Recruitment, Selection & Vetting Policy

Issued by: Clarence Recruitment ("the Company")
Date: August 2026
Review Cycle: Annual, or sooner where required

1. Introduction

Clarence Recruitment is an employment business supplying temporary workers to work within the education sector. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

Our processes are compliant with relevant legislation and the Department for Education's statutory guidance: **Keeping Children Safe in Education (KCSIE)**. We ensure our temporary workers remain compliant throughout their time with Clarence Recruitment by undertaking the checks set out in this policy.

We have processes in place whereby we obtain feedback from our clients once placements are made.

2. Recruitment and Selection

2.1. Face to face interviews

Before placing any work seekers on assignments, Clarence Recruitment meets with them face to face either in person or via video. Before meeting the work seeker, we ask them to forward a copy of their CV and advise them of the documentation they are required to forward to us or bring with them to the interview.

During the interview, a suitably trained and competent consultant will assess the work seekers suitability for the role by discussing their previous work history and qualifications. Clarence Recruitment uses a template of standard relevant questions to ensure equality of approach and seek to understand the work seeker's knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, Clarence Recruitment will then start the pre-employment checks.

2.2. Right to work checks

Clarence Recruitment conducts right to work checks on every work seeker we intend to supply to our clients to comply with immigration requirements, recruitment industry legislation and to ensure that guard against the risk of supplying a person who is not permitted to work, to a client. All checks

are carried out in line with best practice and equality law. We will conduct a manual document check, a digital identity verification check through an Identity Service Provider (IDSP) or an online check using the Home Office Online or Employers checking service to establish a candidate's right to work.

Where a right to work check is conducted using the online service, the information is provided in real-time, directly from Home Office systems and so there will be no requirement to see the documents listed below.

2.2.1. Manual right to work checks

For physical document checks we follow the three-step process set out in the Home Office Guidance: An employer's guide to right to work checks:

Step one:

We obtain the work seekers original documents. The work seeker must provide us with either one document (or a combination of documents where applicable) from LIST A of the Home Office right to work checklist or any of the documents or combination of documents from LIST B of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable, and we must be in receipt of the physical documents.

Step two:
We take reasonable steps to check that the document is genuine and that the work seeker is the person named in the document.

For each document we complete the following checks:

- check any photographs are consistent with the appearance of the work seeker;
- check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the work seeker;
- check that the expiry date for permission to be in the UK has not passed;
- check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
- if given two documents which have different names, we ask for a further document to explain the reason for this. The further document could be a marriage certificate, a divorce decree absolute, a deed poll or a statutory declaration.
- check that in relation to restrictions on permission to work in the UK the work seeker is allowed to do the type of work they have applied for. For students, we will obtain a copy of their academic term times from the relevant institution.

Step three:

We make a copy of the relevant page/s of the document in a format which cannot be subsequently altered. This can include a photocopy or a scan in a non-rewritable format.

Where the work seeker has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder's nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full.

All copies of documents taken will be kept securely for the duration of the work-seeker's engagement with Clarence Recruitment and for two years afterwards. The copy will then be securely destroyed.

We will make a note of the date on which the check was conducted by either a declaration on the hardcopy or on a separate record.

2.2.2. Digital identity verification check

For digital document checks we follow the three-step process set out in the Home Office Guidance: An employer's guide to right to work checks:

Step one:

We will use the services of an Identification Service Provider (IDSP) who can satisfy a minimum of a Medium Level of Confidence check. We have appointed CREDAS, who are certified by the UK Government, to undertake these biometric checks.

Step two:

Once we have received the output form from the IDSP confirming details of the check, we will satisfy ourselves that both the photograph and biographic details of the work-seeker such as their date of birth, are consistent with the person presenting themselves to us for work finding services. We may conduct this check via video call or in person.

Step three:

All copies of the output forms will be kept securely for the duration of the work-seeker's engagement with Clarence Recruitment and for two years afterwards. The copy will then be securely destroyed.

2.2.3. Online right to work checks

For online right to work checks we will follow the three basic steps set out in the the Home Office Guidance: An employer's guide to right to work checks:

Step one:

Where the work-seeker provides us with a valid share code we will use the Home Office online right to work checking service and will only supply the person if the online check confirms they are entitled to do the work in question;

Step two:

We satisfy ourselves that any photograph on the online right to work check profile page is of the individual presenting themselves for work; and

Step three:

We retain a clear copy of the profile page provided by the online right to work check (storing that response securely, electronically or in hardcopy) for the duration of the work-seekers engagement with Clarence Recruitment and for two years afterwards. The copy will then be securely destroyed.

2.2.4. Employers checking service checks

If we are unable to conduct an online check because:

- we have not been provided with any acceptable documents listed in List A or B of the guidance and we have been unable to obtain an online check via share code;
- we have been provided with a non-digital Certificate of Application (CoA), email or acknowledgement letter confirming an application for the EU Settlement Scheme (EUSS) was made on or before 30 June 2021;
- we have been provided with evidence that the worker is a long-term resident of the UK who arrived before 1988 but have not received documents in List A or B;
- we have been provided with a non-digital CoA confirming an application for the EUSS was made on or after 01 July 2021
- we have not been provided with any acceptable documents but have been given information that indicates an application for permission to stay was made to the Home Office prior to the expiry of the workers previous permission or there is an appeal or administrative review pending;
- we have been provided with a valid application registration card.

In these circumstances we will use the Home Office's employers checking service and await receipt of a positive verification notice before supplying the work seeker to a client.

2.3. ID checks and proof of address

In addition to the above right to work documents, we also require the work seeker to provide us with two original1 documents, one to confirm their identity and one to confirm their address. The type of documents that we accept are a valid driving licence, Passport, utility bill, bank statement, government document/letter which includes the work seeker's national insurance number. Copies of documents will be taken and noted with the date the documents were checked. Copies will be kept securely for the duration of the work-seeker's engagement with Clarence Recruitment and for at least 1 year after. The copy will then be securely destroyed.

2.4. References

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Crown Commercial Service (CCS) Supply Teacher Framework), we require (at least) two references that must cover the previous two years of employment for all work seekers. One reference must be from the work seekers' most recent employer. References must be from non-family members who give their consent for the reference to be forwarded to our clients.

We will verify all references by contacting the referees directly, either by telephone or email.

1 Please note that it is a requirement of the REC Audited Education Criteria to see original ID documentation.

Verbal references will be recorded, and a copy of the record will be sent to the referee via their school email address to obtain their written confirmation that the record is correct and their consent to forward it to a third party. If the referee does not provide their written confirmation that the record is correct and does not give their consent, the reference will not be accepted.

Open references may be accepted, provided that they include the following information:

- the dates during which the work seeker worked for or with the referee;
- the role the work seeker undertook;
- whether the work seeker is deemed suitable to work with children;
- whether the referee would re-employ the work seeker; and
- whether the work seeker was subject to any disciplinary action and the circumstances, if any.

References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.

3. Vetting

3.1. Rehabilitation of Offenders Act Declaration

During the registration process, all work seekers are required to complete our Rehabilitation of Offenders Act Declaration and as required for regulated sectors, disclose all spent and unspent convictions, subject to the filtering rules.

If a work-seeker discloses any convictions or cautions, Clarence Recruitment will consult with the Teacher Regulation Agency, or for Wales, the Education Workforce Council, and the REC's legal helpline to obtain advice and guidance on whether the work seeker can work in the education sector. We will also ensure that the school has a policy on the treatment of ex-offenders, is aware of the conviction/s to allow them to conduct their own risk assessment and determine their assessment of a candidate's suitability for the role in accordance with its policy on ex-offenders.

3.2. Rehabilitation of Offenders Policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order and using criminal record checks processed through the Disclosure and Barring Service (DBS), Clarence Recruitment complies fully with the DBS code of practice and undertakes to treat all applicants for positions fairly.

Clarence Recruitment undertakes not to unfairly discriminate against any subject of a criminal record check on the basis of a conviction or other information revealed.

Clarence Recruitment can only ask an individual to provide details of convictions and cautions that Clarence Recruitment are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended), and where appropriate (Police Act Regulations as amended),

Clarence Recruitment can only ask an individual about convictions and cautions that are not protected.

Clarence Recruitment is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Clarence Recruitment has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.
Clarence Recruitment actively promotes equality of opportunity for all with the right mix of talent, skills, and potential and welcomes applications from a wide range of candidates, including those with criminal records.

Clarence Recruitment selects all candidates for interview based on their skills, qualifications and experience.

Clarence Recruitment ensures that all staff of Clarence Recruitment who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

Clarence Recruitment also ensures that they have received appropriate guidance and training on the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, Clarence Recruitment ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment/assignment.

Clarence Recruitment makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

Clarence Recruitment undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

3.3. Disclosure and Barring Service and Update Service checks

Clarence Recruitment requires all our work seekers to have an enhanced Disclosure and Barring Service (DBS) check which includes a check on the Children's Barred List, where appropriate/required.

We view and take a copy of the physical and original DBS certificate and, with consent from the work seeker, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken on the work seeker's file. If the Update Service check states that there is new information, we will require the work seeker to apply for a new DBS certificate before proceeding with their registration.

If a work seeker wishes to register with Clarence Recruitment and they are not already on the Update Service, a new DBS check will be required, and we would encourage the work seeker to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check

to be undertaken at least once a year. More frequent checks may be required in certain circumstances, such as if required by a school/client or if we receive information about a work-seeker/candidate that requires us to carry out additional checks.

Clarence Recruitment will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker's consent to undertake a status check.

If the DBS check shows details of a conviction or caution, in line with The School Staffing (England) Regulations 2009[2], we must email a copy of the DBS to the school.

Following the decision of the Department for Education to remove access to the stand-alone Barred List checking system for employment businesses from 1 April 2021, we cannot conduct this standalone check and we will not place any work seekers in a role without a full enhanced DBS check being completed. This check includes a Barred List check where required.

When reviewing a work seeker's DBS certificate, Clarence Recruitment will check that the certificate is for the Child Workforce only and status checks on the Update Service will only be for the Child Workforce. Unless the role being applied for involves regulated activity with both children and adults in accordance with the definition of Regulated activity contained in the Safeguarding Vulnerable Groups Act 2006, we will not accept a previously issued DBS that covers both adult and child workforces.

The definition of 'work with adults', as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of 'work with children' and refers to providing personal care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the DBS eligibility tool and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the work seeker has an existing DBS certificate covering both the child and adult workforces, we will require them to undertake a new DBS for the child workforce only.

3.4. Overseas Police Checks

All work seekers who have lived and worked in a single overseas country for six months or more in the last five years must provide an overseas police check. This will be done in accordance with the Government Guidance particular to each country. Anything else a candidate provides will not be accepted.

If the work seeker is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks), Clarence Recruitment may accept a statement of good conduct from the work seeker's previous employer within the relevant country. We would require the statement to include confirmation that, to the best of their knowledge, the work seeker has no criminal convictions and that they know of no reason why the work seeker should not work with children.

[2] Regulation 18(1)b The School Staffing (England) Regulations 2009

If we are unable to obtain a police check or a statement of good conduct, we will advise the school that we have been unable to obtain these and the reasons why in order for the school to advise us of any further checks they may require or carry out a risk assessment based on the information we have been able to obtain.

3.5. Letter of professional standing for work seekers that have lived or worked overseas

For work seekers seeking teaching roles, which have lived or worked overseas, Clarence Recruitment will request sight of a letter of professional standing issued by the professional regulatory authority in the country/countries where the individual worked. This check is completed to confirm the work seeker's suitability for the role in line with Clarence Recruitment obligations under the Conduct Regulations. We will obtain details of the Regulated bodies in the EU/EEA and Switzerland via the Regulated Professions database or for any other part of the world from the UK Centre for Professional Qualification (UKCPQ).

Where the letter cannot be obtained and all reasonably practicable steps have been taken to obtain it, Clarence Recruitment will request that the work seeker to provide an alternative document which confirms their suitability for the role. This may be a letter of good standing from the head teacher in the school that they worked in or additional professional references. In such a case where the letter of professional standing cannot be obtained, Clarence Recruitment may also refer to the Teacher Regulation Authority Country evidence table for guidance on what other document/s might confirm suitability.

Clarence Recruitment will then inform the client of the steps taken to comply with the suitability requirements which are set out in Regulation 22 of the Conduct Regulations.

3.6. Online/social media checks

In accordance with the updated guidance in KCSIE 221, Clarence Recruitment will conduct an online search of a shortlisted candidate as part of our due diligence checks should this form part of a school's recruitment policy. We will take into account any specific checks that form part of the school's own online checks policy or procedure. We will inform all candidates that this will form part of the recruitment process prior to conducting a search and update our privacy policy and retentions policy accordingly.

3.7. Qualifications and early career teachers (ECTs)/newly qualified teachers (NQTs)

Where the client, legislation or any professional body requires the work seeker to have a particular qualification or authorisation to work in the position offered by the client, we will obtain copies of original qualifications and authorisations, and these will be available to our clients upon request.

Under the Education (School Teacher's Qualifications) (England) Regulations 2003, work seekers being supplied into a teaching position within a maintained school must hold qualified teacher status (QTS) and have successfully completed their induction. This is subject to certain exemptions listed in Annex A of the Induction for Early Career Teachers (England) statutory guidance. In addition to checking the qualifications, we will also check the teacher's qualified teacher status via the Teacher Regulation Agency online portal. Please see further details below.

We will check overseas qualifications via UK ENIC the UK's National Information Centre.

A qualified teacher who has been awarded QTS but who has not yet completed an induction period can only undertake short term supply work of less than 1 term in a maintained school for a maximum period of 5 years from the award of the QTS. An induction programme must be put in place immediately if it becomes clear that the extended assignment will continue for at least a term. Clarence Recruitment will ensure that a teacher who has not satisfactorily completed an induction period is eligible to carry out short term supply work.

Wherever possible, we will work with schools and ECTs/NQTs to find suitable induction placements. In England, an ECT is required to complete 6 full school terms. In Wales NQTs must complete 3 school terms but this can be done by working 380 sessions (a session is equivalent to either a morning or an afternoon of teaching).

3.8. Teacher Regulation Agency / Education Workforce Council (Wales)

Clarence Recruitment will undertake checks via the Teacher Regulation Authority (TRA), or in Wales, the Education Workforce Council (EWC), to check a teacher's UK qualified teacher status to ensure that qualification certificates are genuine and that there are no prohibitions or sanctions imposed against the work seeker. We will retain a screen print on the teacher's file as a record of these checks.

3.9. Referrals

Clarence Recruitment as an employment business is a 'personnel supplier' and has a legal requirement under the Safeguarding Vulnerable Groups Act 2006 to refer information to the DBS about individuals who have either harmed, or placed at risk of harm, a child or vulnerable adult.

Where Clarence Recruitment supplies or introduces a work seeker to a client, and the client subsequently removes the work seeker from carrying out 'regulated activity' because the client believes that the person has engaged in 'relevant conduct' or the 'harm test' is satisfied, Clarence Recruitment must provide information to the DBS about this matter. Additionally, if Clarence Recruitment decides to withdraw our services from the work seeker because we believe that the work seeker engaged in 'relevant conduct' or that the 'harm test' is satisfied, we must provide information to the DBS about this.

'Relevant conduct' is defined as:

- Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult,
- Conduct which, if repeated against a child or vulnerable adult would endanger or would be likely to endanger him,
- Conduct involving sexual material relating to children (including possession of such material),
- Conduct involving sexually explicit images depicting violence against human beings,
- Conduct of a sexual nature involving a child or vulnerable adult.

Clarence Recruitment has a duty to refer information to the DBS if the 'harm test' is satisfied, i.e. if Clarence Recruitment thinks that that the person may:

- Harm a child or vulnerable adult
- Cause a child or vulnerable adult to be harmed
- Put a child or vulnerable adult at risk of harm

- Attempt to harm a child or vulnerable adult
- Incite another to harm a child or vulnerable adult

To ensure compliance with the DBS referral rules, we have processes in place to ensure that all staff are aware of the legal duty to make a DBS referral where necessary and know the process for doing so.

4. Use of Safeguarding Allegation Records in Recruitment & Vetting

As part of our commitment to safer recruitment, the organisation recognises that safeguarding-related records may be relevant to future employment decisions. Allegation records that meet the harms threshold are maintained in line with statutory guidance to enable accurate references, prevent repeated investigations, and support suitability assessments during recruitment.

Where a reference is requested for an individual who has previously been the subject of an allegation, the organisation will provide accurate, fair and factual information in accordance with safeguarding guidance and employment law. Any information shared will reflect the nature, investigation and outcome of the allegation (excluding malicious allegations, which must not be included in references).

This policy should be read alongside the organisation's **Safeguarding & Child Protection Policy**, which sets out full procedures for:

- Handling allegations against staff
- Record-keeping responsibilities
- Outcomes and definitions
- Retention rules
- LADO processes

The organisation will also comply with its statutory duty to refer individuals to the **Disclosure and Barring Service (DBS)** where an individual is dismissed, removed from regulated activity, or would have been removed had they not resigned.

4.1. Fitness to teach

To ensure compliance with the **Education (Health Standards) (England) Regulations 2002**, Clarence Recruitment will ask all work seekers to advise us of any health or disability issues that they believe are relevant to the role and which make it difficult for them to carry out functions that are essential to the role.

If a declaration is made, with consent from the work seeker, we will obtain confirmation from the work seeker's doctor that the work seeker is fit to teach. If we are unable to obtain this confirmation, we will not proceed with the registration.

If a teacher has been retired on medical grounds by the Department of Education after 1 April 1997, and is currently in receipt of ill health pension or total Incapacity benefit, the teacher will not be able to teach as they have been considered medically unfit. However, if the retirement was before 1 April 1997, the teacher may be able to work if they can evidence that they have the health and physical capacity to teach. This can be achieved by obtaining confirmation, in writing, from a GP. In these

instances, they can only work a maximum of 2.5 days per week. This requirement only applies in England.

4.2. Disqualification

In order for Clarence Recruitment 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**, we must carry out appropriate checks to ensure that work seekers are not disqualified from teaching. Under the rules, individuals can either be disqualified from carrying out work with children in their own right, or disqualified by association because they live with somebody, or have somebody working in their home, who is disqualified.

4.2.1. Disqualification by association checks

Changes to the disqualification rules were introduced in 2018 and since then, disqualification by association only applies to those who work in childcare in a domestic setting, such as in a childminder's home (previously it applied in schools and non-domestic settings such as nurseries).

For roles involving childcare, which is carried in a domestic setting only, we will require a disqualification by association declaration to be signed by candidates before we place them in any roles.

4.2.2. Disqualification checks

Disqualification checks are required for all candidates who are seeking work which involves 'relevant childcare roles', such as:

- provision of early years childcare
- later years childcare in nursery, primary or secondary school settings
- staff directly concerned with the management of the above.

For candidates who do not work in these 'relevant childcare roles', we will not conduct disqualification checks. For example, staff who do the following are not covered:

- only provide education, childcare or supervised activity during school hours to
- children above reception age; or
- only provide childcare or supervised activities out of school hours for children who
- are aged 8 or over; and
- are not involved in the management of relevant provision.

5. Training

5.1. Mandatory Safeguarding Training

All candidates are required to complete our Mandatory Safeguarding Training Course, which has recently been outsourced to CPD service provider Candidate Go. www.candidatego.com.

The mandatory training includes:

- Keeping Children Safe in Education (all parts)
- Safeguarding

- Prevent and Anti-radicalisation
- FGM Awareness
- Allergy Safety in Schools
- E-Safety
- Child Sexual Exploitation

6. Other checks

6.1. Continued suitability

In order to ensure that all work seekers registered with Clarence Recruitment meet the safeguarding and suitability requirements on an ongoing basis, at least once a year we will conduct status and Teacher Regulation Authority/Education Workforce Council checks (subject to any shorter period imposed by a client).

Where a work seeker has not worked with us for a period of three to six months, we will conduct status and Teacher Regulation Authority/Education Workforce Council checks and obtain an additional reference/s to cover the period in question.

Where a work-seeker has not worked with us for over six months the registration process will be repeated in full.

7. 9. Review of this Policy

This policy will be reviewed annually, or sooner where there are changes to legislation, regulatory requirements, guidance or the Company's activities.

Policy Owner: Mia Jones, Head of Business Services & Governance
Next Review Date: August 2027