**POLICY 05 | 2026-27**

# Safer recruitment

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

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Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

## 1 Purpose and commitment

Crea Pax is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is part of that safeguarding system: it is intended to deter, identify and reject people who may be unsuitable to work with learners, while ensuring recruitment decisions are fair, proportionate, evidence-based and properly recorded.

This policy applies to employees, apprentices, trainees, volunteers, self-employed contractors and other adults engaged by Crea Pax where their role may bring them into contact with learners or safeguarding information. It should be read alongside the Safeguarding and Child Protection Policy, Staff Behaviour / Code of Conduct, Whistleblowing Policy and Single Central Record (SCR).

## 2 Framework

Crea Pax uses Keeping Children Safe in Education (KCSIE) 2026 Part Three as its principal safer-recruitment benchmark, together with current Disclosure and Barring Service (DBS) eligibility guidance and applicable employment, equality, right-to-work and data-protection requirements. As an alternative provision commissioned by schools and local authorities, Crea Pax also considers relevant commissioner and local safeguarding expectations.

Where a legal requirement applies only to a particular type of school or college, Crea Pax will not present that requirement as automatically applying to Crea Pax. Instead, it will apply the requirement where legally applicable and otherwise use the relevant KCSIE standard as safeguarding best practice.

## 3 Responsibilities

- Martha Bache, Director / Proprietor and DSL, has overall responsibility for safer recruitment, suitability decisions and oversight of the SCR.
- At least one person involved in recruitment should have appropriate safer-recruitment knowledge or training. Crea Pax will keep this competence under review and refresh it where required.
- Anyone participating in recruitment must declare relevant conflicts of interest and maintain confidentiality.
- No person may be placed into duties beyond the checks, supervision, competence or authorisation appropriate to that role.

## 4 Planning and advertising

Before recruitment begins, Crea Pax will define the role, duties, safeguarding responsibilities, working pattern and level of contact with children. This determines the checks that are legally available and appropriate, including whether the role is regulated activity with children.

Recruitment information should make Crea Pax's safeguarding commitment clear and explain that appropriate vetting and pre-appointment checks will be required. Job descriptions or role descriptions should identify responsibility for safeguarding and promoting learner welfare where relevant.

## 5 Application and shortlisting

Applicants should provide sufficient information to establish identity, qualifications where relevant, employment or education history, and suitability for the role. CV information may support an application but will not be relied upon alone where a fuller application or employment history is needed.

Crea Pax will scrutinise gaps, inconsistencies, unexplained periods and repeated changes where relevant to safeguarding. Shortlisting decisions will be based on the requirements of the role and recorded proportionately.

In line with the KCSIE safer-recruitment benchmark, Crea Pax carries out an appropriate online search on shortlisted candidates as part of due diligence and tells candidates that this may occur. Relevant public information is explored fairly at interview; private accounts are not accessed and findings are considered in context.

## 6 References

References will normally be sought directly from appropriate referees and, where practicable, before appointment. They should help verify employment or education history and provide relevant information about suitability. Open testimonials or references supplied only by the candidate will not be treated as equivalent to a directly verified reference.

For a person entering their first employment, an appropriate school, college, training-provider or other suitable reference may be used where there is no previous employer. Any requirement that is genuinely not applicable will be recorded as such rather than creating artificial evidence.

## 7 Interview and suitability assessment

Interviews and suitability discussions will explore the applicant's experience, values, motivation to work with children, understanding of safeguarding, professional boundaries and any relevant gaps or concerns. Crea Pax may use scenario or values-based questions where helpful. Information disclosed during recruitment will be considered fairly, lawfully and in relation to the role.

## 8 Pre appointment checks

The checks required depend on the individual and the role. Crea Pax will determine and record what is required rather than applying every possible check indiscriminately. As applicable, checks may include:

- identity and address evidence;
- right to work in the United Kingdom;
- Enhanced DBS and Children's Barred List information where the role is legally eligible;
- references and employment/education history;

- relevant qualifications and professional status;
- overseas checks or additional information where a person has lived or worked outside the UK and this is appropriate;
- prohibition, restriction or management checks where relevant to the actual role and legal eligibility;
- health or adjustment information at the appropriate stage, handled lawfully and confidentially; and
- any commissioner-specific check that is lawful, relevant and proportionate.

A criminal record does not automatically prevent appointment. Information will be considered in context, including relevance to the role, seriousness, circumstances, time elapsed, safeguarding risk and applicable legal protections.

## 9 DBS, barred list checks and regulated activity

Crea Pax will assess each role against current DBS eligibility guidance. It will request only the level of criminal-record information that it is legally entitled to request. Where a role constitutes regulated activity with children and is eligible, the appropriate Enhanced DBS check with Children's Barred List information will be sought.

From 1 September 2026 the previous supervision exemption for relevant supervised volunteer activity with children was removed. Supervision alone therefore no longer takes an otherwise qualifying frequent activity outside regulated activity. Crea Pax will take this into account when assessing volunteers and other roles under the current definition.

DBS certificate numbers, check dates, barred-list information where applicable, Update Service status/checks and relevant decisions are recorded securely on the SCR or associated compliance records. Crea Pax does not require routine photocopying of DBS certificates merely to create a duplicate personnel file.

## 10 DBS Update Service and rechecking

Where an individual is subscribed to the DBS Update Service and Crea Pax has the required consent and certificate information, a status check may be used where legally appropriate. Crea Pax will periodically review whether existing DBS information remains appropriate to the role, including after role changes, breaks in service, commissioner requirements or safeguarding concerns. A fresh DBS application will be obtained where necessary.

## 11 Starting work while a check is outstanding

Starting duties before every check is complete is exceptional and must never be treated as routine. Where legally permissible and judged necessary, the Director / DSL must make and record a role-specific safeguarding decision. Controls may include continuous supervision, restriction from direct or unsupervised learner work, limits on duties, a written risk assessment and prompt completion of the outstanding check.

The fact that a person is supervised does not change whether qualifying activity is regulated activity under the post-1 September 2026 definition. Crea Pax will therefore distinguish between DBS eligibility and the temporary safeguarding controls used while a check is being processed.

Supervision must never be used to bypass a legally required barred-list or other pre-start check. Where the applicable rules do not permit the proposed duties to begin, they must not begin. Any permitted exceptional arrangement must identify the completed essential checks,

outstanding evidence, named supervisor, allowed duties, restrictions, review date and decision-maker. The check remains outstanding until evidence is received and verified.

## 12 Apprentices, young workers and trainees

Apprentices, trainees and young workers are subject to the same principle of role-appropriate safer recruitment. Their age, experience, competence and level of responsibility will also be considered through induction, supervision and risk assessment. A person awaiting a required check will not be given unsupervised learner duties merely because they are an apprentice, trainee or young worker.

## 13 Volunteers

Volunteer roles will be assessed individually according to the activity undertaken, frequency and current DBS eligibility rules. Since 1 September 2026, supervision no longer provides the former exemption from regulated activity for otherwise qualifying supervised volunteer activity. Volunteers undertaking regulated activity must not be barred from working with children and Crea Pax will obtain the appropriate check where required.

Occasional visitors or helpers who do not meet the regulated-activity criteria will be managed using proportionate checks, supervision and visitor controls appropriate to their actual role.

## 14 Contractors and visiting professionals

For self-employed contractors engaged directly by Crea Pax, checks will be determined from the work they actually perform and their contact with learners. Where an external organisation supplies a professional or contractor, Crea Pax may obtain written assurance of appropriate vetting from that organisation and will verify identity on arrival where relevant. Adults who are not appropriately vetted for unsupervised learner contact will be supervised or kept away from learners as appropriate.

## 15 Existing staff, role changes and ongoing suitability

Safer recruitment does not end on appointment. Crea Pax expects staff and contractors to disclose relevant changes that may affect suitability, including criminal charges or convictions, safeguarding restrictions, professional restrictions or other matters required by policy. Annual suitability declarations, supervision, training records and SCR reviews support ongoing oversight.

Where duties materially change, Crea Pax will reconsider whether additional checks, training, risk assessment or competence sign-off are required.

## 16 Single Central Record and evidence

Crea Pax maintains an SCR as its central workforce vetting record. It records the checks and evidence appropriate to each person and role, including dates and outcomes where required. Historical entries are retained appropriately; new checks and training are added rather than rewriting history.

The SCR is audited periodically and whenever significant workforce changes occur. Gaps, anomalies, expired evidence or checks requiring review are recorded and actioned. Supporting recruitment and training evidence is stored securely with access limited to those who need it.

The SCR job title and role assessment must match actual current duties. Recruitment records identify employees, apprentices, volunteers and contractors accurately. Former workers are

removed from the active list while necessary historical evidence is retained securely. Policy publication does not certify that every individual check has been completed.

## 17 Concerns arising during or after recruitment

Any safeguarding information arising during recruitment will be considered before appointment. If concerns arise after appointment, Crea Pax will follow its Safeguarding and Child Protection, Staff Behaviour / Code of Conduct and Whistleblowing arrangements, including LADO consultation or referral where appropriate.

Where the legal conditions for a DBS barring referral are met, Crea Pax will make the required referral. This duty is separate from referrals to children's social care, the police or LADO and will not be delayed because another process is underway.

## 18 Data protection, confidentiality and retention

Recruitment and vetting information is sensitive personal data. Crea Pax will collect only what is necessary, restrict access, store information securely, and retain or dispose of records in accordance with data-protection requirements and its retention arrangements. Information obtained for safer recruitment will not be used for unrelated purposes.

## 19 Induction

Appointment is followed by role-appropriate induction. This includes safeguarding arrangements, KCSIE 2026 Part One, the Staff Behaviour / Code of Conduct, whistleblowing and low-level concerns, emergency arrangements, health and safety, confidentiality and data protection, learner-specific information where needed, and Crea Pax procedures relevant to the role. Additional animal, equipment, transport or practical-work competence is confirmed before independent responsibility is given.

## 20 Monitoring and review

The Director / Proprietor and DSL monitors this policy through SCR audits, recruitment-file checks, workforce changes, safeguarding learning and commissioner or local-authority feedback. The policy will be reviewed by September 2027, or sooner following changes to legislation, KCSIE, DBS eligibility rules, local arrangements or Crea Pax practice.