



SAFER RECRUITMENT PROCESS

Internal Process Document — Teacher and Mentor Engagement

Document Reference:	EL-SRP-001
Date Adopted:	1 September 2026
Status:	Adopted

PURPOSE AND SCOPE

This document sets out the mandatory safer recruitment checks and process that must be completed before any individual is permitted to deliver Sessions as a teacher or mentor on behalf of Ember Learning Ltd.

This process applies to all teachers and mentors, regardless of their employment status. Self-employed status does not remove or reduce safeguarding obligations. No individual shall deliver any Session or access any Student or Mentee personal data until all checks in this process have been completed satisfactorily and a pre-start sign-off has been issued by a Company director or designated lead.

This process is designed to be consistent with the safer recruitment principles set out in Keeping Children Safe in Education (DfE, 2026) and applies to all associates working with students and mentees in the context of non-statutory Alternative Provision, mentoring, or other services delivered on behalf of Ember Learning Ltd, commissioned by Local Authorities, Multi-Academy Trusts, private companies or individual schools.

LEGAL AND REGULATORY FRAMEWORK

This process reflects obligations arising from:

Keeping Children Safe in Education (DfE, 2026) ('KCSIE')

The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

The Safeguarding Vulnerable Groups Act 2006

The Children and Families Act 2014

Section 19 of the Education Act 1996

Working Together to Safeguard Children (HM Government, 2023)

The Care Act 2014 (adult safeguarding)

Ember Learning Ltd's Child Protection and Safeguarding Policy

STAGE 1 — PRE-APPLICATION CHECKS

Before proceeding with an application from a prospective teacher or mentor, the Company shall:

Confirm that a genuine vacancy or engagement need exists

Confirm the role specification and whether the role involves regulated activity with children and/or adults at risk (all teacher and mentor roles are classified as regulated activity)

Confirm that any advertising for the role includes a statement that the position is subject to an enhanced DBS check with both the Children's Barred List and Adults' Barred List checks

STAGE 2 — APPLICATION AND SUITABILITY REVIEW

2.1 IDENTITY VERIFICATION. The following original documents must be verified in person or via a live video call (if in-person verification is not practicable, the Company shall document the method used and verify with reference to original documents):

Photographic proof of identity (current passport or photocard driving licence)

Proof of current address issued within the last three months (utility bill, bank statement, or HMRC correspondence)

Proof of right to work in the United Kingdom

Copies of all identity documents shall be retained securely in the Associate's personnel file.

2.2 QUALIFICATIONS AND EXPERIENCE. Confirmation of relevant qualifications or experience shall be sought, including verification of any teaching qualification claimed.

2.3 EMPLOYMENT HISTORY REVIEW. A full employment and self-employment history for the previous five years must be provided. The Company shall:

Review the history for unexplained gaps

Request a written explanation for any gap exceeding one month

Document the review and the explanation received in the Associate's personnel file

A pattern of repeated short engagements without satisfactory explanation, or gaps that cannot be satisfactorily accounted for, shall be treated as a concern and may result in the application not proceeding.

2.4 ONLINE INTERVIEW. Before proceeding to references, the Company shall conduct a live video interview with the applicant. The interview shall be used to verify the applicant's suitability for the role, explore their experience and approach to working with children and/or adults at risk, and confirm their understanding of safeguarding responsibilities. The interview shall be conducted by the Company Director or DSL, and a brief written record of the interview shall be retained in the Associate's personnel file.

STAGE 3 — REFERENCES

3.1 Two references must be obtained and reviewed before commencement. References must be:

Provided in writing (via email is acceptable) directly from the referee to the Company

From named individuals who can confirm the applicant's suitability to work with children and/or adults at risk

3.2 Reference requirements:

Reference 1: From the most recent employer or principal (if the most recent role involved working with children, this reference must confirm the applicant's conduct and suitability in relation to children and/or adults at risk). Where the applicant has not worked with children in their most recent role, a reference from the most recent role involving children should be sought as the first preference

Reference 2: From any other professional source who can speak to the applicant's suitability for the role (not a personal acquaintance)

3.3 References from family members, personal friends, or other individuals who cannot speak to professional suitability shall not be accepted.

3.4 The Company shall contact at least one referee by telephone to verify the reference, and shall document the verification.

3.5 If a reference raises any concern — including any indication of safeguarding concerns, inappropriate conduct with children, or capability issues, or concerns relating to work with vulnerable adults — this must be escalated to the DSL immediately before any further steps are taken.

3.6 Open references ('To Whom It May Concern') shall not be accepted.

STAGE 4 — ENHANCED DBS CHECK WITH BARRED LIST

4.1 All teachers and mentors must complete an enhanced Disclosure and Barring Service check at the enhanced level with inclusion of both the Children's Barred List and the Adults' Barred List ('enhanced DBS with both barred list checks') before delivering any Session.

4.2 The DBS check shall be applied for through the Company's registered body or an approved umbrella body. The Company shall retain a record of the DBS certificate number, date of issue, and outcome. A copy of the DBS certificate shall not be retained beyond initial checking, in accordance with the DBS code of practice; instead, the Company shall retain a note of the information disclosed.

4.3 DBS UPDATE PROVISION. If the applicant is subscribed to the DBS Update Service, and the original certificate was issued at enhanced level with both the Children's Barred List and Adults' Barred List checks, the Company may carry out a free Update Service check in lieu of a new application. The Company shall record the date and outcome of the Update Service check.

4.4 The Company shall not permit any individual to commence work until either: (a) a satisfactory enhanced DBS certificate has been received; or (b) an Update Service check has confirmed satisfactory status. No exceptions shall be made to this requirement.

4.5 DISCLOSURE OF INFORMATION. The Company operates a policy of fair consideration of DBS disclosures. Disclosure of a criminal record does not automatically disqualify an applicant. The Company shall consider: the nature of the offence; the time elapsed; the relevance to the

role; and any other relevant circumstances. However, any information disclosed that indicates that an individual is barred from regulated activity with children or adults shall result in the application not proceeding, and — where appropriate — a referral to the DBS.

4.6 Where a DBS check reveals relevant information, the DSL shall be consulted before any decision to proceed is made.

4.7 RENEWAL. Where a Teacher/Mentor is subscribed to the DBS Update Service, the Company shall run a status check at least annually and at any point where a concern arises. Where a Teacher/Mentor is not subscribed to the Update Service, a new enhanced DBS check shall be required every three years or sooner if a concern arises. Subscription to the Update Service is strongly encouraged and may be required by the Company as a condition of ongoing engagement.

STAGE 5 — SAFEGUARDING TRAINING CONFIRMATION

5.1 Before delivering any Session, the teacher or mentor must complete the mandatory safeguarding and prevent training specified in the Teacher and Mentor Agreement (EL-TMA-SE-003A or EL-TMA-E-003B). The Company shall retain evidence of completion (for example, a completion certificate from an approved online training provider).

5.2 No teacher or mentor shall deliver any Session without current, valid safeguarding training. Training shall be renewed annually and shall cover at minimum: recognising signs of abuse and neglect; the Company's reporting and escalation procedures; online safety risks relevant to the student and mentee age groups; and the principles of Keeping Children Safe in Education (DfE, 2026). Evidence of completed training shall be retained on the teacher's or mentor's or mentor's file.

STAGE 6 — PRE-START CHECKLIST SIGN-OFF

Before the teacher or mentor is permitted to deliver any Session, the following pre-start checklist must be completed and signed off by a Company director or designated lead:

Pre-Start Check	Completed / Satisfactory?	Date / Notes
Identity verified (photo ID + proof of address + right to work)		
Employment history reviewed (5 years); gaps explained and documented		
Online interview conducted and recorded in personnel file		
Reference 1 received and verified		
Reference 2 received and verified		

Qualifications/experience confirmed		
Enhanced DBS with Children's and Adults' Barred Lists: certificate received / Update Service check conducted		
DBS result: no relevant disclosures / disclosures reviewed by DSL		
Prevent training		
Mandatory safeguarding training completed — evidence retained		
Teacher and Mentor Agreement signed (EL-TMA-SE-003A or EL-TMA-E-003B) including Schedule 2 Undertaking		
Platform onboarding completed		

SIGN-OFF**IMPORTANT NOTE ON SELF-EMPLOYED STATUS**

Ember Learning Ltd treats all teachers and mentors as individuals engaged in regulated activity with children and/or adults at risk, regardless of their self-employed status.

Self-employed status does not:

Remove the obligation to complete an enhanced DBS check with both the Children's Barred List and Adults' Barred List checks before commencing work

Remove safeguarding obligations or the duty to report concerns

Affect the Company's obligation to verify the suitability of the individual before permitting them to work with children or adults at risk

Remove the Company's responsibility to refer to the DBS if a teacher or mentor is dismissed or resigns in circumstances where there is reason to believe they have harmed a child or adult at risk, or placed a child or adult at risk of harm

KCSIE is clear that any individual working with children in a regulated activity capacity must have an enhanced DBS check regardless of their employment status. The Care Act 2014 places equivalent obligations in relation to adults at risk. This applies to all teachers and mentors without exception.

NOTE ON NON-EMBER OBSERVERS

A representative of a Commissioner or partner organisation who attends a session purely to observe delivery, without working directly with Students or Mentees, is not required to complete the full process set out above. Instead, the following applies: the observing individual's own organisation must confirm they hold an appropriate, current DBS check or equivalent vetting for their role; the DSL must be notified and must approve the observation in advance; the observer must not be left alone with any Student or Mentee at any point, and may only join in the presence of the session's teacher or mentor; and the DSL must record the arrangement (date, observer, organisation, session).

RECORDS AND STORAGE

All safer recruitment records shall be stored securely and confidentially in the Associate's personnel file. Access shall be limited to the DSL, Deputy DSL, and Company directors. Records shall be retained for a period of:

The duration of the engagement plus six years, or in accordance with any applicable statutory requirement, whichever is the longer.

REVIEW

This process shall be reviewed annually and following any update to KCSIE or relevant statutory guidance. The process owner is the Designated Safeguarding Lead.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026