

Hidelow Grange School/College

Safeguarding Policy – Safer Recruitment Policy



**Juliet Smith – Deputy
Headteacher Deputy
DSL**



**Benjamin Neasom
Headteacher – DSL**

**Rob McConomy –
Regional Lead**

Written: April 2026
Author: Benjamin Neasom, Headteacher
Reviewed: Benjamin Neasom, Headteacher
**Next
Review:** April 2026
April 2027
Approved by: Rob McConomy

Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2025 and Working Together to Safeguard Children 2023. It incorporates the new requirements for remote education safeguarding and the updated definitions of child on child abuse introduced in KCSiE 2025. It also further reflects KCSiE 2025's emphasis on contextual safeguarding and multi-agency information sharing.

Please refer to links below

[Keeping children safe in education 2025](#)

[Working together to safeguard children 2023: statutory guidance](#)

We also provide education to over 18s. With this in mind, this policy is also written in line with the Care Act 2014, Disclosure and Barring Service 2013 and Safeguarding Vulnerable Groups Act 2006.

Wider Policies

This Safer Recruitment Policy should be read alongside the following school policies:

Safeguarding and Child Protection:

- Safeguarding and Child Protection Policy
- Child-on-Child Abuse Policy
- Role of the DSL Policy
- Online Safety Policy
- Filtering and Monitoring Policy
- Managing Allegations Against Staff Policy
- Low-Level Concerns Policy
- Whistleblowing Policy

Education and SEND:

- SEND Policy
- Curriculum Policy
- Teaching and Observation Policy

Behaviour and Attendance:

- Positive Behaviour Support Policy



- Physical Intervention/Restrictive Practice Policy
- Anti-Bullying Policy
- Behaviour Policy
- PREVENT Policy
- Attendance Policy
- Children Missing from Education Policy

Operational:

- Staff Behaviour Policy/Code of Conduct
- Safer Recruitment Policy (CareTech Group)
- Data Protection Policy
- Equality, Diversity and Inclusion Policy

Hidelow Grange School Specific:

- School Statement of Purpose
- School Prospectus
- Guide for Learners (Pupil Handbook)
- Quality Framework

Links: All policies are available on the school website and from the school office upon request.

Aims of this policy

The aim of this policy is to ensure that staff understand:

- The group recruitment policy and how it applies to Hidelow Grange School
- Checks for ex-offenders and how these are assessed in the context of working with HSB pupils
- What checks need to be completed by the Headteacher before appointment
- The updated statutory definitions of 'regulated activity' and 'designated safeguarding lead responsibilities' as set out in KCSiE 2025
- The requirement for annual refresher training on safeguarding practice, including online safety, mandated by KCSiE 2025
- **The additional safeguarding considerations specific to recruiting staff to work with young people who display harmful sexual behaviour (HSB)**
- **The importance of assessing candidates' understanding of trauma-informed practice, boundary management, and the Good Lives Model**

What is Safer Recruitment?

KCSiE 2025 defines safer recruitment as adopting 'robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges'. It expands the definition of regulated activity, clarifies the threshold for 'engaging in regulated activity', and introduces contextual safeguarding checks at the point of hire.

When recruiting new staff, we use our professional curiosity to ensure that the people being employed are who they say they are and want the role for the right reason. Recruiters must also assess candidates' understanding of remote education risks and digital safeguarding principles before appointment.

At Hidelow Grange School, safer recruitment is particularly critical given our specialist HSB cohort. Our young people have experienced significant trauma, have complex attachment difficulties, and display harmful sexual behaviours. Staff must be able to:

- Maintain clear, consistent, and appropriate professional boundaries
- Understand the dynamics of harmful sexual behaviour and how trauma affects learning and relationships
- Work therapeutically within a trauma-informed framework
- Recognise and respond appropriately to sexualised behaviour, boundary testing, and grooming indicators
- Apply the Good Lives Model to support rehabilitation and positive identity development
- Manage their own emotional responses to working with HSB and seek appropriate support

Therefore, recruiters at Hidelow Grange School must assess candidates' understanding of:

- Harmful sexual behaviour and trauma-informed practice
- Boundary management and professional conduct with HSB pupils
- Risk assessment and safeguarding in HSB contexts
- Good Lives Model principles and strengths-based approaches
- The emotional demands of working with HSB and strategies for self-care and supervision

Recruitment staff and the Headteacher ensure that:

- This person was born with the name and DOB shown on their official documentation and these match the application



- Any change of name can be accounted for with official documentation such as a marriage certificate or deed poll
- The applicant can account for their time since leaving school – a full employment history, including reasons for leaving jobs, account for gaps in employment (travelling or maternity/paternity leave), certificates that show the additional education the applicant has achieved if they remained in further education
- If a person has been outside of the country, recruiting staff satisfy themselves that checks have been made in those countries if a person has worked abroad. They obtain any relevant overseas child protection and criminal records information in line with KCSI 2025's updated international checks guidance
- Checks are completed on international applicants
- They have a DBS certificate and any convictions have been considered in line with the ex-offenders policy
- References are given by appropriate people and can be verified – consideration should be given to the email address the reference has been received from; you would not expect a reference to come from a personal account if they worked for CareTech, for example. **References must explicitly confirm that the referee is not aware of any safeguarding concerns, including those related to HSB, boundary issues, or digital safeguarding incidents involving the candidate**
- Social media and online presence checks are considered where relevant, and any discrepancies are probed before appointment
- At least one member of every appointment/interview panel has completed safer recruitment training, and panels probe candidates' safeguarding attitudes and experience **including their understanding of HSB, trauma, and boundary management**

If something doesn't feel right when completing checks, contact the HR team who will be able to offer more support and guidance.

Safer recruitment

Self-Declaration Requirements for Hidelow Grange School

Shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children/students. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Self-declarations must now explicitly cover disqualification under the Childcare Disqualification Regulations 2018 and any digital safeguarding incidents or online harms the candidate has been involved with.

For roles at Hidelow Grange School, self-declarations must also explicitly cover:



- Any allegations, investigations, or concerns (substantiated or not) related to harmful sexual behaviour, sexual misconduct, or inappropriate relationships with children or young people
- Any previous employment in HSB specialist settings, secure settings, or youth justice settings, and reasons for leaving those roles
- Any disciplinary proceedings or capability concerns related to safeguarding, boundary management, or professional conduct
- Understanding of professional boundaries when working with young people who display HSB
- Any personal circumstances that may affect their ability to maintain appropriate professional boundaries (e.g., personal experience of abuse, current mental health difficulties that may impact professional judgement)

Candidates must declare:

- If they have a criminal history
- If they are included on the children's/students barred list
- If they are prohibited from teaching
- If they are prohibited from taking part in the management of an independent school/college
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- If they are known to the police and local authority social care department
- If they have been disqualified from providing childcare
- Any relevant overseas information
- If they have been subject to any online safety incidents or investigations
- **Any allegations, investigations, or concerns related to harmful sexual behaviour, sexual misconduct, or boundary issues**
- **Any previous employment in specialist HSB, secure, or youth justice settings and reasons for leaving**

More information can be found on the group policy (HR) Recruiting of Ex-offenders Policy – onrezume.com.

In addition to the group HR policy, the Principal/Headteacher ensures they have completed the following pre-employment checks prior to the person commencing their role in school/college. These checks include:



- verifying a candidate's identity to ensure the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice requires checking the name on their birth certificate, where this is available.
- obtaining (via the applicant) an enhanced DBS check (including children's/students barred list information, for those who will be engaging in regulated activity with children/students). When using the DBS Update Service, checks are undertaken to ensure the certificate matches the applicant and retain evidence of the check date.
- obtaining a separate barred list check if an individual will start work in regulated activity with children before the DBS certificate is available (This does not apply to 16-19 Academies, Special Post-16 institutions and Independent Training Providers)
- verifying the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- verifying the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then schools and colleges should follow advice on the GOV.UK website
- ascertaining if the person has lived or worked outside the UK whilst making any further checks the school or college consider appropriate and,
- verifying professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- confirming that all candidates have read and understood Part One and Annex B of KCSiE 2025, with dated evidence stored on the Single Central Record (SCR).
- ensuring arrangements are in place for successful candidates to complete a digital safeguarding induction or e-learning module covering online safety risks (the "four Cs")

In addition:

- independent schools/colleges, including academies and free schools, check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- all schools/colleges ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE, before its abolition in March 2012
- before employing a person to carry out teaching work in relation to children/students, reasonable steps are undertaken to establish whether that person is subject to a prohibition order issued by the Secretary of State
- all schools and colleges ensure that appropriate checks are carried out to ascertain that individuals employed to work in reception classes, or in wraparound care for

children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

- agencies and supply staff providers confirm in writing that all required checks are up to date before placement, and our schools and colleges record continuing suitability reviews of those staff at least annually on the SCR.
- our schools and colleges reference their filtering and monitoring policy during interviews and induction, making clear to candidates the ongoing expectation to uphold digital safeguarding standards.

HSB-Specific Interview Questions (Hidelow Grange School)

All candidates for roles at Hidelow Grange School should be asked **at least two HSB-specific questions** during the interview. These questions assess candidates' understanding of harmful sexual behaviour, trauma-informed practice, boundary management, and their suitability to work in a specialist HSB setting.

Example questions include:

Understanding of HSB:

- What do you understand by the term 'harmful sexual behaviour'?
- Can you give examples of behaviours that might be considered harmful sexual behaviour in a school setting?
- How does trauma impact a young person's understanding of boundaries and appropriate relationships?

Boundary Management:

- How would you respond if a pupil made a sexually inappropriate comment or gesture towards you?
- What boundaries would you maintain when working with young people who have displayed HSB?
- How would you balance building therapeutic relationships with maintaining professional boundaries?
- Can you give an example of a time when you had to maintain a professional boundary in a challenging situation?

Safeguarding Response:

- What would you do if you witnessed concerning sexualised behaviour between pupils?
- How would you respond if a pupil disclosed that they had been sexually abused?
- What would you do if you had concerns about a colleague's boundaries or conduct with pupils?



Trauma-Informed Practice:

- How does trauma affect a young person's behaviour and ability to learn?
- What strategies would you use to support a young person who becomes dysregulated?
- How would you support a young person to develop healthy relationships and understand consent?

Good Lives Model:

- What do you understand by the Good Lives Model?
- How would you apply a strengths-based approach when working with a young person who has displayed harmful behaviour?
- How would you support a young person to develop a positive identity beyond their harmful behaviour?

Self-Awareness and Resilience:

- Working with HSB can be emotionally demanding. How would you manage your own emotional responses?
- What support would you need to work effectively in a specialist HSB setting?
- How would you maintain your own wellbeing when working with trauma and harmful behaviour?

Interview panels should:

- Probe candidates' answers to assess depth of understanding
- Look for evidence of trauma-informed thinking, not just theoretical knowledge
- Assess candidates' ability to maintain boundaries while remaining empathetic and non-judgemental
- Consider whether candidates demonstrate appropriate self-awareness and emotional resilience
- Explore any gaps, inconsistencies, or concerning responses in detail
- Consult with the DSL if any safeguarding concerns arise during the interview

References for Hidelow Grange School

References are a critical safeguarding check. For all appointments at Hidelow Grange School, **at least two references must be obtained** before appointment, including:

- The candidate's current or most recent employer



- A previous employer (preferably one where the candidate worked with children or young people)

References must explicitly confirm:

- The referee is not aware of any safeguarding concerns, including those related to HSB, sexual misconduct, or boundary issues
- The candidate maintained appropriate professional boundaries with children and young people
- The candidate is suitable to work with young people who display HSB
- The candidate has the emotional resilience and professional maturity required for this challenging work
- There are no concerns about the candidate's conduct, behaviour, or professional judgement
- The referee would re-employ the candidate (if applicable)

The Headteacher or designated senior leader will:

- Contact referees directly by phone to verify the reference and probe any vague, insufficient, or concerning information
- Ask specific questions about boundary management, safeguarding practice, and suitability to work with HSB pupils
- Record the conversation and file it with the reference
- Escalate any concerns to the DSL and HR team immediately
- Not proceed with an appointment if references raise safeguarding concerns or cannot be satisfactorily verified

References will not be accepted if:

- They come from a personal email address (unless the referee is self-employed or retired)
- They are vague, overly brief, or fail to address the specific questions asked
- They cannot be verified by phone
- They raise any safeguarding concerns or suggest the candidate may not be suitable to work with HSB pupils

Induction Requirements (Hidelow Grange School)

All new staff at Hidelow Grange School must complete a comprehensive safeguarding induction **before they begin working unsupervised with pupils**. This induction includes:

Week 1 (Mandatory):

- **Safeguarding and Child Protection Induction** (Day 1)
 - KCSIE 2025 Part 1 and Annex B
 - School Safeguarding and Child Protection Policy
 - Role of the DSL and how to report concerns
 - Low-Level Concerns Policy and Whistleblowing Policy
 - Child-on-Child Abuse Policy
- **HSB Awareness Training** (Day 1-2)
 - Understanding harmful sexual behaviour: definitions, indicators, and impact
 - Trauma and attachment: how these affect behaviour and relationships
 - Risk assessment and risk management in HSB contexts
 - Safeguarding responses to HSB: reporting, recording, and multi-agency working
- **Boundary Management and Professional Conduct** (Day 2-3)
 - Staff Behaviour Policy/Code of Conduct
 - Maintaining appropriate professional boundaries with HSB pupils
 - Recognising and responding to boundary testing, grooming indicators, and sexualised behaviour
 - Managing physical contact, personal care, and one-to-one situations safely
 - Use of social media, mobile phones, and digital communication with pupils
- **Good Lives Model Induction** (Day 3-5)
 - Principles of the Good Lives Model
 - Strengths-based practice and positive identity development
 - Supporting young people to meet their needs in pro-social ways
 - Integration of GLM with education, care, and therapy
- **Trauma-Informed Practice Training** (Week 1)



- Understanding trauma and its impact on learning, behaviour, and relationships
- Trauma-informed behaviour management and de-escalation
- Emotional regulation support and co-regulation
- Recognising and responding to trauma triggers

Week 2-4 (Mandatory):

- **Online Safety and Digital Safeguarding** (Week 2)
 - Filtering and Monitoring Policy
 - Online Safety Policy
 - The "four Cs" of online safety (Content, Contact, Conduct, Commerce)
 - Managing online risks for HSB pupils
- **Positive Behaviour Support and Physical Intervention** (Week 2-3)
 - Behaviour Policy
 - Physical Intervention/Restrictive Practice Policy
 - De-escalation techniques
 - Team Teach training (if applicable)
- **SEND and Inclusion** (Week 3-4)
 - SEND Policy
 - Understanding the additional vulnerabilities of SEND pupils
 - Differentiation and adaptive teaching for HSB pupils with SEND

Ongoing (First 6 Months):

- **Supervision and Reflective Practice**
 - Fortnightly supervision with line manager
 - Monthly reflective practice sessions with therapeutic team
 - Access to clinical supervision where appropriate
- **Shadowing and Mentoring**
 - Shadowing experienced staff for first 2 weeks
 - Assigned mentor for first 3 months
 - Gradual increase in responsibility and autonomy

Induction Completion:

- All induction training must be completed and signed off by the Headteacher and DSL
- Records of induction training are stored on the Single Central Record (SCR)
- Staff cannot work unsupervised with pupils until induction is complete
- Any concerns about a staff member's understanding, conduct, or suitability during induction will be escalated immediately to the Headteacher and DSL

INSERT AFTER: "Induction Requirements" Section

Probation Period Monitoring (Hidelow Grange School)

All new staff at Hidelow Grange School are subject to a **probationary period of 6 months** (unless otherwise specified in the employment contract). During this period, the school will closely monitor the staff member's suitability to work with young people who display HSB.

Probation monitoring includes:

Fortnightly Supervision (Weeks 1-12):

- Line manager will meet with the staff member fortnightly
- Supervision will cover: safeguarding practice, boundary management, understanding of HSB, trauma-informed practice, professional conduct, wellbeing and self-care
- Any concerns will be documented and addressed immediately

Probation Review Meetings:

- **6-week review:** Initial assessment of suitability, understanding of HSB, and boundary management
- **12-week review:** Progress review, assessment of trauma-informed practice, and integration with the team
- **20-week review:** Final probation review before confirmation of employment

Each probation review will explicitly assess:

- Understanding of harmful sexual behaviour and trauma-informed practice
- Ability to maintain appropriate professional boundaries with HSB pupils
- Safeguarding practice: reporting concerns, recording incidents, following procedures
- Professional conduct: adherence to Staff Behaviour Policy/Code of Conduct
- Emotional resilience and self-awareness: managing the demands of working with HSB



- Relationships with pupils: building therapeutic relationships while maintaining boundaries
- Relationships with colleagues: teamwork, communication, and collaboration
- Application of the Good Lives Model in practice

Probation concerns:

- Any concerns about safeguarding practice, boundary management, or suitability to work with HSB pupils will be addressed immediately
- Concerns will be documented in writing and discussed with the staff member
- The staff member will be given clear expectations and support to improve
- If concerns are serious or do not improve, the probation period may be extended or employment may be terminated
- The DSL will be consulted on any safeguarding-related probation concerns

Confirmation of employment:

- Employment will only be confirmed if the staff member has demonstrated:
 - Safe and effective safeguarding practice
 - Appropriate professional boundaries
 - Understanding of HSB and trauma-informed practice
 - Emotional resilience and professional maturity
 - Commitment to the Good Lives Model and the school's values
- The Headteacher will make the final decision on confirmation of employment, in consultation with the line manager and DSL

Ongoing Suitability Monitoring (Hidelow Grange School)

Safer recruitment does not end at appointment. At Hidelow Grange School, we continuously monitor the ongoing suitability of all staff to work with young people who display HSB.

Ongoing suitability is monitored through:**Annual Safeguarding Refresher Training:**

- All staff must complete annual safeguarding refresher training, including updates on HSB, KCSIE, and local safeguarding procedures
- Training records are stored on the Single Central Record (SCR)
- Staff who do not complete training will not be permitted to work with pupils until training is complete

**Regular Supervision:**

- All staff receive regular supervision with their line manager (at least monthly)
- Supervision covers safeguarding practice, boundary management, wellbeing, and professional development
- Supervision records are stored securely and reviewed by the Headteacher and DSL

Low-Level Concerns Process:

- All staff are aware of the Low-Level Concerns Policy and how to report concerns about adult behaviour
- Low-level concerns are recorded, reviewed, and addressed promptly
- Patterns or escalations in low-level concerns are identified early and managed appropriately

Annual Self-Declaration:

- All staff complete an annual self-declaration confirming:
 - They are not subject to any new cautions, convictions, or investigations
 - They are not aware of any reason they should not continue to work with children
 - They remain suitable to work with young people who display HSB
 - They understand and comply with the Staff Behaviour Policy/Code of Conduct

Annual SCR Review:

- The Single Central Record is reviewed annually to ensure all checks remain current
- DBS checks are renewed every 3 years (or more frequently if required)
- Prohibition from teaching checks are repeated annually for all teaching staff
- Section 128 checks are repeated annually for all staff in management positions

Responding to Concerns:

- Any concerns about a staff member's conduct, behaviour, or suitability will be addressed immediately via the Managing Allegations Against Staff Policy or Low-Level Concerns Policy
- Concerns related to boundary management, safeguarding practice, or suitability to work with HSB pupils will be escalated to the DSL and Headteacher
- Where appropriate, staff will be offered support, coaching, or additional training
- Where concerns are serious or do not improve, formal action may be taken, including suspension, investigation, or termination of employment

Volunteers, Visitors and Contractors (Hidelow Grange School)

Given the specialist HSB nature of Hidelow Grange School, we apply enhanced safeguarding measures to all volunteers, visitors, and contractors.

Volunteers:

- All volunteers must undergo the same DBS and barred list checks as staff
- Volunteers must complete a safeguarding induction, including HSB awareness, before working with pupils
- Volunteers are **never left unsupervised** with pupils
- Volunteers must sign a Volunteer Agreement confirming they understand and will comply with the school's safeguarding policies
- The DSL maintains a register of all volunteers, including details of checks completed and supervision arrangements

Visitors:

- All visitors must sign in at reception and wear a visitor badge at all times
- Visitors are escorted at all times by a member of staff
- Visitors receive a safeguarding briefing before entering the school, including:
 - The specialist HSB nature of the school
 - The importance of maintaining professional boundaries
 - How to report any safeguarding concerns
 - The expectation that they will not be alone with pupils
- A visitor log is maintained and reviewed regularly by the DSL

Contractors:

- All contractors must provide evidence of an enhanced DBS check (including barred list information) before working on site
- Contractors working on site during school hours must be escorted at all times or work in areas where pupils do not have access
- Contractors receive a safeguarding briefing before starting work, including the specialist HSB nature of the school
- The Site Manager maintains a register of all contractors, including details of checks completed and supervision arrangements

Exceptions:



- Contractors working on site outside of school hours (e.g., evenings, weekends, school holidays) when pupils are not present do not require DBS checks or escorts
- However, contractors must still sign in and wear a visitor badge, and the Site Manager must ensure pupils do not have access to the area where contractors are working

Review History

A review will be undertaken annually as a minimum. However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation - Children), Craig Davis (Head of Resourcing – Children) the DSL of the School and agreed by the Head of the Governance Board.

Next Review – September 2026