Virtual Learning uk

TITLE	VERSION
Recruitment and Vetting Policy 2026-2027	6

APPROVAL BODY	DATE	REVIEW DATE
Board of Governors	August 2026	August 2027

LEAD PERSON	Director of Operations

POLICY STATEMENT

VLUK is committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults. We expect all staff, governors, contractors, and volunteers to share this commitment.
VLUK aims to recruit the best candidate for every post through an open, rigorous, and transparent selection process. All recruitment practices adhere strictly to statutory guidance, particularly Keeping Children Safe in Education (KCSIE), and comply with the Equality Act 2010. Recruitment and vetting processes are designed to ensure fair treatment, equal opportunities, and prevention of any form of unlawful discrimination.

BACKGROUND

VLUK is a National Independent Training Provider, delivering education in the 16-19 FE sector. It is part of The Oxford Virtual Education Group. VLUK is led by a Chief Executive Officer, accountable to a Board of Governors and Group Chief Executive Officer and supported by an Executive team and a Senior Leadership Team (SLT). Accountable to the SLT is a layer of middle management located throughout the country. The Middle Leadership team is responsible for tutors and enrichment staff.

PURPOSE

This policy establishes a robust framework for safer recruitment and selection. It ensures that individuals responsible for hiring act consistently, fairly, and in compliance with safer recruitment statutory duties to deter, reject, or identify people who might be unsuitable to work with young people or are otherwise unsuitable to work in an educational environment.

SCOPE

This policy applies to all staff involved in the recruitment and vetting process at VLUK, including Governors, the Senior Leadership Team, Middle Leaders, Tutors, Support Staff, Agency/Supply Staff, Volunteers, and Contractors.

DEFINITIONS

Applicant / Candidate: Anyone who applies for or is shortlisted for a vacancy at VLUK.
DBS: Disclosure and Barring Service.
Regulated Activity: Work that a barred person must not do, involving regular contact with children or young people under 18 in an educational setting.
Section 128 Direction: An order made under Section 128 of the Education and Skills Act 2008 prohibiting an individual from taking part in the management of an independent school or FE institution.

RESPONSIBILITIES

Board of Governors	The Governing Board reviews and challenges the effectiveness of the internal controls and the management of risk detailed in this policy. The Lead Governor for Safeguarding conducts termly audits of the Single Central Record (SCR).

Chief Executive	Overall strategic accountability for operational compliance, resource allocation, and organisational compliance with KCSIE and employment law. Ensures at least one member of every interview panel is trained in Safer Recruitment. Reviews policy effectiveness and risk management controls annually.
Senior Leadership Team	Ensure implementation and monitoring of this policy across all areas.
Lead Person	Maintain alignment with regulatory updates (KCSIE, DfE, Legislation). Oversee audit trials, Single Central Record (SCR) maintenance, and pre-employment workflows.
All Line Managers	Execute recruitment in strict adherence to this policy. Ensure interview structures, reference checks, and risk assessments follow standard procedures.

POLICY - ADVERTISING ROLES

All job advertisements will state VLUK's explicit commitment to safeguarding and promoting the welfare of young people, specifying that pre-employment vetting checks will be conducted.
Every role will be accompanied by a concise **Job Description** and **Person Specification** detailing:

- Job title, pay scale/salary, and core benefits.
- Typical work arrangements (e.g., permanent, fixed-term, part-time, hybrid).
- Essential and desirable qualifications, skills, and experience required.
- Specific safeguarding duties relevant to the post.
- Closing dates and clear application instructions.

Advertisements will avoid indirect or direct discriminatory criteria in accordance with the Equality Act 2010.

APPLICATION AND SHORTLISTING PROCESS

- VLUK requires a completed standard application form. Curriculum Vitae (CVs) will not be accepted on their own to ensure consistent information gathering (including complete employment histories).
- Candidates must provide a full chronological work history. Any gaps in employment must be explicitly explained on the application form.
- Shortlisted candidates must complete a self-declaration of their criminal record and any relevant information making them unsuitable to work with children (under Ministry of Justice filtering rules).
- In line with KCSIE guidelines, VLUK conducts online searches (including publicly available social media content) on shortlisted candidates as part of due diligence. This helps identify any public incidents or concerns that require exploration during the interview process. Searches are conducted strictly in line with data protection legislation and this is explicitly communicated upfront on the application forms.
- Applicants will be kept informed at all key stages regarding timelines and expectations.

INTERVIEW AND SELECTION

Where possible 2 members of staff will complete the interview, and at least one person must have completed Safer Recruitment Training.

- Standardised, criterion-based questions will be used for all candidates.
- Questions will explore the candidate's attitude towards safeguarding, professional boundaries, and suitability to work with young people.
- Any gaps in employment history or discrepancies in the application form or points arising from references and online checks will be explicitly explored.
- Interview notes will be systematically taken and retained in accordance with UK GDPR / Data Protection Act 2018 retention schedules.

Once the interview has taken place and the decision has been made, contact is made with the successful individual to offer the role.

If at any point during the recruitment process a candidate wishes to report concerns about the fairness or conduct of the recruitment process should contact the Director of Operations.

COMPLAINTS

Complaints or appeals regarding the recruitment and selection process should be submitted in writing to the Director of Operations: gemma.halsey@vluk.org.

If the complaint involves the Director of Operations, it should be addressed directly to the Chief Executive Officer.

REFERENCES

Keeping Children Safe in Education (KCSIE)
Working Together to Safeguard Children
The Equality Act 2010
Data Protection Act 2018 and UK GDPR
DBS Code of Practice
Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
VLUK Modern Slavery Statement
VLUK Comments and Complaints Policy

INTERNAL RECRUITMENT

It is important that VLUK recruits experienced people who deliver a high standard of service. VLUK takes the recruitment, development, and promotion of staff seriously and we do this by following a fair and non-discriminatory process.

Any opportunities for promotion are advised and open to all members of staff. Applications are welcome from existing staff who feel they have the appropriate skills and experience.

PRE-EMPLOYMENT CHECKS

All offers of employment are conditional upon the satisfactory completion of statutory pre-employment checks prior to commencement of employment:

- **Identity Verification:** Verification of name, address, date of birth, and photographic ID.
- **Right to Work in the UK:** Verified via standard Home Office online checks or original document checks.
- **Enhanced DBS Certificate & Barred List Check:**
    - An Enhanced DBS check with Children's Barred List information is mandatory for staff engaging in regulated activity.
    - If a candidate is registered with the DBS Update Service, VLUK will inspect the original physical certificate and perform an online status check with candidate consent.
    - An Enhanced DBS *without* a Barred List check is appropriate for supervised volunteers, whereas an Enhanced DBS *with* a Barred List check is legally required for volunteers in unsupervised regulated activity.
- **Prohibition from Teaching Check:** Verification via the Teaching Regulation Agency (TRA) Secure Access portal that teaching staff are not subject to a prohibition order or interim prohibition order.
- **Section 128 Management Check:** Verification that staff appointed to management positions (including SLT and Governors) are not subject to a Section 128 direction.
- **References:**
    - At least **two satisfactory written references** must be obtained directly from referees prior to interview if possible.
    - One reference must be from the candidate's current or most recent employer.
    - References from personal acquaintances or relatives are not accepted.
    - Referees will be contacted to confirm authenticity, verify duties, and clarify any safeguarding concerns or reasons for leaving previous roles involving children/young adults.
    - If a reference cannot be obtained prior to the interview (e.g., due to candidate confidentiality concerns), it is obtained and scrutinised prior to the start of employment.
    - References will be checked for consistency against the application form.
- **Qualifications Check:** Verification of original certificates for all mandatory professional qualifications.
- **Overseas Candidates:** Individuals who have lived or worked outside the UK for a period of 12 months or more within the last 10 years must provide a Certificate of Good Conduct/police check from the relevant country, alongside standard UK checks.

- **A health questionnaire** is completed during onboarding.

RISK ASSESSED STARTS (DBS PENDING)

Where an individual is required to start work before an Enhanced DBS certificate is physically issued, this will only be permitted under exceptional circumstances with the explicit written approval of the CEO. A formal **DBS Risk Assessment** must be completed, a standalone Children's Barred List check cleared (where applicable), all other pre-employment checks finalised, and strict supervision controls implemented.

AGENCY/CASUAL STAFF

VLUK requires written confirmation from supply or recruitment agencies that all statutory pre-employment checks (identical to those conducted for direct employees) have been completed prior to placing staff at VLUK. Identity must be checked upon arrival on their first day.

Where VLUK works with external providers, written confirmation must be obtained confirming that appropriate safer recruitment checks have been undertaken for all personnel working with VLUK learners.

CRIMINAL CONVICTIONS

In compliance with the DBS Code of Practice, VLUK treats all applicants fairly and does not discriminate automatically on the basis of a criminal conviction or disclosed information.

Where an applicant's self-declaration or DBS certificate discloses a conviction, caution, or reprimand:
A **Safeguarding Panel** will convene. The panel consists of three senior members of staff (Director of Operations as Chair, alongside two of the following: CEO, Director of Standards, Performance and Curriculum, Designated Safeguarding Lead, or Senior Quality Lead).
The panel will conduct an objective risk assessment considering:

- The nature and relevance of the offence.
- The age of the candidate at the time of the offence.
- Time elapsed since the event.
- Pattern of behavior or context surrounding the offence.

The panel's decision and reasoning will be formally documented and stored confidentially in line with UK GDPR rules.

SINGLE CENTRAL RECORD (SCR)

VLUK maintains an up-to-date, centralized **Single Central Record (SCR)** covering all employed staff, governors, agency personnel, and regular volunteers.
The SCR explicitly records:

1. Verification of identity, Right to Work, Enhanced DBS/Barred List, Qualifications, Section 128 check, Prohibition check, Overseas checks, and References.
2. The exact date each check was completed and verified.
3. The name/initials of the staff member who carried out each verification.

The SCR is monitored continuously by the Lead Person and subject to termly formal audits by the Lead.

SIGNATORIES



Chief Executive Officer
1st August 2026



Chair of Governors
1st August 2026