival requested.

Appendix B – Escalation and contacts

Agency Safeguarding Lead: Adam Gray | 0121 796 0990 | adam@u-educate.co.uk

Deputy / escalation: Christian Brown | 0121 796 0990 | chris@u-educate.co.uk

Alternative senior leadership escalation: Jack Kendall | 02392 004587 | jack@u-educate.co.uk

Host DSL: the named DSL/deputy of each receiving school or education setting, confirmed for the assignment. Relevant children's social care and LADO details are maintained in the Safeguarding and Child Protection Policy regional contact directory.

Emergency: 999 | Police non-emergency: 101 | NSPCC whistleblowing advice: 0800 028 0285