

Recruitment Selection and Vetting Policy

Policy Owner	Director of Operations
Approved By	Board of Directors
Version	2.0
Effective Date	August 2026
Review Date	August 2027
Applies To	All employees, tutors, Teaching Assistants, agency workers, suppliers and contractors acting on behalf of LTS Group Limited
Designated Safeguarding Lead	Liz Feeney – l.feeney@ltsg.co.uk / 07719 304301
Deputy Designated Safeguarding Lead	Eddi Banks – e.banks@ltsg.co.uk / 07540 881687

Contents

1. Safer Recruitment Policy Statement
2. Legislative Framework
3. Scope
4. Roles and Responsibilities
5. Recruitment Principles
6. Advertising Vacancies
7. Applications
8. Shortlisting
9. Interviews
10. References
11. Online Searches
12. Pre-Employment Checks
13. Conditional Offers
14. Agency Workers and Supply Staff
15. Record Keeping and GDPR
17. Appendix

1. Safer Recruitment Policy Statement

LTS Group is committed to creating a culture that safeguards and promotes the welfare of children. In order to achieve this culture, we adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment.

2. Legislative Framework

This policy has been developed in accordance with, and is underpinned by, the following key legislation and statutory guidance (the full list, with links, is set out in the Appendix):

- Keeping Children Safe in Education (KCSIE) 2025;
- the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Extended Entitlement (Amendment) Regulations 2018;
- the Safeguarding Vulnerable Groups Act 2006;
- the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended;
- the Conduct of Employment Agencies and Employment Businesses Regulations 2003;
- immigration legislation and Home Office guidance on right to work checks; and
- the UK GDPR and the Data Protection Act 2018.

This policy will be reviewed in line with any material changes to the above legislation or guidance.

3. Scope

This policy applies to anyone engaged by LTS Group including our directors, staff, contractors, agency workers, tutors, Teaching Assistants, suppliers and any work placement/volunteers acting on behalf of LTS Group Limited.

All prospective applicants will be supplied with copies of the Safeguarding Policy, Allegation Policy, Safeguarding Children Policy, Safeguarding Children and Adults at risk 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:

- Prevent people who pose a risk of harm from working with children by having effective policies and procedures in place for the recruitment of staff and volunteers in accordance with the DfE guidance, Keeping Children Safe in Education 2025 (KCSIE) (as updated from time to time) and any guidance or code of practice published by the Disclosure and Barring Services (DBS);
- Prevent people who are subject to a Section 128 direction (which prohibits or restricts a person who has previously been prohibited from teaching) from taking part in the management of an independent school, including academies and free schools, in accordance with the DfE guidance, Keeping Children Safe in Education 2025 (KCSIE, paragraph 262) (as updated from time to time) and any guidance or code of practice published by the Disclosure and Barring Services (DBS);
- Ensure that it meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

5. Recruitment Principles

All those involved with the recruitment and employment of staff to work with children will be trained to a recognised standard in safer recruitment. LTS Group ensures at least one person who conducts an interview has completed training in safer recruitment.

Before placing any work seeker on an assignment, LTS Group meets with them either face to face or via video call. Before the meeting, we ask candidates to provide a copy of their CV and advise them of the documentation they are required to bring to, or forward ahead of, the interview.

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 the role (whether through the job, role description and person specification) LTS Group will have regard to Section 214 of Keeping Children Safe in Education (KCSIE 2025) and include:

- *the skills, abilities, experience, attitude, and behaviours required for the post; and*
- *the safeguarding requirements, i.e., to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to children.*

All adverts will also include:

- *LTS Group's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken;*
- *the safeguarding responsibilities of the post as per the job description and personal specification; and*
- *whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013, 2020, 2023 and subsequent amendments.*

7. Applications

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."

LTS Group will also ensure that all prospective applicants provide the following:

- personal details, current and former names, current address and national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references;

- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification; and
- a statement from the applicant sharing all relevant information about spent and unspent convictions, allegations, disciplinarys and investigations.

LTS Group does not accept curriculum vitae in place of application forms.

8. Shortlisting

In order to ensure that candidates have the opportunity to share relevant information and allow for this to be discussed at interview stage before the DBS certificate is received, all shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

LTS Group will ensure the following:

- that at least two people carry out the shortlisting exercise.
- that reasons are given for any inconsistencies and for gaps in employment and reasons given for them; and
- all potential concerns are explored.

9. Interviews

LTS Group uses a range of selection techniques to identify the most suitable person for each post. All interviews will include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with children;
- exploring their skills and asking for examples of experience of working with children which are relevant to the role; and
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

All information considered in decision making will be clearly recorded along with decisions made.

10. References

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, including the most recent assignment. One reference must be from the work seeker's most recent employer. All offers of employment made by LTS Group are subject to receipt of these references.

LTS Group follows strict standards and therefore will:

- not accept open references e.g. to whom it may concern;
- not rely on applicants to obtain their references;
- ensure any references from the candidate's current employer have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations);

- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children). If the applicant has never worked with children, then secure further references (more than 2);
- always verify any information with the person who provided the reference;
- ensure electronic references originate from a legitimate source;
- contact referees to clarify content where information is vague or insufficient information is provided; and
- compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
- establish the reason for the candidate leaving their current or most recent post, and,
- ensure any concerns are resolved satisfactorily before appointment is confirmed.

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 our Record Keeping and GDPR practices set out below.

11. Online Searches

In accordance with the updated guidance in KCSIE 2025, LTS Group will conduct an online search of shortlisted candidates as part of our due diligence checks, and will take into account any additional online-checks requirements set out in a client school's own recruitment policy. Candidates will be informed that an online search will be conducted as part of the recruitment process before it takes place. Any incidents or issues identified that are publicly available online will be explored with the candidate at interview. 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.

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.

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.

Disqualification 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.

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.

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 appropriate. 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.

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.

Qualifications

Where a role requires a specific qualification or authorisation, LTS Group will obtain copies of original qualification certificates and, where the role requires a teaching qualification, will verify this via the Teacher Regulation Agency (TRA) Employer Access Service, or the Education Workforce Council (EWC) in Wales.

Rehabilitation of Offenders Act Declaration and Policy

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.

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. Conditional Offers

Offers of employment or assignment made by LTS Group are conditional upon the satisfactory completion of all checks set out in this policy.

Original DBS Certificate – Conditional Placement

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, 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;
- A 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 DBS 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.

14. Agency Workers and Supply Staff

LTS Group is an employment business supplying agency workers, tutors and Teaching Assistants to work within the education sector. In order to ensure that all work seekers registered with LTS Group continue to meet safeguarding and suitability requirements on an ongoing basis, we 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.

15. Record Keeping and GDPR

LTS Group retains copies of all documents, checks and declarations referred to in this policy securely, for the duration of the work seeker's engagement and for the retention periods set out above, in accordance with our Data Protection and Privacy Policy and the UK GDPR and Data Protection Act 2018. Records 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.

16. Monitoring and Review

This policy is owned by the Director of Operations and approved by the Board of Directors. It will be reviewed annually, or sooner where required by a change in legislation or statutory guidance, or as a result of an incident or lesson learned. The Designated Safeguarding Lead is responsible for monitoring compliance with this policy on an ongoing basis.

17. Summary

LTS Group will ensure that clients, candidates, workers and relevant staff are made aware of this Safer Recruitment Policy through appropriate communication, induction, training and by making the policy available on request and through the company's document management systems.

All staff, temporary workers, candidates and contractors understand that the above checks must be conducted and must be aware that they have a professional duty to share information with other recruitment firms in order to safeguard children/adults at risk. The public interest in safeguarding children/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 interview completed and satisfactory;
- Right to work check completed (manual, digital ID, or online);
- Identity and proof of address documents seen and copied;
- Application form completed in full, with no unexplained employment gaps;
- Minimum of two satisfactory written references obtained and verified;
- Online/social media search completed for shortlisted candidates;
- Rehabilitation of Offenders Act Declaration completed;
- Enhanced DBS check obtained (and Update Service check, where applicable);
- Overseas police check or statement of good conduct obtained, where applicable;
- Disqualification declaration obtained, where applicable;
- Qualification certificates verified, where applicable;
- Fitness-to-work declaration obtained, where applicable;
- Original DBS certificate seen in person (or conditional placement risk assessment authorised);
- All checks and documents recorded and securely filed.

List of relevant legislation and guidance governing this policy

Legislation/Regulation/Guidance	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
The Children Act 2004	https://www.legislation.gov.uk/ukpga/2004/31/contents
Disqualification under the Childcare Act 2006	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
Rehabilitation of Offenders Act 1974	https://www.legislation.gov.uk/ukpga/1974/53
Children and Social Work Act 2017	https://www.legislation.gov.uk/ukpga/2017/16/contents
Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')	https://www.legislation.gov.uk/ukpga/2015/6/contents
Modern Slavery Act 2015	https://www.legislation.gov.uk/ukpga/2015/30/contents
Human Rights Act 1998	https://www.legislation.gov.uk/ukpga/1998/42/contents
Female Genital Mutilation Act 2003	https://www.legislation.gov.uk/ukpga/2003/31/contents
Safeguarding Vulnerable Groups Act 2006	https://www.legislation.gov.uk/ukpga/2006/47/contents
United Nations Convention on the Rights of the Child (UNCRC) 1989 (Ratified by the UK in 1992)	https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf
Working Together to Safeguard Children 2023 (HM Government)	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Prevent duty guidance: England and Wales (2023)	https://www.gov.uk/government/publications/prevent-duty-guidance

Care and Support Statutory guidance (as updated)	https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance
Information Sharing: Guidance for practitioners and managers providing safeguarding services (as updated) (HM Government)	https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf
Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium)	https://www.saferrecruitmentconsortium.org/files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf
What to do if you're worried a child is being abused - Guidance (HM Government)	https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
Local Safeguarding Partners/Arrangements	https://consult.education.gov.uk/child-protection-safeguarding-and-family-law/working-together-to-safeguard-children-revisions-t/supporting_documents/Transitional.pdf