Thallo
ALTERNATIVE PROVISION

Safer Recruitment and Selection Policy

Thallo Education Ltd.

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Policy Lead	May MacKay-Morris Provision Lead / Director
Approved By	May MacKay-Morris - Director
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1. Aim and scope

Thallo Alternative Provision is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is an essential part of that responsibility and is designed to deter, identify and reject people who are unsuitable to work with children.

This policy applies to the recruitment, engagement and deployment of employees, directors undertaking work within the provision, teachers, temporary and agency workers, contractors, volunteers, trainees and other adults whose role brings them into contact with children or gives them access to information, premises or activities relevant to safeguarding.

Recruitment decisions will also be fair, transparent and non-discriminatory. Reasonable adjustments will be made for disabled applicants where required.

2. Legal and safeguarding framework

Thallo will have regard to the current edition of Keeping Children Safe in Education (KCSIE), including its safer recruitment guidance, and will comply with applicable legislation and guidance relating to safeguarding, recruitment, equality, right to work, criminal-record checks and regulated activity.

Relevant frameworks include the Safeguarding Vulnerable Groups Act 2006, as amended; the Protection of Freedoms Act 2012; the Equality Act 2010; the Immigration, Asylum and Nationality Act 2006; the Rehabilitation of Offenders Act 1974 and applicable Exceptions Orders; and current Disclosure and Barring Service (DBS) eligibility guidance.

From 1 September 2026 the supervision exemption from regulated activity with children was removed. Thallo will therefore assess each paid and unpaid role against the current regulated-activity and DBS eligibility rules rather than assuming that supervision removes the need for barred-list consideration.

3. Principles

Thallo's recruitment and selection arrangements will:

- place the safety and welfare of children at the centre of recruitment decisions;
- define the role, safeguarding responsibilities and required competence before recruitment begins;
- use proportionate and legally permitted vetting checks for the particular role;
- scrutinise employment history, references and information provided by applicants;
- explore safeguarding concerns, discrepancies and gaps before appointment;
- ensure identity and right-to-work checks are completed;
- ensure no person is knowingly permitted to undertake regulated activity if barred from doing so;
- record recruitment checks and decisions sufficiently to demonstrate compliance;
- apply appropriate induction, safeguarding training, supervision and ongoing monitoring after appointment.

4. Responsibility for safer recruitment

The Director / Provision Lead has overall responsibility for ensuring that recruitment is conducted in accordance with this policy and that appropriate checks are completed before a person begins work with children.

Recruitment will involve people with appropriate knowledge of safer recruitment. Thallo will ensure that safer-recruitment competence is available within its recruitment process and will maintain evidence of relevant training.

The Designated Safeguarding Lead will contribute to recruitment and workforce decisions where safeguarding knowledge or risk assessment is required.

5. Planning a role and recruitment information

Before recruitment or engagement begins, Thallo will define the duties, employment or contractual status, safeguarding responsibilities, qualifications or experience required, working arrangements and the level of pre-employment checks legally available and appropriate to the role.

Job descriptions, role profiles and recruitment information will make Thallo's safeguarding commitment clear and will identify the individual's responsibility to safeguard and promote the welfare of children.

Where a post is advertised, recruitment material will make clear that appropriate safeguarding checks will be undertaken and that the level of DBS check will depend on the legal eligibility of the role.

6. Applications and shortlisting

Applicants for roles will normally be required to provide a full employment history and sufficient information to assess their suitability. A CV may supplement, but will not normally replace, the information required by Thallo for safer recruitment.

Shortlisting will be carried out consistently against the role requirements. Wherever practicable, at least two people will be involved in shortlisting. Employment gaps, repeated changes, discrepancies and incomplete information will be identified for clarification.

Shortlisted candidates will be informed that Thallo may carry out an online search as part of due diligence. Any search will be proportionate, limited to publicly available information relevant to suitability to work with children, and considered in accordance with data-protection and equality requirements. Relevant issues identified will be explored with the candidate rather than treated as automatically determinative.

7. References

Thallo will seek appropriate references to obtain factual information supporting appointment decisions. References will normally include the current or most recent employer and, where relevant, the employer by whom the applicant was most recently employed to work with children.

References from relatives or friends, open references and testimonials will not normally be accepted as substitutes for verified employer or professional references.

References will be scrutinised and, where appropriate, verified with the referee. Thallo will seek information relevant to the candidate's suitability to work with children and will explore discrepancies or safeguarding concerns with the referee and candidate as appropriate.

8. Interview and selection

Selection will assess competence for the role as well as values, professional boundaries and safeguarding understanding. Questions will be appropriate to the role and will include safeguarding where the person will work with or around children.

Candidates will be given an opportunity to explain gaps, discrepancies and relevant information identified during the recruitment process. Reasonable adjustments will be made to the selection process where required.

Any practical exercise or observation used in selection will be proportionate to the role and arranged so that children are appropriately safeguarded.

9. Pre-employment and pre-engagement checks

Before an individual begins work, Thallo will complete and record the checks required for that person's role. These may include, as applicable:

- verification of identity;
- verification of the person's right to work in the United Kingdom;
- appropriate references and resolution of relevant discrepancies;
- verification of qualifications or professional status where required for the role;
- the appropriate level of DBS check for which the role is legally eligible;
- a Children's Barred List check where the role is regulated activity and the check is legally available/required within the applicable safeguarding framework;
- teacher prohibition checks where applicable to the person and role;
- section 128 prohibition-from-management checks where applicable;
- additional checks for people who have lived or worked outside the UK where appropriate;
- any legally permissible health/fitness information necessary to establish that the person is able to carry out the role, with reasonable adjustments considered;
- online due-diligence information where used as part of shortlisting;
- any further check required by law, current KCSIE, the commissioning contract or the nature of the role.

The level of DBS check will be determined by the activities actually undertaken and current DBS eligibility rules. Thallo will not request barred-list or other criminal-record information that it is not legally entitled to obtain.

Where a required check has not been completed, the person will not undertake duties for which that check is a prerequisite unless the applicable law, statutory guidance and commissioning requirements permit an alternative arrangement and a documented safeguarding risk assessment has been approved by the Provision Lead.

10. Regulated activity, DBS and barred-list information

Thallo will assess whether each role constitutes regulated activity with children using current legislation and DBS guidance. All paid and unpaid roles will be assessed on their actual activities and frequency.

From 1 September 2026, supervision no longer prevents frequent teaching, training, instructing, caring for or supervising children from being regulated activity where the statutory conditions are met. This is particularly relevant when considering volunteers and sessional workers.

DBS certificates do not have a statutory expiry date. Thallo will maintain arrangements to ensure that information obtained through employment checks remains appropriately current, using risk-based rechecking, the DBS Update Service where suitable, declarations, supervision and other lawful measures as appropriate to the role and Suffolk contractual requirements.

11. Agency and temporary workers

Before an agency or third-party worker is deployed, Thallo will obtain written confirmation that the supplier has completed the safer-recruitment checks that Thallo would otherwise be required to complete for that role. Thallo will check the identity of the individual who arrives against the person for whom the checks were completed and will resolve any discrepancy before deployment.

Agency and temporary workers are subject to Thallo's safeguarding, induction, conduct and supervision requirements while working within the provision.

12. Contractors and self-employed or sessional practitioners

Using a self-employed, consultancy, sessional or contractor arrangement does not remove safeguarding responsibilities. Before engagement, Thallo will assess the individual's role and complete, or obtain satisfactory evidence of, the checks appropriate to the work they will undertake.

Where a contractor organisation supplies staff, Thallo will obtain appropriate written assurance of checks and will verify the identity of the person attending. Contractors without the checks required for unsupervised or regulated activity will not be given access to children in circumstances for which those checks are required.

13. Volunteers

Volunteer roles will be defined and risk assessed before appointment. Thallo will determine the appropriate DBS eligibility by reference to the volunteer's actual activities and frequency.

Where a volunteer undertakes regulated activity with children, Thallo will ensure that the applicable barred-list safeguards are met. Occasional volunteer activity will be considered separately against current DBS eligibility rules rather than automatically being treated as regulated activity.

14. Trainees and students on placement

Where Thallo is responsible for recruiting or employing a trainee, it will undertake the checks appropriate to the role. Where a recognised training provider is responsible for the trainee's checks, Thallo will obtain the written confirmation required by the applicable safeguarding framework and will verify the trainee's identity on arrival.

15. Directors and management checks

Directors and people undertaking management functions will be subject to the checks legally applicable to their role. Where a section 128 check or other prohibition-from-management check applies, Thallo will ensure it is completed and recorded.

16. Recruitment records and central record of checks

Thallo will maintain a central record of recruitment and vetting checks for people working within the provision. The record will be kept securely, reviewed regularly and made available for appropriate commissioner quality-assurance or audit activity.

Personnel and recruitment records will be retained securely in accordance with data-protection law and Thallo's retention arrangements. Access will be restricted to authorised people.

Where a commissioner requests evidence of safer-recruitment checks, Thallo will provide the information required for appropriate quality assurance while protecting unnecessary personal information. Full internal recruitment records or the central record of checks will only be shared where there is a lawful and appropriate basis to do so.

17. Induction, training and supervision

No recruitment process ends at appointment. New staff, volunteers, sessional practitioners and other relevant workers will receive induction appropriate to their role before or at the start of their duties.

Induction will include, as applicable:

- Thallo's Safeguarding and Child Protection Policy and reporting routes;
- the current KCSIE Part One requirements applicable to Thallo's safeguarding arrangements;
- staff conduct and professional boundaries;
- whistleblowing and low-level concerns;
- online safety and information security;
- health and safety, fire and emergency procedures;
- the individual needs, risk controls and reasonable adjustments relevant to the young people they support;
- role-specific training, supervision and performance expectations.

Training and supervision will be recorded. Ongoing workforce development, supervision and monitoring are addressed further in Thallo's Staff Training, Monitoring and Supervision Policy.

18. Ongoing suitability and duty to report

All people working for or on behalf of Thallo must inform the Provision Lead promptly of any arrest, charge, conviction, caution, investigation, professional restriction, safeguarding allegation or other change that may affect their suitability to work with children, subject to the lawful requirements applying to disclosure.

Thallo will respond to new information proportionately, taking safeguarding advice where necessary and following its procedures for allegations and concerns about adults.

Where the legal conditions for a referral to the Disclosure and Barring Service are met, Thallo will make the required referral. Teacher misconduct or prohibition matters will also be referred through the appropriate route where required.

19. Monitoring and review

The Provision Lead will monitor compliance through review of recruitment files, the central record of checks, DBS and barred-list arrangements, references, training records, agency assurances and any safeguarding issues arising after appointment.

This policy will be reviewed at least annually and sooner following relevant legislative or KCSIE changes, changes to DBS eligibility rules, commissioner requirements, or a safeguarding incident indicating that recruitment arrangements require improvement.