Safer Recruitment and Vetting
POLICY & PROCEDURE

1 Introduction

1.1 Reaseheath College and University Centre (the College) is committed to providing an environment which recognises that the delivery and management of effective safeguarding of children and adults identified as 'vulnerable', requires sound procedures, good inter-agency co-operation and highly competent and confident staff supported by ongoing management, training and development.

1.2 This policy provides a framework which incorporates the advised nationally recommended safeguarding practices, thereby ensuring that the College has in place a robust and rigorous recruitment and selection procedure which precludes unsuitable applicants from gaining a position with the College.

1.3 To ensure a secure environment is maintained the policy covers staff who are not directly employed by the College.

1.4 The policy should be read in conjunction with the following College policies and procedures:

- Safeguarding Adults Policy
- Child Protection and Safeguarding Policy
- Online Safety Policy
- College Security Policy
- Recruitment and Selection Policy and Procedure
- Equality, Diversity and Inclusion Policy

2 Legal

2.1 The College recognises is explicit duty under Section 175 of the Education Act 2002, the Children's Act 2004 and Working Together to Safeguarding Children to provide an environment which safeguards and promotes the welfare of children. This policy has also been developed in accordance with the Keeping Children Safe in Education guidance.

2.2 The Policy refers to the provisions of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and defines the activities and work considered to be 'regulated activity' (work that a barred person must not do).

2.3 Regulated activity includes:

- Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice and guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- Work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

  The work above is regulated activity only if done regularly. Regularly means
  - Once a week or more often
  - Four or more days in a 30 day period
  - Overnight between 2.00am and 6.00am

- Some activities are always regulated activity regardless of frequency or whether they are supervised, such as providing personal care (helping with eating, drinking, toileting, washing, bathing, dressing) or health care.

2.4 For the purposes of this guidance and DBS checks, a child is someone aged under 18 years of age, except in employment situations where the age limit is 16.

3 **Policy scope and purpose**

3.1 The College is under a statutory duty to not employ anyone that is barred from working with children and their name appears on any Vetting and Barring list.

3.2 There are three types of criminal records check that are available through the DBS:

- **Standard:** this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.
- **Enhanced:** this provides the same information as a standard check, plus any additional information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed; and
- **Enhanced with barred list check:** where people are working or seeking to work in regulated activity with children, this allows for an additional check to be made as to whether the person appears on the children's barred list.

3.3 If a role within the College requires an Enhanced DBS check the College will request if appropriate a barred list check (for children, adults or both). Enhanced DBS checks with barred list, for work within 'regulated activity' will tell the College (when requested) if the person is on one of the barred lists.

3.4 The flowchart at Appendix A provides guidance on what level of check is required for different types of staff working with the College.

3.5 Transgender applicants

3.5.1 The Disclosure and Barring Service has a confidential checking process for Transgender Applicants and other applicants who do not wish to reveal details of their previous identify to the person who has asked them to complete a DBS application. Further information from the DBS Service is available by contacting their Sensitive Applications Team at sensitive@dbs.gov.uk.

3.6 Applicants who have lived or worked outside the UK

3.6.1 All new staff providing education within the College who have lived or worked outside of the UK are subject to such additional checks as are deemed appropriate where the required DBS Enhanced Disclosure check is not considered sufficient to establish suitability to work with Children and Adults in regulated activity.

3.6.2 Applicants who have resided outside the UK must undergo the same checks as all other staff joining the College and further checks should be carried out following the Home Office guidance on criminal records checks for overseas applicants.

3.6.3 Documents that are evidence of an individual's overseas identity will be retained securely by the People Services Team for the duration of the individual's employment and in line with the College's Data Retention guidance.

3.7 Visiting staff and volunteers

3.7.1 Visiting staff and volunteers such as education mentors who do not have regular and unsupervised access to children will not receive a DBS check. The normal risk assessment process that applies to all visitors will be sufficient.

3.7.2 Visiting staff and volunteers who do have unsupervised regular access to children and adults requiring 'regulated activities' such as educational psychologists, sports coaches, learning support assistants – their providing organisation will request the check. The People Services Team will, prior to an individual's commencement, seek written confirmation from the respective agencies of two satisfactory references, ID check and satisfactory DBS check at the appropriate level.

3.7.3 The College will request the required level of DBS check for volunteers working directly for the College, and will also assess suitability to work with children through its recruitment process, perform an ID check and source satisfactory references. Volunteers will be encouraged to join the DBS Update scheme.

3.8 Agency staff

3.8.1 The People Services Team will seek written confirmation from the respective agencies that the appropriate checks, including two references, ID check and DBS check have been carried out satisfactorily. The agency will provide the necessary DBS number and certificate issue date for the Single Central Record.

3.8.2 When an agency has obtained an enhanced certificate, the agency will confirm to the People Services Team in writing that the disclosure provides the full details, including any relevant information which the police may have provided about the individual which they consider to be justified and proportionate.

3.8.3 The People Services Team will confirm with the Manager once confirmation of all satisfactory checks have been received from the agency. Managers will then check that the person presenting for work is the same person on whom the checks have been made.

3.9 Contractors

3.9.1 Contractors are managed by the Estates Department and must follow the College's Contractor Safeguarding Procedures which are set out in the College Security Policy.

3.9.2 Contractors involved in larger building projects lasting several weeks will work within a defined compound with no access to any welfare/catering facilities shared with learners and no opportunity to have direct unsupervised access to learners. Students will receive communications regarding the project and be clearly instructed as to which areas are restricted, where contact with contractors is not required. These contractors will not require a DBS check.

3.9.3 All other contractors are required to report in and out via the Estates office, wear a high visibility jacket to distinguish themselves as a contractor and be supervised when in student areas and escorted to and from any site.

3.9.4 Regular contractors and consultants working unsupervised will be required to obtain an enhanced DBS check through their specific organisation and will be included on the Single Central Record.

3.10 Students on work/volunteer placements

3.10.1 Work experience placements are organised through the Careers team, who ensure that placement providers have policies and procedures in place to protect children from harm.

3.10.2 The Careers and work placements team will consider each specific circumstance of work experience and liaise with the placement provider regarding whether any specific DBS checks are required in relation to those supervising work placement students if under the age of 16 and whether this constitutes regulated activity.

3.11 Staff

3.11.1 A full range of employment checks are carried out on all prospective College staff to minimise the possibility of any learners suffering harm from those whom they consider to be in positions of trust in whatever capacity.

3.11.2 The member of staff will have the appropriate level of DBS check for their role and if they change role and require a different level of DBS check, this will be carried out before they start the new role.

3.11.3 If there is a break in service of 3 months or more a new DBS check will be carried out.

3.11.4 If a prospective member of staff has worked in a school in England which brought them into regular contact with children under 18, or worked in another institution within the FE sector in England (including 16-19 Academy), in a position which involved the provision of education, caring, training, supervising or being in sole charge of persons aged under 18, within the last 3 months then the People Services Team will seek the guidance of the Safeguarding Lead regarding whether a further enhanced DBS is required. If it is deemed that one is not required, then a barred list check will be completed if the individual will be in regulated activity, in additional to all other pre-employment checks.

3.12 Existing staff

3.12.1 If a member of staff moves from a position that did not include regulated activity to a position which does, then the individual will be re-checked, and all required pre-appointment checks repeated.

3.12.2 If concerns are raised about an existing staff member's suitability to work with children then the People Services Team may be asked to re-check the individual as if they were a new member of staff.

3.12.3 Any safeguarding allegations made against a member of staff will be dealt with in accordance with the guidance outlined in the Safeguarding policies. Should it be deemed that the individual has harmed or poses a risk of harm to a child or vulnerable adult then the College will refer to the DBS through the Designated Safeguarding Lead.

3.13 Residential staff family members

3.13.1 Family members living with residential staff in their own home within College grounds are required to provide a DBS disclosure certificate and must comply with the standards of conduct and probity expected of College residents.

3.14 Governors

3.14.1 Due to the close interaction between students and Governors within the College, the Group undertakes DBS checks in respect of Governors.

4. Employment checks

4.1 The College as part of its safer recruitment and selection process, undertakes the following checks on prospective staff in addition to DBS checks:

- Verification of ID
- Verification of mental and physical fitness to carry out the role
- Verification of right to work in the UK
- Any further checks if someone has lived or worked outside the UK
- Verification of professional qualifications

4.2 References should always be obtained from the candidate's current employer. If a candidate is unemployed, verification of their most recent period of employment and reasons for leaving will be obtained. The People Services Team use a standard proforma to request references which includes questions around suitability to work with children. The People Services Team will scrutinise all references and resolve any concerns before an appointment is confirmed. The People Services Team will always seek references and not accept open references, they will follow up any questions not answered, check information against the application form and ensure electronic references originate from a legitimate source. Any discrepancies are directed back to the Recruiting Manager or Director of People and Culture for them to discuss with the candidate.

5. Appointment prior to receipt of DBS check

5.1 Staff will not be appointed into post until the DBS check has been satisfactorily received by the College, except in exceptional circumstances approved by the Principal/CEO or Vice Principal. The appropriate risk assessment process must be followed and all relevant checks, including barred list, must be completed before any approval is given for a start date. The risk assessment process is documented at Appendix B.

6. Single Central Record

6.1 The College maintains a Single Central Record of all pre-appointment checks for all staff including trainee teachers and agency staff who work at each site providing education to children. Where subcontracting provision exists, each subcontractor maintains a Single Central Record for their staff providing education which is visible to the People Services Team and is audited regularly.

6.2 The Single Central Record contains information on the following checks with dates when each check has been completed:

- Identity check
- DBS check
- Separate barred list check if required
- Checks if lived or worked outside the UK
- Professional qualifications

- Right to work
- Two professional verified references

6.3 The People Services Team will also carry out a Prohibition from teaching check for all employees recruited into front facing teaching roles and record this on the Single Central Record.

6.4 Agencies supplying staff to the College will be required to confirm in writing that the required checks have been carried out and appropriate certificates seen.

6.5 Copies of DBS certificates are not retained once the DBS certificate has been seen and the DBS certificate number added to the Single Central Record. Copies of all other pre-employment check information is retained on the individual's electronic personal file.

7. General

7.1 Any person refusing to be checked by the College will be unable to be employed, as this is a pre-requisite to offering or continuing in any contract of employment.

7.2 The College covers all fees paid to the DBS in the case of employees who earn £18,000 per annum or less and student workers. Employees earning over this threshold will have the cost of the DBS check deducted from their first monthly salary payment. Casual and bank staff are responsible for the cost of their own DBS check.

8. Update Service

8.1 For an annual subscription of £13.00, applicants can join the Update Service and have their DBS Certificate kept up to date. They can take it with them from role to role, within the same workforce, where the same type and level of check is required. This service is free to volunteers.

8.2 An applicant must subscribe to the Update Service within 30 days of the DBS certificate being issued. Once subscribed, with their permission, the employer can use their current DBS certificate and carry out a free, instant online status check to see if any new information has come to light since issue.

8.3 Before carrying out an online status check the People Services Team will obtain the consent of the individual to do so, confirm that the DBS certificate matches the individual's identity and check that the DBS certificate is original and has the right level of DBS check for the role they will be performing. If there has been a change of information since the issuing of the certificate, then the People Services Team will initiate a new DBS check at the correct level.

9. Secure handling and use of disclosures and disclosure information

9.1 The College will continue to use the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust. It will also continue to comply fully with the respective Code of Practice regarding correct handling, use, storage, retention and disposal of Disclosures and certificate information.

9.2 The People Services team have responsibility for co-ordinating the procedure and monitoring compliance with the policy. It will advise the College on its effectiveness by providing statistical data which demonstrates the effectiveness of the process and make subsequent recommendations.

9.3 The College complies with its obligations under GDPR legislation and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information.

9.4 Disclosure information will only be used for the specific purpose for which it was requested and for which the applicant's consent has been given. Disclosure information will only be passed to those who are authorised to receive it in the course of their duties.

10. Responsibilities for implementation

10.1 The Principal/CEO will be responsible for ensuring that a regular review of the effectiveness of this Policy and Procedure takes place.

10.2 The People Services team and Director of People and Culture have responsibility for co-ordinating the procedure and monitoring compliance with the policy. It will advise the College on its effectiveness by providing statistical data which demonstrates the effectiveness of the process and make subsequent recommendations.

10.3 Line managers will ensure that all aspects of the policy are adhered to in order to ensure that there is no discrimination against any employee. Where a risk assessment process is used, the line manager is responsible for ensuring its compliance.

10.4 It is the responsibility of the manager to seek advice from their member of Executive, the Director of People and Culture, the Safeguarding Lead or deputy where an employee needs to be removed immediately from an area/activity where it is felt a learner may be put at risk. The procedure for dealing with safeguarding allegations against members of staff is outlined in the Child Protection and Safeguarding and Safeguarding Adults policies.

10.5 Visitors to the College should be signed in and out and provided a visitor's badge and accompanied around the site.

10.6 The Director of People and Culture is responsible for ensuring that the College Management Team involved in the recruitment and selection process have received the

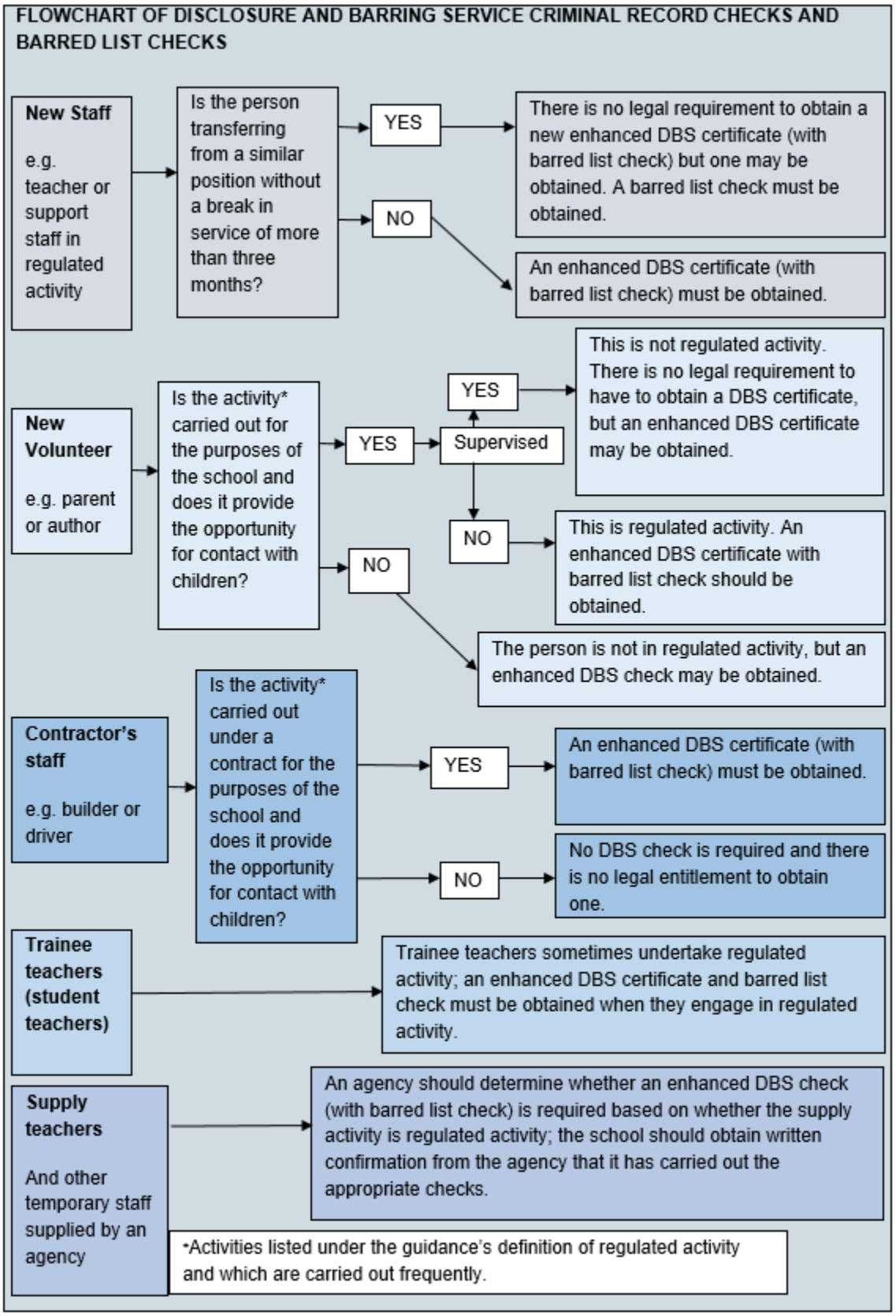
appropriate safer recruitment guidance and training. Safer recruitment training and guidance is also provided to subcontractors.

11. Review and Monitoring

11.1 The policy and procedure will be reviewed on a regular basis according to legislative changes.

Issue/Version	August 2026
Lead	Director of People and Culture
Review Period	Every three years
Next Review	August 2029
Equality Analysis Review (if applicable)	August 2026
Approved by	Executive 09.09.26

Internal


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

Internal

RISK ASSESSMENT – commencing employment before a DBS certificate has been received

In exceptional circumstances it may be necessary for the College to allow an individual to start employment in regulated activity before a DBS Certificate is available. This is in accordance with the guidance provided in 'Keeping children safe in education -statutory guidance for schools and colleges.

"Where a school or college allows an individual to start work in regulated activity before the DBS certificate is available, then they should ensure that the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed."

This decision can only be made by the Principal or Vice Principal and there must be clear documented justification for this decision.

This Risk Assessment applies to staff working on or off the main College site, ***excluding*** any staff working in the following departments: **Student Services, Estates, Domestic, LSC**. These departments are classed as working in a higher risk regulated activity and therefore all pre-employment checks are required to be in place and satisfactory before they commence employment. A risk assessment will not be considered for these staff.

Name of new member of staff
Department
Job Title
Start Date
Line Manager taking responsibility for this Risk Assessment
What is their previous experience and do they currently hold a DBS Certificate for a previous role?
If they hold a current DBS Certificate what is the Disclosure No. and date (please provide a copy):
Briefly describe the business reasons why the new starter needs to join the Group urgently

PEOPLE SERVICES Department to complete – tick to indicate check completed	
Minimum of 2 written and verified professional references (at least one being from their current or most recent employer), validated by People Services by telephone discussion	
Checking gaps in employment or education	
Right to work in the UK check (checking authenticity of pre-employment documentation)	
Evidence of relevant qualifications and current memberships of professional bodies	
Individual to complete a separate declaration regarding previous convictions (see Annex 2 below)	
Separate barred list check	
DBS applied for: reference no, date applied and current status:	
Signed on behalf of People Services Department: Signature: Date:	
Line Manager Declaration	
The following restrictions apply during a risk assessment period. The new member of staff: • **MUST be accompanied AT ALL TIMES including when walking around the campus/site, conducting any teaching/instructing or interacting with students** • **MUST report in and out of campus via their Programme Administrator/Dept Reception** • **MUST wear a visitors badge or be clearly identified as a visitor at all times when on campus or college business** • **MUST not have any access to College data systems** **The new member of staff should only have access to areas of campus which are required for their role and should not have access to Student accommodation or student social areas.**	
As Line Manager with responsibility for this new member of staff, I understand that I am responsible for enforcing the above restrictions during the risk assessment period. Signature: Date: **Any breaches of the restrictions will be investigated and could lead to disciplinary action against the individuals responsible. Any questions or queries, or difficulties in**	

enforcing the restrictions should be raised with People Services and the Vice Principal asap.
Decision
Risk assessment decision: Approved / Not Approved
Start Date of Risk Assessment : **Risk Assessment valid until:**
Signature: (Principal / Vice Principal)
Risk Assessment reviews
The Risk Assessment will be reviewed on a 2 weekly basis until the DBS certificate has been received and is deemed to be satisfactory. At that point People Services will withdraw the Risk Assessment. **Details of Review, extension dates and authorisation:**
Date Risk Assessment was lifted and all checks completed satisfactorily:

RISK ASSESSMENT NEW STARTER DECLARATION
(Commencing employment before a DBS certificate has been received)

In exceptional circumstances the College can allow an individual to start employment in regulated activity before a DBS Certificate is available. This decision can only be made by the Principal or Vice Principal and there must be clear documented justification for this decision. If approved, you will be subject to a Risk Assessment which contains clear restrictions on the activities you can undertake and in what format. These must be complied with until all satisfactory checks have been completed and the risk assessment is lifted.

The following restrictions apply during a risk assessment period.
You:

- **MUST be accompanied AT ALL TIMES including when walking around the campus/site, conducting any teaching/instructing or interacting with students**
- **MUST report in and out of campus via their Programme Administrator/Dept Reception**
- **MUST wear a visitors badge or be clearly identified as a visitor at all times when on campus or College business**
- **MUST not have any access to College data systems**

You should only have access to areas of campus which are required for your role and you should not have access to Student accommodation or student social areas.

Declaration:
I understand the restrictions that are placed upon me whilst subject to a risk assessment and I agree to comply with these. I acknowledge that my offer of employment is subject to a satisfactory DBS check and this offer can still be withdrawn by the College should my DBS check prove unsatisfactory.

Signed:

Name:

Date:

Job:

Declaration of Previous Convictions for posts exempt from the Rehabilitation of Offenders Act 1974

The **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended** makes certain regulated activity (i.e. work with children and/or young people) exempt from the Act and therefore requires individuals seeking to work with these groups to be subject to an Enhanced Criminal Records Bureau Disclosure check, amongst other safer recruitment checks.

Where a post is classed as exempt under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, you are required to reveal all convictions, both spent and unspent, which would not be filtered in accordance with current guidance.

Have you ever been convicted of a criminal offence or cautioned? YES / NO

If Yes, please provide details

Are there any criminal charges pending against you? YES / NO

If Yes, please provide details

Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

The College undertakes to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment
Having a criminal record will not necessarily bar applicants from working at the College. This will depend on the nature of the position and the circumstances and background of their offences
I certify that the information on this form is true and accurate. I understand that if the information I have supplied is false or misleading in any way, it may automatically disqualify me from appointment or may render me liable to dismissal without notice.
Signed:

Name:
Date:

Internal