



Recruitment, Selection and Vetting Policy

1 Introduction

SupplyNow Ltd is an employment business supplying temporary workers to work within the education sector. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients, and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

Our processes are compliant with relevant legislation and the Department for Education's statutory guidance: [Keeping Children Safe in Education](#). We ensure our temporary workers remain compliant throughout their time with SupplyNow Ltd by undertaking the checks set out in this policy.

We have processes in place whereby we obtain feedback from our clients once placements are made.

2 Recruitment and Selection

2.1 Face-to-face/Video interviews

Before placing any work seekers on assignments, SupplyNow Ltd meets with them face to face, either in person or via video. Before meeting the work seeker, we ask them to forward a copy of their CV and advise them of the documentation they are required to forward to us or bring with them to the interview.

During the interview, a qualified consultant will assess the work seeker's suitability for the role by discussing their previous work history and qualifications. SupplyNow Ltd uses a template of standard relevant questions to ensure equality of approach and seeks to understand the work seekers' knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, SupplyNow Ltd will then start the pre-employment checks.

Where the outcome of the interview is not satisfactory, SupplyNow Ltd reserves the right not to provide work-finding services.

2.2 Right-to-work checks

SupplyNow Ltd conducts right-to-work checks on every work seeker we intend to supply to our clients to comply with immigration requirements, recruitment industry legislation, and to ensure that we guard against the risk of supplying a person who is not permitted to work to a client. All checks are carried out in line with best practice and equality law. We will conduct a manual document check, a digital identity verification check through an Identity Service Provider (IDSP) or an online check using the Home Office Online or Employer's checking service to establish a candidate's right to work. Where a right-to-work check is conducted using the online service, the information is provided in real-time, directly from Home Office systems, and so there will be no requirement to see the documents listed below.



2.2.1 Physical/Video right-to-work checks

For physical document checks, we follow the three-step process set out in the [Home Office Guidance: An employer's guide to right-to-work checks](#):

Step one:

We obtain the work seekers' original documents. The work seeker must provide us with either one document from [LIST A](#) of the Home Office right-to-work checklist or any of the documents or a combination of documents from [LIST B](#) of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable.

Step two:

We take reasonable steps to check that the document is valid and that the work seeker is the person named in the document.

For each document, we complete the following checks:

- Check any photographs are consistent with the appearance of the work-seeker;
- Check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the work-seeker;
- Check that the expiry date for permission to be in the UK has not passed;
- Check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
- if given two documents that have different names, we ask for a further document to explain the reason for this. The further document could be a marriage certificate, a divorce decree absolute, a deed poll or a statutory declaration.
- Check that in relation to restrictions on permission to work in the UK the work seeker is allowed to do the type of work they have applied for. For students, we will obtain a copy of their academic term times from the relevant institution

Step three:

We make a copy of the relevant page/s of the document in a format that cannot be subsequently altered. This can include a photocopy or a scan or where we take an electronic copy, this will be in a non-rewritable format.

Where the work-seeker has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder's nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full, including both sides of a Biometric Residence Permit.

All copies of documents taken will be kept securely for the duration of the work-seeker's engagement with SupplyNow Ltd and for two years afterwards. The copy will then be securely destroyed.



2.2.2 Online/Digital right-to-work checks - U.K. and Irish Nationals

For digital document checks, we follow the three-step process set out in the Home Office Guidance: An employer's guide to right to work checks:

Step one:

We will use the services of an Identification Service Provider (IDSP) who can satisfy a minimum of a Medium Level of Confidence check.

Step two:

We will ask the candidate to complete an online Right to Work check via our UK government-approved IDSP providers [Trust ID](#) and [Yoti](#). This will require the candidate to pass a liveness test and verify the candidate's identity against their passport. It will also be checked against a database of lost/stolen documents and fraudulent documents. This check may be completed via a video call or in person

Step three:

We retain a clear copy of the verification document alongside copies of all original documents processed. This can be requested by the client at any time.

2.2.3 Online right-to-work checks - Non-UK

For online right to work checks we will follow the three basic steps set out in the the [Home Office Guidance: An employer's guide to right to work checks](#):

Step one:

Where the work-seeker provides us with a valid share code, we will use the Home Office online right to work checking service and will only supply the person if the online check confirms they are entitled to do the work in question;

Step two:

We satisfy ourselves that any photograph on the online right-to-work check is of the individual presenting themselves for work; and

Step three:

We retain a clear copy of the response provided by the online right-to-work check (storing that response securely, electronically or in hard copy) for the duration of employment and for two years afterwards

2.2.4 Employers Checking Service



If we are unable to conduct an online check because:

- we have not been provided with any acceptable documents listed in List A or B of the guidance and we have been unable to obtain an online check via share code;
- we have been provided with a non-digital Certificate of Application (CoA), email or acknowledgement letter confirming an application for the EU Settlement Scheme (EUSS) was made on or before 30 June 2021;
- we have been provided with evidence that the worker is a long-term resident of the UK who arrived before 1988 but have not received documents in List A or B;
- we have been provided with a non-digital CoA confirming an application for the EUSS was made on or after 01 July 2021
- we have not been provided with any acceptable documents but have been given information that indicates an application for permission to stay was made to the Home Office prior to the expiry of the workers previous permission or there is an appeal or administrative review pending;
- we have been provided with a valid application registration card.

In these circumstances we will use the Home Office's employers checking service and await receipt of a positive verification notice before supplying the work seeker to a client.

2.3 ID checks and proof of address

In addition to the above right-to-work documents, we also require the work seeker to provide us with two documents to confirm their identity and proof of address. The type of documents that we accept is a driving licence (Provisional or Full), core utility bill, bank, mortgage or credit statement, and government document/letter which includes the work-seeker national insurance number.

Copies of documents will be taken and noted (physically or virtually) with the date the documents were checked. Copies will be kept securely for the duration of the work-seeker's engagement with SupplyNow Ltd and for at least 1 year after. The copy will then be securely destroyed.

2.4 References

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Crown Commercial Service (CCS) Framework), we require (at least) two references within the past two years.

- One reference must be from the work seeker's most recent employer.
- One reference must be from the work seekers' most recent education employer (if this is different from the above most recent employer)
- References covering at least the past two years of work history.
- References must be from non-family members who give their consent for the reference to be forwarded to our clients.
- We will verify all references by contacting the referees directly, either by telephone or email. References will and must come from a verified work email address.
- References must be in a senior or managing position in relation to the candidate they are providing a reference for.
- Open references will only be accepted once they are verified by the original referee or the organisation of the original referee was a member.
- References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.



- All references are available on request from clients at any time.

If your setting requires further reference checks, please do let your consultant know and we can look at how to structure these reference checks.

3 Vetting

3.1 Rehabilitation of Offenders Act Declaration

During the registration process, all work seekers are required to complete our Rehabilitation of Offenders Act Declaration and, as required for regulated sectors, disclose all spent and unspent convictions, subject to the filtering rules.

If a work-seeker discloses any convictions, SupplyNow Ltd will consult with the Teacher Regulation Agency, or for Wales, the Education Workforce Council, and the REC's legal helpline to obtain advice and guidance on whether the work-seeker can work in the education sector.

All candidates with disclosures will go through a standard risk assessment process, which can only be signed off by a member of the SupplyNow Ltd senior management team.

3.2 Rehabilitation of Offenders Policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order and using criminal record checks processed through the Disclosure and Barring Service (DBS), SupplyNow Ltd complies fully with the [DBS 'Code of Practice'](#) and undertakes to treat all applicants for positions fairly.

SupplyNow Ltd undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

SupplyNow Ltd can only ask an individual to provide details of convictions and cautions that SupplyNow Ltd are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended), and where appropriate (Police Act Regulations as amended),

SupplyNow Ltd can only ask an individual about convictions and cautions that are not protected.

SupplyNow Ltd is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

SupplyNow Ltd has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

SupplyNow Ltd actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records.

SupplyNow Ltd selects all candidates for interviews based on their skills, qualifications and experience.



SupplyNow Ltd ensures that all staff of SupplyNow Ltd who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

SupplyNow Ltd also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At the interview, or in a separate discussion, SupplyNow Ltd ensures that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment/assignment.

SupplyNow Ltd makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

SupplyNow Ltd undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

3.3 Disclosure and Barring Service and Update Service checks

SupplyNow Ltd requires all our work seekers to have an enhanced Disclosure and Barring Service (DBS) check, which includes a check on the Children's Barred List.

We view and take a copy of the original DBS certificate and, with consent from the work seeker, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken in the work seeker's file. If the Update Service check states that there is new information, we will require the work seeker to apply for a new DBS certificate before proceeding with their registration.

If a work seeker wishes to register with SupplyNow Ltd and they are not already on the Update Service, a new DBS check will be required, and we would encourage the work seeker to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check to be undertaken at least once a year.

SupplyNow Ltd will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker's consent to undertake a status check.

If the DBS check shows details of a conviction or caution, in line with the Rehabilitation of Offenders Act 2014, we must inform the school and send over a copy that clearly shows any and all convictions, cautions or reprimands.

Following the decision of the Department for Education to remove access to the stand-alone Barred List checking system for employment businesses from 1 April 2021, we cannot conduct this standalone check and we will not place any work seekers in a role without a fully enhanced DBS check being completed. This check includes a Barred List check.

When reviewing a work seeker's DBS certificate, SupplyNow Ltd will check that the certificate is for Child Workforce only and status checks on the Update Service will only be for Child Workforce.



The definition of 'work with adults', as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of 'work with children' and refers to providing personal care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the [DBS eligibility tool](#) and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the work-seeker has an existing DBS certificate covering both child and adult workforce, we will require them to undertake a new DBS for the child workforce only.

3.4 Overseas Police Checks

All work-seekers who have lived and worked in a single overseas country for more than six months in the last five years must provide an overseas police check. This will be done in accordance with the [Government Guidance](#) particular to each country. Anything else a candidate provides will not be accepted.

If the work seeker is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks or there is currently an active conflict). SupplyNow Ltd will secure additional information from the candidate's employer in the relevant country in the form of a detailed reference. We would require the statement to include confirmation that, to the best of their knowledge, the work seeker has no criminal convictions and that they know of no reason why the work seeker should not work with children.

In cases such as this, the school will be informed in advance of placement and will be able to make a recruitment decision in line with its own policies.

If we are unable to obtain a police check or a statement of good conduct, we will not proceed with the registration of the work seeker.

3.5 Letter of professional standing for work seekers who have lived or worked overseas

For work seekers seeking teaching roles, who have lived or worked overseas, SupplyNow Ltd will request sight of a letter of professional standing issued by the professional regulatory authority where the individual worked. This check is completed to confirm the work seeker's suitability for the role in line with SupplyNow Ltd obligations under the Conduct Regulations. We will obtain details of the Regulated bodies in the EU/EEA and Switzerland via the Regulated Professions database.

Where the letter cannot be obtained, and all reasonably practicable steps have been taken to obtain it, SupplyNow Ltd will request the work seeker to provide an alternative document that confirms their suitability for the role. This may be a letter of good standing from the headteacher in the school that they worked in, or additional professional references.

SupplyNow Ltd will then inform the client of the steps taken to comply with the suitability requirements, which are set out in Regulation 22 of the Conduct Regulations.

3.6 Online/Social Media Checks



In line with [Keeping Children Safe in Education](#), SupplyNow Ltd will endeavour to complete basic online and social media checks. This is done in order to ensure all Engage

Education staff are playing safeguarding as a high priority concerning social media and their online presence. It also serves to protect the reputation of SupplyNow Ltd and our Clients

These checks will be completed at the shortlisting stage, and candidates are informed of this in writing during the registration process in advance of any submissions to clients

3.7 Qualifications and Early Career Teachers (ECTs)

Where the client, legislation or any professional body requires the work seeker to have a particular qualification or authorisation to work in the position offered by the client, we will obtain copies of original qualifications and authorisations and these will be available to our clients upon request.

Under the Education (School Teacher's Qualifications) (England) Regulations 2003, work-seekers being supplied with a teaching position must be qualified to teach. In addition to checking the qualifications, we will also check the teacher's qualified teacher status via the new '[Check a teacher's record](#)' service from the Department of Education.

A qualified teacher who has been awarded QTS but who has not yet completed an induction period can only undertake short-term supply work of less than 1 term in a maintained school for a maximum period of 5 years from the award of the QTS. An induction programme must be put in place immediately if it becomes clear that the extended assignment will continue for at least a term. SupplyNow Ltd will ensure that a teacher who has not satisfactorily completed an induction period is eligible to carry out short-term supply work.

We will check overseas qualifications via the [ECCTIS](#), the UK authorities' partner for the evaluation of international qualifications and skills (formerly UK NARIC)

Wherever possible we will work with schools and ECTs/NQTs to find suitable induction placements. In England, an ECT is required to complete 6 full school terms.

3.8 Teacher Regulation Agency / Education Workforce Council (Wales)

SupplyNow Ltd will undertake checks via the [Teacher Regulation Authority](#) (TRA), or in Wales, the [Education Workforce Council](#) (EWC), to check a teachers UK qualified teacher status to ensure that qualification certificates are genuine and that there are no prohibitions or sanctions imposed against the work seeker. We will retain a screen print on the teacher's file as a record of these checks.

Additionally, we will undertake a check for all non-teaching support staff to ensure that there are no prohibitions or restrictions. A record of this check will be noted on the work seeker's file. If a prohibition or restriction is imposed, we will retain a screen print.

3.9 Referrals



SupplyNow Ltd as an employment business, is a 'personnel supplier' and has a legal requirement under the **Safeguarding Vulnerable Groups Act 2006** to refer information to the DBS about individuals who have either harmed or been placed at risk of harm, a child or vulnerable adult.

Where SupplyNow Ltd supplies or introduces a work seeker to a client, and the client subsequently removes the work-seeker from carrying out 'regulated activity' because the client believes that the person has engaged in '[relevant conduct](#)' or the '[harm test](#)' is satisfied, SupplyNow Ltd must provide information to the DBS about this matter. Additionally, if SupplyNow Ltd decides to withdraw our services from the work seeker because we believe that the work seeker engaged in 'relevant conduct' or that the 'harm test' is satisfied, we must provide information to the DBS about this.

'Relevant conduct' is defined as:

- Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult,
- Conduct which, if repeated against a child or vulnerable adult, would endanger or would be likely to endanger him,
- Conduct involving sexual material relating to children (including possession of such material),
- Conduct involving sexually explicit images depicting violence against human beings,
- Conduct of a sexual nature involving a child or vulnerable adult.

SupplyNow Ltd has a duty to refer information to the DBS if the 'harm test' is satisfied, i.e. if SupplyNow Ltd thinks that the person may:

- Harm a child or vulnerable adult,
- Cause a child or vulnerable adult to be harmed,
- Put a child or vulnerable adult at risk of harm,
- Attempt to harm a child or vulnerable adult,
- Incite another to harm a child or vulnerable adult.

To ensure compliance with the DBS referral rules, we have processes in place to ensure that all staff are aware of the legal duty to make a DBS referral where necessary and know the process for doing so.

3.10 Fitness to teach

To ensure compliance with the **Education (Health Standards) (England) Regulations 2002**, SupplyNow Ltd will ask all work-seekers to advise us of any health or disability issues that they believe are relevant to the role and which make it difficult for them to carry out functions that are essential to the role.

If a declaration is made, with consent from the work seeker, we will obtain confirmation from the work seeker's doctor that the work seeker is fit to teach. If we are unable to obtain this confirmation, we will not proceed with the registration.

If a teacher has been retired on medical grounds by the Department of Education after 1 April 1997, the teacher will not be able to teach as they have been considered medically unfit. However, if the retirement was before 1 April 1997, the teacher may be able to work if they can evidence that they have the health and physical capacity to teach. This can be achieved by obtaining confirmation, in writing, from a GP. In these instances, they can only work a maximum of 2.5 days per week. This requirement only applies in England.



3.11 Disqualification

In order for SupplyNow Ltd to comply with our obligations under the **Childcare Act 2006** and the **Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Extended Entitlement (Amendment) Regulations 2018**, we must carry out appropriate checks to ensure that work-seekers are not disqualified from teaching. Under the rules, individuals can either be disqualified from carrying out work with children in their own right or disqualified by association because they live with somebody, or have somebody working in their home, who is disqualified (See disqualification by association).

3.11.1 Disqualification by association checks

Changes to the disqualification rules were introduced in 2018, and since then, disqualification by association only applies to those who work in childcare in a domestic setting, such as in a childminder's home (previously, it applied in schools and non-domestic settings such as nurseries).

For roles involving childcare that are carried out in a domestic setting only, we will require a disqualification by association declaration to be signed by candidates before we place them in any roles.

3.11.2 Disqualification checks

Disqualification checks are required for all candidates who are seeking work that involves 'relevant childcare roles', such as;

- provision of early years childcare
- later years childcare in the nursery, primary or secondary school settings
- staff directly concerned with the management of the above.

For candidates who do not work in these 'relevant childcare roles', we will not conduct disqualification checks. For example, the following roles are not covered: staff who:

- only provide education, childcare or supervised activity during school hours to children above reception age; or
- only provide childcare or supervised activities out of school hours for children who are aged 8 or over, and
- are not involved in the management of relevant provisions.

4 Other checks

4.1 Continued suitability

In order to ensure that all work seekers registered with SupplyNow Ltd meet safeguarding and suitability requirements on an ongoing basis, at least once a year, we will conduct status and Teacher Regulation Authority/Education Workforce Council checks (subject to any shorter period imposed by a client).

Where a work seeker has not worked with us for a period of three to six months, we will conduct DBS status and Teacher Regulation Authority/Education Workforce Council checks and obtain additional reference/s and work history to cover the period in question.



Where a work-seeker has not worked for SupplyNow Ltd for a period of 12 months, the registration process will be repeated in full.

For Further Information on SupplyNow Ltd Policies and Procedures, please visit:

<https://www.supplynow.co.uk/policies> or contact Joseph Raffell, Associate Director - Talent Acquisition, Compliance and Safeguarding - joseph.raffell@engagepartners.co.uk

I have read and understood this policy and agree to abide by its terms.

Signed Joseph J Raffell

Dated 07/08/2025

Amendments to V1 (May 2021)

We have added additional text to 3.5 Letter of professional standing for work seekers that have lived or worked overseas to refer to the Teacher Regulation Authority Country Evidence table which can be referred to for guidance on other suitable document/s where a letter of professional standing cannot be obtained.

Amendments to V2 (July 2021)

We have updated the document to account for changes regarding checking right to work, face-to-face interviews and working with schools when supplying early career teachers completing their induction period.

Amendments to V3 (August 2023)

4.1 - Addition of Online checks as standard

Amendments to V4 (August 2024)

2.2.2 - Addition of Yoti as an IDSP Supplier
2.4 - Additional Language related to additional checks for certain settings
3.6 - Changes to TRA system - Inserted link to new 'Check a Teacher' service
3.6 - Change of name from UK NARIC to ECCTIS

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3.8 - Links added for definitions of Harm Test and Relevant Conduct

Amendments to V5 (December 2024)

3.4 - Clarification of OSPC checks policy

Amendments to V6 (March 2025)

2.1 - Additional language - withdrawal of service
2.2 - Updated language from REC guide
2.2.1 - Additional language added on visa restrictions (clarification)
2.2.3. - Additional links added for Home Office guidance
3.4 - Link to government overseas police check guidance.
3.6 - Additional Information added related to 5 year QTS Induction rule.

Amendments to V7 (August 2025)

1 - KCSIE Link Updated
2.2.4 - Further information added to cover employee checking service where online checks are not available.
3.5 - Removal of reference to UKCPQ and Country of Evidence Table (which has been removed by the TRA)
3.6 - Online and Social Media checks moved from 4.1 to 3.6