



# **Best In Class (Bradford) Ltd**

## **Recruitment, Selection and Vetting Policy**

Safeguarding, Safer Recruitment and KCSIE – England 2026

|                |                                                                                                                      |
|----------------|----------------------------------------------------------------------------------------------------------------------|
| Policy owner   | Best In Class Ltd / Directors                                                                                        |
| Effective date | 1 September 2026                                                                                                     |
| Version        | 2026.1                                                                                                               |
| Review date    | 31 August 2027, or sooner if legislation/guidance changes                                                            |
| Applies to     | All Best In Class staff involved in recruitment, compliance, candidate management and placement of education workers |



## 1. Introduction and purpose

Best In Class is an employment business supplying temporary workers to work within the education sector. The work seekers we engage must pass robust recruitment, selection, safeguarding and vetting procedures before they are considered for any placement or assignment with a client.

This policy sets out Best In Class's safer recruitment arrangements and is designed to support compliance with applicable legislation, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, Disclosure and Barring Service (DBS) requirements, Home Office right to work requirements and the Department for Education's Keeping Children Safe in Education (KCSIE) 2026 statutory guidance.

KCSIE 2026 replaces the September 2025 version and comes into force on 1 September 2026. Best In Class will keep this policy under review and amend it where legislation, statutory guidance, DBS requirements or client/framework requirements change.

The policy is intended to prevent unsuitable people from being supplied to schools and colleges, to identify safeguarding concerns at the earliest opportunity, and to ensure that suitability is monitored throughout a worker's engagement with Best In Class.

## 2. Scope and principles

This policy applies to all candidates/work seekers supplied or introduced by Best In Class to schools, colleges, nurseries, alternative provision and other education settings where safeguarding requirements apply.

- Safeguarding is a shared responsibility and the best interests of children must remain central to recruitment and placement decisions.
- No candidate will be placed into an assignment until the checks required for the role have been completed, unless a lawful and documented exception applies and the client has been informed.
- Checks will be proportionate to the role and based on the legal eligibility of the position; Best In Class will not request checks that the law does not permit.
- Recruitment decisions will be fair, consistent and non-discriminatory, including when criminal record information is disclosed.
- Information will be collected, used, shared and retained in accordance with UK data protection law and Best In Class's data protection arrangements.
- Safeguarding suitability is an ongoing requirement and is not satisfied merely by obtaining a DBS certificate.

## 3. Responsibilities

Directors / senior management are responsible for ensuring that the policy is implemented, resourced and reviewed.



Recruitment and compliance staff are responsible for completing and recording the required checks, identifying gaps or concerns, escalating safeguarding matters, and ensuring that only appropriately cleared candidates are put forward.

All Best In Class employees must report safeguarding concerns, allegations, low-level concerns, changes in candidate circumstances or information that may affect a worker's suitability.

Where a concern relates to a worker already placed in a school, Best In Class will work promptly with the school, the relevant safeguarding lead and, where appropriate, the Local Authority Designated Officer (LADO), police, local authority children's social care, DBS or [Teaching Regulation Agency](#) (TRA).

## **4. Recruitment and selection process**

### **4.1 Application and initial screening**

- Candidates will provide a current CV/application containing sufficient information to assess their experience, qualifications and suitability.
- Recruiters will explore employment history, experience of working with children, relevant safeguarding experience, qualifications, professional status and any gaps or inconsistencies.
- Candidates must disclose information that is legally required and relevant to the role, including matters that may affect suitability to work with children.
- Where information is incomplete, inconsistent or raises a safeguarding concern, the candidate will not be cleared until the matter has been investigated and resolved to the satisfaction of Best In Class.

### **4.2 Interview**

Before placement, Best In Class will interview candidates face-to-face, either in person or by secure video where appropriate. Interviewers will use a structured set of safeguarding and suitability questions and will assess the candidate's experience, professional judgement, understanding of safeguarding, behaviour management, boundaries and response to safeguarding scenarios.

Recruitment staff involved in safer recruitment will receive appropriate training and will understand the principles in Part Three of KCSIE 2026. Where the client has a stricter safer recruitment requirement, the stricter requirement will be followed.

### **4.3 Job and role information**

Where Best In Class advertises or sources for a role, the vacancy information should make clear the nature of the work, contact with children and, where known, whether the role involves regulated activity. Where appropriate, adverts will state that safeguarding checks will be undertaken and that the post is subject to satisfactory vetting.



## 5. Identity, right to work and address checks

### 5.1 Identity

Best In Class will verify identity using appropriate original documentation or approved digital identity processes. Any discrepancies, name changes or identity concerns must be resolved before placement.

Where appropriate, Best In Class will obtain at least two suitable identity/address documents in addition to the evidence used for right to work purposes, in line with company and client requirements.

### 5.2 Right to work

Original right to work checklist: <https://www.gov.uk/view-right-to-work>

Best In Class will complete a right to work check for every work seeker in accordance with current Home Office requirements. [Physical document checks](#), where permitted, will involve obtaining the original documents, checking their validity and consistency with the individual, and retaining a compliant copy. Online checks will be completed through the Home Office service where required.

Right to work evidence will be retained securely for the required period and then securely destroyed in accordance with the company's retention schedule.

## 6. References and employment history

In accordance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and applicable client/framework requirements, Best In Class will obtain at least two references covering the previous two years of employment, including the most recent employer where practicable.

References will be verified directly with the referee. Where a verbal reference is taken, the record will be documented and confirmation sought where required by Best In Class procedures.

References should, where relevant, address dates of employment, role, suitability to work with children, re-employment and disciplinary/safeguarding matters. References from employment businesses should include employment dates and known safeguarding concerns.

Best In Class will investigate unexplained gaps in employment history. For roles or clients requiring it, Best In Class may obtain a longer employment history, including a ten-year history, where this is a contractual, client or safeguarding requirement.



## 7. DBS checks and regulated activity

### 7.1 Role-based DBS eligibility

Best In Class will determine the appropriate DBS level by reference to the actual duties of the role and current DBS eligibility rules. An Enhanced DBS check with Children's Barred List information will be required where the individual is engaging in regulated activity with children and the law permits/requires the barred list check.

For roles involving regular contact with children but which do not amount to regulated activity, an Enhanced DBS check without barred list information may be appropriate. Barred list information will not be requested where the individual is not engaging in, or seeking to engage in, regulated activity.

From 1 September 2026, the statutory definition of regulated activity changes following the removal of the supervision exemption. Best In Class will therefore reassess DBS eligibility where a role involves teaching, training, instructing, caring for or supervising children, even where the activity is supervised.

### 7.2 DBS certificate and Update Service

Best In Class will view the original DBS certificate and record the relevant details and outcome. Where the candidate is subscribed to the DBS Update Service, Best In Class may carry out a status check with the candidate's consent, provided the certificate is of the appropriate workforce and level for the role.

Where a new [DBS certificate](#) is required, Best In Class will not place the candidate into work requiring that check until the required clearance has been obtained, subject to any lawful exception expressly permitted by the relevant legislation and client requirements.

Best In Class will undertake periodic DBS Update Service status checks where permitted and required by company or client procedures. A new DBS application will be required where an Update Service check identifies new information or where the existing certificate is not suitable for the role.

Any criminal record information will be considered fairly and individually in accordance with the Rehabilitation of Offenders Act 1974, the Exceptions Order and Best In Class's Recruitment of Ex-Offenders Policy. A criminal record will not automatically result in rejection.

### 7.3 DBS information and confidentiality

DBS information is sensitive personal data. Best In Class will restrict access to authorised personnel and process, store, retain and destroy information in accordance with UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and DBS handling requirements.

Where a copy of a DBS certificate is retained, there must be a legitimate and documented reason. Copies will not be retained indefinitely. The company will normally retain only the information needed to evidence that the check was completed, the outcome and the recruitment decision, unless a longer retention period is legally justified.



## 8. Overseas checks

Candidates who have lived or worked outside the UK will be subject to the same UK pre-employment checks as other candidates, plus any further checks that are reasonably available and appropriate to establish suitability.

- Overseas criminal record information will be sought where available and appropriate.
- For teaching roles, Best In Class will seek evidence from the relevant overseas <https://www.gov.uk/guidance/recruit-teachers-from-overseas> where available, including confirmation of sanctions or restrictions.
- The previous company rule requiring an overseas police check after six months in a single country within the last five years will be treated as a minimum internal requirement where applicable, but it will not replace the wider KCSIE requirement to consider relevant overseas history.
- Where a country does not provide a criminal record check, Best In Class will consider alternative evidence and/or undertake a documented risk assessment before deciding whether the candidate can be placed.
- Where evidence cannot be obtained despite reasonable efforts, the client will be informed of the steps taken where this is relevant to the placement decision.

## 9. Professional status, qualifications and restrictions

Where a role requires QTS, Best In Class will verify Qualified Teacher Status through the [Teaching Regulation Agency](#) or the relevant current government system. Where appropriate, Best In Class will also check prohibitions, sanctions and restrictions.

For support staff and other regulated roles, Best In Class will complete any applicable prohibition, restriction or professional registration checks required by law, the role or the client.

Qualifications and authorisations required for the assignment will be verified and recorded. Overseas qualifications will be checked through an appropriate recognised route where necessary.

## 10. Early Career Teachers and trainees

Best In Class will verify QTS and relevant qualifications for teachers and will establish whether the candidate is an Early Career Teacher where this affects suitability or placement. Where a client requires specific induction arrangements, Best In Class will work with the school and candidate to ensure the placement is appropriate.

## 11. Rehabilitation of Offenders and criminal record information

Candidates will be informed clearly about criminal record disclosure requirements and the circumstances in which DBS checks can be requested. Best In Class will comply with the [DBS Code of Practice](#) and the Rehabilitation of Offenders Act 1974 and associated Exceptions Order.



Where a DBS certificate discloses information, Best In Class will provide the candidate with a fair opportunity to discuss the information and will assess relevance, seriousness, recency, circumstances, role and safeguarding risk before making a decision.

Best In Class maintains a separate Recruitment of Ex-Offenders Policy and will ensure that recruitment staff understand the lawful treatment of protected convictions and cautions.

## **12. Childcare disqualification**

Best In Class will apply childcare disqualification requirements where they are legally applicable to the role. Disqualification by association checks will only be applied where the law requires them, including relevant domestic childcare settings.

For relevant childcare roles, Best In Class will obtain the appropriate declaration/check and act on any information that indicates the individual may be disqualified. Recruitment staff must escalate uncertainty rather than making assumptions about eligibility.

## **13. Safeguarding training and KCSIE**

All Best In Class employees involved in recruitment or candidate management will receive safeguarding awareness appropriate to their role. Staff involved in safer recruitment will receive appropriate safer recruitment training.

Candidates supplied to education settings will be required to read and acknowledge the relevant KCSIE safeguarding information required by Best In Class and/or the client. From September 2026, schools and colleges are expected to ensure all staff, including those who do not work directly with children, read Part One of KCSIE. Best In Class will therefore make the full Part One available to relevant candidates and will retain evidence of acknowledgement.

Candidates will also be reminded that school-specific safeguarding procedures, local safeguarding arrangements and the client's code of conduct must be followed while on assignment.

## **14. Continued suitability and monitoring**

Safer recruitment does not end when a candidate is placed. Best In Class will maintain ongoing vigilance over the suitability of registered workers.

- DBS Update Service/status checks will be undertaken where required and legally permitted.
- TRA/professional status checks will be repeated where appropriate.
- Candidates will be asked to notify Best In Class promptly of any change that may affect their suitability, including criminal allegations/convictions, restrictions, safeguarding concerns, disciplinary action relevant to safeguarding, or changes to professional status.
- Where a candidate has not worked for Best In Class for three to six months, Best In Class may complete updated checks and obtain additional references to cover the period.



- Where a candidate has not worked for Best In Class for more than six months, Best In Class may repeat the registration/vetting process where required by company, client or framework rules.
- Where there is a material concern about a candidate's suitability, the candidate will be suspended from placement consideration while the matter is investigated.

## 15. Safeguarding concerns and allegations involving workers

Best In Class recognises that KCSIE Part Four applies to concerns or allegations involving people working in or on behalf of schools, including supply teachers, contractors and agency workers.

Where a school raises an allegation or safeguarding concern about a Best In Class worker, Best In Class will cooperate immediately with the school and relevant safeguarding authorities. The school remains responsible for managing its safeguarding procedures and LADO arrangements, while Best In Class will manage its employment/agency responsibilities.

- The worker will not be placed into further assignments where immediate safeguarding action is required.
- The matter will be escalated internally to a Director/safeguarding lead.
- Best In Class will cooperate with the school's case manager, DSL and LADO as appropriate.
- Records will be factual, confidential and securely stored.
- Best In Class will not conduct an investigation in a way that compromises a school, police, social care or LADO investigation.
- Where the legal criteria are met, Best In Class will make the required DBS referral and/or consider a referral to the [Teaching Regulation Agency](#).

## 16. Low-level concerns

Best In Class will maintain a culture in which concerns about inappropriate or unprofessional behaviour are reported early. A low-level concern may be any concern, however small, that an adult working in or on behalf of a school may have acted inconsistently with the expected code of conduct but which does not meet the harm threshold.

Where a school identifies a low-level concern relating to a Best In Class worker, the school should notify Best In Class so that patterns can be identified. Best In Class will record and review such concerns proportionately and confidentially.

Low-level safeguarding concerns will not automatically be included in references. Where a concern relates to substantiated misconduct or poor performance that would ordinarily be referenced, it may be dealt with in accordance with reference procedures and applicable law.

Best In Class will maintain a separate Low-Level Concerns and Professional Boundaries Procedure.





## 17. DBS and regulatory referrals

Best In Class recognises its legal duties as a personnel supplier. Where the relevant conditions are met, Best In Class will make a referral to the DBS. This includes circumstances where Best In Class removes a person from regulated activity, or would have done so had the person not left, and the relevant conduct/harm test/automatic barring criteria are satisfied.

Where Best In Class dismisses or ceases to use a teacher because of serious misconduct, or would have done so had the teacher not left, Best In Class will consider whether a referral to the [Teaching Regulation Agency](#) is required under the Education Act 2002.

Referrals will be made as soon as practicable and records will be retained to evidence the decision-making process.

## 18. Fitness, health and reasonable adjustments

Best In Class will not routinely seek unnecessary medical information. Any health or disability information requested will be relevant, proportionate and processed lawfully. The purpose will be to establish whether the candidate can safely perform the essential functions of the role and/or whether reasonable adjustments are required.

Where an occupational health or medical assessment is genuinely necessary and lawful, Best In Class will obtain appropriate consent and maintain confidentiality. Candidates will not be disadvantaged because of a disability where reasonable adjustments can address the relevant requirements.

## 19. Information sharing and data protection

Safeguarding information may need to be shared without consent where there is a lawful basis and sharing is necessary to protect a child. Best In Class will follow current data protection law and applicable safeguarding information-sharing guidance.

Information will be shared on a need-to-know basis, securely and proportionately. Where a safeguarding concern involves a worker, Best In Class may share relevant information with the client school, safeguarding partners, police, social care, LADO, DBS, TRA or other competent authority where lawful and necessary.

The company will maintain a documented retention schedule covering recruitment records, right to work evidence, identity documents, references, DBS records, safeguarding concerns and placement records.

## 20. Agency supply and client notification

Best In Class will provide clients with written confirmation of the checks required for the relevant worker and role. In particular, where a school or college uses Best In Class as an agency/third-party supplier, Best In Class will provide the written confirmation required by KCSIE that the checks the school would otherwise undertake have been completed.



Where an Enhanced DBS certificate with Children's Barred List information is required, Best In Class will confirm that the appropriate certificate has been obtained before the individual is placed into regulated activity, subject to applicable law.

Best In Class will cooperate with the school's identity checks and will ensure that the person attending the school is the same person who was vetted.

## **21. Whistleblowing and escalation**

Employees and workers are encouraged to raise safeguarding concerns immediately. No person will be disadvantaged for making a genuine safeguarding report in good faith.

Concerns about a Best In Class employee should be escalated to a Director or the nominated safeguarding lead. Where the concern concerns senior management or cannot be safely raised internally, the individual should use the company's Whistleblowing Procedure and, where appropriate, external statutory reporting routes.

## **22. Record keeping and audit**

Best In Class will maintain an auditable recruitment record for each worker. The record should demonstrate what checks were completed, when they were completed, by whom, the outcome and any decisions or risk assessments.

- Application/CV and interview record
- Identity and right to work checks
- References and employment history
- DBS certificate/check and Update Service status where applicable
- Overseas checks and professional standing evidence where applicable
- QTS/TRA and other professional checks where applicable
- Qualifications and authorisations
- Childcare disqualification checks where applicable
- KCSIE/safeguarding acknowledgement
- Safeguarding concerns, low-level concerns, allegations and referral decisions where applicable

Access to records will be restricted to authorised personnel and records will be securely destroyed when the applicable retention period expires.

## **23. Review and annual update**

This policy will be reviewed at least annually and whenever there is a significant change to legislation, statutory guidance, DBS requirements, immigration requirements, safeguarding arrangements or client/framework requirements.



Before each September, Best In Class will check for the latest version of KCSIE and update candidate communications, training, forms and compliance procedures accordingly.

## **24. Related policies and procedures to maintain**

To operate this policy effectively, Best In Class should maintain the following linked policies/procedures and ensure that staff know how they interact with this document:

- Safeguarding and Child Protection Policy
- Allegations Against Staff / Supply Workers Procedure
- Low-Level Concerns and Professional Boundaries Procedure
- Whistleblowing Policy
- Recruitment of Ex-Offenders Policy
- Data Protection, Information Sharing and Records Retention Policy
- Online Safety / Acceptable Use Policy for Best In Class staff and workers
- Code of Conduct for Best In Class employees and education workers
- Safer Recruitment Training and Competency Procedure
- DBS and Vetting Procedure / Compliance Checklist
- Complaints and Incident Reporting Procedure
- Equality, Diversity and Inclusion / Recruitment Policy

## **25. Key statutory and guidance references**

- Keeping Children Safe in Education 2026 – Department for Education (in force from 1 September 2026).
- Working Together to Safeguard Children 2026 – Department for Education.
- Safeguarding Vulnerable Groups Act 2006, as amended.
- Crime and Policing Act 2026 – changes to regulated activity with children from 1 September 2026.
- Rehabilitation of Offenders Act 1974 and Exceptions Order 1975, as amended.
- Childcare Act 2006 and relevant childcare disqualification regulations/guidance.
- Conduct of Employment Agencies and Employment Businesses Regulations 2003.
- Education Act 2002, including relevant teacher misconduct/referral provisions.
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
- Current Home Office right to work guidance.
- Current DBS guidance on criminal record checks, Update Service and barring referrals.

## **Appendix A – Minimum compliance checklist before placement**

- Candidate application/CV received and reviewed
- Structured interview completed and suitability assessed
- Identity verified
- Right to work check completed
- Required references obtained and verified



- Required employment history/gaps reviewed
- Correct DBS level determined from role duties
- Enhanced DBS completed where required
- Children's Barred List information obtained where the role is regulated activity and the law permits/requires it
- DBS Update Service checked where applicable and consent obtained
- Overseas criminal record/professional checks completed where applicable
- QTS/TRA/professional status checked where applicable
- Qualifications/authorisations checked
- Childcare disqualification check completed where applicable
- Safeguarding/KCSIE acknowledgement completed
- Any safeguarding concern, disclosure or risk assessed and recorded
- Client supplied with required written confirmation of checks
- Candidate identity matched at placement where required
- All compliance records securely stored