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Safer Recruitment Policy

Last reviewed on:	August 2026
Next review due by:	August 2027

SAFER RECRUITMENT POLICY

(Recruitment, selection and pre-employment vetting)

Based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026 – Part 3.

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education (KCSIE) 2026.

The Early Years Foundation Stage statutory framework contains its own requirements for safer recruitment and suitability (see paragraphs 3.13 to 3.27), which the School will follow in respect of its EYFS provision.

The School will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which will, as a minimum, cover Part 3 of KCSIE.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Require applicants to provide:

- › Personal details, including current and former names, current address and National Insurance number
- › Details of their present or most recent employment and the reason for leaving
- › A full employment history since leaving school, including education, employment and voluntary work, with reasons for any gaps
- › Details of relevant qualifications, including the awarding body and date of award

- › Details of referees/references
- › A statement outlining the personal qualities and experience relevant to their suitability for the post and how they meet the person specification

A curriculum vitae (CV) will only be accepted alongside a completed application form. A CV will not be accepted on its own.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- › Consider any inconsistencies and look for gaps in employment and reasons given for them
- › Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
 - If they have a criminal history
 - Whether they are included on the children's barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
 - If they are known to the police and/or children's local authority social care
 - If they have been disqualified from providing childcare
 - Whether they are prohibited from taking part in the management of an independent school
- › Sign a declaration confirming the information they have provided is true
 - Where an application or declaration has been signed electronically, the shortlisted candidate will be asked to physically sign a hard copy at interview.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview where possible. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references, we will:

- › Not accept open references (for example, "To whom it may concern")
- › Not rely on applicants to obtain their reference
- › Not accept references from family members

- › Ensure that electronic references originate from a legitimate source
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting (EYFS).
- › Contact referees to clarify where information is vague or insufficient information is provided
- › Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

When providing references for current or former staff, the School will confirm whether it is satisfied with the individual's suitability to work with children and will provide the facts, not opinions, of any substantiated safeguarding concerns or allegations that meet the harm threshold. Information about concerns or allegations which are unsubstantiated, unfounded, false or malicious will not be included.

Interview and selection

When interviewing candidates, we will use agreed structured questions and appropriate selection techniques. We will:

- › explore what attracted the candidate to the post and their motivation for working with children
- › explore their skills and ask for examples of relevant experience of working with children
- › probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask them to explain this
- › explore any potential areas of concern and the candidate's understanding of the vulnerability of children, appropriate professional boundaries and safeguarding responsibilities
- › consider any relevant past disciplinary action or substantiated allegations in the circumstances of the individual case
- › record all information considered and decisions made

Where appropriate, pupils will be involved meaningfully in the recruitment process, for example through appropriately supervised interaction with shortlisted candidates.

Pre-appointment vetting checks

The School will maintain a Single Central Record (SCR) of the required pre-appointment checks. The SCR will include all staff, including trainee teachers on salaried routes, agency and third-party supply staff, even where they work for only one day, and all members of the proprietor body.

The SCR will record whether the required checks have been carried out or certificates obtained, together with the date of each check, including identity, children's barred list where applicable, enhanced DBS, prohibition from teaching, further checks for those who have lived or worked outside the UK, professional qualifications where required, right to work in the UK and section 128 checks for those taking part in management.

For agency and third-party staff, the School will record whether written confirmation of the required checks has been received, the date that confirmation was received, whether details of any enhanced DBS certificate have been provided and, where applicable, the date on which the certificate was obtained.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. Where the DBS Update Service is used, the School will obtain the individual's consent, inspect the original DBS certificate, ensure that the certificate is appropriate for the workforce and level of check required and undertake the relevant status check. The School does not ordinarily retain copies of DBS certificates. Where there is a valid reason for retaining a copy, it will not be kept for longer than six months. The School may retain a record that the vetting took place, the result of the check and the recruitment decision taken.
- › Obtain a separate barred list check:
 - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
 - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- › Where an individual is permitted to start work in regulated activity before the enhanced DBS certificate is available, all other relevant pre-employment checks must have been completed, including a separate children's barred list check, and the individual will be appropriately supervised until the DBS certificate has been obtained and considered.
- › **EYFS – Nursery and Reception**
 - The arrangements above permitting an individual to begin work while an enhanced DBS certificate remains outstanding do not apply where the EYFS statutory framework requires the enhanced criminal-record and children's barred-list checks to be received before the individual begins work or volunteering. Except for supervised volunteers who only help occasionally within the limited statutory exception, an individual must not begin working or volunteering within

MMPS EYFS provision until the required enhanced criminal-record and children's barred-list checks have been received and considered.

- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be retained on their personnel file in accordance with the School's records retention arrangements and data protection requirements.
- › Ensure that any person to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed by the General Teaching Council for England (GTCE) which remains current.
- › For teaching appointments, the DfE's Check a teacher's record service will be used to verify any relevant teacher prohibition, Qualified Teacher Status (QTS), where applicable, and completion of statutory induction or probation where relevant.
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
 - Where relevant overseas information is not available, the School will seek alternative methods of checking suitability and/or undertake a risk assessment to support an informed decision about whether to proceed with the appointment.
- › Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the Secretary of State

*There is no exhaustive list of roles that constitute management for section 128 purposes. Roles likely to involve management include, but are not limited to, the Headteacher, Deputy/Assistant Headteachers and members of the proprietor body/Trustees. Other staff with significant management responsibilities may also fall within scope. The individual's job title is not determinative.

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. Where we take a decision 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 on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity

Regulated activity has the meaning given in Schedule 4 to the Safeguarding Vulnerable Groups Act 2006, as amended.

In summary, regulated activity with children includes:

- › paid or unpaid work involving teaching, training, instructing, caring for or supervising children, or providing advice or guidance on their physical, emotional or educational wellbeing, where the statutory frequency or period conditions are met
- › driving a vehicle solely for children where the relevant statutory conditions are met
- › certain work in specified places, including schools, which provides an opportunity for contact with children and meets the relevant statutory conditions
- › relevant personal care or healthcare, which is regulated activity regardless of frequency

From 1 September 2026, the previous supervision exemption for unpaid activity has been removed. Volunteers who undertake relevant activities frequently, or on more than three days in a 30-day period or overnight will therefore be engaging in regulated activity even where they are supervised.

The above applies to both paid staff and volunteers.

Ongoing safeguarding vigilance

Safer recruitment does not end when an individual is appointed. The School will maintain appropriate processes for ongoing safeguarding vigilance, creating a culture which deters and prevents abuse, challenges inappropriate behaviour and enables staff to raise concerns about the conduct or suitability of adults working with children.

EYFS ongoing suitability

Staff and prospective staff working within the EYFS must disclose any information which may affect their suitability to work with children, including relevant arrests, charges, convictions, cautions, court orders, reprimands or warnings, whether arising before or during their employment, subject to the statutory rules relating to protected convictions and cautions. Staff must inform the Headteacher immediately of any change which may affect their suitability.

For EYFS staff, students and volunteers, the School will retain the information required by the EYFS statutory framework concerning qualifications, identity checks, vetting processes and references, including the relevant criminal-record check reference number, the date the check was obtained and details of who obtained it.

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:

- › There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in [relevant conduct](#); or
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the

[Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- › We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Where the School dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School will consider whether the case should be referred to the Secretary of State via the Teaching Regulation Agency (TRA)

Agency and third-party staff

The School will obtain written notification from any agency or third-party organisation that it has carried out the same checks that the School would otherwise be required to perform on the individual, including where the individual is providing education on the School's behalf through online delivery. The written notification must confirm that the appropriate enhanced DBS certificate has been obtained.

Where an enhanced DBS certificate obtained by the agency or organisation contains any matter or information, the School will obtain a copy of the certificate from the agency before the individual begins work. Where the role requires a children's barred list check, the agency or third party must have obtained an enhanced DBS certificate with children's barred list information before appointing the individual.

The School will check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

The School will set out its safeguarding requirements in any contract or agreement with an organisation providing contractors.

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

Where a contractor does not have an opportunity for regular contact with children, the School will consider whether a basic DBS check is appropriate.

We will obtain the DBS check for self-employed contractors, or request to see the certificate

if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

Where the School retains a copy of a DBS certificate, it will only do so where there is a valid reason and will not retain the copy for longer than six months.

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

We will check the identity of all contractors and their staff on arrival at the school. 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. 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.

The School will determine whether each self-employed individual is to be treated as a member of staff or as a contractor for the purposes of the Independent School Standards. Where a self-employed individual falls within the definition of staff, the full pre-appointment checks applicable to staff will be completed and the individual will be recorded on the SCR accordingly.

Trainee/student teachers

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

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.

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

Visitors

The School will not request DBS or barred list checks, or ask to see existing DBS certificates, for ordinary visitors such as pupils' relatives or visitors attending school events. The Headteacher will use professional judgement to determine appropriate escorting or supervision arrangements.

For visitors attending in a professional capacity, the School will check identity and obtain appropriate assurance that the required safeguarding/DBS checks have been undertaken by the individual's employer, where relevant. The School will not routinely ask to see the DBS certificate itself in these circumstances.

Volunteers

We will:

- › Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised

- › Obtain an enhanced DBS check with children's barred list information for all volunteers engaging in regulated activity, including existing volunteers who become subject to regulated activity requirements from 1 September 2026 as a result of the Crime and Policing Act 2026 changes
- › Carry out and record a written risk assessment for volunteers who are not engaging in regulated activity, using professional judgement to decide what checks, if any, are appropriate. Where the volunteer would be in regulated activity but for the frequency of the activity, an enhanced DBS check without children's barred list information may be obtained. For other volunteers who may have access to children, the School will consider whether a basic DBS check is appropriate
- › The written risk assessment will take account of the nature of the work with children, what the School knows about the volunteer, any other employment or voluntary activities where referees may advise on suitability and whether another level of DBS check may be appropriate.
- › Obtain at least one written reference for volunteers before they are recruited
- › Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. 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.

Trustees

All trustees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

Before an individual becomes Chair of the Board of Trustees, the Secretary of State will carry out an enhanced DBS check and obtain an enhanced DBS certificate, confirm the individual's identity and, where appropriate, undertake such further overseas checks as the Secretary of State considers necessary.

All trustees will also have the following checks:

- › A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- › Identity
- › Right to work in the United Kingdom
- › Other checks deemed necessary if they have lived or worked outside the UK

Alternative Provision

Where the School places a pupil with an alternative provision provider, the School remains responsible for safeguarding that pupil and will satisfy itself that the placement is safe and meets the pupil's needs.

The School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the provision. The provider must also confirm that it will inform the School of any arrangements,

including staff changes, which may put the pupil at risk so that the School can assure itself that appropriate safeguarding checks have been completed.

The School will undertake appropriate safeguarding due diligence, maintain a record of where the pupil is based during school hours, including any subcontracted provision or satellite sites, and review the placement at least half-termly. Where safeguarding concerns arise, the placement will be reviewed immediately and terminated where necessary unless and until those concerns have been satisfactorily addressed.