



LIGHTHOUSE

LEARNING PROVISION

— BELONG • GROW • ACHIEVE • THRIVE —

— PRACTICAL LEARNING. EMOTIONAL GROWTH. PREPARATION FOR ADULTHOOD. —

OPERATIONAL AND PUBLIC POLICY

Safer Recruitment and Selection Policy

Belong • Grow • Achieve • Thrive

Organisation	Lighthouse Learning Provision Ltd
Policy owner	Board of Directors
Safer Recruitment Lead	Rachel Waldron - Director, Deputy DSL and Named Safeguarding Person
Second trained decision-maker	Adam Waldron - Director and Designated Safeguarding Lead
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No adult will work unsupervised with learners until Lighthouse has completed and recorded all checks required for the actual role and is satisfied that the person is suitable.

Policy at a glance

Lighthouse uses safer recruitment to deter, reject or identify adults who may be unsuitable to work with children. The same safeguarding standard applies to Directors, employees, self-employed practitioners, sessional staff, contractors, agency workers and volunteers. A DBS check is one part of a wider, recorded assessment of suitability.

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1. Purpose and aims

1.1 This policy sets out how Lighthouse Learning Provision Ltd plans roles, advertises opportunities, selects candidates, completes pre-engagement checks, records decisions and monitors continuing suitability for work involving children and young people.

1.2 Lighthouse aims to:

- create a culture of safe recruitment that deters unsuitable applicants and makes safeguarding expectations clear from the outset;
- use fair, consistent and evidence-based selection methods that test values, competence, judgement and professional boundaries;
- complete the correct identity, right-to-work, criminal-record, barred-list, reference, qualification and other checks for each role;
- apply the same safeguarding standard regardless of whether a person is employed, self-employed, sessional, supplied by an agency, volunteering or acting as a Director;
- provide commissioners with written assurance that appropriate checks have been completed and notify them of material staffing changes;
- keep accurate, secure records of checks, decisions and risk assessments without retaining unnecessary personal information; and
- maintain continuing vigilance through induction, supervision, training, low-level-concern reporting and prompt action when new information emerges.

1.3 Safer recruitment is not a guarantee that harm will never occur. It is one part of Lighthouse's wider safeguarding system and must operate alongside clear conduct standards, supervision, learner voice, complaints, whistleblowing and allegations procedures.

2. Scope, status and legal framework

2.1 Lighthouse is an independent non-school alternative provision provider. It is not a maintained school, academy, college or registered independent school. Requirements that apply specifically to schools do not automatically transfer to Lighthouse; however, Lighthouse adopts the relevant safer-recruitment expectations in Part three of Keeping Children Safe in Education (KCSIE) as sector good practice and to meet commissioner assurance expectations.

2.2 This policy applies to Directors involved in delivery or governance, employees, workers, self-employed practitioners, consultants, sessional staff, agency workers, contractors, subcontractors, volunteers, students on placement and regular visitors where their role may involve contact with children, access to children's information or influence over safeguarding arrangements.

2.3 The policy is informed by the Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012, Rehabilitation of Offenders Act 1974 and Exceptions Order, Police Act 1997, Immigration, Asylum and Nationality Act 2006, Equality Act 2010, Data Protection Act 2018 and UK GDPR, current DBS guidance, KCSIE 2025 and 2026, and the voluntary national standards for non-school alternative provision.

2.4 KCSIE 2025 remains the operative statutory guidance for schools and colleges until 31 August 2026. KCSIE 2026 applies from 1 September 2026. Lighthouse will use the current edition when making decisions and will update forms and procedures when legal or guidance changes affect its practice.

2.5 The legal eligibility for a DBS or barred-list check depends on the actual duties, frequency, supervision and setting of the role. Lighthouse will not request a higher level of criminal-record check than the law permits.

3. Safer recruitment principles

Principle	What it means
Child-centred	The safety, welfare and rights of children take priority over convenience, staffing pressure or a preferred start date.
Role-specific	Checks are based on the activities actually undertaken, not job title or contractual label alone.
No unsupervised start	No person begins unsupervised work with learners until all required checks are complete and a recorded suitability decision has been made.
Whole-process assessment	Application information, history, references, interview evidence, checks, conduct and professional judgement are considered together.
Fair and lawful	Candidates are treated consistently, given reasonable adjustments and allowed to respond to relevant concerns.
Recorded rationale	All material information, discrepancies, risk assessments and appointment decisions are documented.
Continuing vigilance	Suitability is reviewed throughout the relationship and is not treated as complete once a DBS certificate has been seen.
Commissioner transparency	Lighthouse gives accurate written assurance and reports staff changes or arrangements that may affect placement safety.

4. Roles and accountability

4.1 Board of Directors

The Board retains overall accountability for safer recruitment and will ensure that:

- this policy is implemented, resourced and reviewed;
- at least one person involved in each shortlisting and interview process has current safer-recruitment training, and two people participate wherever reasonably practicable;
- conflicts of interest are declared and no person makes an appointment decision involving a close personal, family, financial or business interest without independent oversight;
- appropriate DBS processing, identity verification, secure records and Single Central Record arrangements are maintained;
- appointments are conditional until all required checks and evidence are satisfactory;
- commissioners receive accurate safer-recruitment assurances; and
- allegations, patterns, audit findings and DBS referral duties are acted on.

4.2 Safer Recruitment Lead - Rachel Waldron, Director and Deputy DSL

Rachel Waldron leads the operational implementation of this policy, confirms role-check requirements, oversees shortlisting and appointment records, reviews concerns or discrepancies, signs final suitability decisions and audits the Single Central Record.

4.3 Second trained decision-maker - Adam Waldron, Director and DSL

Adam ensures safeguarding information is shared with commissioners when required. Both named leads must complete recognised safer-recruitment training before recruitment for learner-facing roles. Adam Waldron provides a second and alternative decision-making route, supports shortlisting and interviews, verifies checks and references, and leads where Rachel Waldron has a conflict of interest or is unavailable. In the event that both the Safer Recruitment Lead and Deputy Safer Recruitment Lead have a conflict of interest in any recruitment process, responsibility will be delegated to Peter Semmens, Director, who will oversee the process to ensure impartiality, fairness and compliance with safer recruitment requirements.

4.4 Recruiting managers and administrators

Anyone supporting recruitment must follow the documented process, protect candidate information, avoid informal promises, verify evidence accurately, report discrepancies and ensure that no start date is treated as final before authorised clearance.

5. Workforce planning and role-risk assessment

5.1 Before advertising or engaging any person, Lighthouse will complete a written role and safeguarding assessment covering:

- the purpose, duties, location, working pattern and level of responsibility;
- the age and vulnerability of learners and whether contact will be regular, intensive, one-to-one, off-site, online, in transport or otherwise isolated;
- whether the person will teach, train, instruct, care for, supervise, advise or provide guidance to children and the frequency of those activities;
- whether the role meets the legal definition of regulated activity and is eligible for an enhanced DBS check with children's barred-list information;
- access to safeguarding, health, behaviour, contact, financial or other sensitive information;
- required qualifications, licences, professional registration, insurance and experience;
- appropriate supervision, probation, review and commissioner notification arrangements; and
- the selection methods and evidence needed to test competence and safeguarding suitability.

5.2 The role description and person specification will clearly distinguish essential from desirable requirements.

Requirements must be necessary and proportionate, not copied automatically from another organisation or school role.

5.3 Where a role changes after appointment, Lighthouse will reassess DBS eligibility, barred-list status, competence, insurance, training and supervision before the new duties begin.

6. Advertising and candidate information

6.1 Advertisements and role information will state that Lighthouse is committed to safeguarding and promoting the welfare of children and that appointment is subject to appropriate checks. Where the role is regulated activity, the advertisement will state that it is an offence for a barred person to apply or engage in the role.

6.2 Candidate information will normally include:

- role description, person specification and working arrangements;
- Lighthouse values and safeguarding commitment;
- the level and type of pre-engagement checks expected;
- the requirement to disclose relevant information lawfully requested for the role;
- the selection stages, including interview and any supervised learner interaction;
- the conditional nature of any offer;
- privacy information explaining how recruitment data will be used; and
- how to request reasonable adjustments or an alternative application format.

6.3 Recruitment wording will not imply that a DBS certificate alone proves suitability or that every conviction automatically prevents appointment.

7. Applications, employment history and self-declaration

7.1 A structured application form or equivalent written record is required for substantive learner-facing roles. A curriculum vitae may support but will not normally replace a complete application because it may omit gaps or information relevant to safeguarding.

7.2 Applicants must provide:

- current and previous names, current address and reliable contact details;
- a complete chronological education, employment, self-employment, volunteering and other activity history from leaving secondary education, with dates and explanations for gaps;
- reasons for leaving current and previous relevant roles;
- qualifications, registrations, licences and professional memberships relevant to the role;
- details of referees, including the current or most recent employer and the most recent employer involving work with children where different;
- any relationship, conflict or connection with a Director, worker, commissioner or learner that may affect impartiality; and
- a signed declaration that the information supplied is accurate and complete.

7.3 Shortlisted candidates will complete a confidential self-declaration covering criminal-record or suitability information that Lighthouse is lawfully entitled to ask about, including relevant cautions or convictions, barred-list status, teaching or management restrictions where applicable, substantiated safeguarding findings, disciplinary matters, ongoing investigations and any reason they may be unsuitable to work with children.

7.4 Candidates will be told not to disclose protected or filtered information that the law does not require them to reveal. The declaration provides an opportunity to discuss relevant information at interview before the DBS result is available.

7.5 Omissions, discrepancies or false information will be explored fairly. Deliberate dishonesty about a material safeguarding matter may result in withdrawal of an offer or termination, but an innocent error will not be treated automatically as misconduct.

8. Shortlisting and online due diligence

8.1 Shortlisting will normally be completed independently by at least two people against the published criteria. Wherever practicable, those who shortlist will participate in the interview to provide continuity and accountability.

8.2 Shortlisters will consider:

- evidence against essential criteria rather than personal familiarity or assumptions;
- unexplained gaps, frequent moves, inconsistent dates, incomplete answers and reasons for leaving;
- patterns of short employment, disciplinary wording or reluctance to name appropriate referees;
- the quality and relevance of experience with vulnerable or neurodivergent learners;
- whether any declared conflict or relationship requires an alternative decision-maker; and
- questions that must be explored at interview or with referees.

8.3 As part of due diligence, Lighthouse may conduct a proportionate search of publicly available online information for shortlisted candidates. The search will focus on matters relevant to safeguarding, professional conduct, discrimination, violence, extremist activity, fraud or role suitability. It will not be used to collect irrelevant private information or make decisions based on protected characteristics.

8.4 Where possible, the person carrying out the online search will not be the sole appointment decision-maker. Relevant findings will be recorded factually and raised with the candidate so that context and accuracy can be considered.

9. Interview, assessment and learner involvement

9.1 Every shortlisted candidate for a substantive learner-facing role will be interviewed, even where there is only one candidate. Interviews will normally involve at least two decision-makers, one of whom has safer-recruitment training.

9.2 A structured question set and scoring framework will test:

- motivation for working with children and understanding of children's vulnerability and rights;
- professional boundaries, power, confidentiality and appropriate physical or online contact;
- response to a disclosure, concern about a colleague, low-level concern or unsafe practice;
- attitudes to trauma, SEND, behaviour and relationship-led practice;
- ability to maintain calm, curiosity, accountability and respectful challenge;
- risk assessment, lone working, transport, community learning and emergency judgement relevant to the role;
- learning from mistakes, supervision and willingness to follow policy; and
- any discrepancies, concerns, gaps, references or declarations identified before interview.

9.3 Concerning responses may include minimising children's vulnerability, presenting adults and children as equals, idealising children, blaming children for adult conduct, rejecting supervision, showing poor boundary awareness or suggesting that safeguarding rules may be bypassed for convenience.

9.4 Where safe and appropriate, candidates may take part in a planned, supervised interaction with learners or a practical task. Learners may contribute accessible feedback, but they will not carry responsibility for the appointment decision and will not be exposed to confidential candidate information.

9.5 Interview notes must record evidence and material responses rather than unstructured opinion. All appointment decisions, moderation and reasons must be documented.

10. Conditional offers and pre-engagement checks

10.1 Any offer is conditional until all required checks are complete, satisfactory and authorised. The offer letter will identify outstanding conditions and state that Lighthouse may withdraw the offer if the conditions are not met.

10.2 Depending on the role, checks may include:

- identity and current address;
- right to work in the United Kingdom and any time-limited follow-up requirement;
- enhanced DBS and children's barred-list information where legally eligible;
- references and direct verification;
- employment-history and gap clarification;
- qualifications, licences, professional registration and competence;
- overseas criminal-record or conduct information;
- teaching prohibition, section 128 or other restriction checks where legally applicable and available;
- driving licence, vehicle, MOT, insurance and business-use cover for transport duties;
- public liability, professional indemnity or other insurance for self-employed or specialist providers;
- health or adjustment information after conditional offer where lawful and necessary; and
- signed acceptance of the Staff Code of Conduct, safeguarding duties and confidentiality requirements.

10.3 Check results will be reviewed together. No person may self-authorise their own clearance.

11. Identity and right-to-work checks

11.1 Lighthouse will verify identity using original documents, approved digital identity-checking arrangements or another lawful method. The person checking must compare the applicant with the evidence, examine consistency across names and dates, and record the method, date and checker.

11.2 Previous names and changes of identity must be evidenced where necessary to complete accurate DBS, reference and employment-history checks. Any unexplained inconsistency will be resolved before appointment.

11.3 For employees and workers, Lighthouse will complete the prescribed right-to-work check before employment starts and any follow-up check required for time-limited permission. Manual, Home Office online or approved digital routes will be used in accordance with current official guidance.

11.4 Right-to-work checks will be applied consistently and without assumptions based on nationality, ethnicity, accent or appearance. A person's right to work is separate from their suitability to work with children.

11.5 For genuinely self-employed contractors, Lighthouse will still verify identity and status and will obtain evidence that the person can lawfully provide the contracted service where appropriate.

12. DBS eligibility, regulated activity and barred-list checks

12.1 The Safer Recruitment Lead will determine the lawful level of DBS check from the actual role. Standard, enhanced and barred-list checks may only be requested where the role is eligible under legislation.

12.2 Roles involving frequent teaching, training, instruction, care, supervision or advice and guidance relating to a child's educational, emotional or physical wellbeing may meet the definition of regulated activity. Day-to-day management of a person in regulated activity may also be regulated activity. The role assessment must record the basis for the decision.

12.3 A person who is barred from regulated activity with children must not be engaged in that activity. It is also an offence knowingly to permit a barred person to do regulated activity.

12.4 From 1 September 2026, the supervision exemption for volunteers undertaking relevant frequent child-facing activity is removed. Volunteers whose activities meet the period condition or involve qualifying overnight work will require an enhanced DBS check with children's barred-list information.

12.5 The DBS Update Service may be used only with the person's consent and after Lighthouse:

- sees the original certificate or approved evidence and verifies identity;
- confirms that the certificate is the same workforce and level required for the new role;
- checks whether barred-list information is required and included;
- completes the online status check and records the date and result; and
- obtains a new check where the role, workforce, level, identity or status result is not suitable.

12.6 A DBS check is a snapshot. It does not replace references, overseas checks, professional judgement, supervision or the duty to act on new concerns.

13. Criminal-record information and suitability decisions

13.1 A criminal record or other information on a DBS certificate will not automatically prevent appointment. A documented risk assessment will consider:

- the nature, seriousness, relevance and circumstances of the information;
- the person's age at the time, time elapsed, pattern and evidence of change;
- whether the matter involved children, violence, sexual conduct, abuse of trust, dishonesty, drugs, weapons, discrimination or risk to others;
- the applicant's explanation, insight, honesty and any evidence of rehabilitation;
- the duties, level of access, supervision, lone working and vulnerability of learners;
- professional, LADO, DBS, police, legal or commissioner advice where appropriate; and
- whether risks can be controlled without compromising children or the integrity of the role.

13.2 Protected or filtered information will not be considered. Decisions will not be discriminatory and will be made only by authorised people with a need to know.

13.3 Where the information indicates possible current risk, dishonesty, a barred status, an unresolved safeguarding matter or a role restriction, appointment will not proceed until the matter is lawfully clarified. If the person is barred from the proposed regulated activity, they cannot be appointed to it.

14. References and employment verification

14.1 Lighthouse will obtain references directly from referees and will not accept open references or references supplied by the candidate as the only evidence. References should be obtained before interview where possible so that concerns can be explored with both the referee and candidate.

14.2 References will normally include the current or most recent employer and the most recent employer involving work with children where different. For self-employed candidates, Lighthouse will seek recent commissioners, clients, professional supervisors or other sources capable of commenting on conduct and suitability.

14.3 Referees will be asked to confirm:

- identity, role, dates and reason for leaving;
- the referee's relationship to the candidate and authority to provide the reference;
- performance, reliability, conduct, integrity and suitability to work with children;
- any disciplinary action, safeguarding concern, substantiated allegation or relevant ongoing process that may be disclosed lawfully;
- whether the candidate has been subject to capability or attendance concerns relevant to the role, excluding prohibited health discrimination;
- whether the referee would re-employ or re-engage the person and, if not, why; and
- whether there is any reason the person should not work with children or vulnerable learners.

14.4 References will be scrutinised against the application and other evidence. Vague, inconsistent, incomplete or unexpectedly neutral references will be followed up by telephone or another independently verified route. The identity and authority of the referee will be checked using organisational contact details rather than relying only on details supplied by the candidate.

14.5 Where a previous employer no longer exists or a reference cannot be obtained, Lighthouse will record reasonable attempts and obtain alternative evidence. Lack of a reference does not automatically prevent appointment, but any alternative arrangement must be risk assessed and approved by two Directors before work with learners begins.

15. Qualifications, professional status and restriction checks

15.1 Lighthouse will verify only qualifications, licences or memberships that are essential or material to the role. Original or approved digital evidence will be checked with the awarding or professional body where authenticity is uncertain.

15.2 Where a person presents themselves as a teacher, therapist, counsellor, social worker, health professional, driving instructor, outdoor instructor or other regulated or accredited professional, Lighthouse will verify the current registration, scope, conditions and expiry where relevant.

15.3 Teacher-prohibition and section 128 checks are school-specific in their statutory application. Lighthouse is not an independent school; however, it will consider these checks where the proposed role, commissioner requirement, access to an official checking route or information received makes them relevant. Any known prohibition or restriction will be assessed and the person will not be presented as holding a status they do not hold.

15.4 A qualification check does not replace assessment of current competence. Practical activities, first aid, medication, food, transport, tools, outdoor learning and other specialist work require current evidence, appropriate supervision and role-specific risk controls.

16. Overseas history and additional checks

16.1 A DBS check may not contain criminal or conduct information from outside the United Kingdom. Where an applicant has lived or worked overseas, Lighthouse will decide what additional evidence is reasonable and proportionate, taking account of the country, length and recency of residence, role risk and availability of reliable records.

16.2 Additional checks may include:

- an overseas criminal-record certificate or certificate of good conduct;
- direct references from overseas employers or commissioners;
- verification of professional registration or disciplinary history;
- evidence of dates, addresses and activities while overseas;
- a letter from a recognised authority, embassy or professional body; and
- a documented risk assessment where reliable checks cannot be obtained.

16.3 There is no automatic fixed period after which overseas checks are required for every role. The decision must be proportionate and recorded. A person will not begin unsupervised learner-facing work while significant unexplained overseas history or suitability concerns remain unresolved.

17. Health questions, adjustments and occupational requirements

17.1 Lighthouse will not ask broad health or disability questions before a job offer except where the law permits, such as arranging reasonable adjustments for selection, monitoring diversity, checking an intrinsic function of the role or taking lawful positive action.

17.2 After a conditional offer, Lighthouse may ask proportionate questions necessary to:

- identify reasonable adjustments or support;
- confirm ability to carry out intrinsic duties safely;
- complete an occupational-health or safety assessment where justified; and
- understand emergency or medication information relevant to the person's safety at work.

17.3 Health information will be handled confidentially and separately from ordinary selection scoring. Decisions will focus on adjustments and safe working arrangements, not assumptions about disability, neurodivergence or mental health.

18. Directors, self-employed practitioners and contractors

18.1 Directors who take part in delivery, have access to children or direct safeguarding arrangements are subject to the same role assessment, identity, DBS eligibility, references or history verification, training and continuing-suitability expectations as other adults. Director status does not permit self-approval or a reduced standard.

18.2 Self-employed status does not remove safeguarding duties. Before engagement, Lighthouse will verify:

- identity, role competence and relevant work history;
- the correct DBS and barred-list position for the activities undertaken;
- references or commissioner history;
- qualifications, professional registration and safeguarding training;
- verify that the individual is covered by appropriate insurance arrangements for the role, either through Lighthouse's own insurance or, where applicable, their own cover;
- agreement to Lighthouse policies, code of conduct, supervision and reporting arrangements; and
- who controls records, equipment, transport, communication and emergency decisions.

18.3 Contracts for organisations or specialist providers will set out safeguarding requirements, evidence to be supplied, staff-change notification, access to audit, confidentiality, allegations and termination provisions. Lighthouse will verify the identity of the individual who actually attends and will not rely solely on company-level assurance.

19. Agency workers, volunteers, visitors and work experience

19.1 Agency and third-party workers

Before an agency worker starts, Lighthouse will obtain written confirmation that the correct checks have been completed, review any information relevant to suitability, agree who holds the underlying evidence and verify the person's identity on arrival. Lighthouse remains responsible for site induction, supervision, conduct expectations and reporting concerns.

19.2 Volunteers

Volunteer checks will reflect the actual activities and frequency. From 1 September 2026, volunteers who undertake qualifying frequent child-facing activity or relevant overnight work will be in regulated activity and will require an enhanced DBS check with children's barred-list information. Occasional supervised help may require different checks and controls. Every volunteer must receive induction and clear supervision.

19.3 Visitors and occasional speakers

Visitors are not treated as cleared staff because they are known to Lighthouse. They must sign in, establish identity where appropriate, follow safeguarding instructions and remain supervised unless a documented assessment confirms that vetting and induction are sufficient for the intended access.

19.4 Students and work-experience participants

Lighthouse will agree safeguarding responsibility with the placing organisation, verify identity and checks according to age and duties, provide induction and ensure close supervision. No child or adult placement student will be used as a substitute for cleared staffing.

20. Single Central Record and recruitment files

20.1 Lighthouse will maintain a secure Single Central Record (SCR) or equivalent central compliance tracker. Although the school SCR requirements do not apply to Lighthouse in exactly the same way, the record will provide clear commissioner assurance and operational control.

20.2 The SCR will record, as applicable:

- full name, previous names where necessary, role and contractual status;
- start date and end date;
- identity-check date and checker;
- right-to-work method, date, checker and follow-up date;
- DBS level, workforce, certificate date, certificate number, barred-list inclusion and decision date;
- Update Service check dates where used;
- references received and verified;
- employment-history and gap checks;
- qualifications, professional registration and restriction checks;
- overseas checks or risk assessment;
- safer-recruitment approval, induction, safeguarding training and review dates;
- agency, contractor or volunteer assurance and identity verification; and
- commissioner assurance issued and material staff-change notifications.

20.3 The SCR records that checks were completed and their outcome; it does not reproduce unnecessary criminal-record details. Access is restricted and the record is audited regularly by a person who did not make every original entry where practicable.

20.4 Recruitment files will include the role assessment, application, shortlisting, interview evidence, references, verification records, risk assessments, offer and approval. Unsuccessful-candidate information will be retained only for the period justified by Lighthouse's retention schedule and then securely destroyed.

21. DBS certificate information: storage, use, retention and disposal

21.1 Lighthouse will comply with the DBS Code of Practice and current official handling guidance. Certificate information is used only for the purpose for which it was requested and is disclosed only to authorised people who need it for the suitability decision, safeguarding audit or legal process.

21.2 Where a physical or digital copy of certificate information is temporarily retained, it must be stored securely with strictly controlled access. Lighthouse will not routinely keep a copy for the duration of a person's engagement.

21.3 Once the recruitment or other relevant decision has been made, certificate information will be retained only for as long as necessary to resolve a dispute, complaint, safeguarding audit or other lawful need. A copy should not normally be kept for longer than six months unless there is a documented lawful reason and appropriate data-protection assessment.

21.4 When no longer required, certificate information will be securely destroyed. Lighthouse may retain a record of the applicant's name, certificate date, certificate number, level and workforce, role, date seen, checker, result category and recruitment decision, without retaining a copy or detailed content.

21.5 DBS information must not be sent through personal email, stored on personal devices or discussed with commissioners beyond the assurance and information lawfully necessary to safeguard children.

22. Induction, probation, supervision and continuing suitability

22.1 Before direct work, every adult will receive role-appropriate induction covering safeguarding, local reporting routes, Staff Code of Conduct, professional boundaries, allegations and low-level concerns, whistleblowing, online communication, data protection, health and safety, emergency procedures and learner-specific risk information.

22.2 New adults will be subject to a planned induction and review period proportionate to their role. This may include observations, shadowing, restricted access, regular supervision, case discussion, feedback from learners and commissioners, and review of recording and boundary practice.

22.3 Continuing suitability includes:

- required safeguarding and role-specific training;
- supervision, practice observation and professional development;
- monitoring expiry of licences, registrations, insurance and right-to-work permission;
- periodic Update Service checks where consented and appropriate;
- requiring adults to report arrests, charges, cautions, convictions, restrictions, professional investigations or other changes that may affect suitability;
- reviewing complaints, incidents, allegations, low-level concerns, attendance and conduct patterns; and
- reassessing checks when duties, supervision, site or contractual arrangements change.

22.4 Failure to disclose relevant new information may be addressed under conduct or contractual procedures.

Lighthouse will assess the information and risk rather than assuming that every change requires automatic termination.

23. Staff changes and safeguarding assurance to commissioners

23.1 Where a school places a pupil with non-school alternative provision, the school continues to be responsible for safeguarding the pupil and should obtain written confirmation that appropriate checks have been completed. Lighthouse will provide a signed assurance statement before placement or on request.

23.2 Assurance will confirm the categories of checks and safeguarding controls completed without disclosing unnecessary personal or criminal-record information. Commissioners may request proportionate inspection of evidence subject to confidentiality and data-protection requirements.

23.3 Lighthouse will notify the home school or commissioner without delay of a material staffing arrangement that may put a child at risk or affect the assurance previously given, including:

- a new or replacement practitioner;
- a change in supervision, lone-working or transport arrangements;
- an adult beginning work before an outstanding check is completed under an exceptional authorised plan;
- a relevant restriction, allegation or safeguarding concern affecting placement arrangements; or
- use of a new subcontractor, satellite site or agency arrangement.

23.4 Commissioners will not automatically receive confidential details of an allegation or DBS information. Information sharing will be proportionate to their safeguarding responsibility and any statutory advice.

24. Allegations, low-level concerns and DBS referrals

24.1 Any concern about an adult's conduct after application or appointment must be reported immediately under the Safeguarding and Child Protection Policy. Where the harm threshold may be met, Lighthouse will seek LADO advice and will not allow a recruitment, resignation or contract-ending process to obstruct statutory action.

24.2 Low-level concerns, self-referrals, complaints and boundary issues will be recorded and reviewed for patterns. Continuing work, supervision or access may be changed while risk is assessed.

24.3 Lighthouse has a legal duty to refer a person to the DBS when the statutory referral conditions are met, including where a person is removed from regulated activity, or would have been removed had they not left, because they harmed or posed a risk of harm to a child.

24.4 Resignation, refusal to cooperate, expiry of a contract or withdrawal of an application does not prevent Lighthouse from completing safeguarding enquiries, sharing relevant information, making a DBS referral or providing a lawful factual reference.

24.5 References provided by Lighthouse will be accurate, fair and based on substantiated information. They will include relevant safeguarding findings or formal disciplinary outcomes where lawful and necessary, and will not include unsubstantiated low-level concerns unless these have become relevant through a substantiated pattern or formal process.

25. Equality, data protection and conflicts of interest

25.1 Recruitment decisions will comply with equality law. Lighthouse will not discriminate because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation. Reasonable adjustments will be offered throughout the process.

25.2 Positive safeguarding scrutiny is not a licence for stereotyping. Decisions must be based on role-related evidence and recorded criteria.

25.3 Recruitment information is confidential personal data. Special-category and criminal-offence information will be processed only where Lighthouse has a lawful basis and appropriate safeguards. Access will be limited to those who need it.

25.4 Candidates must declare personal or business relationships with decision-makers. A Director or worker with a material conflict must withdraw from scoring, verification and approval. An uninvolved Director or external adviser will provide oversight where necessary.

25.5 Informal recruitment through friends, former colleagues or professional networks must still follow the full documented process. Familiarity is not evidence of suitability.

26. Monitoring, audit and review

26.1 The Safer Recruitment Lead will report assurance and improvement actions to the Board, including:

- vacancies and engagements completed through the full process;
- outstanding, overdue or exception checks;
- SCR accuracy and evidence sampling;
- reference quality and verification;
- DBS, overseas or suitability risk assessments;
- training status of decision-makers;
- agency, contractor and volunteer compliance;
- commissioner assurance and staff-change notifications;
- complaints, allegations, low-level concerns or patterns relevant to recruitment; and
- actions arising from audits, guidance changes or safeguarding reviews.

26.2 The SCR will be checked before opening, at least termly thereafter and whenever a commissioner audit or material staffing change occurs. Sampling will confirm that entries are supported by evidence and not simply marked complete.

26.3 This policy will be reviewed at least annually and sooner after a serious allegation, DBS or legal change, commissioner finding, audit weakness, change in operating model or introduction of a new type of role.

27. Reference framework

27.2 Core external framework

- Keeping Children Safe in Education 2025 and 2026 - Part three adopted as relevant good practice;
- Non-school alternative provision: voluntary national standards;
- Disclosure and Barring Service - regulated activity with children and employer guidance;
- Disclosure and Barring Service Code of Practice and handling of certificate information;
- Rehabilitation of Offenders Act 1974 and Exceptions Order guidance;
- Home Office - right-to-work checks: an employer's guide;
- Government guidance on overseas criminal-record checks;
- Equality Act 2010 guidance on recruitment health and disability questions; and
- DBS barring-referral guidance.

External legal and guidance information checked 20 July 2026. Current official legislation and guidance take precedence where a source changes.