

Recruitment, Selection and Sub Contracting Policy

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Operated by: Nudge Education Ltd · **Version:** Dec 2025 · **Owner:** HR
/ People

Recruitment, Selection & Sub-contracting Policy December 2025 Review Date:
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Scope of Document

This policy applies to all employees and subcontractors of Nudge Education regardless of employment status Purpose This policy is drafted to ensure two key principles:

1. That people who are recruited or sub-contracted to work with Nudge

Education are fully assessed and vetted to ensure a safe environment to provide engagement, education and empowerment for our students.

2. That the processes we use provide a fair, transparent and inclusive

opportunity to work in an organisation committed to safeguarding, equality and diversity.

This policy is linked to several other key documents including:

- Safeguarding & Child Protection Policy
- Confidentiality Policy
- Information Security, Data Protection and GDPR Policy
- Social Media Policy
- Equality and Diversity

This policy is informed by:

- Keeping Children Safe in Education 2026 (KCSIE 2026, in force 1 September 2026)
- Working Together to Safeguard Children 2023
- Prevent Duty Guidance: England and Wales (March 2023)

It should also be read in conjunction with our Child Protection and Safeguarding Policy ([hyperlink](#)). Recruitment and Subcontracting Process:

We use the same high levels of scrutiny for all new staff and associates, whether recruited directly or through a subcontracting arrangement.

Every person who is successfully recruited and onboarded will have:

- Produced valid documentation proving their identity, including photo ID.
- Provided evidence of the right to work in the UK.
- Provided a full employment history, with reasonable written explanations for any gaps.
- Undertaken an Enhanced DBS check with children's barred list information (or provided evidence of Update Service status). This must be renewed every three years if not on the Update Service. If recruiting from overseas (or where a candidate has worked abroad in the last 5 years), additional checks will be required, including criminal record checks from the relevant jurisdiction.
- Supplied at least two satisfactory references, one of which must be from the most recent employer/line manager.
- Provided evidence of relevant training and qualifications (original certificates only).
- Been checked via the DfE's Check a Teacher's Record service (formerly Employer Access) Service to confirm they are not subject to a prohibition, sanction, restriction or interim prohibition order. This is whether they disclose they are a qualified teacher or not to ensure that anyone providing us with false or inaccurate information is identified.
- A record or statement detailing any other positions of trust they may hold elsewhere (i.e. School Governor, Football Coach)

In addition to the mandatory checks, Staff and associates will have to undergo a thorough interview and assessment process to be recruited or on boarded:

- In line with KCSIE 2026, we will carry out online searches for shortlisting candidates to help identify any incidents or issues that might need to be

discussed at interview.

- Where appropriate, social media accounts and online presence may be reviewed to judge suitability.
- Initial CV and Telephone screening/Online awareness session where we can check initial suitability
- Live interview via a software platform that allows us to record the meeting and add notes
- Competency-based assessment tasks
- Online induction/ on-boarding session. The above process will always be overseen by at least one person who has completed Safer Recruitment in Education training within the last three years. It is our standard Practice, however, for all members of our Recruitment and HR Team to undertake Safer Recruitment refresher

Advertising Jobs and Pre Interview Screening

- All adverts will explicitly state Nudge Education's safeguarding commitment, the requirement for a DBS check, and our Safer Recruitment approach.
- CVs alone will not be accepted; all applicants must complete our application form.
- At interview, safeguarding questions will always be asked, including whether there is any reason the applicant cannot work with children.
- References will be verified by phone/email/letterhead, and discrepancies will be followed up.

Providing false or misleading information may result in:

- rejection of the application,
- withdrawal of any offer,
- summary dismissal if already employed/engaged, and
- referral to relevant regulatory or safeguarding bodies (including the LADO, police, DBS and Teaching Regulation Agency, where appropriate).

Record Keeping

- Notes will be kept of all recruitment decisions and interview responses, including explanations of employment gaps.
- Records will be retained securely for at least 7 years in line with our Data Protection policy.

Dealing with Convictions

If a candidate and/or a DBS certificate reveals convictions, the HR Team will:

- consider the nature, relevance and seriousness of the offence(s),
- review how long ago the offence occurred,
- consider whether it was isolated or repeated,
- take into account evidence of change, rehabilitation and remorse,
- escalate the case to the HR Lead and/or Operations Manager to complete a Risk Assessment.

A written statement will be obtained from the candidate to establish the facts and nature of the offence(s). This will then be passed to the HR Lead and Operations Manager (or other suitable SLT members) to evaluate all of the risk factors above before a position is offered or confirmed. The statement will be held on file for as long as that information is deemed to be relevant. (7 years if the applicant is hired) If a candidate wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the candidate would otherwise be offered a position were it not for the disputed information, Nudge Education may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Where convictions raise safeguarding concerns, consultation with the LADO will take place before any decision is made.

Post recruitment/ sub-contracted stage

After a staff member or sub-contractor successfully completes the selection and induction stage as detailed above, the standard protocol is that this person will be supported by a Regional Team during the course of their first interventions to assess quality.

There will be a regular observation schedule communicated to all Education Experts in addition to a raft of unplanned visits to ensure quality is upheld as well as safeguarding. We use the background data about an Education Expert as well as reviewing their performance on intervention when we undertake the matching process for future students.

Training and Professional Development

Throughout their time within the Nudge Education network, we will ensure that all of our staff and associates are up to date with relevant training and guidance. We provide a thorough induction and training programme for all staff who begin working with Nudge Education on the principles of working 1:1 with disengaged students

Before being deployed to work with young people, we expect staff and associates to have undertaken the following courses via our e-learning portal -(our staff receive a login for this during onboarding) (Tes Develop: Log in to the site (myeducare.com/)) unless they can provide evidence that they have completed the same course in the current academic year.

- Prevent Duty (Educare)
- Safeguarding Children and Young People (Educare)
- First Aid (Educare)

Safeguarding Children and Young People and First Aid needs to be renewed annually on Educare unless staff have completed a Level 2 or above training through another organisation(s), which should specify an expiry date.

We also encourage our associates and staff to attend any LA safeguarding training courses in areas we are commissioned to work so we have area specific information and training.

Volunteers

Nudge Education do not currently use volunteers in any capacity however reasonable checks as detailed above will be undertaken should it be judged that having a volunteer or guest speaker would be beneficial to a student's development.

Misconduct

All staff and associates are bound by our policies. Breaches will be managed by line managers and HR, with escalation to the Senior Leadership Team where necessary. Safeguarding-related breaches will always be referred to the LADO.

Right to Withdraw

Employment or engagement offers remain conditional until all pre-employment checks are satisfactorily completed. Offers may be withdrawn where conditions

are not met.

NEO Online Addendum

This addendum applies the canonical Nudge Education policy above to the online provision context of Nudge Education Online (NEO). It is sourced from NEO - Safer Recruitment and Use of Volunteers Policy v04.26.docx.

NEO BY NUDGE EDUCATION

Safer Recruitment and Use of Volunteers Policy Nudge Education Online

Policy Owner	Director, Nudge Education Online & Head of School, jointly with the Designated Safeguarding Lead (DSL)
Approved	April 2026
Review Date	April 2027
Version	04.26
Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Proprietor, Nudge Education Ltd
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Statement of Intent

Nudge Education Online (NEO) is committed to safeguarding and promoting the welfare of all learners. Safer recruitment practice is one of the most important safeguards NEO can put in place: it reduces the likelihood of unsuitable people being appointed to roles that bring them into contact with children and young people, and it establishes a culture of vigilance from the first point of contact with a candidate. This policy sets out how NEO plans, advertises, shortlists, interviews, and pre-appoints staff, practitioners, contractors, and volunteers. It applies whether appointments are on-site, remote, permanent, fixed-term, casual, freelance, or voluntary. It applies equally to qualified subject-specialist teachers, named practitioners, administrative staff, technical contractors, and any external provider delivering content or services to learners. NEO is pursuing OEAS accreditation only. NEO is not a DfE-registered independent school and is not subject to ISI inspection. However, NEO applies the safer recruitment principles set out in Part Three of Keeping Children Safe in Education 2026 (KCSIE) as its baseline standard.

2. Scope

This policy applies to all recruitment and deployment activity undertaken by Nudge Education Ltd in connection with NEO, including: Qualified subject-specialist teachers delivering live lessons. Named practitioners acting as mentors and single points of contact for learners. The Designated Safeguarding Lead (DSL), Deputy DSL, SENCo, and any other safeguarding-critical appointment. Operational, administrative, and technical roles supporting NEO. Contractors and external providers whose work involves direct or indirect contact with learners, or access to learner data. Volunteers, including enrichment speakers, mentors, and governance-adjacent roles. Agency-supplied workers, including supply teachers and temporary administrative staff.

3. Legal and Regulatory Framework

Keeping Children Safe in Education 2026 (KCSIE) — Part Three is the authoritative framework for safer recruitment Safeguarding Vulnerable Groups Act 2006 Children Act 1989 and Children Act 2004 Education Act 2002 (Section 175, applied as reference where relevant) Protection of Freedoms Act 2012 (DBS regulated activity) Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 (as amended) Disclosure and Barring Service (DBS) Code of Practice Equality Act 2010 Immigration, Asylum and Nationality Act

2006 (right to work) UK GDPR and the Data Protection Act 2018 OEAS accreditation criteria (workforce and safeguarding strands)

4. Principles of Safer Recruitment at NEO

Safer recruitment is a continuous process, not a single event. Vigilance begins at job design and continues through induction, probation, and ongoing management. Every role is defined with safeguarding explicitly in mind. Job descriptions and person specifications name safeguarding responsibilities. At least one member of every recruitment panel has completed accredited Safer Recruitment training within the last three years. No appointment is confirmed until all pre-appointment checks listed in Section 8 are complete and recorded on the Single Central Record. Where information is missing, incomplete, or inconsistent, the panel stops and resolves the gap before proceeding. Time pressure is never a reason to shortcut a check. Candidates are told, at application stage, that NEO is an organisation committed to safeguarding and will apply enhanced checks. Rejected candidates are informed clearly and respectfully, with appropriate signposting if the rejection relates to a disclosed conviction or barred-list finding.

5. Roles and Responsibilities

Role	Responsibility
Proprietor	Named accountable person under OEAS framework; final approver of senior and safeguarding-critical appointments; ensures NEO invests adequately in safer recruitment training; reviews the Single Central Record at least annually.
Director, NEO & Head of School	Operational ownership of recruitment. Designs roles, chairs recruitment panels, ensures KCSIE 2026 Part Three is applied, maintains the Single Central Record during the initial period, and countersigns this policy with the DSL.

Role	Responsibility
Designated Safeguarding Lead (DSL)	Advises on safer recruitment decisions, especially where candidates disclose relevant information; reviews references for safeguarding signals; sits on panels for safeguarding-critical appointments; co-signs this policy.
SENCo	Sits on panels for roles involving SEND-identified learners; advises on role-specific requirements.
Recruitment panels	At least two people, with at least one Safer Recruitment-trained panel member present for every shortlisting and interview. Panels keep contemporaneous notes and preserve them for the retention period set in Section 11.
All staff	Participate in safer recruitment as required; challenge unsafe shortcuts; report any safeguarding concerns arising during a recruitment process to the DSL.

6. Job Design and Advertising

6.1 Designing the Role

Every job description includes safeguarding responsibilities appropriate to the role, including a clear commitment to KCSIE 2026. Person specifications distinguish essential from desirable criteria and are assessed only on evidence provided by the candidate. Where a role involves regulated activity with children, this is explicitly stated. Roles held by a single post-holder during the initial period (for example, dual-hat Director / Head of School) are documented with the intended future split criteria.

6.2 Advertising

All advertisements include a safeguarding statement and a clear reference to enhanced DBS checks and barred-list verification. Advertisements use inclusive language and comply with the Equality Act 2010. Adverts specify the NEO operating company (Nudge Education Ltd) and the nature of the provision (fully online alternative provision for learners aged 11–18). Social-media-only adverts are avoided for safeguarding-critical roles; at least one formal, documented channel is used.

7. Application, Shortlisting, and Interview

7.1 Application

Candidates complete a standard NEO application form that captures full employment history, gaps in employment, qualifications, and a personal statement. CVs alone are not accepted in place of an application form for safeguarding-critical roles. Candidates declare any previous employment involving children, any safeguarding investigations they have been subject to, and any unspent convictions (and relevant spent convictions disclosable under the Exceptions Order 1975 as amended). Candidates consent to NEO undertaking the checks set out in Section 8 as a condition of application.

7.2 Shortlisting

Shortlisting decisions are made against the person specification and documented by at least two panel members. Any gaps or inconsistencies in employment history are flagged for exploration at interview. An online presence review is undertaken for shortlisted candidates for safeguarding-critical roles, documented factually and proportionately in line with UK GDPR.

7.3 Interview

Interviews always include at least one Safer Recruitment-trained panel member. A structured question set is used, with consistent questions across all candidates for a given role. Every candidate is asked at least one question designed to explore attitudes to safeguarding, professional boundaries, and working with vulnerable young people. Candidates are asked to explain any gaps in employment and any reasons for leaving previous roles involving children. Interviews for safeguarding-critical roles (DSL, Deputy DSL, SENCo, teacher, practitioner) also include a case-based scenario exploring

safeguarding judgement. Contemporaneous interview notes are retained in line with Section 11.

8. Pre-Appointment Checks

The following checks are completed before a candidate commences work. No candidate begins work in a role involving contact with learners until all applicable checks are in place and recorded on the Single Central Record.

Check	Applies To	Notes
Verified identity	All roles	In-person or remote verification in line with DBS Code of Practice.
Right to work	All paid roles	Document checks per Home Office guidance; share code accepted for relevant statuses.
Enhanced DBS with barred-list check	All regulated-activity roles, including teachers, practitioners, DSL, Deputy DSL, SENCo, any staff engaging directly with learners.	Enhanced check required; barred-list check in addition to the enhanced certificate.
Enhanced DBS (without barred list)	Staff who do not engage in regulated activity but whose work brings them into contact with learners.	Proportionate to role risk.
Section 128 / prohibition check	All teaching roles and any role involving	Via the DfE's Check a Teacher's Record

Check	Applies To	Notes
	management of teaching.	service.
Teacher prohibition check	All qualified teachers.	Confirms no prohibition order is in force.
Childcare disqualification declaration	Roles involving learners under 8 (where applicable in future enrichment).	Not currently required given 11–18 age range but policy retains the check for future expansion.
Overseas police check / equivalent	Anyone who has lived or worked outside the UK for three months or more in the last five years.	Includes certificate of good conduct where UK DBS cannot substitute.
Qualification verification	All teaching and SENCo appointments.	Certificates seen in original or via approved verification route.
Two satisfactory references	All roles.	At least one from the most recent employer; references are taken up before appointment, not after.
Medical fitness declaration	All roles.	Self-declaration at offer stage; reasonable adjustments under the Equality Act 2010.

References are sought directly from named employers using NEO's structured reference form. Open references and testimonials provided by the candidate are treated with caution and not accepted in place of direct references.

9. Single Central Record (SCR)

From September 2026, in line with KCSIE 2026 and the Crime and Policing Act 2026: the supervision exemption from regulated activity has been removed, so any volunteer who teaches, trains, instructs or supervises children more than 3 days in a 30-day period (or overnight) is in regulated activity and receives an enhanced DBS check with children's barred list check; and DBS certificates are obtained before appointment or within 30 calendar days of the certificate's issue date. NEO maintains a Single Central Record in line with KCSIE 2026. The SCR is held securely in Google Workspace with role-based access restricted to the Director / Head of School, the DSL, and any delegated administrator authorised by them. The SCR records, for each person working in regulated or learner-contact activity: Identity, right to work, and qualification checks, with date and verifier. Enhanced DBS check (number, date issued, whether barred list check applied, verifier). Prohibition and Section 128 checks where applicable. Overseas checks where applicable. References taken up and reviewed. Safer recruitment training completion for panel members. Date each person commenced work and, where applicable, date they left. The SCR is audited at least termly by the DSL and annually by the Proprietor. Any gap identified is closed before the post-holder continues work.

10. Volunteers, Contractors, and External Providers

10.1 Volunteers

All volunteers are subject to proportionate safer recruitment, including references, identity verification, and an interview. Regular volunteers in regulated activity receive an enhanced DBS with barred-list check. One-off volunteers (for example, a guest speaker in a single enrichment session) are supervised at all times by an NEO staff member and do not have unsupervised access to learners. Volunteers receive a safeguarding and conduct induction before any contact with learners.

10.2 Contractors and External Providers

Contractors delivering services involving direct contact with learners must satisfy the checks in Section 8. Contractors without direct learner contact but with access to personal data must confirm their own safeguarding and data protection arrangements, and sign a data processing agreement. Agency-supplied workers are only accepted from agencies able to confirm, in writing, that the statutory checks have been completed. NEO verifies the checks directly where reasonably practicable and retains the confirmation on the SCR.

10.3 AI Tools and Automated Decision Support

Where AI tools are used in recruitment (for example, shortlisting aids, reference analysis, or interview scheduling), their use is governed by NEO's agentic-AI design principles. No shortlisting or appointment decision is made by an AI tool alone. A human decision-maker reviews and is accountable for every shortlisting and appointment outcome. The DPO is consulted before any AI tool is introduced into the recruitment pipeline and a DPIA is completed.

11. Record Keeping and Data Protection

Recruitment records for successful candidates form part of the personnel file, retained for six years after the end of employment. Recruitment records for unsuccessful candidates are retained for twelve months, then securely destroyed. DBS certificates are not retained on file; the certificate number and issue date are recorded on the SCR and the physical or digital certificate is returned to the candidate. All records are held in line with UK GDPR, the Data Protection Act 2018, the ICO Children's Code where records touch learners, and the NEO Data Protection, Confidentiality and Privacy Policy.

12. Induction, Probation, and Ongoing Duty

12.1 Induction

Every new staff member, practitioner, contractor, or volunteer receives a structured safeguarding induction covering: KCSIE 2026 Part One (read in full — the condensed Annex A version has been withdrawn), the NEO Child Protection and Safeguarding Policy, the NEO Staff Code of Conduct, the NEO Online Safety and Acceptable Use Policy, and the NEO Data Protection,

Confidentiality and Privacy Policy. Induction includes a meeting with the DSL (or Deputy DSL) and introduction to the reporting routes. Induction completion is recorded and countersigned by the inductee.

12.2 Probation

All new staff and practitioner appointments are subject to a probationary period, typically six months, during which performance and conduct are reviewed formally at the halfway and end points. The probation review explicitly considers safeguarding practice. A concern about safeguarding during probation is escalated immediately to the DSL and the Director / Head of School.

12.3 Ongoing Duty

All staff have a continuing duty to disclose any change in circumstances that affects their suitability to work with children, including charges, convictions, cautions, barred-list inclusion, or safeguarding investigations. Annual self-declaration is required of all staff, practitioners, and regular volunteers. Re-checks are undertaken where there is a material change or where NEO has specific concern.

13. Managing Concerns and Allegations

Where information comes to light during a recruitment process that suggests a candidate may pose a risk to children, the process is paused and the DSL is consulted immediately. Depending on the nature of the information, NEO may: Seek clarification from the candidate in writing. Consult the LADO for advice. Withdraw the offer or terminate the application in line with this policy and employment law. Make a referral to the DBS under its referral duty where the threshold is met. Allegations about serving staff are managed under the Managing Allegations Against Staff Policy and KCSIE 2026 Part Four (which now extends explicitly to trainee teachers and volunteers).

14. Training

At least one member of every recruitment panel holds current (within three years) accredited Safer Recruitment training. The DSL and Director / Head of School are Safer Recruitment-trained at all times. Safer recruitment principles

are included in annual staff safeguarding training so that all staff understand their role in maintaining a safer culture.

15. Monitoring and Review

The Single Central Record is audited termly by the DSL. The Proprietor reviews recruitment activity, SCR compliance, and any safer recruitment concerns annually. This policy is reviewed annually, or sooner if KCSIE, OEAS criteria, or statutory guidance change. A focused review is scheduled after the first full recruitment cycle (expected September 2026) to capture lessons learned.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy
NEO Staff Code of Conduct
NEO Online Safety and Acceptable Use Policy
NEO Data Protection, Confidentiality and Privacy Policy
NEO Equal Opportunities, Equality and Diversity Policy
NEO Health and Safety Policy
NEO Complaints Procedure
Managing Allegations Against Staff Policy
Whistleblowing Policy

Document Control

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