

Compliance+

The best practice standard
for the education sector



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Introduction

APSCo has developed **Compliance+** to provide an uncompromising quality benchmark for education recruitment businesses.

The requirements of **Compliance+** compel education recruitment companies to go beyond statutory safeguarding standards, and to aim for excellence in competency selection and service quality.

APSCo has constructed this ground-breaking standard, designed to safeguard children and to benchmark recruitment businesses against the highest service criteria, following extensive consultation with its Education Sector Group members (recruitment businesses) and, crucially, external stakeholders from the National Association of Head Teachers, the Association of School and College Leaders, Voice, the National Association of School Business Management, Academies Enterprise Trust, the School Governors One Stop Shop and the Independent Academies Association.

Through APSCo, education recruitment businesses now have a unique opportunity to take control of the sector and shape future practices by working to a new, rigorous measure that manages the expectations of all stakeholders involved and demonstrates their expert knowledge in this specialist market.



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ASCL warmly welcomes the approach being taken by APSCo with its **Compliance+** initiative.

Recruitment businesses meeting this new standard will not only have demonstrated very high standards in safe recruitment practices but will also have focused on helping schools achieve the best outcomes for their students. We particularly welcome the emphasis on working in partnership with schools.”

Duncan Baldwin, Deputy Policy Director, Association of School and College Leaders

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As the pressures on recruitment in schools grow, it is critical to ensure that employment and safeguarding checks and references are rigorously implemented. **Compliance+** offers our members peace of mind that agencies are taking this seriously”.

Paul Whiteman, General Secretary, NAHT

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Voice has enjoyed being a part of the external stakeholder group, giving us the opportunity to represent our members’ needs in a new, uncompromising quality standard. Supply teachers and schools need confidence when they use the services of a recruitment firm.

Compliance+ will be a strong indication of best practice in this sector.”

Deborah Lawson, General Secretary, Voice

What is Compliance+?

Compliance+ is a set of best practice requirements for all temporary and permanent recruitment in the education sector, which has been designed with Ofsted criteria in mind, and goes beyond the statutory requirements. Recruitment businesses are audited to these best practice requirements on an annual basis by an independent professional, and continuous improvement is required (Continuous Improvement Required (**CIR**)) in a number of key areas. The standard consists of three sections:

Section 1 – Safeguarding, which covers all safeguarding and child protection activities undertaken by recruitment businesses when providing any candidates into schools. This section is underpinned by statutory requirements and the Department for Education's guidance on best practice.

Section 2 – Competency requirements which go beyond the safety of a candidate and look to ensure that recruitment businesses are not just providing candidates, but that they are providing the best suited and highest quality candidates for a particular post.

Section 3 – This section explains the audit parameters for **Compliance+** accreditation.

Why Compliance+?

Compliance+ gives recruitment businesses the framework within which to provide clients with better trained and therefore safer candidates.

Who can achieve accreditation?

Any education recruitment business based in the UK may apply for accreditation to **Compliance+** however, it is necessary for them to be a member of APSCo to achieve accreditation. This allows APSCo to maintain standards and quality control through its robust referencing procedure, adherence to its code of conduct and the associated complaints process.

How to become accredited

The accreditation process is administered by APSCo. There are seven steps to becoming accredited to **Compliance+**:

1. Provide APSCo with certain information about your company
2. Understand APSCo **Compliance+** terms of business
3. Understand the requirements of **Compliance+**
4. Ensure your internal processes are in line with the best practice requirements
5. Request an audit with one of our independent auditors
6. Pass the audit on an annual basis showing continuous improvement

Details of the audit parameters and scoring are set out in Section 3 of this document.

APSCo will provide advice and support to its members who have not gone through the audit process before, as required.

What it costs

Recruitment businesses pay for each audit undertaken. APSCo makes no other charges for accreditation to **Compliance+**. The current audit fees can be obtained from APSCo. Please call us on 0203 117 0910.

Definitions

The following definitions apply within this document:

“temporary recruitment” means recruitment services where the recruitment business contracts with the candidate either directly or through another intermediary, and there is no direct contractual relationship between the client and the candidate.

“permanent recruitment” means recruitment services where the client contracts directly with the candidate.

“EBA” means evidence-based audit.

“IBA” means interview/questionnaire-based audit.

“candidate’s file” means any format in which candidate information is kept, as long as it is easy to identify the candidate and kept securely.

The definitions of “children” and “adults at risk” to be adopted by this standard are as per the Children Act 1989 and the Care Act 2014:

Children Act 1989: **“child”** means, subject to paragraph 16 of Schedule 1, “a person under the age of eighteen”;

Care Act 2014: an **“adult at risk”** is a person “aged 18 years or over and who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”.

“original” where this relates to original documents, it is permissible that electronic copies or screen shots are accepted.

How to use this document

This document provides all the information a recruitment business needs to work towards **Compliance+** accreditation. This introduction explains what **Compliance+** is, who can become accredited and how. Sections 1 and 2 provide details of the operational best practice requirements, which a recruitment business must adhere to if it wishes to achieve **Compliance+** accreditation. Section 3 of this document explains the audit process, which must be passed to achieve accreditation.

Disclaimer

Compliance+ is a best practice standard for use by APSCo members only. The facts, information and opinions contained herein are correct to the best of APSCo’s knowledge as at the time of publication. However, this is intended as a guide to best practice for education recruitment businesses and not as a substitute for legal advice. The aim of **Compliance+** is to set a standard for education recruitment businesses to work to but is not a substitute for any UK regulation or legislation relating to safeguarding, the recruitment industry or any other issue, and recruitment businesses adhering to **Compliance+** must make themselves aware of all appropriate legislation. This document is not an exhaustive and complete reference document for education recruitment. APSCo can take no responsibility or liability for any actions or for the consequences of any actions of a member or any candidate at any time in relation to a member’s adherence to **Compliance+**.

Section 1 Safeguarding

All recruitment businesses providing services to education establishments must protect children and adults at risk by:

- demonstrating their commitment to safeguarding and promoting the welfare of children and adults at risk;
- having policies and processes in place that ensure candidates are recruited and selected in the most appropriate way;
- preventing unsuitable people from working with children and adults at risk;
- demonstrating best practice in all recruitment activity;
- ensuring that all recruitment business staff receive appropriate training in statutory safeguarding obligations; and
- contributing to an effective partnership working between all those involved in providing safeguarding services for children.

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Safeguarding children must be everybody's responsibility. Good safeguarding practice therefore has to be built into routine procedures and practice. Nowhere is this more important than in the recruitment and vetting of people who have contact with children.

It is vital that...agencies that supply staff that give rise to contact with children, adopt robust recruitment and vetting procedures that minimise the risk of employing people who might abuse children, or are otherwise unsuited to work with them.”

DfE's Safeguarding Children and Safer Recruitment and College Leaders

Safeguarding - Recruitment and Selection

The purpose of these Best Practice Requirements is to ensure that the recruitment and vetting checks required on all candidates who work with children and adults at risk are adhered to. This section will be underpinned by statutory requirements and the Department for Education's Keeping Children Safe in Education guidance on best practice. All Best Practice Requirements in this section apply to Temporary Recruitment. Best Practice Requirements that also apply to Permanent Recruitment are denoted with the icon .

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
1. Policies and Procedures  The recruitment business shall have written policies or procedures covering the recruitment process and safeguarding activity.	• Evidence of suitable policies or procedures, which are controlled. • Evidence of a robust method for identifying relevant changes in law and updating documents. • Evidence of a robust method for communication of policies or procedures and any changes to relevant staff.	Policies or procedures should be formally documented. They may come in different formats, for instance as flow charts or videos. Changes to documents must be controlled, so that all copies of out-of-date documents are deleted/destroyed, and only current versions are used. Policies/procedures should be communicated to all relevant staff members. All policies should include a statement of purpose, reporting structure, and allocation of responsibilities. Written safeguarding/child protection procedures shall include a definition of safeguarding/child protection, and include processes for reporting, investigation, escalation, training, and regular review to ensure relevancy and effectiveness. APSCo template safeguarding and Allegations model policies are available here.

Section 1 Safeguarding

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Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
2. Candidate Registration P		
A full registration process will be undertaken for each new candidate before being placed on assignment with a client, which shall include the candidate's confirmation of the type of work that they would be willing to undertake. Where there is a break of more than 12 weeks since the candidates last assignment with the recruitment business, the recruitment business shall ensure all details from that previous registration remain valid and reference any gaps. The recruitment business will obtain a completed application form from the candidate. The candidates CV can be used alongside the completed application form. For the avoidance of doubt, the recruitment business will not accept the candidates CVs in place of the application form.	Evidenced by records of registration for all new candidates. All records should be dated prior to the candidate's first assignment.	Every 12 months the recruitment business should review the candidate's registration details. Where all employment details from the previous registration remain valid, it is acceptable for the recruitment business to only obtain written references for the gaps where the candidate was not working through the recruitment business (in line with Requirement 4). The recruitment business should also renew any relevant documents that need updating, such as DBS (where the candidate is registered on the Update Service, checks are undertaken at least every 12 weeks). A full re-registration is only required where the recruitment business no longer holds the relevant documentation. Where a candidate has provided a complete CV with full employment history (see requirement 4), the CV can be referred to in the application form. The candidate will not need to repeat the information in both documents.
3. Registration Interviews P		
The recruitment business will undertake a face-to-face registration interview with every candidate prior to them being placed on assignment with a client, unless in exceptional circumstances. All original documents provided by the candidate must be checked for legitimacy during the registration interview. Where a face-to-face registration interview is not possible, it is permissible to substitute the standard face-to-face interview with good quality video interviewing. The registration interview will assess the candidate's experience to establish congruency with the candidate's application form. The interview will be evidenced by the completion of an interview document, signed and dated by the consultant conducting the interview and the candidate.	- Evidenced by a formalised process for undertaking and documenting registration interviews in line with this Requirement. - Evidence of registration interview document(s) showing dated notes from the interview which include: - the signature of the interviewer and the candidate or candidate email approval or recorded interview; and - the date of the interview. - A list of the documents provided and validated with a date and signature at the time of the interview.	Where the client is informed in writing in advance, a face-to-face/video registration interview may occur after submitting an application form. This should not become common practice. Where the candidate is unable to provide all original documents required at the interview, they may provide these at a later date, but still before the start of the first assignment, and the documents must be validated and dated as original and legitimate. All documents provided for validation must be held in a format that cannot be subsequently altered. The interview document may be a formal document, or it may be made up of interview notes. However, this process is documented, there should be a standard for all registration interviews. There must be a process for the recording of any documents validated after the interview. Where there is a video registration interview, the recruitment business must ensure the video quality is clear, e.g. not pixelated, good lighting and not just the face in frame. Where obtaining the candidates signature is not possible the interview document should be emailed to the candidate and the candidate's email confirmation that they have read it and approve the contents will be sufficient provided the email chain is not broken. Where the interview is recorded (with the candidate's consent) and the interview document is typed in real time on the shared screen and the candidate can clearly see the typed content, and candidate approves the content, the entire recording of the interview will be retained as proof of approval by the candidate of the content of the interview document.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
4. Employment History		
The recruitment business will obtain a completed application form from the candidate which covers their full employment history or back to compulsory full-time education, whichever is more recent. Any gaps of 12 weeks or more in the employment history will be explained in full by the candidate and verified by the recruitment business. A personal reference shall mean a reference written by a professional that is not related either directly or indirectly to the candidate, whom the candidate has known for at least three years explaining the gap in employment.	- Evidenced by candidate application form in line with this Requirement and the Safer Recruitment Consortium. - Evidence of process to ensure that employment histories obtained are of the correct length, and that any gaps of 12 weeks or more in the employment history are investigated and verified by the recruitment business.	For the avoidance of doubt, CVs are not an acceptable substitute for a completed application form. A process or procedure to ensure all employment histories are of the correct length and any gaps checked, it does not necessarily have to be a formal written document. However, if not, the recruitment business must be able to show that the process or procedure is clear, robust and understood by relevant staff members. Personal references must be written by a professional. The reference must include the professional's title and the organisation in which they work. For the avoidance of doubt, personal references must not be completed by any individual that does not hold a professional title from a recognised profession (examples of recognised professions are listed in the Home Office guidance here).
5. Rehabilitation of Offenders Declaration		
A "Rehabilitation of Offenders" declaration will be signed and dated by the shortlisted candidate. For the avoidance of doubt, the declaration should only be required at shortlisting stage. This declaration will include a "yes" or "no" answer to the following question: <i>'Do you have any convictions, or any pending convictions, cautions, reprimands or final warnings, which would not be filtered in line with current guidance?'</i> If the candidate answers 'yes' to any part of this question the recruitment business will obtain written details pertaining to this.	- Evidenced by signed candidate declarations in line with this Requirement. - Evidence of process to ensure that any situations where action is required are identified immediately, and where identified appropriate action is taken, and both the action and the outcome is documented.	Please ensure that the question is substantively similar to the example shown. A process or procedure should be in place to ensure that any "yes" answers are identified immediately. The process or procedure should show how this would be actioned, who would be responsible for this, and how the action and the outcome would be documented and verified. The recruitment business should consider the clear definition of action and responsibility throughout the process and should ensure that staff members checking documentation understand the legal requirements. Guidance on the Rehabilitation of Offenders Act 1974 can be accessed here.
6. Proof of Identity		
The recruitment business will obtain photographic evidence of the candidate's identification, checking the name on the birth certificate, where this is available. All original documents provided as evidence of identification must be copied (in full or all relevant pages), and the copy validated, signed, and dated by the recruitment business. All documents must be held in a format that cannot be subsequently altered. The recruitment business may accept identity checks conducted through digital identity document validation technology (IDVT).	Evidenced by validated, signed, dated copy of acceptable proof of identification, in line with this Requirement.	Acceptable proofs of identity: the recruitment business must follow the Disclosure & Barring Service's 3 route ID checking process, which can be found here: https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications-from-3-september-2018#three-routes-of-id-checking. If the evidence is obtained through identity document validation technology (IDVT), the recruitment business will ensure the provider is on the government's list of approved identity checking providers.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
7. Proof of Address		
The recruitment business will obtain two original documents from the Disclosure and Barring Service's Trusted Government Document lists 2a and 2b. This will be in addition to the proof of identity (see Requirement 6 above). Where two original documents are not possible then one original document from the Disclosure and Barring Service's Trusted Government Document lists 2a or 2b will suffice provided that, it is not the same document that has already been relied upon for proof of identity. Where you cannot obtain a hard copy, screen shots and/or validated electronic statements are acceptable. In "exceptional circumstances" when a business has exhausted all options of obtaining two proofs of address, one proof of address is acceptable. This should not be standard practice. All original documents provided as evidence of proof of address must clearly show the candidate's name and address. These will be copied (in full or all relevant pages), and the copy validated, signed, and dated by the recruitment business.	Evidenced by validated, signed and dated acceptable proofs of address in line with this Requirement.	Acceptable proofs of address: Documents from Disclosure and Barring Service's Trusted Government Document lists 2a and 2b. For the avoidance of doubt, all documents provided as proof of address must be the same address.
8. Eligibility to Work in the UK P		
The recruitment business will either have sight of original documentation of a candidate's right to work in the UK or utilise a certified Identity Service Provider (IDSP). All documents provided will be copied on all relevant pages, and validated, signed, and dated by the recruitment business. For recruitment businesses to use a certified IDSP when conducting a right to work check and therefore obtain a statutory excuse, they must: - Ensure the IDSP is certified and on the government's list of approved identity checking service providers; - When conducting a right to work check through an IDSP, verify it is the same individual you are engaging with through either a video call (where you match the IDSP result with the image of the applicant) or in person by day 1 of starting work; and - Provide appropriate training and guidance to your staff for example, on what information they must obtain from an IDSP to confirm verification of identity, what the information can be used for, and what other requirements they still need to fulfil to establish eligibility to work in the UK.	- Evidenced by appropriate, validated documents in line with this Requirement. - Evidence that the person(s) responsible for validating documents has/have access to appropriate guidelines on what constitutes acceptable proof. - Evidence of a clear escalation process should there be any doubt regarding the validity of documentation. - Evidence of a robust process to monitor visas where there are restrictions.	The documents provided must conform to current government requirements (see guidance here: https://www.gov.uk/government/publications/right-to-work-checks-employers-guide). Non-British nationals who hold a Biometric Residence Permit (BRP), a Biometric Residence Card (BRC) or have been granted Pre-Settled/ Settled status under the EU Settlement Scheme can use the Home Office online service for checking immigration status (https://www.gov.uk/viewprove-immigration-status). The recruitment business should ensure that staff members checking documentation understand the legal requirements. When in doubt about the validity of documentation the recruitment business should seek confirmation from the Government or an independent specialist. The recruitment business should have in place a process (not necessarily written) to check validity where this is in doubt, with clear responsibilities.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
9. Proof of National Insurance		
The recruitment business will obtain the candidate's national insurance number. The document provided will be validated, signed and dated by the recruitment business.	Evidenced by a written record of the National Insurance number in line with this Requirement.	The following documents are acceptable proofs: - National insurance card; - P45 or P60; - Letter from HMRC or Benefits Agency stating the candidate's NI number; and - Pay slip from the candidate's previous employer, stating the NI number.
10. Qualifications P		
The recruitment business will have sight of the candidate's original qualifications that are legally required for the job. This applies to all roles, including Teaching Assistant positions. In the case of a teacher the recruitment business will check their qualifications via the Teaching Regulation Agency ("TRA") check. In Wales, this check will be via the Education Workforce Council. In Scotland, this check will be via the General Teaching Council for Scotland. In Northern Ireland, this check will be via the General Teaching Council for Ireland. Where this check is used the recruitment business must ensure that this check is kept up to date. All original documents provided as evidence of qualification will be copied, signed and dated by the recruitment business. All documents must also be held in format that cannot be subsequently altered.	- Evidenced by appropriate, signed, dated documents in line with this Requirement. - Evidence of a process to ensure that where qualifications are confirmed other than by original documentation, these qualifications are: - identified - confirmed in line with this Requirement - updated in line with this Requirement.	Confirmation of qualifications by obtaining original certificates should be the recruitment businesses preferred method. Screen shots from the TRA website are acceptable as long as they are signed and dated in line with this requirement. In the case of teachers, where the teacher is newly qualified and does not yet have access to their certificates, these can be checked via the relevant university or the TRA, however, the recruitment business must have a process in place to check and see original certificates within a reasonable timeframe. The recruitment business should have in place a process to identify and update Teacher Regulation Agency checks if used. For the avoidance of doubt, the recruitment business will obtain all qualifications that are legally required for the role within a school. This includes Teaching Assistant positions.
11. Induction (Teachers)		
For teachers who have qualified since 1999, the recruitment business will gain evidence that the induction period has been completed satisfactorily. The recruitment business will ensure that all teachers who have not yet completed their induction period are within the rules of working on supply.	- Evidenced by appropriate confirmation of the completion of the induction period by the candidate, or proof that the candidate is working within the appropriate rules. - Evidence of a process to identify candidates who are teachers that have qualified since 1999, and to gain the appropriate evidence in line with this Requirement.	The recruitment business should have in place a process to identify candidates who are teachers that qualified after May 1999. This process should set out the method for gaining the required evidence that they have completed their induction or are within the rules of working on supply. A teacher's induction status is also listed on the TRA site (please see Requirement 12).

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
12A. The Teaching Regulation Agency Checks P		
For all qualified teachers, the recruitment business will conduct an online check with The Teaching Regulation Agency ("TRA") to ensure that the candidate has a valid Qualified Teacher Status (QTS) qualification, that there are no active restrictions and/or prohibitions against them, and their induction status. In Wales, this check will be via the Education Workforce Council. In Scotland, this check will be via the General Teaching Council for Scotland. In Northern Ireland, this check will be via the General Teaching Council for Ireland. This check will be recorded with the outcome of the qualification, the restriction information, their induction status and the date that this check was undertaken. The recruitment business is required to demonstrate that there are no active restrictions and/or prohibitions against the candidate throughout the placement.	- Evidenced by a record of online check with the TRA in line with this Requirement. - Evidence of a process to identify candidates who are qualified teachers, and to undertake an online check with the TRA for qualified teachers in line with this Requirement. - Evidence of a process to record the outcome of such checks, and any resultant action required.	The recruitment business should have in place a process or procedure to identify when a candidate is a qualified teacher, and that such identification will trigger an online check to the TRA. There should be a clear process for the recording of the outcome of this check. There should also be a clear process for the action to be taken if the outcome of the check is not entirely satisfactory. Such a process need not necessarily be written down. The recruitment business should be able to show that it has been effectively communicated to all relevant staff members.
12B. Disqualification under the Childcare Disqualification Regulations 2018 and Childcare Act 2006 P		
The recruitment business will ensure that a Disqualification under the Childcare Regulations 2018 and Childcare Act check is completed for all candidates working with children aged 5 and under and also those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care, and a signed self-declaration is obtained.	Evidenced by a signed self-declaration form in line with this Requirement.	There should be a clear process for the recording of the outcome of this check. Guidance on the Disqualification under the Childcare Act 2006 and the Childcare Regulations 2018 can be accessed here.
12C. Section 128 Direction Check		
The recruitment business will ensure that a Section 128 check is completed on all candidates applying for management and governance roles within maintained and independent schools. A Section 128 Direction, checks and provides the names of individuals who are barred from taking part in the management of any independent or maintained school. Where candidates are not applying for these types of roles, this check will not need to be conducted. Any Section 128 Direction that is issued against the candidate will apply to both maintained and independent schools.	- Evidenced by a record of online check with the TRA in line with this Requirement. - Evidenced by a DBS check with a barred list in line with this requirement.	Checks can be completed through the TRA and through a DBS check with a barred list checks provided that 'child workforce independent school' is specified in the parameters. For further information see paragraph 259 of Keeping Children Safe In Education 2023. There is no exhaustive list of roles that might be regarded as 'management'. However, roles are likely to include (but are not limited to) headteachers, principals, deputy/assistant headteachers, governors and trustees. Further guidance on Section 128 checks can be accessed in paragraph 256 and 315 of Keeping Children Safe In Education 2023.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
13. DBS Checks & Update Service		
The recruitment business will either obtain a new or see an original existing Enhanced DBS certificate with a children's barred list check for all candidates. The barred list check/workforce designation must be correct for the role being applied for. This check will be recorded either in hard or soft copy. Hard copies of the Enhanced DBS certificate must be verified (with name, signature and date). Electronic checks must be recorded with the date and the name of the person that undertook it. Where the Enhanced DBS certificate is not the result of a new application, an Update Service check must also be undertaken. Where the candidate provides a DBS certificate from a third party, the recruitment business will tell the end client before placing the candidate and will immediately initiate a new Enhanced DBS check. Where a candidate has a gap of more than 12 weeks since their last work the recruitment business will immediately initiate a new Enhanced DBS check. Update Service checks must be undertaken not less than once every 12 months from the last check and must be recorded with the date and the name of the person that undertook it. Where a candidate is on a long-term assignment of over 12 weeks, then an Update Service check can be completed before the start of the new assignment. Where the candidate has not signed up to the Update Service the original DBS check may be relied upon for 12 months, after which the recruitment business must initiate a new Enhanced DBS check. The recruitment business will act appropriately on any information received relevant to a candidate's DBS status, which comes to the recruitment business's attention. If information is received after the candidate has started an assignment, the recruitment business will provide the client with an immediate update regarding any change to the candidate's suitability as a result. Recruitment businesses shall have a written policy statement on the correct handling and safekeeping of DBS certificate information.	• Evidenced by a copy of an Enhanced DBS certificate with barred list checks, appropriate to the workforce designation of the role, and any online update checks in line with this Requirement. Evidenced by a policy document detailing the correct handling and safekeeping of DBS information. • Evidence of process to: - Explain DBS Update Service to candidates and gain consent; - Ensure consistency of regularity in checks; - Identify any relevant information and take any necessary resultant action, which will include the provision of information regarding a candidate's suitability to the client in line with this Requirement; and - Ensure workforce designation checks and barred list checks are relevant to each assignment.	The recruitment business should obtain an Enhanced DBS check before the beginning of an assignment. The Disclosure and Barring Service will apply to all candidates in England and Wales. In Scotland, the relevant check will be through Disclosure Scotland and Access NI in Northern Ireland. It is permissible to supply a candidate to a client whilst the DBS check is in process, as long as client consent is obtained. The client must be notified as soon as the outcome of the DBS check has been received and evidence provided of this. This process should not be standard procedure, and if used the recruitment business must have a robust process in place to ensure that applications are followed up on a regular basis until the DBS outcome is received. For information on how the Update Service operates please see the DBS Update Service Employer Guide. The DBS provides a DBS Update Service Applicant Guide which clearly sets out the benefits to candidates of the Update Service. Processes should be in place to ensure that any potentially relevant information is easily and immediately identified, and any possible action identified and carried out by the appropriate person in an appropriate timescale. The recruitment business must ensure that the Enhanced DBS certificate and/or check for each candidate is relevant to the role they will be undertaking. Guidance on workforce designations and eligibility can be found in the following documents: • DBS: A Guide to Eligibility for Criminal Record Checks • DBS Child Workforce • DBS Adult Workforce Please note that where the candidate has signed up to the Update Service, it is possible that the original DBS will not be in the name of the recruitment business. The Disclosure & Barring Service has a sample policy statement for handling DBS certificate information.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
14. Overseas Candidate Police Checks		
Where a candidate has worked/lived overseas, while aged 18 and over during the last 5 years for a period of 6 months or more, the recruitment business will obtain an overseas police check, which will be verified for originality and a copy signed and dated by the recruitment business. The recruitment business will act appropriately on any information received from the overseas police check which comes to the recruitment business's attention. If the recruitment business cannot obtain an overseas police check, then a full professional reference may be acceptable with full client disclosure.	- Evidenced by a record of validated overseas police checks in line with this Requirement. - Evidence of process in place to identify candidates who have worked or lived overseas, and where identified, evidence of process to undertake checks in line with this Requirement.	The check must be carried out regardless of whether the candidate has lived or worked in the UK previously. There may be situations where the candidate has travelled through multiple countries without working, or taken a gap year, in which case it may not be possible to obtain information covering all the time spent out of the UK. The recruitment business will be fully transparent with the client at all times. The recruitment business should have a process in place to ensure time spent outside of the UK by candidates is identified, and the appropriate checks made. Please note all Skilled Worker (formerly Tier 2 (General)) visa applicants who want to work in specified health, education or social care sectors must provide a criminal record certificate from any country (except the UK) where they have lived for 12 months or more (whether continuously or in total) in the last 10 years, while aged 18 or over (see appendix). There is government guidance available on conducting overseas police check which can be accessed through here.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
15. References P The recruitment business will obtain a minimum of 2 written professional references, including the most recent assignments. These references must cover at least 2 years' worth of assignments. If the candidate is to start on an assignment before the second written reference has been received, the recruitment business will obtain one verbal reference before the candidate starts on assignment. The second written reference must be obtained no later than 15 days after the start of the candidate's assignment. Written references may be received in electronic format, as long as there is a clear audit trail showing where/who the reference has come from. Gaps of more than 12 weeks must be verified. In exceptional circumstances, where references are unobtainable, the recruitment business will tell the end client and gain any other feedback or information that it is able to gather regarding the candidate. Where an unsatisfactory reference is received, the recruitment business will take the appropriate action to ensure that no candidate with child protection, safeguarding, or disciplinary issues or concerns is placed on assignment. Where a reference has been received that raises questions about a candidate's work history (e.g. where a candidate was made redundant during the academic year), additional references should be sought.	- Evidenced by valid, written references in line with this Requirement. - Evidence of processes to ensure that references are obtained in line with this Requirement, evaluated and any appropriate action taken and recorded. - Where references are unobtainable, this will be evidenced by proof of attempts by the recruitment business to obtain references.	"2 years' worth of assignments" means obtaining references for a total of 24 months. For clarity, this 24-month reference period must demonstrate 24 months of work and cannot include references covering gaps between assignments (please see Requirement 4 'Employment History' above in respect of gaps in employment). Where the recent assignments as stated above do not include working with children, the recruitment business will also obtain additional references from the relevant employer(s) from the last time the candidate worked with children (if not currently working with children), covering the last 2 assignments / roles that involved working with children. In cases where candidates do not have any experience working with children further references (more than 2) should be sought from relevant organisations in the candidate's employment history. References must include details of any safeguarding issues, disciplinary procedures, or allegations raised, particularly relating to children or adults at risk. References must be verified with a signature and a stamp; be on letter headed paper; fax header displaying the name of sender; compliment slip; or e-mail from the referee's organisation (not a private e-mail address). The referee's address must be their professional address. References should be provided by a referee with sufficient seniority in the school such as a Headteacher. Where a reference has not been completed by a senior member of staff, references should be countersigned by them. Please see template wording below: <i>"In line with Keeping Children Safe in Education 2023, references should be completed by a senior person with appropriate authority.</i> <i>Please tick here to confirm that the Headteacher is aware of the content in this reference and has confirmed it is accurate and true in respect of any safeguarding and/or disciplinary investigations.</i> Signed:..... Dated:....." A testimonial ("To Whom It May Concern") or open references are not acceptable. Such references may only be accepted in exceptional circumstances, and where the recruitment business receives verification issued by the referee, and addressed to the recruitment business, and such verification specifically addresses child-protection and safeguarding in relation to the candidate (these references may come from a private address). Recruitment businesses should respond to requests for references by other recruitment businesses and third parties in a timely manner. The recruitment business should have robust procedures in place to ensure references are properly evaluated and actioned to ensure that no candidate with child protection, safeguarding or disciplinary issues or concerns is placed on assignment. Also, where necessary, the candidate is informed that they have not met the minimum standards required by the recruitment business. If the recruitment business has any concerns or reservations in relation to a reference, this should be discussed with the candidate and (where appropriate) with any potential placements. The recruitment business should consider whether it is appropriate to subject the candidate to a fixed term risk assessment to address any identified risks. Recruitment businesses may also consider contacting the Local Authority Designated Officer (LADO), to see if they are aware of any

concerns related to the candidate's previous employment.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
16. Medical Fitness to Work		
The recruitment business will obtain a signed declaration from the candidate regarding their physical and health capacity to work, as required by the Education Health Standards (England) 2003 Regulations annually.	- Evidenced by a signed declaration in line with this Requirement. - Evidence of a process to ensure this information is obtained for all candidates, and any declarations not reaching the required standard are identified and appropriate action taken.	The recruitment business will have in place a process or procedure to ensure that all candidates complete a medical declaration confirming their fitness to work, and that any issues raised are adequately investigated. For any declarations not reaching the required standard the recruitment business shall follow the procedures under part 7 of The Education (Health Standards) (England) Regulations 2003.
17. Overseas Trained Teachers (Outside EEA, Switzerland, Australia, Canada, New Zealand, & US)		
The candidate will provide an original UK ENIC check to the recruitment business to establish their qualifications are equivalent to the UK. The recruitment business will verify this document and copy, sign, and date it. Where the recruitment business intends to place a candidate as a qualified teacher, they will check and record the candidate's status in reference to the four-year rule and ensure that it is adhered to.	- Evidenced by validated UK ENIC check and candidate's four-year rule status. - Evidence of process to: - identify teachers trained overseas and outside of the countries listed; and - undertake checks in line with this Requirement.	This applies to teachers trained outside of the EEA, Switzerland, Australia, Canada, New Zealand and the US. Such candidates can work in the UK as a qualified teacher for four continuous calendar years from the first date on which they start work as a qualified teacher. The recruitment business should have in place a process to identify overseas qualifications and undertake the appropriate checks. Where available, the candidate should provide a letter of professional standing, including information about their past conduct, from the professional regulating authority in the country in which the candidate has worked.
18. Overseas Trained Teachers (From EEA, Switzerland, Australia, Canada, New Zealand, & US)		
The candidate will provide evidence to the recruitment business that they have applied to the Teaching Regulation Agency ("TRA") for the award of QTS. The recruitment business will have sight of the evidence provided and copy, sign and date, and file it. No more than 12 weeks after the candidate provides evidence of their application for QTS, the candidate will provide the recruitment business with evidence of their QTS award from the TRA. The recruitment business will copy, sign, date and file this document.	- Evidenced by a validated proof of application for QTS and/or QTS award in line with this Requirement. - Evidence of process to identify teachers trained in the countries shown, and process to ensure that such teachers are: - asked to provide evidence of application to TRA for QTS award; - not placed in qualified teaching roles until the QTS award is confirmed; and - receiving confirmation of their QTS by the recruitment business within 12 weeks of the application.	This applies to teachers from the EEA, Switzerland, Australia, Canada, New Zealand and the USA. Overseas teachers apply through the Teaching Regulation Agency using the relevant form to apply for QTS. Candidates can work as an instructor while waiting for their QTS to be awarded. The TRA does not give a timescale for QTS applications because each case is looked into individually, and QTS is not guaranteed. The TRA system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Where available, the candidate should provide a letter of professional standing, including information about their past conduct, from the professional regulating authority in the country in which the candidate has worked.

Section 1 Safeguarding

All checks in Section 1 must be carried out PRIOR to placement.

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
19. Records Retention P All documents relating to a candidate with regard to safeguarding or their registration interview will be kept securely by the recruitment business in accordance with relevant legislations, regulations and the General Data Protection Regulations. DBS checks should be processed in line with the Disclosure & Barring Service's "Handling of DBS certificate information" sample policy statement. DBS certificate code of practice requires that the information revealed is considered only for the purpose for which it was obtained. Further information can be found here: DBS checks: guidance for employers.	- Evidenced by records retained in line with this Requirement. - Evidence of secure record retention and deletion process.	Documents must be kept securely in line with the principles of data protection law including the Data Protection Act 2018 and the UK General Data Protection Regulation (see Appendix for links), Employment Practices Code and supplementary guidance. Recruitment businesses may find it necessary to keep records longer in situations where allegations or concerns have been raised in accordance with Record Retention in KCSIE 2023. This standard does not apply to accounting records, which are covered by separate statutory requirements. The recruitment business should consider processes to securely retain documents and identify and securely delete obsolete documents.

Section 2 Competency Requirements

The previous “Safeguarding” section of this standard looks at the statutory and best practice requirements to ensure safeguarding checks are properly carried out. Safeguarding is usually an “expected” part of the service provided by education recruitment businesses. This second section looks at the competency of both the candidate and recruitment business in providing services to their clients.

The aim of section two is to ensure that APSCo education recruitment businesses provide not only safe candidates, but the best and most appropriate safe candidates.

The competency requirements included in **Compliance+** represent best practice, which APSCo and its **Compliance+** accredited recruitment businesses are committed to attain. Some requirements contained within this section involve significant changes in the attitudes and working practices of both recruitment businesses and clients, and APSCo appreciates that transformations of this kind can take time. In recognition of this, certain obligations contained in Section 2 involve continuous improvement to work towards best practice, rather than mandatory achievement. Where continuous improvement rather than mandatory achievement is required, it will be marked “CIR”.

Section 2 Competency Requirements

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
20. Commitment to Safer Recruitment P		
The recruitment business will promote its commitment to Compliance+, and safer recruitment in all electronic and paper-based promotional materials, websites, and communications with both candidates and clients. The recruitment business will ensure that all staff involved in the recruitment of candidates working with children have received safer recruitment training from a reputable training provider.	- Evidenced by external communications in line with this Requirement. - Evidence of top management’s commitment to, and staff members’ understanding of Compliance+, and safer recruitment practices. - Evidenced by relevant certificate of safer recruitment training from a reputable training provider.	The recruitment business should be able to show commitment to promoting Compliance+ principles at the highest level within the organisation. Also, staff members should have an understanding of Compliance+, and what’s expected of them, the business and its clients.
21. Interviewing Competency P		
Registration interviews will be undertaken by competent individuals who will be trained to a recognised standard in safer recruitment or value-based interviewing skills. CIR This requirement may be waived where the individual is considered already competent in safer recruitment or value-based interviewing, by virtue of their experience. Where this is the case the recruitment business will assess the safer recruitment or value-based interviewing skills of the individual, and a record of this assessment, signed and dated by a senior manager within the recruitment business will be filed. The registration interview format shall promote and encourage the interviewer to question any inconsistencies in the candidate’s application form and examine the candidate’s motivation.	- Evidence of written confirmation/certificate of safer recruitment or value-based interviewing skills training in line with this Requirement. CIR - Alternatively, evidenced by an assessment of the individual’s safer recruitment or value-based interviewing skills where the individual is considered competent due to their experience rather than formal training. - Evidence of competency of individuals undertaking interviews and that the format used is in line with this Requirement. In particular evidence of recruitment consultants’ understanding of: - settings into which workers are placed; - the area of work, experience and qualifications required; - safeguarding of children and adults at risk; - the relevance and importance of a safe recruitment interviewing technique; and - any relevant training and overall level of experience.	The recruitment business should contact APSCo to obtain information about training courses. APSCo provides training courses for Compliance+, accredited recruitment businesses. Compliance+, demands continuous improvement in this Requirement until excellence is achieved. Therefore, newly accredited recruitment businesses will have some time to spread the cost of training. Training may be undertaken in-house but evidence that the trainer is formally qualified or accredited to deliver recognised safer recruitment or value-based interview training will be required. Where an individual has been trained by a previous employer, the recruitment business should request the certificate or other written evidence of such training. Individuals undertaking registration interviews will be interviewed by the Compliance+, auditor to ascertain their competency in interviewing, and to assess the effectiveness and suitability of the interview format.

Section 2 Competency Requirements

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
22. Relationship with the Client P		
The recruitment business will work with the client to ensure that it has sufficient information to provide a suitably qualified candidate, and a well-prepared candidate. CIR	Evidenced by the following information provided by the client: 1 Qualifications, experience, training, and any authorisations necessary or required by law; 2 Start date and duration; 3 Description of the role, including location, hours, and pay; 4 Description of any out of hours commitment expected of the candidate; 5 Any risks to health and safety; 6 A handbook, or a link to other such document(s) giving details of the key policies and procedures of the client, including those relating specifically to the role being recruited for; and CIR 7 Listing of the outcomes expected by the client either during or at the end of the assignment. CIR	Some of the required information may be obtained/updated on an ad-hoc basis rather than for each specific assignment. For example, the recruitment business may already have a handbook for a client and update this as and when required. Regarding the Requirement for points 6 and 7, the auditor will look to see continuous improvement towards obtaining this information as standard. These requirements will necessitate changes in attitude by clients. It may take some time to change their behaviour – however, the recruitment business will be expected to show efforts taken to work towards this best practice.
23. Provision of Information to the Client P		
The recruitment business will provide to the client: • an explanation of Compliance+; • all relevant information it has obtained about the candidate; and • terms of business.	• Evidenced by an agreement between the parties, which at least conforms to the requirements of the Conduct Regulations. • Evidence of process in place to identify relevant information and forward this to the client in a timely manner. • Evidence of client understanding of Compliance+, and in particular the requirements made of clients.	APSCo model terms of business with clients are available for use by members. The recruitment business should have a clear process in place to ensure that all relevant information captured about a candidate is forwarded to the client in a timely manner. A random sample of clients will be surveyed to ascertain their level of understanding of Compliance+, and in particular the level of involvement required by the client.
24. Provision of Information to the Candidate P		
The recruitment business will provide the candidate with an explanation of Compliance+. The recruitment business will provide to the candidate all relevant information it has obtained from the client about the assignment/role. The recruitment business will provide the candidate with confirmation of assignment details, and the terms that shall apply in line with the requirements of the Conduct Regulations.	• Evidenced by assignment details document and terms in line with this Requirement. • Evidence of process to provide candidates with all relevant information about an assignment/role. • Evidence of candidate understanding of Compliance+.	The recruitment business should have a process in place to ensure all relevant information gained from the client about the role is passed on to the candidate. This doesn't necessarily need to be a written process, but if not in a written format it must be demonstrated that the process is well understood by the relevant personnel. Information given about assignments, should at least conform to the requirements of the Conduct Regulations. A random sample of candidates will be surveyed to ascertain their level of understanding of Compliance+. Template contracts with candidates are available from APSCo, which you can access here.

Section 2 Competency Requirements

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
25. Submission of Candidates P		
The recruitment business will only submit candidates to vacancies where the candidate's skills have been matched to the vacancy by a trained recruitment consultant who has discussed the vacancy with the candidate.	Evidence that a recruitment consultant spoke to the candidate either about the specific vacancy before CV submission, or shortly after the CV submission where the recruitment business had obtained the candidate's previous agreement to be put forward for a particular type of position.	A random sample of candidates will be surveyed to ascertain if they were spoken to about requirements before, or shortly after in certain cases, being submitted for a role.
26A. Safeguarding Training		
All candidates must have undertaken safeguarding training within the last 12 months before being placed in a school. The recruitment business must have sight of the candidates safeguarding training certificate.	Evidenced by appropriate, signed, dated documents in line with this Requirement.	The recruitment business should have in place a process/procedure to identify when a candidates' safeguarding training needs to be updated.
26B. Training During Placement		
All candidates on assignment must have access to information on relevant subsidised training courses. The recruitment business must ensure that all candidates placed on assignment are aware of their obligations regarding the safeguarding of children, FGM and the prevention of extremism in education.	- Evidence of provision of information on training courses. - Evidence of candidate awareness of safeguarding, FGM and the prevent duty.	The recruitment business may consider courses that a candidate might want to take in order to enhance their professional competencies and keep abreast of relevant legislation. Potential opportunities for training may come out of discussions. Recruitment businesses may wish to enhance their service by offering training to employees of clients as well. As best practice, candidates should attend the following courses not less than once every 12 months: Prevent Duty Training Recruitment businesses may provide safeguarding and prevent duty awareness via training or information documentation. The Home Office has developed a free training package on the prevent duty which you can access here. Educate Against Hate also provide guidance and trainings which can be accessed here. Female Genital Mutilation (FGM) Teachers have a mandatory duty to make a report to the police if they are informed by a child under the age of 18 that they have undergone FGM or if they observe physical signs that an act of FGM may have been carried out. As best practice, all candidates should have undertaken female genital mutilation (FGM) training before being placed in a school. The Home Office offer free FGM training which can be accessed here and a resource pack and e-learning service which can be accessed here.

Section 2 Competency Requirements

Best Practice Requirement	Audit Requirement	Notes for Recruitment Businesses
27. Placement Support Candidates on assignment will at all times have access to telephone support during working hours, and if required face to face meetings with the recruitment business. Recruitment consultants will maintain regular, effective contact with candidates on assignment and clients. The recruitment business will give the candidate access to a confidential contact to whom they can raise any serious concerns about the client or the recruitment business.	- Evidence that candidates are aware of the different contacts within the recruitment business available to them. - Evidence of the quality and quantity of contact between the recruitment business and the candidate, and the recruitment business and the client.	The auditor will speak to candidates and clients to assess the level and effectiveness of contact. The recruitment business should have a policy in place, not necessarily written down regarding the regularity and content of calls made to candidates on assignment, and clients.
28. Complaints Policy P The recruitment business will have a written complaints procedure, which is available to all candidates and clients if required.	Evidenced by complaints procedure, which is accessible to clients and candidates.	Recruitment businesses may have a candidate handbook where all relevant policies are kept, and a process in place to ensure all new candidates receive a copy of the handbook. Alternatively, such a procedure may be held publicly on the recruitment business's website.
29. Allegations/Misconduct Policy The recruitment business will have a transparent policy in place to explain how they will deal fairly and appropriately with misconduct and allegations both about candidates, and from candidates about clients. The policy will explain how an investigation should be carried out to gather enough evidence to establish if the misconduct/ allegation has foundation, and where the recruitment business has sufficient information to meet the referral duty criteria (which can be found on GOV.UK.) the recruitment business should make the referral to the DBS. This policy will be made available to candidates and clients.	Evidenced by a policy which is in line with this Requirement.	Recruitment businesses should ensure that this policy and any associated procedure deals fairly and appropriately with all allegations. It should ensure that all allegations are dealt with, and all parties are made aware of the outcome.
30. Safeguarding Policy P The recruitment business will have a safeguarding policy which must include the legal duty of referral of any candidates that have harmed or pose a risk of harm to children or adults at risk. The recruitment business will have a recorded audit trail for all referrals made.	- Evidenced by appropriate safeguarding policy and record of any audits made. - Evidence of a robust policy to ensure where candidates are identified as a potential threat to safeguarding, they are referred immediately, and all action related to them is recorded.	A safeguarding policy should be a statement of a recruitment business's aims and objectives regarding safeguarding. Such a policy should include clear statements concerning what steps the recruitment business will take to ensure the protection of children, young people and adults at risk, and should be pertinent to the type of staff a recruitment business provides. To ensure the legal duty for referral is accurate please see the DBS Referral Guide, (see Appendix for link).

31. Data Protection & Processing Policy P

All personal data will be kept and processed by the recruitment business in line with data protection law including the Data Protection Act 2018 and the UK General Data Protection Regulation ("Data Protection Laws").

The recruitment business will have a privacy notice, which sets out the purposes for which data will be processed and kept, which the recruitment business will communicate this notice to candidates.

The recruitment business shall obtain a written obligation from any third party with whom the recruitment business shares any personal data to keep and process that data in line with Data Protection Laws.

- Evidenced by a policy and contractual documentation in line with this Requirement.

Recruitment businesses should have an appropriate notice, and this should be made available to candidates. There may be uses of personal data for which the recruitment business will require explicit consent from the candidate.

32. Designated Safeguarding Lead (DSL)

Recruitment business will look to appoint an appropriate senior member of staff to the role of Designated Safeguarding Lead (DSL) at the earliest opportunity. The appointed DSL must undertake all relevant DSL training provided by a reputable training provider

- Evidenced by notes from the regular review meeting(s) where the need to appoint a DSL was discussed and diarised for future review.
- Evidenced by relevant certificate of training from a reputable training provider.

The recruitment business should regularly review the earliest opportunity that it will be appropriate to appoint a DSL.

Section 3 Audit Parameters

This section explains the audit parameters for Compliance+ accreditation

1. Audits will be undertaken by independent, experienced teaching professionals, or by independent, professional auditors that specialise in auditing situations where the safeguarding of vulnerable people is involved.
2. Recruitment businesses will be audited annually to the **Compliance+** standard.
3. There are two parts to the audit, and the recruitment business must pass both parts.
4. The amount of time spent on an audit will vary depending on the size of the recruitment business, however, there is a minimum audit requirement of one per year. Where a recruitment business has more than one office or branch, at least 10% of the office or branch network will be audited within each year.
5. Recruitment businesses are given notice of their next audit. Recruitment businesses are expected to accommodate the independent auditor, and provide information requested by the auditor in a professional and timely manner. An inability to do so may mean that the recruitment business loses marks or in extreme circumstances could fail the audit.
6. The recruitment business may make a request to APSCo to postpone the audit if there is a legitimate business reason, unrelated to the audit, as to why the recruitment business cannot accommodate the auditor on the agreed date. Where a postponement is agreed it will take place within 3 months of the original audit date.
7. The recruitment business may request advice and support from APSCo if they are inexperienced in the audit process.
8. The audit is undertaken as set out in this Section 3.
9. Once an audit is completed, the independent auditor provides both APSCo and the recruitment business with an audit report. The audit report specifies the records checked, evidence found, and the mark achieved. The auditor may make observations that require action by the recruitment business, and progress on such observations will be checked at the next audit. If evidence of appropriate improvement is not found at the next audit, then the observation may become a non-conformance.
10. The audit report specifies any non-conformances, and the recruitment business is required to show evidence of action taken to rectify non-conformances at the next audit. If non-conformances are not rectified this may lead to the recruitment business's **Compliance+** accreditation being suspended until such time as the non-conformance is satisfactorily rectified.
11. If a non-conformance is considered serious the auditor may require the recruitment business to rectify it and provide evidence of this before the next scheduled audit.

1. Evidence Based Audit (“EBA”)

- i. This consists of an onsite, sample-based review of the safeguarding and documentation requirements set out in the standards in Section 1 and Section 2.
- ii. APSCo can provide advice and support to recruitment businesses that have not undertaken the audit process previously.
- iii. Each requirement has a pass mark as shown in the Audit Scoring section. The marks are weighted dependent upon the attendant level of risk of non-conformance. The auditor randomly samples documentation of workers the recruitment business places or has on site at the time of audit. A number of marks will be removed for each incorrect/incomplete/missing document.
- iv. The pass mark on the evidence-based audit is 96%.
- v. Where a recruitment business achieves between 80% and 95.99%, the auditor will communicate to the recruitment business the areas in which it failed, and the recruitment business will have six months to improve their processes before another audit is undertaken. During this period the recruitment business may continue to use the **Compliance+** logo. At the next audit the recruitment business will be expected to show evidence of improvements made to their processes as well as under-going a full audit. Where a recruitment business achieves less than 96% in two consecutive audits, clause vi. below will apply.
- vi. Where a recruitment business achieves less than 80% in an audit, or less than 96% in two consecutive audits the auditor will communicate to the recruitment business the areas in which it failed. The recruitment business will not be entitled to use the **Compliance+** logo at this time. A recruitment business may request to be re-audited after a period of no less than three months. At the next audit the recruitment business will be expected to show evidence of the improvements made to their processes as well as undergoing a full audit.
- vii. There is no limit to the number of times a recruitment business that fails the audit can apply to be re-audited, although there must be a period of at least three months between each audit.
- viii. Observations may be made by the auditor regarding the processes of the recruitment business.

2. Interview/Questionnaire Based Audit (“IBA”)

- i. This consists of an onsite/telephone, interview-based review of the competency requirements set out in Section 2.
- ii. APSCo can provide advice and support to recruitment businesses that have not undertaken the audit process previously.
- iii. A sample of the recruitment consultants working for the recruitment business that undertake registration interviews will be interviewed face to face by the auditor to assess their competency as set out in Section 2. In particular the auditor reviews consultants’ level of understanding of safeguarding, education, environments, and the training they have received.
- iv. The auditor will review recruitment consultants based on their ability to demonstrate a knowledge and understanding of the following:
 - a. settings into which workers are placed
 - b. the area of work and experience and qualifications required
 - c. safeguarding of children and adults at risk
 - d. the relevance and importance of a safe recruitment interviewing technique
 - e. understanding of any relevant training and overall level of experience
- v. A random sample of clients and candidates will be contacted with regard to:
 - a. provision of information - Requirements 24 & 25
 - b. submission of candidates - Requirement 26
 - c. professional development - Requirement 27
 - d. placement support - Requirement 28
- vi. Each competency-based Requirement (Competency Requirement) in Section 2 is given a mark as shown in the Audit Scoring section. The marks are weighted dependent upon the attendant level of risk of non-conformance. The independent auditor will use their experience to make judgments and award marks.
- vii. Certain requirements are not compulsory, these are indicated by the letters **CIR**, meaning Continuous Improvement Required. The auditor will look to see progress in these areas from one audit to the next, but complete adherence to the standard is not compulsory.
- viii. The fail mark for the interview-based audit will be 60%.
- ix. The goal for “excellence” is a pass mark of 96%. Where a recruitment business achieves a pass mark lower than 96% the auditor will expect at each subsequent audit to see improvement. The aim is to help recruitment businesses continually improve until they achieve excellence.
- x. Where a recruitment business achieves less than 60% the auditor will communicate to the recruitment business the areas in which it failed. The recruitment business will not be entitled to use the **Compliance+** logo at this time. A recruitment business may request to be re-audited after a period of three months, at which time they are expected to show evidence of the improvements made to their processes as well as undergoing a full audit.
- xi. Where a recruitment business achieves more than 60% but shows no improvement in their pass mark (until they reach excellence at 96%) over three consecutive audits, the recruitment business’s accreditation will be suspended until such time as improvement is achieved at a future audit. At this time the recruitment business will not be entitled to use the **Compliance+** logo.
- xii. Observations may be made by the auditor regarding the processes of the recruitment business, and although these may not affect the marks given, the auditor may require action or improvement in relation to such observations.

Section 3 Audit Parameters

There are 28 requirements and a total of 375 marks available to be awarded.
The pass mark on the evidence-based audit is 96%

Audit Scoring - Evidence Based Audit

Section No.	Req No.	Requirement Name	Max Total Marks	Notes
1	1	Policies and Procedures	10	A maximum of 2 marks will be awarded for evidence of each of the following procedures/policies: - Safeguarding policy - Recruitment procedures 1 mark will be awarded if suitable evidence is provided to the auditor of each of the following, regarding both recruitment and safeguarding procedures/policies giving a maximum mark of 6. - Controlled - Changes in regulation identified - Communicated to all relevant staff.
1	2	Candidate Registration	10	A random sample of approximately 5 candidate files will be checked. At least 2 of these candidates will be qualified teachers. A maximum of 2 marks will be awarded per candidate file if all registration records of candidates checked are complete and dated before the start date of the first assignment. Candidate files will include, as a minimum, the following documents, executed in line with the relevant Requirement: - Registration interview document - Application form - Rehabilitation of offenders' declaration (only temporary candidates) - Proof of face-to-face interview - Proof of identity - Proof of address (only temporary candidates) - Proof of eligibility to work in the UK - Written record of NI number (only temporary candidates) - Proof of employment history - Proof of qualifications - Proof of DBS Barred check - Enhanced DBS check (only temporary candidates) - References - Proof of the relevant teaching regulation agency/council check – for qualified teachers only - Proof of medical fitness to work (only temporary candidates) Further documents may be required dependent upon the candidate's circumstances.

Section 3 Audit Parameters

Audit Scoring - Evidence Based Audit

Section No.	Req No.	Requirement Name	Total Marks	Notes
1	3	Registration Interviews	70	A maximum of 20 marks will be awarded for evidence of a formalised process for undertaking and documenting registration interviews. The marks awarded will depend upon the robustness and suitability of the process. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 50 marks. 2 marks will be deducted for each piece of information missing from the candidate file. All files will include the following: • A standard form of registration interview documentation • Notes from the interview • A list of the documents provided and checked at the interview • The signature of the interviewer • The signature of the candidate or an email confirmation from the candidate confirming that a face-to-face interview took place, or the candidate's email approval, or the recorded interview. • The date of the interview
1	4	Employment History	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to ensure that employment histories obtained from candidates are in line with this Requirement. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate employment history that is not in line with this Requirement.
1	5	Rehabilitation of Offenders Declaration	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to ensure that any situations where action is required are identified immediately, and where identified appropriate action is taken, and both the action and the outcome are documented. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate file that does not include a declaration in line with this Requirement.
1	6	Proof of Identity	5	A random sample of approximately 5 candidate files will be reviewed. 1 mark will be deducted for each candidate file that does not include a validated, signed, dated copy of an acceptable proof of identification in line with this Requirement.
1	7	Proof of Address	5	A random sample of approximately 5 candidates files will be reviewed. 1 mark will be deducted for each candidate file that does not include validated, signed, dates copies of acceptable proofs of address in line with this Requirement.
1	8	Eligibility to Work in the UK	15	A maximum of 2.5 marks will be awarded for evidence that the person(s) responsible for validating documents has/ have access to appropriate guidelines on what constitutes acceptable proof. A maximum of 2.5 marks will be awarded for evidence of a clear identification and escalation process should there be any doubt regarding the validity of documentation.

				A random sample of approximately 5 candidates files will be reviewed, and this carries a maximum of a further 10 marks. 2 marks will be deducted for each candidate file that does not include validated documents showing a candidate's right to work in the UK, in line with this Requirement.
1	9	Proof of National Insurance Number	5	A random sample of approximately 5 candidate files will be reviewed. 1 mark will be deducted for each candidate file that does not include a record of the NI number in line with this Requirement.

Section 3 Audit Parameters

Audit Scoring - Evidence Based Audit

Section No.	Req No.	Requirement Name	Total Marks	Notes
1	10	Qualifications	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to ensure that where qualifications are confirmed other than by original documentation, these qualifications are identified as such, confirmed in line with the Requirement, and updated in line with this Requirement. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate file that does not include the appropriate proof of, or check of the candidate's qualifications, in line with this Requirement.
1	11	Induction (Teachers)	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to identify candidates who are teachers that have qualified since May 1999. This will include the action to be taken to gain the appropriate evidence in line with this Requirement. The recruitment business will show, if such candidates have been identified, certificates of induction, or proof that the candidate is working within the appropriate rules. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate file where the proof of Induction is missing, in line with this Requirement
1	12A	The Teaching Regulation Agency Checks	10	A maximum of 10 marks will be awarded for evidence of a clear and robust process to identify candidates who are qualified teachers; to undertake an online check with The Teaching Regulation Agency ("TRA") for qualified teachers; to record the outcome of such checks; and to take any necessary resultant action in line with this Requirement. In Wales, this check will be via the Education Workforce Council. In Scotland, this check will be via the General Teaching Council for Scotland. In Northern Ireland, this check will be via the General Teaching Council for Ireland.
1	12B	Disqualification under the Childcare Act 2006	2.5	A maximum of 2.5 marks will be awarded for evidence of a process to undertake checks in line with the Requirement.
1	12C	Section 128 Direction Check	2.5	A maximum of 2.5 marks will be awarded for evidence of a process to undertake checks in line with the Requirement.
1	13	DBS Checks & Update Service	20	A maximum of 10 marks will be awarded for evidence of a clear and robust process to explain the DBS update service and to obtain consent to it, identify any relevant information concerning a candidate's DBS status, and take any necessary resultant action, including the provision of information regarding a candidate's suitability to the client in line with this Requirement. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 10 marks. Up to 2 marks will be deducted for each candidate file that does not include a dated Enhanced DBS check, in line with this Requirement

1	14	Overseas Candidate Police Checks	15	A maximum of 10 marks will be awarded for evidence of a clear and robust process to identify where candidates have worked or lived overseas, and where identified, evidence of process to undertake checks in line with the Requirement. The recruitment business will show, if such candidates have been identified, candidate files with a record of validated overseas police checks in line with the Requirement. When possible, a random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate file that does not include a validated overseas police check, in line with this Requirement
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Section 3 Audit Parameters

Audit Scoring - Evidence Based Audit

Section No.	Req No.	Requirement Name	Total Marks	Notes
1	15	References	15	A maximum of 5 marks will be awarded for evidence of a clear and robust process to ensure that references are obtained in line with the Requirement. This will include the evaluation of references obtained, and action to be taken where references are unsatisfactory or raise concerns. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 10 marks. Up to 2 marks will be deducted for each candidate where references have not been requested, in line with this Requirement
1	16	Medical Fitness to Work	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to ensure that medical fitness to work information is obtained for all candidates, and any declarations not reaching the required standard are identified and appropriate action taken. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate for whom a medical fitness to work information is obtained, in line with this Requirement.
1	17	Overseas Trained Teachers (Outside EEA, Switzerland, Australia, Canada, New Zealand, & US)	10	A maximum of 5 marks will be awarded for evidence of a clear and robust process to identify teachers trained overseas and outside of the countries shown, and to undertake checks in line with this Requirement. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate for whom the checks have not been conducted, in line with this Requirement.
1	18	Overseas Trained Teachers (From EEA, Switzerland, Australia, Canada, New Zealand, & US)	10	A maximum of 5 marks will be awarded for evidence of a clear and a robust process to identify teachers trained in the countries shown, and process to ensure that relevant checks are undertaken in line with this Requirement. A random sample of approximately 5 candidate files will be reviewed, and this carries a maximum of a further 5 marks. 1 mark will be deducted for each candidate for whom the checks have not been conducted, in line with this Requirement

1	19	Records Retention	5	A maximum of 5 marks will be awarded for evidence of a robust policy for records retention. This will include the secure and easily identifiable retention of records, and the identification and secure deletion of obsolete records in line with this Requirement. The recruitment business will provide evidence of records retained securely in line with this Requirement.
2	20	Commitment to Safer Recruitment	5	A maximum of 5 marks will be awarded for evidence of external communications and evidence of relevant certificate of training in line with this Requirement.

Section 3 Audit Parameters

Audit Scoring - Evidence Based Audit

Section No.	Req No.	Requirement Name	Total Marks	Notes
2	22	Relationship with the Client	10	A maximum of 10 marks will be awarded for evidence of the following information provided by the client regarding a sample of recent requirements: • qualifications, experience, training, and any authorisations necessary or required by law • start date and duration • description of the role, including location, hours, and pay • description of any out of hours commitment expected of the candidate • any risks to health and safety
2	23	Provision of Information to the Client	10	A maximum of 5 marks will be awarded for evidence of an agreement between the parties, which at least conforms to the requirements of the Conduct Regulations. A maximum of a further 5 marks will be awarded for evidence of a process to identify relevant information and forward this to the client in a timely manner.
2	24	Provision of Information to the Candidate	10	A maximum of 5 marks will be awarded for evidence of terms and assignment details in line with this Requirement. A maximum of a further 5 marks will be awarded for evidence of a process to provide candidates with all relevant information about an assignment/role.
2	26A	Safeguarding Training	5	A maximum of 5 marks will be awarded for evidence of the candidate undertaking safeguarding training within the last 12 months before being placed in the school.
2	28	Complaints Policy	5	A maximum of 5 marks will be awarded for evidence of a complaint's procedure, which is available to be accessed by clients and candidates.
2	29	Allegations / Misconduct Policy	10	A maximum of 10 marks will be awarded for evidence of an allegation/ misconduct policy and procedures which are transparent and fair, in line with this Requirement, and the policy is made available to candidates.
2	30	Safeguarding Policy	50	A maximum of 5 marks will be awarded for evidence of an appropriate safeguarding policy and a record of any audits made. A maximum of a further 45 points will be awarded for evidence of a robust policy to ensure that, where candidates are identified as a potential threat to safeguarding, they are referred immediately, and all action related to them is recorded.
2	31	Data Protection & Processing Policy	5	A maximum of 5 marks will be awarded for evidence of a data protection policy, and data protection aspect to terms of business in line with this Requirement.
2	32	Designated Safeguarding Lead (DSL)	5	A maximum of 5 marks will be awarded for evidence of review meeting notes, or certificate of training of a DSL if one is appointed, in line with this Requirement.

Section 3 Audit Parameters

Audit Scoring - Interview Based Audit

There are 5 requirements and 60 marks available to be awarded.

There are a further 5 Continuous Improvement Requirements ("CIR") with an extra 40 marks available to be awarded, which are shown on the next page.

Section No.	Req No.	Requirement Name	Total Marks	3Notes
2	20	Commitment to Safer Recruitment	10	A maximum of 5 marks will be awarded where top management show clear commitment to promoting Compliance+ both internally and externally. A further maximum of 5 marks will be awarded where staff members interviewed show a clear understanding of Compliance+ and safer recruitment practices.
2	21	Interviewing Competency	30	A maximum of 30 marks will be awarded for the competency of individuals in undertaking safe and appropriate interviews and showing a clear understanding of the safeguarding issues and the importance of fully investigating the history and motives of candidates. The auditor will consider the individual's understanding of: • settings into which workers are placed • the area of work, experience and qualifications required • safeguarding of children and adults at risk • the relevance and importance of safer recruitment or value-based interviewing • relevant training and overall level of experience
2	25	Submission of Candidates	5	A maximum of 5 marks will be awarded for evidence that recruitment consultants speak to candidates about specific vacancies either before CV submission, or shortly afterwards where the recruitment business had obtained the candidate's previous agreement to be put forward for a particular type of position.
2	26B	Training During Placement	10	A maximum of 10 marks will be awarded for evidence that candidates are being provided with information about relevant training courses.
2	27	Placement Support	5	A maximum of 2.5 marks will be awarded where the auditor can ascertain that candidates are aware of the different contacts within the recruitment business available to them. A maximum of a further 2.5 marks will be awarded for evidence of regular, good quality contact between the recruitment business and the candidate, and the recruitment business and the client.

Section 3 Audit Parameters

Audit Scoring - Interview Based Audit

(Continuous Improvement Required)

Below are the 4 Continual Improvement ("CIR") requirements, which can provide an extra 50 marks to the IBA score.

Section No.	Req No.	Requirement Name	Total Marks	Notes
2	21	Interviewing Competency	20	A maximum of 20 marks will be awarded for written evidence of recognised safer recruitment or value-based interviewing skills assessment in line with this Requirement for all staff undertaking candidate interviews.
2	22	Relationship with the Client	10	A maximum of 10 marks will be awarded for evidence that the following information is being asked for by the recruitment business and provided by the client: • a handbook, or other such document(s) giving details of the key policies and procedures of the client, including those relating specifically to the role being recruited for. • a list of outcomes expected by the client either during or at the end of the assignment. The auditor will award marks where they see evidence of the recruitment business working with the client to explain the benefits of providing this documentation and setting client expectations.
2	23	Provision of Information to the Client	10	A maximum of 10 marks will be awarded for evidence of a client's understanding of Compliance+ , and in particular the requirements made of clients.
2	24	Provision of Information to the Candidate	10	A maximum of 10 marks will be awarded for evidence of a candidate's understanding of Compliance+ .

Appendix

List of Relevant Information / Documents / Legislation

Information / Document / Legislation	Web Address
Keeping Children Safe in Education	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Children Act 1989	http://www.legislation.gov.uk/ukpga/1989/41/contents
Care Act 2014	https://www.legislation.gov.uk/ukpga/2014/23/contents
Data Protection Act 2018	http://www.legislation.gov.uk/ukpga/2018/12/contents
The Information Commissioners Office (The UK's independent authority set up to uphold information rights)	https://ico.org.uk/for-organisations/guide-to-data-protection/
The Conduct of Employment Agencies and Employment Businesses Regulations 2003/2010	http://www.legislation.gov.uk/uksi/2003/3319/contents/made http://www.legislation.gov.uk/uksi/2010/1782/contents/made
Home Office Guide to Preventing Illegal Working in the UK	https://www.gov.uk/government/publications/preventing-illegal-working-guidance-for-employers-october-2013
Legal Right to Work Tool	https://www.gov.uk/legal-right-work-uk
Employers Guide to Right to Work Checks	https://www.gov.uk/government/publications/right-to-work-checks-employers-guide
Online Right to Work checking service	For employees: https://www.gov.uk/prove-right-to-work For employers: https://www.gov.uk/view-right-to-work
DBS ID Checking Guidelines from 1 July 2021	https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications-from-3-september-2018#three-routes-of-id-checking
DBS Update Service: applicant guide	https://www.gov.uk/government/publications/dbs-update-service-applicant-guide
DBS Update Service: employer guide	https://www.gov.uk/government/publications/dbs-update-service-employer-guide
DBS Check: eligibility guidance	https://www.gov.uk/government/collections/dbs-eligibility-guidance
DBS Guide for employers	https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers
A guide to DBS checks	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1059974/Quick_Guide_to_DBS_Checks.pdf
DBS Workforce Guidance (Adult and Child)	https://www.gov.uk/government/publications/dbs-workforce-guidance
Handling of DBS Certificate Information	https://www.gov.uk/government/publications/oisc-management-of-disclosures-and-disclosure-information/management-of-dbs-certificate-information
Criminal record checks for overseas applicants	https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants
Designated Safeguarding Officer Training	https://www.apscouk.org/resource/designated-safeguarding-officer-training-overview-pdf.html
Check if someone can work in the UK	https://www.gov.uk/legal-right-work-uk
E-Learning training on Prevent	https://www.elearning.prevent.homeoffice.gov.uk/
Guidance on the Rehabilitation of Offenders Act 1974	https://www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974
Disqualification under the Childcare Act 2006	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
DBS code of practice	https://www.gov.uk/government/publications/dbs-code-of-practice
APSCo Template safeguarding policy	http://www.apscouk.org/model-policies.aspx
Home Office FGM Training	https://fgmelearning.vc-enable.co.uk/Register/



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It gives candidates and employers a trusted badge of quality whilst providing member firms with an innovative range of services designed for them by recruitment experts.

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- **The distinctive voice of the professional recruitment sector**
- **Expert support and events designed by recruitment experts**
- **Recognised as a trusted badge of quality**
- **An international profile with separate operations in the UK, Germany, Singapore and Australia**
- **Representing members we respect in a profession we understand**