Training and Competence Policy

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

Purpose of This Policy

Clarence Recruitment is committed to maintaining a competent, ethical and safeguarding-led workforce. We will provide role-appropriate learning so that everyone who recruits, screens, supplies, manages or supports education workers understands their responsibilities and can demonstrate that understanding in practice.

This policy is designed to support compliance with applicable recruitment law, statutory safeguarding guidance and the Recruitment and Employment Confederation (REC) Code of Professional Practice. Training does not replace supervision, current written procedures or specialist legal advice.

The purpose of this policy is to establish a consistent framework for identifying, delivering, recording and evaluating training. It aims to protect children and adults at risk, ensure lawful and fair recruitment, provide reliable services to schools and colleges, and support continuous professional development.

Scope

This policy applies to all Agency personnel, including temporary and probationary staff, who perform recruitment, compliance, payroll, safeguarding, account management, management, data-handling or candidate-facing duties.

The safeguarding provisions are written primarily for placements in England and reflect Keeping Children Safe in Education 2026. For placements in Scotland, Wales or Northern Ireland, the Head of Business Services & Governance must map training to the applicable national legislation and guidance before supply begins.

1. Governance, roles and responsibilities

- **Board/Owner:**
  - Approve this policy and provide sufficient resources for effective training.
  - Receive assurance on completion, competence, safeguarding quality and remedial action.
  - Promote a culture in which safeguarding, lawful conduct, inclusion and professional challenge take priority over commercial pressure.

- **Designated Safeguarding Lead (DSL)** (and Deputies):
  - Maintain the training matrix and annual training plan.
  - Monitor changes in legislation, statutory guidance, regulator expectations and REC standards.
  - Approve training content, trainers and assessment methods.
  - Deliver or commission safeguarding briefings and maintain clear escalation arrangements, including deputy cover.
  - Sample records and files, report trends and require refresher or remedial training.

- **Line Managers:**
  - Assess role-specific learning needs at induction, probation, supervision and appraisal.
  - Ensure staff do not undertake unsupervised regulated or compliance-critical tasks until competence is evidenced.
  - Provide coaching, observation and timely corrective action.

- **All Staff & Contractors:**
  - Attend required learning, complete assessments honestly and apply training in practice.
  - Keep knowledge current, seek guidance when unsure and promptly report mistakes, concerns or conflicts.
  - Read and follow the policies, client procedures and assignment information relevant to their role.

2. Training needs analysis

The Head of Business Services & Governance will maintain a role-based training matrix. Needs will be identified from job descriptions, legal and guidance changes, REC compliance expectations, audit findings, complaints, safeguarding cases, incidents, client feedback, performance data and individual development reviews.

Training will be proportionate to responsibility and risk. New or changed duties must be assessed before they are assigned. Where a person lacks competence, the Agency will provide supervision, restrict the activity or suspend authorisation until competence is demonstrated.

3. Induction and probation

All new starters must complete induction before carrying out unsupervised candidate, client, safeguarding, payroll or placement activity. Induction will normally cover:

- the Agency's values, REC principles, reporting lines and delegated authorities;
- safeguarding and child protection, including immediate action on concerns, the role of the DSL, allegations and low-level concerns, whistleblowing, information sharing and recordkeeping;
- safer recruitment and pre-placement checks;

- the Conduct of Employment Agencies and Employment Businesses Regulations 2003, including terms, assignment information and the Key Information Document where applicable;
- Agency Workers Regulations, working time, pay, holiday, pensions and lawful use of umbrella companies where relevant;
- equality, diversity and inclusion; prevention of discrimination, harassment and victimisation;
- UK GDPR, Data Protection Act 2018, confidentiality, cyber security and secure records;
- right to work, identity fraud indicators, modern slavery and ethical international recruitment;
- health and safety, lone working and incident reporting;
- complaints, concerns, conflicts of interest, anti-bribery, fraud prevention and speaking up;
- the recruitment system, file standards, escalation routes and quality controls.

Managers will agree a probation learning plan. Successful probation requires completion of mandatory modules, satisfactory checks of work quality and a documented competence sign-off.

4. Safeguarding and safer recruitment training

All staff must receive safeguarding training appropriate to their contact with children, candidates and education settings. Anyone working in or supplied to a school or college must be instructed to read the current Part One of Keeping Children Safe in Education in full and follow the setting's safeguarding and child protection procedures.

Training for recruiters and compliance staff must include:

- a child-centred approach; categories and indicators of abuse, neglect and exploitation; online harm; child-on-child abuse; early help; and children who may be particularly vulnerable;
- how to respond to a disclosure, record facts, preserve confidentiality and report without delay to the relevant DSL or emergency service;
- concerns and allegations involving agency workers, supply staff, contractors or Agency personnel, including low-level concerns and referral/escalation routes;
- identity and address verification, employment history and exploration of gaps, references, qualifications and professional status;
- right-to-work checks and any overseas checks appropriate to the individual and role;
- enhanced DBS and children's barred list requirements where legally eligible and required, prohibition checks where relevant, and the limits of each check;
- the duty to provide accurate written confirmation to the school or college of checks completed, the date of checks and any information the setting must consider;
- single central record information required by the hirer, while recognising that responsibility for the record remains with the school or college;
- handling disclosures or risk information fairly, lawfully and through an authorised safeguarding decision-maker;
- ongoing suitability, renewal or status-check arrangements, and immediate action when new information arises.

No worker may be introduced or supplied to regulated activity unless all required checks and risk decisions are complete, recorded and independently quality-checked in accordance with the Agency's safer recruitment procedure.

5. Training for supplied education workers

Before first placement, supplied workers must receive an Agency briefing covering professional boundaries, the staff code of conduct, safeguarding reporting, allegations and low-level concerns, whistleblowing, online safety, confidentiality, behaviour expectations, health and safety, and the requirement to follow each setting's local policies.

Assignment confirmation must make clear that the worker must obtain and follow local induction information, including the identity of the setting's DSL and deputy, emergency arrangements, behaviour policy, acceptable-use rules, medical or SEND information relevant to safe performance, and any site-specific risks.

6. Recruitment law, REC standards and ethical practice

Relevant personnel must be trained to apply the law and the REC Code of Professional Practice to their daily work. Training will address:

- respect for laws, honesty and transparency, work relationships, diversity, safety, professional knowledge, certainty of engagement, prompt and accurate payment, ethical international recruitment, confidentiality and privacy;
- the distinction between an employment agency and an employment business and the obligations attaching to each service;
- agreement and issue of terms with work-seekers and hirers before services or supply, as required;
- collection of sufficient assignment information from hirers and accurate, timely communication to work-seekers;
- Key Information Documents for agency workers where required;
- prohibitions on charging work-seekers for work-finding services and on unfairly restricting work-seekers;
- pay, deductions, holiday pay, pensions, working time, equal treatment under the Agency Workers Regulations and transfer-fee arrangements;
- truthful advertising, documented authority to recruit, fair selection, reasonable adjustments and accurate representations;
- documenting key recruitment stages, protecting confidential information and making prompt, accurate payments;
- complaints handling, cooperation with audits or regulators and correction of errors.

The Agency's nominated REC compliance contact must maintain knowledge sufficient to complete the REC compliance assessment within required timescales. Relevant staff will receive updates and practice checks on any area in which the Agency operates, including supply to vulnerable people.

7. Delivery methods and accessibility

Learning may include instructor-led sessions, e-learning, supervised practice, case studies, role play, legal updates, toolbox talks and external qualifications. Training must be accessible. Reasonable adjustments, alternative formats, additional explanation or supervised practice will be provided where needed without lowering the competence standard.

8. Assessment and authorisation

Attendance alone is not evidence of competence. Assessment may include knowledge tests, observed tasks, scenario responses, file audits and manager questioning. Mandatory knowledge assessments require a pass mark set by the Head of Business Services & Governance; safeguarding-critical questions must be answered correctly before authorisation.

Where an assessment is not passed, the manager will record the gap, provide targeted retraining and reassess. Until then, the person must not perform the affected task unsupervised. Deliberate circumvention of controls may be managed under the disciplinary procedure.

9. Refresher and update training

Safeguarding knowledge will be refreshed at least annually, with updates provided whenever needed and whenever statutory guidance or local procedures change. Other mandatory learning will be refreshed at intervals set in the training matrix, ordinarily every 12 months for high-risk topics and no longer than 24 months unless a documented risk assessment supports a different interval.

Immediate briefing and, where appropriate, reassessment will follow material legislative or guidance changes, a serious incident, an audit failure, repeated error, a complaint trend, a change of role or a significant period away from duties.

10. Training records

The Agency will maintain accurate records showing the learner, role, topic, provider, date, learning outcome, assessment result, reasonable adjustments, expiry or review date, competence decision and any remedial action. Records will be access-controlled, retained in line with the retention schedule and processed under the Agency's data protection policy.

Managers will review overdue items at least monthly. No expired or incomplete training may be represented to a client as current.

11. Monitoring and assurance

The Head of Business Services & Governance will use completion reports, assessment results, quality sampling, candidate-file audits, placement checks, complaints, safeguarding themes and client feedback to test effectiveness. At least quarterly, management will review:

- mandatory training completion and overdue learning;
- assessment pass rates and recurring knowledge gaps;
- errors in checks, assignment information, terms, pay or records;

- safeguarding concerns, allegations and lessons learned, using anonymised information where appropriate;
- complaints, breaches and corrective actions;
- changes required to the training matrix, procedures or supervision.

Findings and actions will be documented and tracked to closure. The Board will receive an annual assurance report.

12. Non-compliance and speaking up

Failure to complete mandatory training, follow lawful instructions or apply safeguarding controls may lead to restriction of duties, retraining, supervision or disciplinary action. The Agency will treat genuine mistakes as opportunities to learn where appropriate, while responding firmly to reckless, dishonest or repeated breaches.

All personnel must raise concerns promptly through their manager, the DSL, the Head of Business Services & Governance or the whistleblowing route. No person will suffer retaliation for raising a genuine concern in good faith.

13. Related documents

- Safeguarding and Child Protection Policy
- Safer Recruitment and Vetting Procedure
- Allegations and Low-Level Concerns Procedure
- Whistleblowing Policy
- Data Protection and Records Retention Policy
- Equality, Diversity and Inclusion Policy
- Complaints Procedure
- Agency Worker, Payroll and Holiday Pay Procedures
- Modern Slavery and Ethical International Recruitment Policy
- Training Matrix and Competence Sign-Off Forms

14. Authoritative references

- Keeping Children Safe in Education 2026 (Department for Education; applies to England)
- Conduct Regulations 2003: guidance for employment agencies and employment businesses
- REC Code of Professional Practice
- REC Compliance Assessment

15. 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.

Updated training and procedures must be issued before changed requirements take effect wherever practicable.

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