



Emil Dale Academy & Emil Dale Part-Time  
**Safer Recruitment Policy**

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## 1. Introduction

1. Emil Dale Academy (“EDA”) is committed to safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff, freelancers, volunteers and contractors to share this commitment.
2. Safer recruitment is a critical part of creating and maintaining a safeguarding culture in which unsuitable individuals are deterred from applying, identified during recruitment, and prevented from working with students.
3. This policy sets out EDA’s robust, proportionate and legally compliant safer recruitment practices across all areas of the organisation, recognising that EDA operates:
  - as a sixth form / further education provider working with students under 18
  - as a higher education provider, including adult learners
  - with a mixed workforce, including employees, regular freelancers, visiting practitioners, guest artists and short-term contractors
  - across full-time, part-time and weekend provision.
4. Safeguarding considerations apply to *all* recruitment activity, regardless of employment status, role type or duration.

## 2. Policy Aims

5. EDA is passionate about ensuring that we provide the best possible care and education to our students and members, and are also committed to providing a supportive and flexible working environment to all our members of staff.
6. EDA recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. The aims of EDA’s recruitment policy are therefore as follows:
  - a. to ensure that the best possible staff are recruited based on their merits, abilities and suitability for the position
  - b. to ensure that all job applicants are considered equally and consistently
  - c. to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age
  - d. to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education as updated annually (KCSIE), Disqualification under the Childcare Act 2006 (DUCA), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
  - e. to ensure that EDA meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
  - f. Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

### 3. Scope

7. This policy applies to:
  - a. All permanent and fixed-term employees;
  - b. All freelance staff (including teaching faculty, creative practitioners, accompanists and support staff);
  - c. Visiting professionals and guest tutors;
  - d. Volunteers and work-experience placements;
  - e. Contractors where there is regular contact with students or access to EDA premises.
8. This policy should be read alongside:
  - a. Sixth Form Child Protection & Safeguarding Policy
  - b. Part-Time / Weekend School Safeguarding & Child Protection Policy
  - c. Staff Code of Conduct
  - d. Freelancer Handbook
  - e. Whistleblowing Policy
  - f. Disciplinary Policy
  - g. Data Protection & Information Security Policy

### 4. Definitions

**Freelancer** – A subcontractor, who is engaged to deliver services to EDA but is not employed through PAYE

**PAYE Staff** - An employee of EDA through contract and paid through PAYE

**Resident teaching faculty** – This term applies to any subcontractor who has taught at EDA’s full-time academy for five or more days across an academic half term.

**Guest teaching faculty** – This term applies to any subcontractor who has taught at EDA’s full-time academy for four days or less across an academic half term.

**Non-teaching staff** – This term applies to any member of contracted staff who works at EDA in a non-teaching format. This may include EDA’s Operations Team, Admissions Team, or Management Team.

### 5. Legal and regulatory framework

9. EDA’s safer recruitment procedures are informed by, and comply with, the following legislation and statutory guidance (as amended from time to time):
  - a. Keeping Children Safe in Education (DfE, 2024)
  - b. Working Together to Safeguard Children (DfE, 2023)

- c. The Children Act 1989 and 2004
- d. The Education Act 2002 (s.175 / s.157)
- e. The Safeguarding Vulnerable Groups Act 2006
- f. The Rehabilitation of Offenders Act 1974 (Exceptions Order)
- g. The Equality Act 2010
- h. Data Protection Act 2018 and UK GDPR
- i. Prevent Duty (Counter-Terrorism and Security Act 2015)

10. EDA also aligns its practice with guidance from:

- a. Hertfordshire Safeguarding Children Partnership
- b. NSPCC safer recruitment guidance
- c. Partner institutions (including North Hertfordshire College and The University of Bedfordshire)

## **6. Roles and responsibilities**

### **6.1 Owner**

11. The owner has overall responsibility for ensuring that effective safer recruitment policies and procedures are in place and implemented consistently.

### **6.2 Principal**

12. The Principal is responsible for:

- a. ensuring safer recruitment practices are embedded across the organisation
- b. ensuring that allegations relating to recruitment or suitability are managed appropriately
- c. ensuring compliance with statutory guidance.

### **6.3 Business, Compliance & Strategy Manager**

13. The Business Compliance & Strategy Manager is responsible for:

- a. maintaining and reviewing this policy
- b. overseeing recruitment processes and pre-engagement checks
- c. ensuring proportionate checks for freelance and visiting staff
- d. ensuring compliance with statutory guidance.

### **6.4 Executive Assistant to Senior Management**

14. The Executive Assistant is responsible for:

- a. sending contractual information and documentation, and requesting the required information for safer recruitment protocols
- b. ensuring receipt of pre-engagement checks (documentation and its validity)
- c. maintaining the Single Central Record
- d. ensuring compliance with statutory guidance.

## **6.5 Recruiting managers**

15. All recruiting managers must:

- a. adhere to this policy
- b. ensure safeguarding considerations are central to recruitment decisions.

## **6.6 Safer recruitment training**

16. EDA confirms that the Business Manager, Principal and Executive Assistant have completed safer recruitment training. Refresher training will be undertaken in line with statutory guidance and best practice.

## **7. Safer recruitment principles**

17. EDA follows the six key principles of safer recruitment:

- i. Job Descriptions and Person Specifications clearly outline safeguarding responsibilities.
- ii. Advertising states the commitment to safeguarding and DBS checks.
- iii. Application Forms require a full work history, with gaps explained where necessary.
- iv. Shortlisting includes scrutiny of previous employment and qualifications.
- v. References are taken and asked specifically about suitability to work with children.
- vi. Interviews include safeguarding-related questions.

18. EDA underpins this by ensuring:

- a. safeguarding is prioritised at every stage of recruitment
- b. safer recruitment is applied proportionately but consistently
- c. no individual is permitted to commence work without appropriate checks
- d. decisions are evidence-based and recorded
- e. equality of opportunity is upheld while maintaining safeguarding rigour.

## **8. Planning and advertising**

19. Before recruitment begins, the role will be assessed to determine:

- a. whether the role involves regulated activity;
- b. the level of contact with under-18s or vulnerable adults;
- c. the appropriate level of pre-engagement checks required.

20. All job descriptions, person specifications and advertisements will:

- a. include a clear safeguarding statement;
- b. reference the requirement for DBS and suitability checks;
- c. state EDA's commitment to safeguarding and safer recruitment.

## **9. Recruitment procedures**

### **9.1 Resident teaching faculty**

21. When hiring for a resident teaching role at EDA, the following steps must be taken to ensure that the recruitment process is robust:
- a. Micro-teach session and Interview
  - b. The candidate must attend a micro-teach session and interview with the relevant Head of Department and Principal.
22. It is the responsibility of the Head of Department and Principal to decide the suitability of the candidate to the role.
23. If it is decided to make an offer of employment following the micro-teach and interview, any such offer will be conditional on the following:
- a. The agreement of a mutually acceptable start date.
  - b. For positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at EDA.
  - c. For applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at EDA.
  - d. Information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at EDA.
  - e. Any medical or health-related checks will be limited to assessing an individual's ability to perform the role safely and will be conducted in accordance with the Equality Act 2010.
  - f. Any further checks which EDA decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.
  - g. An enhanced DBS check is required where the role involves regulated activity with children or regular contact with under-18s, in line with statutory guidance.
24. The candidate must also agree to provide the Executive Assistant with the following information:
- a. An up-to-date teaching CV.
  - b. Two email addresses of employment references.

- c. EDA will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.
  - d. A clear (enhanced) DBS check.
  - e. A signed sub-contractual agreement (which the Executive Assistant will email to the successful candidate upon being offered the role).
  - f. A scanned copy of photo identification and proof of right to work in the UK (where applicable).
  - g. Name and contact details of their next of kin.
25. It is the responsibility of the Executive Assistant to retrieve and document this information for Emil Dale Full-Time faculty, and the Part-Time Manager for the Part-Time faculty. If the successful candidate does not send in this information, EDA reserves the right to delay engagement, commencement of duties and future payments until all required checks are completed. No individual may continue working until compliance is confirmed.

## **9.2 Guest teaching faculty**

26. When hiring for a guest teaching role at EDA, the following steps must be taken to ensure that the recruitment process is robust.
27. Any offer for employment will be conditional of the following:
- a. The agreement of a mutually acceptable start date.
  - b. For positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at EDA.
  - c. For applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at EDA.
  - d. Information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at EDA.
  - e. Any medical or health-related checks will be limited to assessing an individual's ability to perform the role safely and will be conducted in accordance with the Equality Act 2010.
  - f. Any further checks which EDA decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.
28. The subcontractor must also provide the Executive Assistant with the following information:
- a. An up-to-date teaching CV.

- b. Two email addresses of employment references.
  - c. EDA will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee.
  - d. A clear (enhanced) DBS check.
  - e. A signed sub-contractual agreement (which the Executive Assistant will email to the successful candidate upon being offered the role).
  - f. A scanned copy of photo identification and proof of right to work in the UK (where applicable).
  - g. Name and contact details of their next of kin.
29. It is the responsibility of the Executive Assistant to retrieve and document this information for Emil Dale Full-Time faculty, and the Part-Time Manager for the Part-Time faculty. If the subcontractor does not send in this information, EDA reserves the right to delay engagement, commencement of duties and future payments until all required checks are completed. No individual may continue working until compliance is confirmed.

### **9.3 Non-teaching staff**

30. When hiring for a non-teaching role at EDA, the following steps must be taken to ensure that the recruitment process is robust.
31. Following their application, an applicant may be invited to attend a formal interview at which his/her/their relevant skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with children.
32. It is the responsibility of the Line Manager of the role and Principal to decide the suitability of the candidate to the role.
33. If it is decided to make an offer of employment following the interview, any such offer will be conditional on the following:
- a. The agreement of a mutually acceptable start date and salary.
  - b. Information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at EDA.
  - c. Any medical or health-related checks will be limited to assessing an individual's ability to perform the role safely and will be conducted in accordance with the Equality Act 2010.
  - d. For management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at EDA.
  - e. Any further checks which EDA decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

34. The successful candidate must also provide the Executive Assistant or Business, Compliance & Strategy Manager with the following information:
- a. An up-to-date CV.
  - b. Two email addresses of employment references
    - a. EDA will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.
  - c. A clear DBS check (If the candidate does not have a DBS check, they will be required to undertake one with EDA)
  - d. A signed contractual agreement (which the Executive Assistant or Business Compliance & Strategy Manager will email to the successful candidate upon being offered the role).
  - e. A scanned copy of photo identification and proof of right to work in the UK (where applicable).
  - f. Name and contact details of their next of kin.
35. It is the responsibility of the Executive Assistant to retrieve and document this information. If this information is not sent in, EDA reserves the right to delay engagement, commencement of duties and future payments until all required checks are completed. No individual may continue working until compliance is confirmed.

## **10. Application and shortlisting**

36. EDA does not accept CV-only applications for roles involving teaching, supervision or regular student contact.
37. Applicants are required to provide:
- a. a full employment history
  - b. details of relevant qualifications (if applicable)
  - c. confirmation of suitability to work with children via enhanced DBS check or equivalent
  - d. declaration of any relevant criminal convictions (where applicable).

## **11. Interviews and assessment**

38. Interviews will:
- a. be conducted face-to-face or via secure video conferencing
  - b. explore safeguarding attitudes, boundaries and professional conduct
  - c. include questions relating to working with children and young people
  - d. where appropriate, include observed teaching or “micro-teaches”.
39. EDA uses micro-teaches for regular freelance and permanent teaching staff as part of assessing professional competence, communication style and suitability to work with students.

## **12. Pre-engagement checks**

40. No individual may commence work until the required checks have been completed and verified.
41. In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the Education (Independent School Standards) Regulations 2014, EDA carries out a number of pre-employment checks in respect of all prospective employees.
42. EDA reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at EDA. Any online searches will be limited to publicly available information, will not involve deception, and will be carried out consistently and proportionately in line with data protection legislation.
43. In fulfilling its obligations, EDA does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

### **12.1 Identity and right to work**

44. EDA requires:
  - a. verified photographic identification (passport, driving licence or visa);
  - b. confirmation of the right to work in the UK.

### **12.2 DBS checks**

45. Enhanced DBS checks are a requirement of working at EDA.
46. EDA requires DBS checks to be updated every 3 years, however staff are encouraged to register with the DBS Update Service which annually renews the DBS.
47. Portability of a DBS certificate is reviewed on a case by case basis.
  - a. Enhanced DBS checks are required for roles involving regulated activity with children or for staff who regularly come in to contact with children.
  - b. DBS status is checked prior to engagement and recorded on the Single Central Record.
  - c. Update Service status is accepted where applicable.

### **12.3 References**

- a. A minimum of two references are required, one of which must be the most recent relevant employer.
- b. References are requested prior to engagement and followed up where necessary.
- c. Open or testimonial references are not accepted.

### **12.4 Qualifications and professional status**

- a. Qualifications essential to the role are verified prior to engagement.

## **12.5 Freelancers and visiting staff**

48. Freelancers, including guest practitioners, are required to provide:

- a. signed agreement including address;
- b. enhanced DBS confirmation;
- c. proof of public liability insurance;
- d. photographic ID;
- e. CV and references;
- f. emergency contact and relevant medical information;
- g. completion of EDA's electronic freelancer confirmation form.

49. Freelancers receive:

- a. the Freelancer Handbook;
- b. safeguarding policies;
- c. contractual documentation;
- d. an explainer video summarising key expectations, policies and professional boundaries.

## **13. Single Central Record**

50. EDA maintains a Single Central Record in line with statutory guidance, recording:

- a. identity checks;
- b. DBS checks (date and number, or update service reference);
- c. barred list checks (where applicable);
- d. references;
- e. right to work;
- f. training completion.

## **14. Induction and ongoing suitability**

51. All staff and freelancers:

- a. receive safeguarding induction prior to working with students;
- b. are required to read and confirm understanding of safeguarding policies;
- c. are subject to ongoing suitability expectations.

52. EDA undertakes annual reviews of CVs and records held for regular freelancers, and where freelancers may return to EDA each academic year, they are required to submit pre-engagement check documentation every 3 years.

## 15. Allegations, concerns and whistleblowing

53. EDA has clear procedures for managing:

- a. allegations against staff or freelancers;
- b. concerns about conduct or suitability;
- c. disclosures relating to safeguarding.

54. Concerns are managed in line with statutory guidance and EDA's safeguarding policies.

## 16. Recruitment of ex-offenders

### 16.1 Background

55. EDA will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. EDA makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with EDA. Each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 16.2 below.

56. All applicants must declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.

57. A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may result in disciplinary action up to and including dismissal.

58. It is unlawful for EDA to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the School. EDA will make a report to the police and / or the DBS if:

- a. It receives an application from a barred person
- b. It is provided with false information in, or in support of an applicant's application; or
- c. It has serious concerns about an applicant's suitability to work with children

### 16.2 Assessment criteria

59. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, EDA will consider the following factors before reaching a recruitment decision:

- a. Whether the conviction or other matter revealed is relevant to the position in question
- b. The seriousness of any offence or other matter revealed
- c. The length of time since the offence or other matter occurred

- d. Whether the applicant has a pattern of offending behaviour or other relevant matters
  - e. Whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
  - f. The circumstances surrounding the offence and the explanation(s) offered by the applicant.
60. If the post involves regular contact with children, EDA would not usually consider it appropriate to employ anyone who has been convicted at any time of any the following offences:
- a. Murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
  - b. Serious class A drug related offences, robbery, burglary, theft, deception or fraud.
61. If the post involves access to money or budget responsibility, EDA would not usually consider it appropriate to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.
62. If the post involves some driving responsibilities, it is EDA's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

### **16.3 Assessment procedure**

63. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, EDA will carry out a risk assessment by reference to the criteria set out above.
64. The assessment form must be signed by Principal and the Business, Compliance & Strategy Manager before a position is offered or confirmed.
65. If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS.
66. In cases where the applicant would otherwise be offered a position were it not for the disputed information, EDA may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

### **16.4 Retention and security of disclosure information**

67. EDA's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

### **16.5 Risk Assessments**

68. Where a positive disclosure is received, a formal Risk Assessment will be conducted by the Designated Safeguarding Lead (DSL), HR, and Senior Management to determine suitability for the role.

## **17. Data protection and confidentiality**

69. EDA are legally required to carry out the pre-appointment checks detailed in this policy.

- 70. Staff and prospective staff will be required to provide certain information to EDA to enable us to carry out the checks that are applicable to their role.
- 71. EDA will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency (previously known as the National College for Teaching and Leadership (NCTL)).
- 72. Failure to provide requested information may result in EDA not being able to meet its employment, safeguarding or legal obligations.
- 73. All recruitment information is processed in accordance with UK GDPR and the Data Protection Act 2018. Safeguarding information is handled sensitively and shared on a need-to-know basis.

## Document Control

This policy is reviewed annually, or sooner if there are changes to legislation, guidance or organisational structure.

### Document History

Version Number	Date of Issue	Review Date	Author	Changes Made/ detail
01	26 April 2022	April 2023	Eden Tinsey	First issue
02	23 July 2024	July 2025	Sarah Moore	Update key sections
03	19 <sup>th</sup> August 2025	July 2026	Sarah Moore	Merged recruitment policy with Safer Recruitment policy