Safer Recruitment Policy

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Core standard

Compass Learning & Education will only deploy individuals whose competence and suitability to work with children and young people have been established through a fair, rigorous and documented safer recruitment process. All applicable pre-appointment checks, safeguarding induction and formal suitability approval must be completed before any student-facing work begins, whether supervised or unsupervised and regardless of contractual arrangement or delivery setting. No staffing need or pressure to begin provision will override this standard. Safer recruitment remains an ongoing responsibility, supported by supervision, training and prompt action on any concern about an individual's conduct or suitability.

1 Purpose and safeguarding commitment

Compass Learning & Education is committed to safeguarding and promoting the welfare of children and young people. Recruitment must establish both the competence of an applicant and their suitability to work with our learners. Checks support professional judgement; they do not replace it. Safer recruitment continues through induction, supervision and the prompt reporting of concerns.

This policy adopts the safer recruitment expectations in Keeping Children Safe in Education 2026, particularly Part Three, as the standard for Compass. It must be read alongside our Safeguarding and Child Protection Policy, Staff Code of Conduct, Low-Level Concerns Policy, whistleblowing arrangements and data-protection policies. Duties that depend on school status, the nature of a role or a particular activity are applied where legally relevant; Compass also meets applicable commissioning requirements.

The policy is informed by Working Together to Safeguard Children, the Safeguarding Vulnerable Groups Act 2006, the Rehabilitation of Offenders Act 1974 and its Exceptions Order, the Equality Act 2010, the DBS Code of Practice and current DBS guidance. Personal information is handled under the UK GDPR and Data Protection Act 2018, as amended, including relevant changes under the Data (Use and Access) Act 2025.

2 Scope

The policy covers all Compass staff, including teachers, tutors, mentors, learning support staff, therapists and the Director, irrespective of contractual arrangements. It also covers volunteers, agency and supply staff, relevant contractors, visiting professionals and adults involved in work experience. Safeguarding expectations apply to delivery in homes, schools, community venues, hired premises and online.

Checks are selected according to the duties, frequency of contact, setting, learner age and legal eligibility of each role. A common safeguarding standard does not mean that every adult is eligible for the same DBS or barred-list check. Where Compass supports adults aged 18 or over, relevant adult safeguarding requirements are considered separately; an EHCP does not by itself establish eligibility for an adults' barred-list check.

3 Responsibility and approval

The Director is accountable for recruitment decisions, completion of checks and the Single Central Record. At least two people will shortlist and interview applicants, including the Director or a nominated senior representative. Those involved will receive appropriate safer recruitment training; at least one interview panel member must have completed it. An appropriately experienced external panel member may be used where necessary.

No person may approve their own checks or suitability assessment. A conflict of interest, including recruitment of a relative or an assessment concerning the Director, must be referred to an appropriately qualified independent person. A dated recruitment approval must be recorded before any student-facing assignment begins.

4 Advertising and applications

4.1 Advertising

Advertisements and role descriptions will explain the duties, required qualifications, safeguarding responsibilities and expected professional boundaries. They will state that Compass is committed to safeguarding and promoting the welfare of children and young people and that appointment is conditional on satisfactory references, appropriate DBS checks and other relevant safeguarding checks. The level of DBS check will reflect the role's eligibility.

Recruitment information will explain that a criminal record is considered in accordance with this policy and applicable disclosure rules. Where the role involves regulated activity with children, it will state that it is an offence for a barred person to apply to undertake that activity. Applicants will be told that proportionate online searches may form part of due diligence and will have access to this policy and the recruitment privacy notice.

4.2 Application information

Compass will not accept a CV alone. Applicants must complete a structured application recording current and former names, contact details, relevant identity details, and a full history since leaving school, including education, employment and voluntary work. Dates, reasons for leaving roles and explanations for gaps must be provided. The application will include qualifications and awarding bodies, referees, and an explanation of how the applicant meets the person specification.

Applicants must confirm that the information is accurate and complete. Where an application is signed electronically, a signed hard copy will also be obtained at interview, with arrangements made for remote applicants to return it securely. Gaps are explored fairly and without assumptions about caring responsibilities, disability or other protected characteristics.

5 Shortlisting and declarations

At least two people will assess applications against the published criteria and record their decisions. They will identify unexplained gaps, inconsistent dates and matters requiring clarification. Criminal-record and suitability self-declarations will be requested only from shortlisted applicants and will not be used on the initial application form to determine who is shortlisted.

Shortlisted applicants will complete a confidential declaration covering information Compass is legally entitled to consider, including relevant criminal records, barred status, teaching restrictions, applicable disqualification and relevant overseas or other suitability information. Questions will follow current Ministry of Justice and DBS guidance and explain that protected convictions and cautions need not be disclosed. Failure to disclose protected information is not dishonesty.

6 Online searches and selection

Compass will consider proportionate searches of publicly available online information for shortlisted applicants and record whether a search was undertaken, by whom and the outcome. Searches will be consistent, relevant to suitability and limited to what is necessary. Compass will not require access to private accounts. Potential matches will be checked carefully, and relevant concerns will be discussed with the applicant before a decision is reached.

Interviews will use agreed questions and explore motivation for working with children, relevant experience, professional boundaries, responding to disclosures, safeguarding reporting, low-level concerns, whistleblowing and behaviour management. Compass-specific scenarios will include lone working, home visits, online contact, missed sessions and support for vulnerable learners. Gaps, reference discrepancies and relevant declarations will be explored sensitively.

Role-related tasks and appropriately supervised learner involvement may be used where suitable. Interview evidence and reasons for selection will be recorded. Deliberate misrepresentation of information that Compass is entitled to request may lead to withdrawal of an offer, following consideration of the applicant's explanation.

7 Pre appointment checks

Offers are conditional. Compass requires all applicable checks and any disclosure assessment to be completed and approved before student-facing work begins. This includes supervised and unsupervised assignments. An outstanding DBS certificate is not an exception to this Compass rule. Administrative preparation without learner contact or access to learner records may be authorised separately by the Director.

7.1 Identity verification

Compass uses online identity-verification software incorporating biometric checks to confirm applicants' identity. The outcome is reviewed, matched to the applicant and recruitment records, and any discrepancies are resolved. Current and former names, date of birth, address and relevant name changes are checked through appropriate evidence. Where the digital route cannot verify an individual reliably, an alternative compliant process will be arranged.

Where digital verification is relied on for DBS identity checking, the provider and process must meet current DBS requirements, including the relevant digital identity certification. Biometric functionality alone does not establish compliance. The record will show the method, provider, date, outcome and reviewer. Identity verification does not replace DBS, barred-list or right-to-work checks.

7.2 Right to work

Compass will confirm permission to undertake the proposed work before it begins, including any limits on hours or type of work. For employment, the prescribed Home Office online, manual or approved digital route will be used as appropriate, with evidence and the check date retained. Follow-up checks will be diarised where required. Generic identity software or a photograph of a visa is not treated as a substitute for the prescribed process.

7.3 DBS and barred list checks

All staff working for Compass will have an enhanced DBS check including children's barred-list, which is signed up to the Update Service. Barred-list information will be requested only where legally permitted.

A conviction or caution does not automatically prevent appointment to a role involving children. Where Compass is legally entitled to consider information, the Director will complete the assessment in section 8. No appointment will proceed where an applicable bar, prohibition or disqualification prevents the work, or an unacceptable safeguarding risk remains. A person barred from regulated activity with children will not be engaged in that activity.

Compass records that the check and suitability assessment have been completed in the Single Central Record; it does not describe the DBS as granting clearance. A certificate with no disclosed information does not by itself establish suitability.

7.4 Existing certificates and the Update Service

An existing certificate may be accepted only after its suitability for the role and authenticity have been verified. For the Update Service, Compass will obtain the applicant's consent, confirm identity, legal entitlement, the relevant workforce and the required level and barred-list coverage, and record the dated status result. A changed status requires a new DBS check and reassessment before deployment.

7.5 Overseas history

Applicants who have lived or worked outside the UK will undergo the relevant UK checks and an individual review of overseas history. The Director will consider countries, dates, activities and available evidence, and request appropriate additional checks. These may include overseas criminal-record information, certificates of good conduct, references and confirmation from a relevant teaching or professional regulator about restrictions or sanctions.

Where evidence is unavailable, the attempts to obtain it and reasons for its absence will be documented. Alternative evidence and a written risk assessment will be considered by the Director. Missing evidence is not automatically evidence of wrongdoing, but an appointment will not proceed if sufficient assurance cannot be established. Compass will not treat an arbitrary period abroad as a universal exemption from review.

7.6 Professional qualifications and restrictions

Required qualifications will be checked against original certificates or authoritative verification from the awarding organisation. Teaching status, induction and relevant restrictions will be verified through DfE's Check a teacher's record or the appropriate DfE route. Teaching prohibition checks will be applied where relevant to the work and setting. A restriction is assessed against the actual duties, not simply the job title.

Section 128 checks will be undertaken where required for the relevant independent-school management or governance role, or under applicable commissioning arrangements. They are not described as a statutory requirement for every Compass management role. Childcare-disqualification checks will be applied only where the relevant childcare duties and legal requirements apply.

For therapeutic roles, Compass will verify the qualification, relevant professional registration or membership category, current status, conditions of practice and competence for the assigned work. Student membership will not be treated as evidence of full professional registration. Appropriate supervision and insurance arrangements will be confirmed before therapeutic work is assigned.

7.7 References

Compass will normally obtain two satisfactory references directly from verified referees, before interview wherever possible and always before final appointment approval. One must be from the current employer or, where the applicant is not currently employed, the most recent relevant employer. A reference from the last employer involving work with children will also be sought where the applicant is not currently working with children. Additional references may therefore be necessary.

Referees must have suitable authority and direct knowledge of the applicant. For school or college references, the headteacher or principal should confirm accuracy regarding disciplinary investigations. Open references and references supplied solely through the applicant are not accepted. Electronic references will be checked for authenticity, and relevant information verified directly with the referee.

References should confirm role, dates, reason for leaving and suitability to work with children, and provide relevant factual information about substantiated safeguarding concerns meeting the harm threshold. Compass will not request a blanket account of all allegations. False, malicious, unfounded or unsubstantiated allegations should not be included. Low-level concerns are not routinely included unless they relate to matters normally reportable in a reference, such as misconduct or poor performance.

An unanswered suitability question, vague response or discrepancy must be followed up. A blank answer is not treated as positive assurance or automatic proof of unsuitability. The Director will record clarification, any additional evidence and the final judgement. Appointment will not be confirmed while relevant concerns remain unresolved. Alternative referee arrangements for applicants without conventional employment history require a recorded rationale and equivalent scrutiny.

7.8 Fitness and reasonable adjustments

Following a conditional offer, Compass will establish whether the applicant can carry out the role safely, with reasonable adjustments where appropriate. Health enquiries will be relevant and lawful. A disability or diagnosis will not itself be treated as evidence of safeguarding risk. Advice will be sought where necessary, and health information will be restricted to those who need it.

8 Assessment of DBS disclosures and decisions to disregard information

8.1 Protected and lawfully disclosed information

Compass considers criminal-record information fairly and proportionately, with children's safety central to the decision. It will request only information it is legally entitled to consider. Protected convictions or cautions disclosed inadvertently will be disregarded and will not count against the applicant. They will not be retained unnecessarily or treated as evidence of dishonesty because they were not declared.

Where an enhanced certificate contains additional information lawfully disclosed by police, Compass will assess that information appropriately. It will not assume that police information can be ignored merely because an associated conviction or caution would be protected from automatic disclosure. Specialist advice will be obtained where the legal status of information is unclear.

8.2 Discussion and evidence

When relevant information is disclosed, final recruitment approval will be paused. The Director will arrange a confidential discussion and give the applicant an opportunity to explain the circumstances, correct inaccuracies and provide supporting evidence. The discussion will be measured and factual. Where the certificate is disputed, Compass will consider whether the decision should await clarification through the DBS dispute process. No student-facing work will begin while approval remains outstanding.

8.3 Written assessment

The assessment will consider the nature and seriousness of the matter, its relevance to the proposed duties, the applicant's age and circumstances at the time, the time elapsed, any pattern of behaviour and evidence of rehabilitation. It will consider the applicant's explanation and honesty about information they were legally required to disclose, together with references and other reliable evidence. A decision will not rest solely on the age of an offence or an unsupported assurance.

The assessment will address the actual assignment: learner age and vulnerability, opportunities for one-to-one or unsupervised contact, home visits, transport, online communication, access to personal information and the practical limits of supervision. Any proposed safeguards must be achievable and sufficient in that setting. Staffing needs or pressure to start an assignment will not justify an otherwise unacceptable risk.

8.4 Outcomes and authority

The outcome may be to proceed, proceed with justified safeguards, obtain further evidence or decline appointment. Information may be assessed as not preventing appointment where the evidence supports that conclusion. This is a reasoned suitability decision, not removal of an entry from the certificate or a declaration that the disclosure never occurred.

Compass cannot disregard a legal bar or use a risk assessment to override an applicable prohibition or disqualification. Protected information that must be disregarded is distinct from lawfully disclosed information assessed as not preventing appointment. Where a concern remains unresolved or safeguards cannot sufficiently reduce the risk, the appointment will not proceed.

The Director will sign and date the decision before deployment. Complex cases will be referred for appropriately qualified independent advice; a conflict of interest requires independent assessment and approval. The applicant will be informed of the outcome and may request reconsideration where relevant evidence has been misunderstood or omitted. Any review must be impartial and does not authorise work while approval is withheld.

8.5 Decision record and review

The confidential record will identify the evidence considered, decision-maker, rationale, any safeguards, responsible person and review date. Only necessary information will be retained, subject to section 13. Detailed offence information will not be entered on the Single Central Record or routinely shared with commissioners. Any new relevant information after appointment will trigger reassessment, appropriate safeguarding action and consideration of referral obligations.

9 Single Central Record and deployment

The Director will maintain an accurate Single Central Record showing each relevant person's role and the completion dates and outcomes of applicable checks. It will cover identity, DBS and barred-list checks, right to work, teaching restrictions, required qualifications, overseas checks, references and section 128 or childcare-disqualification checks where applicable. Entries that do not apply will be identified with a reason rather than left ambiguously blank.

Compass will also record who completed or verified each check, relevant Update Service checks, induction completion and final deployment approval. Supporting evidence will be kept in the appropriate restricted personnel record. The SCR will be updated when checks are completed or circumstances change and audited termly. It will be made available securely to authorised inspectors or commissioners where appropriate.

Before staff attend a placement, Compass will provide the commissioning school or organisation with appropriate written confirmation of relevant checks and suitability approval. This does not ordinarily require sharing certificate copies or detailed criminal-record information. The receiving setting should confirm the identity of the person arriving against the approved individual.

10 Agency staff volunteers and other adults

10.1 Agency and supply staff

Before deployment, Compass will obtain written assurance from the supplying organisation that all relevant recruitment checks have been completed, including the appropriate DBS and barred-list checks, references, identity, right to work, qualifications and applicable restrictions. Any disclosed information requiring Compass's consideration must be addressed before approval; where required, Compass will obtain and consider the certificate through an appropriate process. Identity will be matched to the person supplied on arrival or before remote delivery.

Agency assurance does not remove Compass's responsibility for suitability, induction, conduct or responding to concerns. Responsibilities for reporting, investigation and information sharing will be agreed with the supplying organisation. An agency worker will not be moved to another assignment to avoid dealing with a safeguarding concern.

10.2 Volunteers

Volunteer roles will be assessed individually, including duties and frequency. Under the 2026 regulated-activity framework, supervision alone does not exempt an otherwise qualifying role from regulated activity. Volunteers undertaking regulated activity with children require an enhanced DBS check including children's barred-list information. Regular teaching, training, instruction or supervision must be assessed against the current statutory criteria.

For roles outside regulated activity, Compass will record a proportionate risk assessment and obtain the checks for which the role is eligible. Applications, references and induction will be appropriate to the responsibilities. An unchecked volunteer must never be left unsupervised or permitted to undertake regulated activity. Compass's requirement for completed checks before student-facing assignments applies to volunteers.

10.3 Contractors visitors and work experience

The Director will agree safeguarding arrangements with contractors and visiting professionals before access to learners. The nature of the work determines the checks required; presence on site alone does not establish barred-list eligibility. Professional visitors may provide verified identity and appropriate employer assurance. Other visitors will be subject to suitable access controls, identification and supervision. No unchecked contractor or visitor will have unsupervised access to learners.

Before work experience begins, Compass will assess the placement, learner's age, adults' duties, supervision and safeguarding arrangements. Appropriate employer assurances and legally eligible checks will be obtained, with reporting contacts and monitoring agreed. The same planning applies to vocational activities in external premises and community venues; venue hire alone does not establish that adults there are suitable to supervise learners.

11 Induction and ongoing support

All Compass staff must complete the compulsory induction before their first assignment. A one-hour induction is the minimum organisational session; additional role-specific training will be provided where necessary. Staff will receive and confirm that they have read and understood KCSIE 2026 Part One in full, the Safeguarding and Child Protection Policy, Staff Code of Conduct and relevant behaviour, low-level concerns and whistleblowing procedures. The Part One overview does not replace the full text.

Induction will explain the DSL and cover arrangements, how to make an immediate referral or report, allegations procedures and the response to repeated or prolonged absence. It will cover online safety and relevant filtering and monitoring responsibilities, professional communications, lone working, home visits, personal-device use, secure information sharing and emergency arrangements. Staff must know what to do if a learner misses a session or cannot be located, and how to report concerns about the Director outside the normal reporting line.

Safeguarding knowledge and professional conduct will be checked during probation or the initial assignment review. Ongoing supervision, appropriate observation and feedback will address boundaries and suitability. Staff will receive regularly updated safeguarding training and updates at least annually. Therapeutic staff will have supervision arrangements appropriate to their role and professional requirements.

12 Concerns after appointment and referrals

Compass staff must promptly report new information that may affect their lawful eligibility or suitability, including relevant restrictions, barred status or professional sanctions. Reports must be limited to information Compass is legally entitled to request and assess. A concern, changed role or new duty may require additional checks or a fresh suitability assessment. Update Service monitoring will operate only with consent and continuing legal entitlement.

Allegations and low-level concerns will be managed under Compass's safeguarding procedures. The Director, or an independent person where the Director is involved, will seek advice from the local authority designated officer where the harm threshold may be met. Immediate risks will be addressed and police or children's social care contacted where necessary. Relevant agencies and commissioners will be informed through lawful, proportionate information sharing.

Compass will make a DBS referral where the legal duty is met, including where a person is removed from regulated activity because the relevant harm or risk criteria are met, or would have been removed had they not resigned or otherwise left. This applies to volunteers as well as paid staff. Relevant teacher misconduct will be considered for referral to the Teaching Regulation Agency under the applicable requirements. Resignation, settlement or a compromise agreement will not prevent a required referral.

13 Confidentiality and retention

Recruitment information will be stored securely with access limited to authorised people. The recruitment privacy notice and retention schedule will identify purposes, lawful bases, retention periods and disposal arrangements. Criminal-offence data requires an appropriate Article 10 condition and applicable Data Protection Act safeguards; biometric data used to identify a person requires the relevant additional protection. Compass will check the provider's processing arrangements and retain verification evidence proportionately rather than unnecessary biometric material.

DBS certificate copies will not be retained routinely. Where a copy is justified, the reason will be recorded and it will be securely deleted within six months. Detailed criminal-record declarations and assessment material will have a specific, justified retention period and will not be retained indefinitely under a general personnel-file rule. A limited record of the check, result and recruitment decision may be retained to evidence the decision, without unnecessarily reproducing certificate contents. Ongoing safeguards may be recorded separately without excessive offence detail.

Records of identity, right-to-work and qualification checks will be retained for the relevant legal and operational periods. Right-to-work evidence for employees will normally be retained throughout employment and for two years afterwards. Unsuccessful applications will be deleted in line with the recruitment retention schedule. Certificate information will be disclosed only to authorised recipients for a lawful purpose.

14 Equality and fair recruitment

Applicants will be assessed against the requirements of the role through a consistent, fair process. Reasonable adjustments will be considered at application, assessment and appointment stages. Safeguarding decisions will be based on relevant evidence, not assumptions about protected characteristics, health conditions, employment gaps or criminal history. Where information cannot lawfully be considered, it will not influence selection.

16 Guidance and supporting documents

This revised draft was prepared with reference to the final September 2026 edition of KCSIE and the guidance below. Current versions should be checked at each review. The policy's requirement to complete all applicable checks before student-facing deployment is an organisational safeguard adopted by Compass.

Keeping Children Safe in Education 2026

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

DBS recruitment of ex-offenders guidance

https://www.gov.uk/government/publications/recruitment-of-ex-offenders-guidance/recruitment-of-ex-offenders-guidance

DBS filtering guidance

https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide

DBS Update Service employer guide

https://www.gov.uk/government/publications/dbs-update-service-employer-guide/dbs-update-service-employer-guide

DBS digital identity verification guidance

https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/dbs-digital-identity-verification-guidance

Handling DBS certificate information

https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information

Right to work checks employer guidance

https://www.gov.uk/government/collections/right-to-work-checks-employer-guidance

Supporting records: recruitment application; shortlisted-candidate declaration; interview record; reference checks; overseas-history assessment; DBS suitability assessment; deployment approval; Single Central Record; induction record; recruitment privacy notice and retention schedule.