Elysian Safer Recruitment Policy

Policy details	
Policy owner	Jo Nunn, Strategic Lead
Applies to	Everyone employed by any of Elysian's three legal entities, and volunteers, agency workers, contractors, Advisory Board members and the proprietor, at all Elysian provisions and sites
Date of review	November 2026
Date of next review	November 2027, or sooner if legislation or statutory guidance changes
Related policies and procedures	Safeguarding and Child Protection Policy; Whistleblowing Policy; Data Protection Policy; Under-18 Animal Care Helper Procedure
Main legislation and guidance	Keeping Children Safe in Education 2026 (KCSIE), Part 3; Education (Independent School Standards) Regulations 2014, Schedule, Part 4; Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026; Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975; Immigration, Asylum and Nationality Act 2006; Equality Act 2010; UK GDPR and the Data Protection Act 2018; Counter-Terrorism and Security Act 2015 (Prevent duty)

1. Introduction

Safer recruitment is the first step in safeguarding and promoting the welfare of CYP. Elysian is committed to safeguarding and promoting the welfare of all CYP in its education and therapeutic provision, and expects all staff and volunteers to share this commitment.

In this policy, "Elysian" means all three Elysian legal entities and all Elysian provisions and sites. "CYP" means children and young people.

2. Aims

This policy helps Elysian to deter, reject or identify people who might harm CYP or who are otherwise unsuitable to work with them. Its aims are to:

- recruit the best staff on the basis of their merits, abilities and suitability for the role;
- consider all applicants equally and consistently;
- make sure no applicant is treated less favourably because of any protected characteristic under the Equality Act 2010;
- comply with all relevant legislation and statutory guidance; and
- carry out every pre-appointment check needed to safeguard and promote the welfare of CYP.

Elysian recruits through open competition and appoints the person best suited to the role, measured against the job description and person specification. Recruitment is carried out professionally, promptly and in line with current employment and safeguarding law.

Anyone involved in recruitment who has a close personal or family relationship with an applicant declares it as soon as they know of the application, and takes no part in the shortlisting, interview or decision.

Everyone involved in recruiting staff or volunteers must read and follow this policy.

3. Roles and responsibilities

The Strategic Leadership Team makes sure that:

- Elysian has effective safer recruitment policies and procedures for all staff and volunteers, in line with statutory guidance and the law;
- every required pre-appointment check is completed, and compliance is monitored;
- agencies and contractors meet Elysian's safeguarding requirements; and
- safeguarding and the welfare of CYP come first throughout recruitment and employment.

The Chief Executive Officer or the Director authorises any exception this policy allows, approves each recommended offer of employment before it is made, and makes sure Elysian operates within the relevant legislation and guidance.

The policy owner, the Strategic Lead named above, keeps this policy up to date and, with the Heads of Provision, monitors how it is followed.

Each Head of Provision screens applicants who will work with CYP at their site, keeps oversight of every volunteer placement, and audits the single central record each term.

The Recruitment Officer manages the recruitment process and keeps the single central record and personal file checklists up to date. The HR Officer checks the single central record.

The site DSL advises on any safeguarding concern that arises during recruitment.

4. Regulated activity

Regulated activity with children is defined in the Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026. It includes:

- teaching, training, instructing, caring for or supervising CYP, or giving them advice or guidance on their wellbeing, or driving a vehicle only for CYP, where this is done frequently or meets the period condition; and
- work in a specified place, which includes Elysian's registered schools, carried out frequently or meeting the period condition, where the person has the opportunity for contact with CYP.

"Frequently" means once a week or more. The period condition means on more than three days in any 30-day period, or overnight between 2am and 6am with the opportunity for face-to-face contact with CYP.

Since 1 September 2026 there is no exemption for people who are supervised. A person, paid or unpaid, who carries out these activities is in regulated activity whether or not they are supervised.

Elysian decides for each role, paid or voluntary, whether it is regulated activity, and records the decision. Elysian treats all its paid roles in its registered schools as regulated activity. Every person in regulated activity has an enhanced DBS check with children's barred list information.

5. Recruitment and selection

Safeguarding is built into every stage of recruitment.

Advertising

Elysian advertises vacancies to attract as wide a field of applicants as possible. This normally means an external advertisement, and every vacancy is also shared with all staff. Every advertisement states Elysian's commitment to safeguarding and promoting the welfare of CYP, says that the role is exempt from the Rehabilitation of Offenders Act 1974, and says that online searches will be carried out on shortlisted candidates.

Job descriptions and person specifications

The job description is finalised before any other step. It sets out the duties and responsibilities of the role clearly and accurately, including the role's responsibility for safeguarding CYP.

The person specification sets out the skills, experience, qualifications and abilities needed, and includes suitability to work with CYP in Elysian's education, therapeutic, vocational and community settings. It informs every selection decision.

Applications

Elysian advertises through its website and recruitment sites, and receives applications through apply@elysianuk.org. Every applicant completes Elysian's application form, which asks for their full education and employment history and their suitability for the role. Applicants who first send a CV complete the full application form, including the self-declaration, before they are shortlisted. A CV alone is not accepted.

Applicants explain any gaps, anomalies or discrepancies in their history. Each one is explored, recorded and resolved before an appointment is confirmed. An incomplete application form may not be shortlisted.

Applicants are told how Elysian will use their personal data, as UK GDPR requires. All documents about applicants are kept confidential.

Self-declaration

Roles at Elysian are exempt from the Rehabilitation of Offenders Act 1974 under the Exceptions Order 1975. Shortlisted applicants complete a self-declaration of their criminal record before interview. They must declare any unspent convictions and cautions, and any spent convictions and cautions that are not protected. Protected convictions and cautions are filtered: applicants do not need to declare them, and Elysian will not take them into account. The DBS filtering guidance on GOV.UK explains which offences are filtered.

The self-declaration also asks whether the applicant is barred from working with CYP, prohibited from teaching or from the management of an independent school, or subject to any other sanction or restriction relevant to working with CYP.

It is a criminal offence for a barred person to seek or take up regulated activity with CYP, and for Elysian knowingly to allow them to do so. Applicants are told that giving false information is an offence and may lead to the application being rejected, or to dismissal if they have been appointed, and to referral to the police and the DBS.

Shortlisting and online searches

Each Head of Provision screens applications for roles working with CYP at their site against the person specification. A reason is recorded whenever an applicant is placed on hold or not progressed.

Shortlisted candidates are told in writing that Elysian will carry out an online search of publicly available information about them. The search is carried out before interview and recorded, with the date, who carried it out and any issues to explore at interview. It is used only to identify information relevant to safeguarding and suitability to work with CYP.

References

References are sought for all shortlisted candidates, before interview wherever possible, so that any concerns can be explored at interview. Elysian obtains at least two references that it considers satisfactory. One must be from the applicant's current or most recent employer. Where that employment did not involve work with CYP, the second is from the employer for whom the applicant most recently worked with CYP. A referee must not be a relative.

References are requested directly from the referee. Elysian does not accept open references, testimonials or references from relatives. Each reference request asks for:

- confirmation that the applicant is suitable to work with CYP;
- any disciplinary findings relating to the safety and welfare of CYP;
- any substantiated allegations or concerns about the applicant's conduct with CYP;
- whether the applicant has been the subject of disciplinary or capability procedures relating to safeguarding; and
- whether the referee knows of any reason why the applicant should not work with CYP.

Elysian checks every reference, follows up any discrepancy or vague answer, and contacts each referee by phone to verify the reference.

No questions are asked about health or medical fitness before an offer of employment is made.

References Elysian provides

When Elysian gives a reference, it includes substantiated safeguarding allegations and other information relevant to the person's suitability to work with CYP. Allegations found to be false, unsubstantiated, unfounded or malicious are not included. Low-level concerns are not included unless they relate to misconduct or poor performance, or the concern met the threshold for referral to the LADO and was substantiated.

Interviews

Interviews are face to face wherever possible, with a panel of at least two people. At least one panel member has completed safer recruitment training in line with current statutory guidance. Where possible, CYP take part in a separate panel or activity, and their views inform the interview panel's decision.

The interview explores the candidate's ability to carry out the role, any gaps or anomalies in their history, any issues from references or the online search, and their attitude to safeguarding and the welfare of CYP. Any disclosed disciplinary action, allegation, caution or conviction is discussed and considered in the circumstances of the individual case.

Interview panels also assess candidates' understanding of online safety. KCSIE includes misinformation, disinformation and conspiracy theories as online risks, and KCSIE 2026 adds generative AI as a risk factor.

Candidates bring evidence of their identity, address and qualifications to interview. The documents are checked and copies are taken.

6. Offer of appointment and pre-appointment checks

A recommended offer is approved by the Chief Executive Officer or the Director before it is made. Every offer is conditional on:

- a start date and the signing of a contract on Elysian's standard terms and conditions;
- verification of identity;
- two satisfactory references, one from the applicant's current or most recent employer;
- a satisfactory enhanced DBS check, with children's barred list information for roles in regulated activity;
- verification of the right to work in the UK;
- verification of medical fitness for the role;
- verification of the professional qualifications the role needs or the applicant has cited;
- a prohibition check for any role that involves teaching;
- a section 128 check for any role that involves the management of an independent school;
- any further checks needed because the applicant has lived or worked outside the UK; and
- confirmation that the applicant is not, and has never been, subject to a sanction, restriction or prohibition from the Teaching Regulation Agency or its predecessors, or from a regulator of the

teaching profession in any country where they have worked, that prevents them working at Elysian or makes them unsuitable in Elysian's view.

A personal file checklist records every check, the date it was completed and who completed it, how gaps and discrepancies were resolved, any risk assessment, and every approval. The completed checklist is kept on the personnel file.

DBS checks

Elysian obtains an enhanced DBS check, with children's barred list information, for every role in regulated activity. Elysian funds each employee's DBS check.

All checks are completed before the person starts work. In exceptional circumstances, a person may start before the enhanced DBS certificate is received, but only when all of the following apply:

- the enhanced DBS application has been submitted;
- a separate children's barred list check has been completed and is satisfactory;
- identity, right to work, references and qualification checks are complete;
- prohibition and section 128 checks are complete where they apply;
- any overseas checks are complete and satisfactory;
- a written risk assessment has been completed;
- the person is supervised at all times until the certificate is received and is satisfactory; and
- the Chief Executive Officer or the Director has approved the start in writing and the approval is recorded on the personal file checklist.

DBS checks are still requested for applicants with recent periods of overseas residence and for those with little or no previous UK residence.

The DBS issues certificates to the applicant only. Applicants show their original certificate to the Recruitment Officer, before they start or within seven days of it being issued, and the Recruitment Officer records it on the single central record.

DBS re-checks and the Update Service

Elysian carries out a further enhanced DBS check every three years, and funds it. A further check is also made when a person moves to a role that needs a different level of check, and Elysian may carry out a check at any time where there is a legitimate safeguarding, regulatory or organisational reason.

Elysian does not require staff to subscribe to the DBS Update Service. Where a new employee already subscribes, Elysian may use the Update Service with their written consent. Before relying on an existing certificate, Elysian confirms that it matches the person's identity, was issued for the children's workforce at the right level, including barred list information for regulated activity, and shows no change in the status check.

Convictions and other disclosures

Where a DBS certificate or the self-declaration shows a conviction, caution or other information, Elysian considers:

- the nature, seriousness and relevance of the offence to the role;
- how long ago it happened;
- whether it was a one-off or part of a history of offending;
- any change in the applicant's circumstances;
- whether the offence has since been decriminalised; and
- the applicant's account of the offence and any remorse shown.

A Strategic Lead meets the applicant face to face to establish the facts, and makes a written record of the meeting and of each factor above. The record is shared with the Chief Executive Officer before a decision is

made, and the decision is recorded on the personal file checklist. No position is offered or confirmed until this is complete.

An applicant who wants to dispute information on a certificate can do so with the DBS. Where the applicant would otherwise be offered the role, Elysian may, at its discretion, defer the decision to give them a reasonable chance to do so.

Prohibition and section 128 checks

A prohibition check is carried out at offer stage for every role that involves teaching. A person prohibited from teaching, or subject to an interim prohibition order, is not appointed to teach. Prohibition orders are made by the Secretary of State following a professional conduct panel convened by the Teaching Regulation Agency.

A section 128 direction under the Education and Skills Act 2008 prevents a person from taking part in the management of an independent school, including as a member of a proprietor body or in any role with management responsibilities. Elysian carries out a section 128 check for the proprietor, Advisory Board members and every role with management responsibilities. For people in regulated activity, a DBS check with barred list information also shows any section 128 direction.

Identity, right to work and qualifications

Identity is checked against original documents, such as a passport, driving licence or birth certificate, in line with DBS identity checking guidance. Applicants who have changed their name, for example by marriage or deed poll, provide evidence of the change.

Right to work is checked before employment starts, in line with the Immigration, Asylum and Nationality Act 2006 and the Home Office employer's guide to right to work checks. Elysian uses original documents, the Home Office online checking service with the applicant's share code, or a certified digital identity provider, as the guidance allows. The check, its date and the person who made it are recorded. Elysian checks every applicant in the same way and does not discriminate on any protected characteristic.

Applicants show evidence that they hold every qualification the role needs and every qualification they have cited.

Medical fitness

Elysian must check that a person is medically fit for the role. This is done after an offer is made and before the appointment is confirmed. The applicant completes a medical questionnaire, and a medical report may be requested where needed. The information is considered against the job description and person specification. Elysian meets its duties under the Equality Act 2010: no offer is withdrawn without first talking to the applicant, obtaining medical advice and considering reasonable adjustments.

Overseas checks

Applicants who have lived or worked outside the UK provide criminal record information or certificates of good conduct from the countries concerned, and evidence of any professional sanctions from teaching regulators there. They do not start work until this information has been received and is satisfactory.

Visa sponsorship

Elysian can only employ a person who needs a visa to work in the UK if Elysian holds a sponsor licence and the role meets the Home Office requirements in force at the time. Before any such offer is made, the interview panel checks with the Chief Executive Officer or the Director. Nobody who needs permission to work starts until that permission is granted.

Induction

Every new member of staff and volunteer has an induction that covers Elysian's Safeguarding and Child Protection Policy, the expected standards of staff behaviour, the Whistleblowing Policy, how to raise low-

level concerns, the identity and role of the site DSL, and Part 1 of the current KCSIE. The induction is recorded.

7. Re-appointment after a short break

This section applies when a person who has worked for Elysian is appointed again within 12 weeks of their last working day. It reflects Part 3 of KCSIE 2026.

Elysian treats a re-appointment as a new appointment and makes the offer conditional on the checks below. Earlier checks are not carried forward without being reviewed. Before the person starts work, Elysian:

- verifies their identity and right to work again;
- confirms that their most recent enhanced DBS certificate was issued for the children's workforce within the last three years and covers the level of check the new role needs, including children's barred list information for regulated activity;
- checks the certificate through the DBS Update Service, with their written consent, where they subscribe;
- completes a separate children's barred list check, and a prohibition check where the role involves teaching;
- reviews Elysian's records for any safeguarding, conduct or low-level concern about the person, and confirms with the site DSL that there is none;
- obtains a signed declaration that nothing listed in section 8 has arisen since they left;
- records what they have done since leaving, and carries out any further checks needed because they have lived or worked outside the UK in that time; and
- updates the single central record and the personal file checklist, recording the dates of the break and the reasons for relying on earlier checks.

Elysian applies for a new enhanced DBS check, and the person does not start until it is complete, unless the exceptional circumstances procedure in section 6 applies, if:

- the certificate is more than three years old;
- the new role is regulated activity and the previous role was not;
- the Update Service check shows new information, or the person does not subscribe and the site DSL decides a new certificate is needed; or
- the site DSL has any concern about the person's suitability.

Where the break is 12 weeks or more, Elysian carries out every check needed for a new employee, including a new enhanced DBS check.

8. Ongoing duty to declare

All staff, volunteers, agency workers, contractors and others working with CYP must tell Elysian straight away of anything that may affect their suitability to work with CYP. This includes any arrest, police investigation, interview under caution, charge, caution or conviction; any safeguarding or professional conduct investigation; any referral to the DBS, barring decision, prohibition order or regulatory sanction; and anything else that may reasonably call their suitability into question.

Failure to disclose relevant information may be treated as a disciplinary matter. Elysian may ask staff to complete periodic declarations confirming that nothing relevant has arisen.

9. Volunteers

Volunteers follow the same safer recruitment process as staff, including two references, an online search and entry on the single central record.

Every volunteer in regulated activity has an enhanced DBS check with children's barred list information before they start, whether or not they are supervised. Where a volunteer is not in regulated activity, Elysian decides what level of DBS check is appropriate and records the decision.

The Head of Provision keeps oversight of every volunteer placement at their site, assesses each volunteer's contact with CYP and makes sure the placement is risk assessed. Any variation in the process for a low-exposure role that is not regulated activity is the Head's decision, and the decision and reasons are recorded. No variation removes a check that the law requires.

A volunteer in regulated activity who has not volunteered with Elysian for 12 weeks or more needs a new enhanced DBS check before they return. Elysian may also seek further information about a volunteer's suitability, such as information from staff, parents or other volunteers, character references, or an informal safer recruitment interview.

Under-18 animal care helpers

Young people under 18 who are not Elysian CYP may help with animal care only, with no contact with CYP. They are not in regulated activity, so no DBS check is needed, and those under 16 cannot have one. They follow Elysian's Under-18 Animal Care Helper Procedure, which requires consent from a parent or carer, a reference from their school or college, and supervision by a member of staff, except for short periods where the parent or carer has declared on Elysian's electronic consent form that the young person can work unsupervised. Before any helper takes on work that brings them into contact with CYP, they go through the full volunteer process.

10. Agency staff, contractors and alternative provision

Agency and supply staff

Agencies provide written confirmation that they have completed every check Elysian would carry out for its own staff, including identity, right to work, an enhanced DBS check with barred list information where the role is regulated activity, and overseas checks. No agency worker starts until this is received. Elysian checks the identity of each agency worker on arrival against the details in the written confirmation, and records them on the single central record.

Contractors

Contractors carry out the same checks for their employees as Elysian requires for its own staff, and confirm this in writing before their employees start work. Elysian checks the identity of each contractor on arrival. Where a self-employed contractor will be in regulated activity, Elysian obtains the enhanced DBS check with barred list information itself. Contractors who have not been checked are supervised at all times when CYP are present.

Alternative provision

Elysian obtains written confirmation from every alternative provision provider that it has carried out the safeguarding checks on its staff, including enhanced DBS checks where appropriate. Elysian records the full address of each alternative provision site, including any satellite or subcontracted location, and reviews each placement every half term to confirm its suitability, attendance and safety.

11. Visiting speakers and the Prevent duty

Under the Prevent duty, Elysian makes sure that every visiting speaker, whether invited by staff or by CYP, is suitable and appropriately supervised. Before inviting or allowing a speaker to attend, Elysian obtains the background information about them that is reasonable in the circumstances, including checking against the definition of extremism in the current Prevent duty guidance.

Elysian cannot obtain a DBS check on a visiting speaker who is not in regulated activity. All visiting speakers sign in and out, wear a visitor's badge at all times, are escorted by a fully checked member of staff, and receive Elysian's safeguarding information for visitors.

Elysian does not discriminate on the grounds of any protected characteristic under the Equality Act 2010 when meeting its Prevent duty.

12. Single central record

Elysian keeps a single central record of recruitment and vetting checks, as the Education (Independent School Standards) Regulations 2014 require. The Recruitment Officer keeps it up to date and the HR Officer checks it. It covers:

- all staff employed to work at Elysian;
- all supply and agency staff, whether employed directly or through an agency;
- volunteers in regulated activity, Advisory Board members and the proprietor; and
- everyone else Elysian has chosen to work in regular contact with CYP, such as peripatetic staff and people who provide additional teaching or instruction.

For each person, the record shows which checks were carried out, the date each was completed, and who carried it out. Each Head of Provision audits the single central record every term and reports the findings to the site Advisory Board.

Where the proprietor is a body, the chair's enhanced DBS check is processed through the Department for Education.

13. Records and data protection

Elysian processes applicants' personal data in line with UK GDPR and the Data Protection Act 2018. Criminal record and health information is handled with extra care and only by those who need it.

For successful applicants, Elysian keeps on the personnel file the information needed from the recruitment process, including copies of the documents used to verify identity, right to work, medical fitness and qualifications. Medical information may be used to help Elysian meet its duties as an employer, such as considering reasonable adjustments. These records are kept for the duration of employment and afterwards in line with Elysian's data protection policy. They are held electronically in a confidential Teams space that only staff with HR permissions can open. Paper documents are scanned and shredded, or kept in a locked cabinet.

DBS certificate information is held securely, seen only by those who need it, and not kept for longer than needed. The single central record holds the date of the check and the certificate number.

Elysian keeps interview notes and documents about unsuccessful applicants for six months after the recruitment is complete, and then destroys them confidentially. The same rules apply to suitability information about volunteers.

14. Ongoing safer working and leaving Elysian

Safer recruitment does not end when a person starts. Elysian provides ongoing safeguarding training and support for all staff, identified through supervision and appraisal, and acts on any concern about a member of staff in line with the Safeguarding and Child Protection Policy.

Elysian must refer a person to the DBS where it removes them from regulated activity, or would have done so had they not left, because they have harmed a child or pose a risk of harm, or have received a caution or conviction for a relevant offence. Failing to refer when the criteria are met is a criminal offence. Where the person is a teacher, Elysian will consider a referral to the Teaching Regulation Agency. A settlement agreement never prevents a referral.

15. Monitoring and review

The Heads of Provision, with the policy owner, make sure this policy is followed, monitored and evaluated. This is done through audits of recruitment files and the single central record each term, and a yearly Safer

Recruitment Evaluation audit. This policy is reviewed every year, or sooner if legislation or statutory guidance changes.

Appendix 1: Required checks

Check	Employee	Volunteer in regulated activity	Advisory Board member	Proprietor	Agency worker or contractor
Identity	✓	✓	✓	✓	Written confirmation, and checked on arrival
Right to work	✓	Not needed	Not needed	✓	Written confirmation
Enhanced DBS	✓	✓	✓	✓	Written confirmation
Children's barred list	Regulated activity	✓	Regulated activity	Regulated activity	Regulated activity
Two references	✓	✓	✓	Not needed	Not needed
Section 128	Management roles	Not needed	✓	✓	Not needed
Prohibition check	Teaching roles	Teaching roles	Not needed	Not needed	Teaching roles
Overseas checks	Where needed	Where needed	Where needed	Where needed	Written confirmation
Online search	✓	✓	✓	✓	Not needed
Medical fitness	✓	Not needed	Not needed	Not needed	Not needed
Single central record	✓	✓	✓	✓	✓

Where the proprietor is a body, the chair's enhanced DBS check is processed through the Department for Education. Agency and supply teachers also need a prohibition check, confirmed in writing by the agency.