Oxford Diocesan Schools Trust
St Mary's Convent
Denchworth Road, Wantage
Oxford, OX12 9AU
odst.governance@oxford.anglican.org
www.odst.org.uk

Safer Recruitment for Schools Policy

Northbourne CE Primary School

Approved by:	**Pay & Personnel**
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Contents

I Statement of Intent 3
II Objectives 3
III Scope 3
IV Relevant Legislation 3
V Related Policies and Documents 3
VI Date of Review 4
VII General principles 4
Definitions 4
Consistency of Treatment and Fairness 4
Delegation 4
Monitoring and Evaluation 4
VIII Responsibilities 4
Responsibilities of the Relevant Body 4
Responsibilities of the Headteacher/ School 4
General 5
ODST Model Safer Recruitment Policy 6
Introduction 6
1. Overview 6
2. Inviting Applications for a Role 6
3. Identification of the Recruitment Panel 7
5. Invitation to Interview 8
6. The Selection Process 9
7. Employment Checks 9
8. Induction 10
10. Volunteers 10
11. Contractors 11
12. Trainee/student teachers 11
13. Record Retention/Data Protection 12
14. Single Central Records 12
Useful Information 12
Declaration 12
APPENDIX 1- Example Reference Request Letter 13
Appendix 2- Recruitment Checklist 14
Appendix 3 Online Checks - Record form 15
Appendix 4 Online Searches - HR Guidance - Sept 2025 16

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I Statement of Intent

This policy has been developed to embed safer recruitment practices and procedures throughout ODST member schools and to support the creation of a safer culture by reinforcing the safeguarding and well-being of children and young people in our care. This policy complies with guidance outlined in "Keeping Children Safe in Education (September 2024)".

All ODST member schools are to adopt this policy.

Please note: The starting point for developing this policy was the Oxfordshire County Council model policy for schools. It has been amended to reflect the independent status of ODST as a multi academy trust, although the substantive content remains the same.

II Objectives

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- attracting the best possible candidates/volunteers to vacancies.
- deterring prospective candidates/volunteers who are unsuitable from applying for vacancies.
- identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people.

III Scope

- Local Governing Body ✓
- All School Staff ✓
- Central Office Staff ✓
- Contractors/ Service Providers ✓

IV Relevant Legislation

- Keeping Children Safe in Education (2025)
- Childcare Disqualification Regulations (2009)
- EYFS Statutory Framework (2025)

V Related Policies and Documents

- ODST Safeguarding and Child Protection Policy
- Guidance on Expected Conduct in School Settings
- Whistleblowing Policy
- Equality Policy
- DfE Guidance on Alternative Provision
- ODST Volunteer Policy

VI Date of Review

The policy will be reviewed as required by the Board of Trustees of ODST to take account of any legislative changes and / or national policy development as well as feedback from ODST staff and schools and in any event, by 31 December 2026 at the latest.

VII General principles

Definitions

- Unless indicated otherwise, all references to "school" include both schools and academies,
- Unless indicated otherwise, all references to "teacher" include the headteacher,
- Unless indicated otherwise, all references to 'staff' include teaching, support and centrally employed staff.

Consistency of Treatment and Fairness

The relevant body is committed to ensuring consistency of treatment and fairness and will abide by all relevant employment and equality legislation.

Delegation

The relevant body has chosen to delegate some of its functions to local governing bodies as set out in this policy.

Monitoring and Evaluation

The Local Governing Body and headteacher will monitor the operation and effectiveness of the school's safer recruitment policy and may be required to provide feedback to officers and Trustees of ODST, or the Local Authority Designated Officer where appropriate.

VIII Responsibilities

Responsibilities of the Relevant Body

- To ensure the ODST has effective policies and procedures in place for the safe and fair recruitment and selection of staff and volunteers in accordance with Department for Education Guidance and Legal Requirements and the relevant Local Authority's Safeguarding Children's Board procedures.
- To monitor members school's compliance with them.

Responsibilities of the Headteacher/ School

- To ensure that the school operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance.
- To ensure that all appropriate checks have been carried out on staff and volunteers in the school.
- To ensure that appropriate staff and governors in member schools have completed safer recruitment training and that this is updated where appropriate.
- To monitor any contractors and agencies compliance with this document.
- To promote the safety and well-being of children and young people at every stage of this process.

General

- It is the responsibility of all potential and existing workers, including volunteers to comply with this document.
- It is the responsibility of all contractors and agencies to comply with safe recruitment pre-employment checks.
- The responsibilities of Ofsted, within inspection and regulation work, also include identifying safeguarding concerns such as inadequate recruitment checking processes.

ODST Model Safer Recruitment Policy

Introduction

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- attracting the best possible candidates/volunteers to vacancies.
- deterring prospective candidates/volunteers who are unsuitable from applying for vacancies.
- identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people.

Safer recruitment means thinking about and including issues to do with child protection, safeguarding and promoting the welfare of children at every stage of the recruitment process.

This policy complies with guidance outlined in "Keeping Children Safe in Education (September 2025)" and reinforces the expected conduct outlined in the Code of Conduct for Staff as well as the school's Safeguarding and Child Protection and Whistleblowing Policies with which all staff are expected to be familiar with. All successful candidates for paid or volunteer employment will be made aware of these documents.

1. Overview

1.1. **……** School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment.

1.2. **…….** School is committed to attracting, selecting and retaining employees who have the appropriate knowledge, skills, experience and ability to carry out their role.

1.3. …… School is committed to using procedures that deal effectively with those adults who fail to comply with the school's safeguarding and child protection procedures and practices.

1.4. We are under a duty to refer any allegation of abuse made against a member of staff to the Local Authority Designated Officer (LADO) within one working day of the allegation being made. A referral will be made if a teacher or member of staff (including volunteers) has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

1.5. Under certain circumstances, we have a duty to refer to the Disclosure and Barring Service (DBS), any member of staff who, following investigation, is either dismissed or resigns prior to the completion of disciplinary procedures, because of conduct or action towards a pupil that has placed that pupil at harm or risk of harm.

2. Inviting Applications for a Role

2.1. All advertisements for posts of regulated activity, paid or unpaid, will include the following statement: "……. School, as a member of the Oxford Diocesan Schools Trust, is committed to safeguarding children and young people. All postholders in regulated activity are subject to appropriate vetting procedures and a satisfactory Disclosure and Barring Service (DBS) Enhanced check. Online checks may also be carried out to comply with KCSIE".

2.2. It is expected that all vacant posts will usually be advertised externally so as to encourage as wide a field of potential candidates as possible and any roles advertised on My New Term will provide access to an application form that is KCSIE compliant. In certain circumstances there may be justification for an internal advertisement only but the rationale for this should be discussed with the ODST HR team prior to advertising.

2.3. All applicants will receive access to the following when applying for a post:

- Job description and person specification.
- An application form.
- Information about ODST, the school and other general information such as reference to the school's commitment to ensuring the safety and well-being of the pupils and to legislation concerning the protection of children.
- Details of the selection procedure for the post.
- The contact details of any person who will be able to provide additional information about the post.
- A statement about access to the school for applicants who may wish to see it or who may wish to speak with the Headteacher before making an application.

2.4. Prospective applicants must complete, in full, and return a standard application form. A curriculum vitae will not be accepted in place of a completed application form although may be submitted as additional evidence. Incomplete application forms cannot be submitted virtually and where insufficient detail has been provided, the candidate will not be shortlisted for selection without the provision of further information.

2.5. By completing and submitting an application form, applicants are deemed to have provided a signed declaration (even if this is sent by e-mail) that the information given is factually correct and that they possess the qualifications, skills, and experience that they have stated on the form.

2.6. Posts involving regular contact with children or young people are exempt under The Rehabilitation of Offenders Act 1974, by virtue of the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975. Applicants for such posts are required to declare any criminal convictions, including spent convictions, that they have or any cautions, reprimands, or final warning that they have been subject to in relation to any offences.

3. Identification of the Recruitment Panel

3.1. At least one member of the Selection and Recruitment Panel will have successfully completed training in safer recruitment.

4. Shortlisting and References

4.1. Candidates will be short listed against the person specification for the post. A minimum of two people should carry out the short-listing process, one of whom should have completed appropriate safer recruitment and selection training.

4.2. Where a candidate is known personally to a member of the selection panel this will be declared before shortlisting takes place. It may then be necessary to consider changing the selection panel to ensure that there is no conflict of interest.

4.3. References for shortlisted candidates will be sent for immediately after shortlisting. The only exception to this is where candidates have indicated on their application forms that they do not wish their current employer to be contacted. In such cases, this reference will be taken up immediately after interview and prior to any offer of employment being made. One reference will be sought prior to interview wherever possible.

4.4. An online search will be conducted for all shortlisted candidates and relevant incidents/issues that are publicly available on-line should be explored at interview with the candidate.

4.5. References will be sought directly from the referee, and we will verify any information with the person who provided the reference (by e-mail or verbally) especially in the event of any anomalies or discrepancies. Detailed written records will be kept of such exchanges.

4.6. Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

4.7. Referees will be asked specific questions about the following:

- The candidate's suitability to work with children and young people.
- Their relationship to the candidate.
- Any substantiated allegations.
- Any disciplinary warnings, including time-expired warnings, relating to the Safeguarding of children and young people.
- The candidate's suitability for the post.

4.8. Reference requests will also include the following factual information:

- Applicant's current post and salary for the period in question.
- Disciplinary record.

4.9 In keeping with good practice, we will:

- Secure a reference from the candidate's most recent employer, training provider or educational setting, and ensure that it has been completed by a senior person with appropriate authority.
- In the case of a setting working with pre-school aged children, additionally secure a reference from the last time the applicant worked with children (if they have previous experience and are not currently working with children).
- Not accept open references, references from a family member or pre-prepared references provided by a candidate.
- Ensure electronic references originate from a legitimate source.

4.10 All appointments will be subject to satisfactory references, vetting procedures, and DBS clearance.

4.11 References should be kept as confidential and should only be seen by the selection panel and the person delegated to obtain the references.

5 Invitation to Interview

5.1 Candidates called to interview will receive:

- Communication confirming the interview and any other selection techniques.
- Details of the interview day including details of the panel members.
- Further copy of the person specification.
- Details of any tasks to be undertaken as part of the interview process.
- The opportunity to discuss the process prior to the interview.

5.2 Candidates who are shortlisted for any selection process should be asked to provide on the day proof of their identity and any qualifications relevant to the role.

6 The Selection Process

6.1 Selection techniques will be determined by the nature and duties of the post, but all vacancies will require as a minimum an interview of short-listed candidates.

6.2 A robust selection process should not however rely solely on an interview and a range of selection activities should be designed in order to help assess who is the most suitable candidate for the job. Interviews must always be face-to-face.

6.3 Panels of at least 2 people should always be involved in interviews so as to allow observation of the candidate and notes to be taken and to minimise the risk of any allegation of bias.

6.4 Candidates will be required to:

- Explain how they meet the criteria within the person specification.
- Explain any gaps in employment.
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel.
- Declare any information that is likely to appear on the DBS disclosure.
- Demonstrate their ability to safeguard and protect the welfare of children and young people.

6.5 To assess the suitability of a candidate to work in a school the interview may examine:

- The candidate's attitude and motivation to work with children.
- Their ability to support the school's agenda for safeguarding and promoting the welfare of children.
- Their attitudes in managing discipline and towards authority.

6.6 Any interview that forms part of the selection process should always include a question related to safeguarding.

7 Employment Checks

7.1 An offer of appointment will be conditional, and all successful candidates will be required to:

- Provide proof of identity.
- Complete an enhanced DBS application (including barred list information for those in regulated activity) and receive satisfactory clearance.
- Where applicable, complete a declaration form confirming that they are not disqualified either directly or indirectly under the Childcare (Disqualification) Regulations 2009.
- Provide proof of professional status and actual certificates of qualifications.
- Ensure that they are not subject to a prohibition order if to be employed as a teacher.
- Complete a confidential health questionnaire.
- Provide proof of eligibility to live and work in the UK.
- Submit to an overseas police check where the individual within the last five years has lived or worked outside the United Kingdom whether they are a UK citizen or not.
- A Section 128 check will be carried out on any candidate taking up a managerial position within a school. This includes members of the SLT within the school and Governors.

7.2 All checks will be:

- Confirmed in writing.
- Documented and retained on the personnel file.
- Recorded on the school's Single Central Record.
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

7.3 It is strongly recommended that all efforts are made to obtain all pre-employment checks prior to the commencement of employment, particularly in relation to references and DBS checks. Where this is not possible, appointments should be delayed until satisfactory checks are received, or in exceptional circumstances advice sought and arrangements made for supervision of the staff member until such time that they are received.

7.4 Documented evidence of the checks made- e.g., eligibility to work, notification of the DBS certificate number, references etc. – must be kept on the individual's personnel file in the school and will be recorded on the school's single central record. Schools do not have to keep a copy of a DBS certificate on file, and if they do so under GDPR regulations there must be a valid reason for doing so and it should not be kept for longer than six months, at which point it must be destroyed.

7.5 Information will be reported to the LADO where:

- the candidate is found to be on the relevant barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a Court; or,
- an applicant has provided false information in, or in support of, his/her application; or,
- there are serious concerns about an applicant's suitability to work with children.

7.5 If an individual's DBS certificate is not completed a member of staff would only be able to commence work if the school is satisfied that:

- appropriate supervision is in place,
- other checks (references etc) have been completed,
- the DBS barred list check has been completed.

8 Induction

8.1 All staff and volunteers who are new to the school will receive information on the school's safeguarding policy and procedures and guidance on safe working practices which would include guidance on acceptable conduct/behaviour. These expectations will form part of new staff members' and volunteer's induction training.

8.2 All successful candidates will undergo a period of induction and will:

- Meet regularly with their induction tutor.
- Meet regularly with their line manager.
- Attend any appropriate training including generalist child protection training.

9 Supply Staff

9.1 …… School will only use those agencies which operate a Safer Recruitment Policy and supply written confirmation that all relevant checks have been satisfactorily completed. Any information disclosed as part of the DBS check will be treated confidentially. These agencies should be able to demonstrate that their staff have received appropriate safeguarding training.

9.2 ……. School will carry out identity checks when the individual arrives at school and add details of that individual onto the SCR.

10 Volunteers

10.1 In line with paragraphs 309-316 of KCSIE 2025, not only should local governing bodies and proprietors prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children and take proportionate decisions on whether to ask for any checks beyond what is required, but they should also ensure that volunteers are appropriately supervised.

10.2 it is a statutory requirement to carry out a risk assessment on volunteers to ascertain whether there are 'certain circumstances' where an Enhanced DBS would be needed. To ensure best practice, schools should therefore carry out a risk assessment and obtain an Enhanced DBS Check with Barred List if the person is in Regulated Activity or an Enhanced DBS Check without Barred List if the person may be left unsupervised by someone who is themselves in Regulated Activity. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

11 Contractors

11.1 We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity,
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

11.2 We will obtain the DBS check for self-employed contractors and will not keep copies of such checks for longer than 6 months.

11.3 Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

11.4 We will check the identity of all contractors and their staff on arrival at Trust premises.

11.5 For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

11.6 Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

12 Alternative Provision

12.1 In the event that any of our pupils are placed in alternative provision, we will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. the same checks that we would carry out for our own staff) and on any new staff they might employ.

13 Trainee/student teachers

13.1 Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

13.2 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.

13.3 In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

14 Record Retention/Data Protection

14.1 The School will retain all interview notes on all applicants for a 6-month period, after which time the notes will be destroyed (i.e., shredded).

15 Single Central Records

15.1 In line with DfE requirements, the school will keep and maintain a single central record of recruitment and vetting checks. The central list will record all staff who are employed at the school, including casual staff, supply agency staff whether employed directly or through an agency, volunteers, governors who also work as volunteers, and those who provide additional teaching or instruction for pupils but who are not staff members, e.g., specialist sports coach.

Useful Information

DfE Guidance on Keeping Children Safe in Education (September 2025):
Keeping children safe in education 2025 (publishing.service.gov.uk)

Oxfordshire Safeguarding Children's Board
https://www.oscb.org.uk

Ofsted Policy on Safeguarding
https://www.gov.uk/government/publications/ofsted-safeguarding-policy

ODST Safeguarding and Child Protection Policy
https://app.governorhub.com/document/631075384ec83765b6f92955/view

Declaration

This policy has been ratified by the Local Governing Body on behalf of ODST:	
Signed:	Date:

Appendix 1 – Example Reference Request Letter

Where roles are advertised on My New Term, the standard template reference will be sent to each referee. Where schools need to contact a referee separately, the example wording below should be used.

XXX has been offered the role of XXX at _____ School, a member of the Oxford Diocesan Schools Trust, and has given us permission to contact you for a reference in support of their application as I understand that you have worked closely with them in the past.

We would be grateful if you could provide information or comment on the following:

- Approximate dates that you have worked with them.
- Capacity in which you know them.
- Confirmation of the position(s) that they held and their reason for leaving.
- Salary information
- Any comments on their skills and strengths.
- Applicant's suitability to work with children.
- The facts of any substantiated safeguarding concerns/allegations that meet the harm threshold.
- Whether the candidate has been subject to any disciplinary or capability procedures.
- Any other information which is relevant to this reference.

For your information I have attached a copy of the job description for the role they have been offered.

Under the provisions of the General Data Protection Regulations, candidates are able to make a subject access request to us, whereby information held on their file would have to be disclosed to them. The reference you submit is considered a working document and will be destroyed in due time in line with our organisational policies. However, it is possible that we may be asked to disclose the details of your reference to the applicant if they make an access request before it is destroyed, and you may therefore wish to discuss the reference with the candidate before completing it and consider sharing its contents with them.

Thank you for your support. If you could return your response by e-mail to xxx that would be most appreciated.

Appendix 2 – Recruitment Checklist

Position			
RECRUITMENT PROCESS			
Activity	**Date actioned**	**By whom?**	**Comments**
Vacancy signed off by HT			
Job description reviewed and updated			
Salary and grade checked			
Dates agreed for short-listing and selection			
Panel members agreed			
Advert placed			
Candidates short-listed/ online checks completed			
Selection process completed			
Panel in agreement over appointment			

Name of Candidate:		**Proposed start date:**	
STARTER PROCESS			
Detail	**Date requested/ actioned**	**Date completed / checked by**	**Comments**
Offer issued			
Reference 1			
Reference 2			
Health clearance			
Right to work			
Overseas checks (as applicable)			
DBS – ID docs			
1			
2			
3			
DBS clearance received			
Barred list check			
Teacher Prohibition check complete			
Childcare Disqualification check (as applicable)			
Section 128 check (managers)			
Bank details			
Emergency contact details			
Contract of employment			
Professional qualification check- e.g., GTC reference			
Details added to Bromcom			

Place on personnel file when complete.

Appendix 3 – Online Checks - Record form

This form is to be used when potential issues are found, in order to keep a record of what has been found, and what has been explored with the candidate. Candidates who are short-listed should be made aware that an online search will be carried out.

Candidate name	
Position applied for	
School	
Date of application	

Detail of Online Searches	
Individual who undertook the searches:	
Date of the searches:	
Outline the links that were followed, and the concerns that have arisen from these: *Key elements to consider are, does the information found suggest the candidate 1) is unqualified for the role 2) poses a potential safeguarding risk 3) risks damaging the reputation of your school or trust.* *Consider taking screenshots or keeping records of any particular issues you find.*	
Outline discussion with candidate:	
Any further action to take? *Risk assessment? Further discussions with HR?*	

Appendix 4 – Online Searches - HR Guidance - Sept 2025

The 2025 version of Keeping Children Safe in Education (KCSIE) stated that schools "should consider" carrying out an online search as part of due diligence on shortlisted candidates. The specific wording is as follows:

"225. In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks."

It is important to note that an online search is not a replacement or an alternative for other recruitment checks.

Data protection

Data protection law applies to online searches the same as any other part of the application process. Searching for, and collecting, information about a candidate counts as a data processing activity. This means you need to comply with the 7 principles of data processing set out under the UK GDPR. Every piece of personal data that your school holds must be:

- Processed lawfully, fairly, and transparently.
- Collected for specific, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary to achieve your purpose with it.
- Accurate and kept up to date.
- Processed and held securely.
- Only retained for as long as is necessary to achieve your purpose with it.
- Your school is responsible for complying with these principles and must be able to show that it is complying.

In order to comply with these principles, it is important to follow the guidance below and retain any documentation relating to issues found as part of these searches with either the recruitment documentation for unsuccessful candidates (and destroy after 12 months), or if relevant to the successful candidate, on their HR file.

Conducting a search

1. Define the scope of the search
The scope of any search should be clearly defined, and consistent. The expectation is that these searches are completed for all school-based roles, to ensure there are no incidents or issues that the school need to be aware of before recruiting candidates. The scope of this search is suggested as:

- A simple Google search of the candidates first and surname, this could include the location or previous employing school if the name is particularly common.
- A review of results is undertaken, which may include social media posts if these are included in the top-rated search results, as long as they are dated within the last 5 years.
- A separate review of all social media platforms or other search engines etc is <u>not</u> recommended.

It is not expected that these searches will be long and extensive, but more a quick review to assess whether there is anything in the public domain which needs to be further explored with the candidate.

2. Tell applicants they'll be subject to an online search if shortlisted
The template wording for the safeguarding statement (which should be included on all adverts) included at paragraph 2.1 in the Safer Recruitment Policy has been updated to reflect this.

3. Consider who carries out the searches

Finding out personal information about a candidate can lead to unconscious bias. This means that best practice is for the person doing the searches not to have any involvement in conducting interviews or making decisions about recruitment. We recognise that in schools, where staffing is limited, this may not be possible, but we suggest that where possible those undertaking the online search (e.g., the office team) are not decision makers in the recruitment process.

4. Make a record of the search

Once the search has been completed, the details of the search need to be recorded (see appendix 3). For candidates who are appointed, please add the date of the search and initials to the recruitment checklist which we have updated. If any issues are found, they should be recorded separately on this form.

The interviewing panel should be provided with the outcome of these searches ahead of the interview. The person undertaking the searches should only share information that suggests that the shortlisted candidate:

- Is unqualified for the role.
- Poses a potential safeguarding risk.
- Risks damaging the reputation of your school or trust.

Any concerns identified must not be shared with any other persons other than the interview panel and colleagues are reminded that any emails containing reference to this will form part of any subject access request where received.

Where the concerns raised through the search are minor, these can be discussed with the shortlisted candidates at the interview stage, in the same way we would raise any issues which may come from a reference. If the concerns relate to content published on a social media platform and you do not feel able to verify that the account belongs to the applicant, you may want to ask the individual, at interview stage, for any social media handles they may use. This will enable you to verify whether the post originated from the candidate's account.

If issues of concern are found through the searches, or where you are unsure, please get in touch with your HR contact for further advice and support.