

# EMPOWERING FUTURES ALTERNATIVE PROVISION

## SAFER RECRUITMENT POLICY

**Issue Date:** December 2025

**Next Review:** December 2026

**Approved by:** Director, Empowering Futures Alternative Provision

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## 1. POLICY STATEMENT

Empowering Futures Alternative Provision (EFAP) is committed to recruiting staff, contractors, volunteers and external tutors who are safe, suitable, competent, and aligned with our safeguarding culture.

We recognise our responsibility to protect:

- Children and young people aged 11–18 in AP
- Adult learners attending evening/weekend provision
- Learners with SEND and SEMH needs
- Vulnerable adults
- Learners participating in online and hybrid sessions
- Learners in vocational environments (beauty, nails, hair, sports, fitness)

EFAP conducts safer recruitment in accordance with:

- Keeping Children Safe in Education (KCSIE) 2024/25
- Working Together to Safeguard Children 2023
- Education Act 2002
- Equality Act 2010
- Teachers' Disqualification Regulations
- DBS Code of Practice
- UK GDPR & Data Protection Act 2018
- Local Authority AP commissioning requirements
- Ofsted Inspection Framework
- Awarding body centre requirements

We operate a **culture of vigilance**, ensuring all adults working with learners are suitable and fully vetted.

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## 2. SCOPE

This policy applies to:

- All EFAP employees (permanent, temporary, agency)
- Tutors and assessors
- Contractors (beauty tutors, sports coaches, external assessors)
- Volunteers
- Freelancers delivering AP or adult learning
- Anyone providing online teaching under EFAP
- Visitors with unsupervised access to learners

This policy covers all recruitment relating to:

- On-site AP delivery
  - Online and hybrid delivery
  - Vocational training environments
  - Off-site and community delivery
  - Short-term contracts and specialist roles
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## 3. SAFER RECRUITMENT PRINCIPLES

EFAP ensures that:

1. **Safeguarding is central to every recruitment stage**
2. All roles include a safeguarding statement
3. No appointment is made until all required checks are completed
4. All gaps in employment are fully explored
5. All candidates understand AP, SEND and SEMH contexts
6. Reference checks are robust and safeguarding-specific
7. Contractors and tutors undergo appropriate checks before teaching
8. Online staff undergo additional digital-suitability checks
9. Adult-learning tutors are vetted to protect vulnerable adults
10. Leadership ensures ongoing safeguarding culture and monitoring

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## 4. JOB DESCRIPTIONS & ADVERTISING

Every advertisement must include:

- EFAP safeguarding statement
- Requirement for enhanced DBS
- Notes on regulated activity
- Reference expectations
- Commitment to safer recruitment and equality

Job descriptions must include:

- Safeguarding responsibilities
  - Online safety responsibilities
  - Behaviour and SEND awareness expectations
  - Vocational safety expectations (where relevant)
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## 5. APPLICATION & SHORTLISTING

All candidates must:

- Complete EFAP's Application Form
- Provide a full employment history with explained gaps
- Provide contact details for two referees, one being most recent employer
- Declare any criminal history, sanctions, or restrictions

**Shortlisting includes:**

- Scrutiny of employment history
- Review of unexplained gaps
- Review of safeguarding-relevant disclosures
- Initial social media screening (proportionate and risk-based)
- Review of professional qualifications and sector experience

Candidates with safeguarding concerns are not shortlisted.

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## 6. INTERVIEWS

Interviews are structured and include:

## **Safeguarding Questions**

All candidates must answer questions exploring:

- Safeguarding understanding
- Boundaries with children & adults
- Online safety awareness
- Responding to disclosures
- Awareness of AP vulnerabilities
- Safer practice in vocational environments

## **Skills & Professional Conduct**

- Behaviour management
- Trauma-informed practice
- Digital professionalism
- SEND support
- Equality and diversity
- Online & offline teaching competency

Two members of staff must participate in every interview.

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# **7. PRE-APPOINTMENT CHECKS**

No appointment is confirmed until **all checks are fully completed**.

## **Mandatory checks for all staff working with learners:**

1. **Enhanced DBS with Children's Barred List**
2. **Enhanced DBS with Adult Barred List** where adult learners may be vulnerable
3. **Identity verification**
4. **Right to work in the UK**
5. **Two references**, verified by direct contact
6. **Employment history / gap analysis**
7. **Qualifications validation** (beauty, nails, sports, teaching, assessing)

8. **Online safety & digital conduct review (proportionate)**
9. **Fitness to work declaration**
10. **Overseas checks** (where required)
11. **Section 128 check** for management positions
12. **Prohibition from teaching check** (if applicable)

### **Additional checks for vocational tutors:**

- Practical competency verification
- Awarding body-specific qualification checks
- Salon or sports safety-based suitability checks

### **Additional checks for online tutors:**

- Device security compliance (Cyber Policy)
  - No use of personal accounts
  - Digital safeguarding training
  - Boundary and conduct expectations
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## **8. DBS RENEWAL & MONITORING**

- EFAP requires DBS renewal every 3 years or continuous monitoring via the update service.
- Any new information is reviewed immediately by the DSL and Director.
- Staff must report arrests, investigations, allegations or cautions immediately.

Failure to disclose results in suspension pending investigation.

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## **9. SINGLE CENTRAL RECORD (SCR)**

EFAP maintains a fully compliant SCR including:

- Identity
- DBS reference, date and outcome
- Barred list checks
- Prohibition checks
- Overseas checks

- Reference details
- Right to work
- Qualifications required for the role
- Confirmation of completed induction
- Contractors and agency staff
- Online-only staff
- Tutors working with adults

The SCR is:

- Updated immediately after each check
  - Monitored termly by the Director
  - Reviewed during audits and LA inspections
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## **10. CONTRACTORS, VISITORS & EXTERNAL TUTORS**

**Contractors delivering teaching (beauty tutors, sports coaches, assessors):**

Must undergo:

- Enhanced DBS
- Qualification verification
- Insurance verification
- Reference checks
- Identity & right-to-work checks

**Contractors not teaching (maintenance etc.):**

- Must be supervised at all times
- DBS is required if unsupervised contact is possible

**External assessors (NCFE/Focus/ASDAN):**

- Registered with EFAP
- Provided with safeguarding and H&S induction
- Identity verified
- Never left alone with learners

Visitors without DBS must never be left unsupervised.

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# 11. SAFER RECRUITMENT FOR ADULT LEARNING STAFF

Adult learners may include individuals who are:

- Vulnerable
- In recovery
- Victims of abuse
- Experiencing mental health challenges

Therefore EFAP requires:

- Adult barred list checks (where needed)
  - Risk assessments for staff delivering adult provision
  - Enhanced expectations for boundaries
  - Online safety compliance
  - Confirmation that staff understand safeguarding adults at risk
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# 12. ONLINE SAFETY & DIGITAL SUITABILITY CHECKS

Aligned with your Online Safety and Cyber Security policies, EFAP ensures:

- Staff can only use EFAP-approved accounts
- Staff must not contact learners via personal devices
- Staff must pass cyber security training
- Equipment used must meet EFAP's security standards
- Any breach results in disciplinary action

Digital misconduct is considered a safeguarding breach.

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# 13. INDUCTION

All new staff must complete an induction covering:

- Safeguarding & KCSIE 2024/25
- Online safety
- Cyber security
- Data protection

- First aid and emergency procedures
- Positive behaviour and trauma-informed practice
- Vocational safety (beauty, nails, hair, sport, fitness)
- Whistleblowing
- Boundaries in AP
- EFAP code of conduct for staff

No staff member may work unsupervised until induction is complete.

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## **14. PROBATION & ONGOING SAFER PRACTICE**

During probation:

- Staff are observed regularly
- Behaviour and conduct are monitored
- Leaders evaluate suitability for AP

If concerns arise:

- DSL assesses safeguarding risk
- Probation may be extended
- Employment may be terminated where safety is compromised

Staff receive annual refreshers in:

- Safeguarding
  - Online safety
  - Cyber security
  - Behaviour and trauma-informed practice
  - Vocational safety
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## **15. ALLEGATIONS AGAINST STAFF**

EFAP follows its Allegations Management Procedures:

- Immediate reporting to the DSL/Director
- Suspension or risk assessment (case-dependent)
- LA Designated Officer (LADO) notified for under-18 cases
- Police involved where criminal allegations exist



- Awarding bodies notified where relevant
- Full documentation and review completed

No staff member under investigation will work unsupervised.

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## **16. DATA PROTECTION IN RECRUITMENT**

EFAP complies with:

- Data Protection Policy
- Cyber Security Policy
- GDPR

We ensure:

- Only relevant data is collected
  - Recruitment information is stored securely
  - DBS information is managed appropriately
  - Access is restricted to authorised personnel
  - Data is destroyed in line with retention schedules
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## **17. EQUALITY & SAFER RECRUITMENT**

EFAP is committed to equality and diversity and will not discriminate on the basis of:

- Race
- Gender
- Disability
- Religion
- Sexual orientation
- Age
- Socioeconomic status

Reasonable adjustments are offered to all candidates.

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## **18. POLICY REVIEW**

This policy is reviewed:

- Annually
- After legislative changes
- After LA or awarding body audit feedback
- After safeguarding incidents relating to recruitment

Approved by:

**Rhean White – Director & Lead DSL**

Empowering Futures Alternative Provision