Continued Suitability Policy

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

1. Purpose of This Policy

Clarence Recruitment is committed to ensuring that every work-seeker supplied or introduced to an education setting remains suitable for the role throughout registration and every assignment. This policy establishes proportionate, documented arrangements for identifying changes that may affect suitability, safeguarding children, informing clients promptly and preventing placement where required checks or assurances are no longer valid.

This policy supports compliance with the REC Code of Professional Practice, REC Audited Education requirements, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, applicable safeguarding and data-protection law, and Keeping Children Safe in Education 2026 ("KCSIE"). Where Clarence Recruitment supplies through the Government Commercial Agency framework RM6376, its additional contractual requirements also apply.

2. Scope & principles

This policy applies to all temporary workers, agency workers, contractors and permanent candidates registered, supplied or introduced by Clarence Recruitment to schools, colleges, alternative provision, early-years settings and other education clients in England. It applies from registration until the individual leaves the active register and includes periods between assignments.

Decisions will be child-centred, evidence-based, timely, fair and proportionate. Safeguarding takes precedence over commercial considerations. Continued suitability is not presumed from initial clearance: it is actively monitored, and any doubt is assessed before a new or continuing placement is permitted.

This policy should be read with the organisation's safeguarding, safer recruitment, DBS and barred-list, overseas checks, references, allegations and low-level concerns, whistleblowing, complaints, data protection, equality, and disciplinary policies.

3. Responsibilities

- **Board / Director:** approves this policy, provides resources and receives assurance on compliance.
- **Designated Safeguarding Lead (DSL):** leads safeguarding risk assessment, allegations management, referrals and liaison with clients, local authority designated officers, the Disclosure and Barring Service, police or other agencies as appropriate.

- **Compliance Manager:** owns the continued-suitability process, monitors expiries and declarations, maintains the audit trail, samples files and suspends clearance when requirements are not met.
- **Consultants and account managers:** remain alert to concerns, verify assignment requirements, report information immediately and do not place anyone whose clearance is incomplete, expired or suspended.
- **Work-seekers:** provide complete and accurate information, comply with client safeguarding procedures and notify Clarence Recruitment immediately of any matter that could affect their suitability.

4. Continued suitability controls

4.1. Before every assignment

The consultant must confirm and record that the individual's identity, right to work, qualifications and role-specific requirements remain valid; the appropriate enhanced DBS and children's barred-list status have been verified where legally required; required overseas checks and any professional-status or prohibition checks remain satisfactory; references and employment history meet the applicable standard; safeguarding training is current; and no unresolved concern, restriction or client instruction prevents supply.

The client must receive the written confirmation required by law and contract, including the checks completed, their dates and any information that must lawfully be disclosed. Any role-specific requirement notified by the client must be resolved before supply. Where Clarence Recruitment supplies under the Government Commercial Agency framework RM6376, the file must also contain two written references covering at least the previous two years, together with evidence of compliance with any additional declarations and controls required by the framework specification.

4.2. Periodic review

Active work-seeker files will be reviewed at least every 12 months and sooner where a check, document, training record or assignment requirement expires. Clarence Recruitment will operate an expiry-alert system and will not rely on an expired document. Where a DBS Update Service status check is lawfully available and consent and subscription requirements are met, it will be completed at the frequency set by organisational procedure and before placement following a material gap or concern.

4.3. Work-seeker declaration

At least annually, and before returning after an extended break, each active work-seeker must sign or electronically confirm a declaration covering criminal investigations, charges, cautions or convictions; DBS or barred-list matters; overseas matters; disciplinary or capability processes; safeguarding allegations or low-level concerns; restrictions imposed by a regulator or professional body; changes to identity, address, right to work, health or ability relevant to safe performance; and any other information that may affect suitability. The declaration must explain the continuing duty to disclose changes immediately.

5. Trigger events and immediate action

A suitability reassessment is required immediately when Clarence Recruitment receives an allegation, complaint, low-level concern or safeguarding report; adverse client feedback; notification of arrest, charge, conviction or police investigation; a new or changed DBS result; a professional-regulator, prohibition or barred-list issue; a break in service or unexplained employment gap; a change in right to work, identity, qualifications, health or capability relevant to the role; conflicting information; failure to complete required training; or any other information that may indicate risk.

The recipient must record the information factually and notify the DSL and Compliance Manager without delay. Where children may be at risk, the individual must not start or continue an assignment unless the DSL has documented why this is safe and lawful. Clarence Recruitment will inform the client promptly, preserve confidentiality, avoid investigating matters reserved to statutory authorities, and make referrals to the local authority designated officer, DBS, police, professional regulator or other body where the legal threshold is met.

No consultant may override a compliance suspension. Commercial urgency, worker shortage or client pressure is not a reason to place.

6. Assessment & decision-making

The DSL and Compliance Manager will consider the nature, seriousness, relevance and recency of the information; the role and degree of contact with children; patterns or repetition; reliability of the source; statutory and client requirements; evidence of remediation; and any advice from competent authorities.

They will distinguish between an allegation, a substantiated finding and information that remains unverified, while always applying appropriate interim safeguards.
The recorded outcome will be one of: cleared without restriction; cleared subject to lawful and proportionate conditions; temporarily suspended pending information or investigation; restricted from specified roles or settings; or removed from the active register. The record must state the evidence considered, decision, reasons, authoriser, client communication, referrals, review date and any conditions.

The work-seeker will be told the outcome and reasons so far as lawful and consistent with safeguarding and third-party confidentiality. They may provide further relevant information or request a review by [senior role] within [10] working days. A review does not lift a safeguarding suspension unless expressly authorised in writing.

7. Client communication and allegations during assignments

Clients must report safeguarding concerns, allegations, conduct issues, material performance concerns and assignment terminations to Clarence Recruitment immediately. The agency and client will agree who will lead each action, share relevant information lawfully and avoid gaps or duplication. KCSIE procedures for concerns or allegations concerning supply staff, contractors and other adults must be followed.

If a client removes a worker from duties or would have done so had the worker not resigned or ceased supply, the DSL will consider without delay whether a referral to the DBS and/or a professional regulator is legally required. Ending an assignment does not end the agency's safeguarding responsibilities.

8. Records, confidentiality and data protection

Clarence Recruitment will keep a clear, chronological audit trail of checks, declarations, communications, risk assessments, decisions, referrals and review dates. Access is limited to authorised personnel. Personal data, including criminal-offence and safeguarding information, will be processed lawfully, fairly, securely and only to the extent necessary. Information will be shared on a need-to-know basis; data-protection law is not a barrier to necessary safeguarding information-sharing.

Records will be retained in accordance with the organisation's retention schedule and any applicable statutory, contractual, safeguarding or insurance requirement. Where information cannot be verified, the attempted checks, source, risk decision and any client notification must be documented.

9. Training, audit and assurance

Relevant agency staff will receive induction and refresher training on this policy, KCSIE, safer recruitment, information-sharing, allegations, low-level concerns and escalation. Understanding will be tested and attendance recorded. Before an education assignment, work-seekers must be instructed to read KCSIE 2026 Part One in full, complete any required safeguarding induction and refreshers, confirm their understanding, and follow the school's or college's safeguarding and child-protection procedures.

The Compliance Manager will conduct documented periodic file sampling and management-information reviews covering overdue reviews, expired checks, blocked placements, declarations, DBS status checks, trigger incidents, referrals, client notifications and completion of corrective actions. Findings will be reported to senior management. The organisation will maintain evidence suitable for REC audit, including current policies, staff understanding, system controls and sampled work-seeker files with appropriate consent.

10. Non-compliance

Failure by agency staff to follow this policy may result in disciplinary action. Failure by a work-seeker to disclose relevant information, provide evidence or comply with safeguards may result in suspension or removal from the active register and, where appropriate, referral to a client, regulator, the DBS, police or another authority.

11. Review

This policy will be reviewed at least annually and sooner following a legislative or statutory-guidance change, an update to REC Audited Education guidance or the GCA framework, a serious incident,

audit finding or identified control weakness. The policy owner will maintain version control and communicate material changes to relevant staff and work-seekers.

12. 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