

Safer Recruitment Policy

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Approved By	Board of Directors
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Applies To	All employees, tutors, Teaching Assistants, agency workers, suppliers and contractors acting on behalf of LTS Group Limited
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1. Safer Recruitment Policy Statement

LTS Group is committed to creating a culture that safeguards and promotes the welfare of children and adults at risk. We adopt robust recruitment procedures designed to deter, identify and prevent people who are unsuitable to work with children from applying for or securing work through LTS Group.

2. Legislative and Guidance Framework

This policy has regard to Keeping Children Safe in Education 2026 (KCSIE 2026), Working Together to Safeguard Children 2026, the Safeguarding Vulnerable Groups Act 2006, the Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders, the Childcare Act 2006 and applicable disqualification requirements, the Children Acts 1989 and 2004, the Children and Social Work Act 2017, the Counter-Terrorism and Security Act 2015 and Prevent duty guidance, the Human Rights Act 1998, the Modern Slavery Act 2015, relevant DBS guidance and Codes of Practice, and other safeguarding guidance applicable to the role.

This policy also has regard to the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration legislation and Home Office guidance on right to work checks, the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, and the UK GDPR and Data Protection Act 2018. The full list of legislation and guidance, with links, is set out in the Appendix.

3. Scope

This policy applies to anyone engaged by LTS Group, including directors, employees, tutors, Teaching Assistants, agency workers, contractors, work placements and volunteers.

Prospective applicants will be supplied with, or given access to, relevant LTS safeguarding and conduct policies, including the Safeguarding and Child Protection Policy, Allegations Policy, Whistleblowing Policy and Code of Conduct.

4. Roles and Responsibilities

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead named at the front of this policy hold overall responsibility for the operation of this policy and for ensuring it is applied consistently across the organisation.

LTS Group will maintain effective recruitment and vetting arrangements to prevent people who pose a risk of harm from working with children. Necessary pre-employment checks will be completed in accordance with KCSIE 2026, DBS requirements and the requirements applicable to the role.

Where applicable, LTS Group will undertake Section 128 direction checks and other relevant prohibition, disqualification or professional status checks.

All those involved in recruiting people to work with children will receive appropriate safer recruitment training. LTS Group will ensure that at least one person conducting an interview has completed safer recruitment training.

5. Recruitment Principles

Safeguarding is considered throughout the recruitment process, from advertising and application through to interview, vetting, placement and ongoing monitoring. Recruitment decisions will be documented and any safeguarding concern, discrepancy or unexplained information will be explored and resolved before appointment or placement is confirmed.

Before placing any work seeker on an assignment, LTS Group meets with them either face to face or via video call. Before the meeting, candidates are asked to provide the information and documentation required by the application and registration process, and are advised of the documents they must bring to, or forward ahead of, the meeting.

A suitably trained and competent member of the LTS Group team will assess each candidate's suitability for the role by discussing their previous work history, qualifications and experience, using a standard set of relevant questions to ensure a consistent and fair approach and to understand the candidate's knowledge of safeguarding protocols.

Provided the outcome of the interview is satisfactory, LTS Group will then begin the pre-employment checks set out in this policy.

6. Advertising Vacancies

When defining a role, LTS Group will have regard to KCSIE 2026 and identify the skills, abilities, experience, attitude and behaviours required, together with the safeguarding requirements of the role and whether it involves regulated activity relevant to children.

Advertisements will state LTS Group's commitment to safeguarding and promoting the welfare of children, make clear that safeguarding checks will be undertaken, identify safeguarding responsibilities where appropriate, and state whether the role is exempt from the Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders.

7. Applications

Applicants will provide sufficient information for safer recruitment checks, including current and former names, current address, National Insurance number, present or most recent employment and reason for leaving, full employment history since leaving school (including education, employment and voluntary work), explanations for gaps, relevant qualifications and referee details.

Applicants will also be asked for information relevant to suitability to work with children, including criminal record information where legally required to be disclosed, applicable cautions, police investigations or pending prosecutions, allegations, disciplinary findings and investigations relevant to suitability.

All roles advertised by LTS Group will include (in the application form or elsewhere) the following statement:

"LTS Group is committed to safeguarding children and young people. All post holders are subject to a satisfactory Disclosure and Barring Service (DBS) check. It is an offence to apply for the role if you are barred from engaging in regulated activity relevant to children."

Applicants will also provide a statement of the personal qualities and experience they believe are relevant to their suitability for the post and how they meet the person specification, together with a statement sharing all relevant information about spent and unspent convictions, allegations, disciplinarys and investigations.

LTS Group does not accept a curriculum vitae as a substitute for the information required through its application and registration process.

8. Shortlisting and Self-Declaration

Shortlisted candidates will be asked to complete a self-declaration regarding their criminal record or other information that may make them unsuitable to work with children, so relevant matters can be discussed before the DBS certificate is received.

Where formal shortlisting is undertaken, LTS Group will ensure that at least two people participate. Inconsistencies, gaps in employment and potential safeguarding concerns will be identified and explored.

Candidates will be informed that online searches may be conducted as part of due diligence. Relevant information identified will be explored with the candidate at interview.

9. Interviews and Selection

LTS Group uses a range of selection techniques to assess suitability. Interviews will explore the candidate's motivation for working with children, relevant skills and experience, safeguarding understanding and any gaps, inconsistencies or frequent changes in employment or location.

Information considered in recruitment decisions and the decisions reached will be appropriately recorded.

10. References and Employment History

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003, LTS Group requires a minimum of two written professional references for all work seekers, covering at least the most recent two years of relevant employment or assignments, including the most recent assignment. One reference must be from the work seeker's most recent employer. All offers of employment or assignment made by LTS Group are subject to receipt of satisfactory references.

LTS Group will not accept open references or rely on applicants to obtain their own references. References will be obtained from an appropriately authorised person. Where a referee is school or college based, the reference should be confirmed by the headteacher or principal as accurate in respect of disciplinary investigations where applicable.

Where the applicant is not currently employed, LTS Group will verify the most recent relevant period of employment. Where the applicant is not currently working with children, a reference will be sought from the relevant employer from the last time they worked with children. Where an applicant has never worked with children, further references may be sought.

Electronic references must originate from a legitimate source and the sender's identity will be verified where necessary. Vague or insufficient information will be clarified with the referee. Information will be compared with the candidate's application/registration information and discrepancies followed up. The reason for leaving the current or most recent post will be established and concerns satisfactorily resolved before appointment is confirmed.

LTS Group will always verify any information with the person who provided the reference. Copies of references and records of verification are retained securely for the duration of the work seeker's engagement with LTS Group and for a minimum of one year afterwards, in line with the Record Keeping and Data Protection section of this policy.

11. Online Searches

As part of safer recruitment due diligence, LTS Group may carry out online searches on shortlisted candidates. The purpose is to identify publicly available information relevant to suitability to work with children. Relevant findings will be considered fairly and, where appropriate, discussed with the candidate before a recruitment decision is made.

LTS Group will also take into account any additional online-check requirements set out in a client school's own recruitment policy. Candidates will be informed before the search takes place. This is in addition to, and does not replace, the shortlisting self-declaration set out above.

12. Pre-Employment Checks

LTS Group completes all of the following pre-employment checks before appointing an individual to engage in regulated activity in relation to children. No candidate will be placed with a client until all mandatory checks have been satisfactorily completed. The level and type of DBS and barred-list check will be determined by eligibility and the nature of the role.

12.1 Right to Work Checks

LTS Group conducts right to work checks on every work seeker to comply with immigration requirements and recruitment industry legislation. We will conduct one of the following, in line with Home Office guidance (An employer's guide to right to work checks):

- a manual document check of original documents from List A or List B of the Home Office checklist;
- a digital identity verification check through a certified Identity Service Provider (IDSP); or
- an online right to work check using the Home Office online service or Employers Checking Service, using a candidate's share code.

Where a right to work check is conducted using the online service, the information is provided in real time directly from Home Office systems. Copies of all documents and check outputs are retained securely for the duration of the work seeker's engagement and for two years afterwards, then securely destroyed.

12.2 Identity and Address Checks

In addition to right to work checks, LTS Group requires two further original documents from each work seeker: one to confirm identity (including being aware of any name changes and obtaining a birth certificate when available) and one to confirm address. Accepted documents include a valid driving licence, passport, utility bill, bank statement, or government document/letter showing the work seeker's National Insurance number. Copies are retained securely for the duration of the engagement and for at least one year afterwards.

12.3 Disqualification and Section 128 Checks

In order to comply with our obligations under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, LTS Group carries out appropriate checks to ensure work seekers are not disqualified from working with children, either in their own right or by association with someone in their household. Where a role involves childcare carried out in a domestic setting, a disqualification-by-association declaration will be signed by the candidate before placement. Section 128 direction checks are carried out for any relevant management roles.

12.4 Overseas Checks

Work seekers who have lived or worked in a single overseas country for six months or more within the last five years must provide an overseas police check, obtained in accordance with the relevant Government guidance for that country. Where a police check cannot be obtained, LTS Group may instead accept a statement of good conduct from the work seeker's previous employer in that country, confirming (to the best of their knowledge) that the work seeker has no criminal convictions and no reason why they should not work with children. Where neither can be obtained, LTS Group will advise the client school of this and the reasons why, so that the school can carry out its own risk assessment or request further checks.

Appropriate checks will also be made for overseas-trained teachers where applicable.

12.5 Disclosure and Barring Service (DBS) Checks

LTS Group requires all work seekers to hold an Enhanced DBS check, including a check of the Children's Barred List where eligible. We view and copy the original DBS certificate and, with the work seeker's consent, carry out a status check on the DBS Update Service. Where a work seeker is not subscribed to the Update Service, a new DBS check will be required at least once a year, or more frequently where required by a client or where new information comes to light. LTS Group will not accept a DBS certificate covering both adult and child workforces unless the role genuinely involves regulated activity with both, in line with the Safeguarding Vulnerable Groups Act 2006.

12.6 Fitness to Work

Work seekers are asked to declare any health or disability issues relevant to the role. Where a declaration is made, LTS Group will, with consent, seek confirmation from the work seeker's doctor that they are fit to undertake the role. If confirmation cannot be obtained, LTS Group will not proceed with the registration.

12.7 Qualifications and Professional Status

Where a role requires a specific qualification or authorisation, LTS Group will obtain copies of original qualification certificates. Where the role requires a teaching qualification, LTS Group will verify qualified teacher status, prohibition orders and relevant sanctions through the Teaching Regulation Agency (TRA) Employer Access Service, or the Education Workforce Council (EWC) in Wales.

12.8 Rehabilitation of Offenders Act Declaration

During registration, all work seekers are required to complete LTS Group's Rehabilitation of Offenders Act Declaration and disclose all spent and unspent convictions, subject to the filtering rules, where the role is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order. If a work seeker discloses a conviction or caution, LTS Group will seek advice on their suitability to work in the education sector before proceeding, and will ensure the client school is made aware so it can carry out its own risk assessment.

LTS Group complies fully with the DBS Code of Practice and undertakes to treat all applicants fairly, and not to discriminate against a candidate on the basis of a conviction or other information revealed except where directly relevant to the safety of children. LTS Group has a separate written policy on the recruitment of ex-offenders, available to all DBS applicants at the start of the recruitment process.

12.9 Referrals to the DBS

As a personnel supplier, LTS Group has a legal duty under the Safeguarding Vulnerable Groups Act 2006 to refer information to the DBS about any individual who has harmed, or poses a risk of harm to, a child or vulnerable adult, where the 'relevant conduct' or 'harm test' set out in that Act is satisfied. This applies both where a client removes a work seeker from regulated activity for this reason, and where LTS Group itself withdraws its services from a work seeker on this basis. LTS Group has processes in place to ensure staff understand this duty and know how to act on it.

13. Verification of DBS Certificates and Update Service

Where LTS Group relies on an existing Enhanced DBS certificate and the DBS Update Service, the candidate must provide the original certificate for verification and give consent for LTS Group to undertake the relevant Update Service status check. LTS Group will ensure the certificate is for the appropriate workforce and level and that the status check is satisfactory.

DBS information will be handled in accordance with the LTS Disclosure and Barring Service Policy and applicable DBS requirements.

14. Conditional Offers and Exceptional Placement

All offers of employment or assignment are conditional upon satisfactory completion of all required safer recruitment and pre-employment checks.

All candidates must present their original Enhanced DBS certificate to LTS Group's compliance team for in-person verification.

In exceptional circumstances, a candidate may be permitted to commence placement before the original DBS certificate has been physically seen, in accordance with the LTS Disclosure and Barring Service Policy and DBS Escalation Policy, and only provided that:

- a valid Enhanced DBS certificate has been issued and received;
- the certificate has been verified via a clear digital copy or reference number;
- the candidate is registered on the DBS Update Service;
- all other required checks have been completed; and
- a documented risk assessment has been completed and authorised by Compliance.

In such cases, the original DBS certificate must be seen in person within 5 working days of the placement start date. Failure to present the original certificate within this timeframe will result in immediate suspension from placement and escalation in line with the DBS Escalation Policy.

Under no circumstances may a candidate continue working without the original DBS certificate being verified in person.

15. Agency Workers and Supply Staff

LTS Group applies the same safeguarding principles to tutors, Teaching Assistants, agency workers and other workers supplied to clients. LTS Group will provide appropriate confirmation of safeguarding and vetting checks to clients and respond promptly to requests for relevant compliance information, subject to data protection and confidentiality requirements.

In order to ensure that all work seekers registered with LTS Group continue to meet safeguarding and suitability requirements on an ongoing basis, LTS Group will, at least once a year, conduct repeat status and other relevant checks (subject to any shorter period required by a client). Where a work seeker has not worked with LTS Group for a period of three to six months, we will conduct repeat status checks and obtain an additional reference to cover the period in question. Where a work seeker has not worked with us for over six months, the full registration process will be repeated in full.

16. Record Keeping and Data Protection

Recruitment, vetting and safeguarding records will be maintained securely and access restricted to authorised personnel. Personal data, criminal record information and safeguarding information will be processed, retained and shared in accordance with UK data protection law, DBS requirements and LTS policies.

Safeguarding information may be shared on a need-to-know basis where lawful and necessary to protect children or adults at risk.

Copies of documents, checks and declarations are retained securely for the duration of the work seeker's engagement and for the retention periods set out in this policy (right to work documents: two years afterwards; identity and address documents and references: at least one year afterwards), and are then securely destroyed. Access to safeguarding and vetting records is restricted to those with a legitimate need, such as the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and Compliance team.

17. Communication, Monitoring and Review

LTS Group will make this policy available to relevant staff, workers, candidates and clients through appropriate communication, induction, training, its website and/or document management systems.

The policy will be reviewed at least annually and sooner where legislation, statutory guidance, DBS requirements, APSCo guidance or LTS procedures change.

This policy is owned by the Director of Operations and approved by the Board of Directors. The Designated Safeguarding Lead is responsible for monitoring compliance with this policy on an ongoing basis.

18. Summary

All staff, temporary workers, candidates, contractors and volunteers are expected to cooperate fully with safer recruitment requirements and provide accurate information. Relevant safeguarding information may need to be shared with clients, recruitment businesses, statutory agencies or other appropriate bodies where there is a lawful safeguarding need. Information will be shared only where necessary and proportionate.

All staff, temporary workers, candidates and contractors must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard children and adults at risk. The public interest in safeguarding children and adults at risk may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by LTS Group.

Appendix – Recruitment Checklist

The following checklist summarises the pre-employment checks set out in this policy that LTS Group's Compliance team must complete before a work seeker is placed with a client:

- ☐ Face-to-face or video meeting/interview completed, including safeguarding suitability and employment gaps
- ☐ Application/registration information complete, including full employment history and gaps explained
- ☐ Identity and address verified (two original documents)
- ☐ Right to work verified (manual, digital ID or online share-code check)
- ☐ National Insurance details obtained
- ☐ Safeguarding self-declaration completed where required
- ☐ Rehabilitation of Offenders Act Declaration completed where required
- ☐ Online search completed where applicable and relevant findings addressed
- ☐ Minimum two satisfactory professional references obtained and verified
- ☐ Most recent/relevant work with children verified
- ☐ Enhanced DBS and Children's Barred List check completed where eligible; Update Service status checked with consent where relied upon
- ☐ Original DBS certificate seen in person where required
- ☐ Overseas police check or statement of good conduct obtained, where relevant
- ☐ Disqualification and Section 128 checks completed where applicable
- ☐ Qualifications and professional status verified (TRA/QTS/prohibition/sanctions) where applicable
- ☐ Fitness-to-work declaration obtained, where applicable
- ☐ Any discrepancies or safeguarding concerns resolved and recorded
- ☐ Any exceptional conditional placement risk-assessed and authorised; original DBS certificate seen within 5 working days
- ☐ All checks and documents recorded and securely filed; final compliance approval recorded before placement/assignment

Appendix – Relevant Legislation and Guidance

Legislation / Guidance	Web Address
Keeping Children Safe in Education 2026 (in force from 1 September 2026)	KCSIE 2026
Working Together to Safeguard Children 2026 (HM Government)	Working Together 2026
Children Act 1989	Children Act 1989
Children Act 2004	Children Act 2004
Children and Social Work Act 2017	Children and Social Work Act 2017
Disqualification under the Childcare Act 2006	Disqualification guidance
Rehabilitation of Offenders Act 1974	ROA 1974
Safeguarding Vulnerable Groups Act 2006	SVGA 2006
Conduct of Employment Agencies and Employment Businesses Regulations 2003	Conduct Regulations 2003
Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')	Prevent Duty
Modern Slavery Act 2015	Modern Slavery Act
Human Rights Act 1998	Human Rights Act
Crime and Policing Act 2026 (regulated activity changes)	Regulated activity 2026
Home Office: employer's guide to right to work checks	Right to work checklist
Information sharing to safeguard children and young people 2026	Information Sharing 2026
Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium)	Safer working practice
Data Protection Act 2018 and UK GDPR	Data Protection and UK GDPR
Disclosure and Barring Service	Disclosure and Barring Service (DBS)

Related LTS Policies

Safeguarding Children and Adults at Risk Policy; Allegations Policy; Disclosure and Barring Service Policy; DBS Escalation Policy; Recruitment of Ex-Offenders Policy; Whistleblowing Policy; Code of Conduct; Data Protection and Privacy policies.