

## SAFER RECRUITMENT POLICY

<b>Version</b>	5
<b>Title of Policy</b>	Safer Recruitment Policy
<b>Policy Owner</b>	Vicki Zolkiewicz
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<b>Authorised by</b>	Kerry Bentley
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### Policy Statement

DBC Training is committed to providing a learning environment where young people and adults have the right to be safe, secure and free from threat and protected from abuse. We are committed to Safeguarding/Prevent and promoting the welfare of all learners in its care, as an employer, the group expects all staff to share this commitment. In line with recent legislation including the [Children Act 1989](#), [Children Act 2004](#), [Keeping children safe in education 2023](#), [Safeguarding Vulnerable Groups Act 2006](#) and [Prevent Duty 2023](#), the company is committed to a thorough and consistent Recruitment and Selection Policy which encompasses our commitment to a safer recruitment strategy. As part of safeguarding, protecting people from extremist views and the threat of extremism and radicalisation is our priority.

### Equality and Diversity Statement

DBC Training strives to treat all its staff, learners and visitors fairly and aims to eliminate unjustifiable discrimination on the grounds of religion or belief, gender reassignment, race, disability, marriage and civil partnership, sex or sexual orientation, spent criminal convictions, age or any other inappropriate grounds. We are committed, wherever practicable and consistent with our statutory and professional obligations, to achieving and maintaining a workforce which broadly reflects the composition of the population in which we deliver our services.

### Introduction

The Company recognises its employees as being fundamental to its success. A strategic and professional approach to recruitment processes helps attract and appoint people with the necessary skills and attributes to fulfil the organisation's strategic aims and support its values. All hiring managers at DBC Training are taken through relevant training to ensure our recruitment practices are fair and equal across the business.

DBC Training has an objective to help keep young people and vulnerable adults safe by contributing to:

- Providing a safe environment for young people and vulnerable adults to learn
- Identifying young people and vulnerable adults who are suffering or likely to suffer significant harm
- Taking appropriate action with the aim of making sure they are kept safe both at home and in the education setting.

Achieving this objective requires systems designed to:

- Prevent unsuitable people working with young people and vulnerable adults.
- Promote safe practice and challenge poor or unsafe practice.
- Identify instances in which there are grounds for concern about a young person or vulnerable adults' welfare, and initiate or take appropriate action to keep them safe; and contribute to effective partnerships with agencies providing services for young people and vulnerable adults.

One of the main purposes of the policy is to ensure that all recruitment and employment decisions follow a standard process which is a fair, rigorous, consistent, transparent and a legitimate assessment of whether an individual should be prevented from working with children and young people/or vulnerable adults. It aims to ensure that people who work, apply to work and/or are associated with for DBC Training are not discriminated against.

The policy refers to all staff, freelancers, subcontractors and any other external stakeholders.

DBC Training is committed to the values and practises of safeguarding, including those associated with radicalisation and extremism.

## **Aim and Principles**

### **Aim**

The aims of this policy are:

- Promote a planned, objective approach to staff recruitment that ensures consistency throughout.
- To maximise the pool of suitable applicants from a diverse range of backgrounds. Ensuring the best possible candidate is appointed to every vacant post.
- To ensure that all appointments are made in accordance with the Equality & Diversity policy, best practice and comply with all relevant legislation.
- To demonstrate our commitment to safer recruitment and employment.
- To comply with current legislation, statutory duties, and codes of practice. Making clear standards to which the organisation is expected to work to.
- To protect young people and vulnerable adults within our organisation and those who are learners.
- To give assurance that unsuitable people are prevented from working or with young people or vulnerable adults within the organisation.
- To ensure that employees and prospective employees understand what information in relation to criminal offences they are obliged to disclose.
- To ensure that pre-employment checks are satisfactorily completed prior to appointment.
- To undertake DBS disclosure self-declarations on a regular basis.
- To deal with positive DBS disclosures on a case-by-case basis in a fair and indiscriminate manner in line with the DBS policy.
- To monitor procedures and to ensure that attention is given to recruitment and employment best practices.
- To maximise promotional and developmental opportunities for existing employees.

As an organisation, DBC Training is committed to ensuring that the recruitment and selection of suitable candidates is conducted in a manner that is systematic, efficient, and effective, that equality of opportunity is promoted and safe recruitment practices adhered to.

Recruitment should be treated as a key public relations exercise as the way it is managed affects the Company's image, and consequently its ability to attract and appoint high calibre people. It should also be treated as an essential process to thoroughly vet applicants who may work with vulnerable groups.

This policy has been designed to provide a flexible framework which promotes a good and safe practice, adopts a proactive approach to equality and diversity issues and supports fully DBC Training's core business.

Safer recruitment is designed to demonstrate our commitment to safer recruitment and employment. It is underpinned by a commitment to the following principles:

- Safeguarding young people and the protection of vulnerable adults
- A duty of care to our employees, prospective employees and learners
- Adherence to a system of safeguarding that is proportionate, unbiased and effective
- Maintaining confidentiality standards about individual's DBS disclosure information
- Any abuse of the procedures within this policy will be dealt with through disciplinary procedures.

## **Remit/Responsibilities**

This policy covers the appointment of employees on all types of contract. All employees engaged in the recruitment and selection process shall receive appropriate training to enable them to discharge their responsibilities fairly and consistently with particular reference to equality of opportunity and the safeguarding of children and vulnerable adults.

There will be continual monitoring to ensure that DBC Training practices and documentation reflect best employment practices. The Finance Director is responsible for ensuring that all company employment practices comply with relevant legislation.

The Finance Director is responsible for the establishment and maintenance of appropriate standards of recruitment and selection within DBC Training. Any changes in procedures and practices must be approved by The Board.

Specific responsibilities for managers, employees and the Recruitment team are detailed as follows:

**Managers:** Every manager has a responsibility to ensure that:

- All recruitment is to be fed through to Human Resources department including all Pre-Recruitment information as required.
- Recruitment procedures are followed at all times for fairness and consistency.
- They attend relevant training sessions on safer recruitment every year as a minimum.
- Recruitment practices and protocols are adhered to, in accordance with and operated to the comprehensive Equality and Diversity policy.
- Accurate records are kept throughout the recruitment and fair/ safe selection process. Any notes or records made to be securely retained and filed in the employee's personal file in HR.
- Clear and honest feedback is given to unsuccessful candidates where requested.

**Employees:** It is the responsibility of every employee to:

- Ensure that, where they have involvement in the recruitment process, they are aware of and comply with the recruitment protocols.
- Follow the guidelines and ensure they adhere to the comprehensive Equality and Diversity policy.
- Act as an ambassador for the Company at all times especially when actively involved in the recruitment and fair/ safe selection process.
- Internal applicants have a responsibility to inform their direct line manager when applying for another position within the organisation.

**Recruitment team:** It is the responsibility of the Recruitment team to:

- Support line managers with any issues surrounding recruitment in terms of offering advice, training, guidance, and practical support where required.
- Ensure that any notes or records made for unsuccessful candidates are retained securely for a period of four months in accordance with the GDPR and relevant Company data policies and procedures.
- Administer the recruitment process.
- Advise potential job applicants.
- Bring to the attention of senior managers any issues which may have implications for the whole of the organisation.
- Oversee and update the Single Central Register
- Review and amend the policy as necessary.

## **Application of the Policy**

In order to ensure compliance with the policy the recruitment and selection procedure must be followed in every case. Guidance notes for those involved at each of the stages are provided by the Human Resources team and can also be found in DBC Training's secure shared drive.

## **Authority to Recruit**

With the exception of senior post holders, the authorisation to recruit to a vacancy is given in accordance with the following:

DBC Training recognises that there will be circumstances where there is a need to provide short term staffing cover for existing posts in unforeseen or unavoidable circumstances. Examples of such circumstances include providing for short term sickness cover, providing cover during a recruitment campaign in response to a staff member leaving, or to ensure adequate workload resource during peak periods.

With the exception of new posts, the appropriate member of senior management may authorise temporary appointments of up to 12 weeks' subject to budget constraints. If the appointment is likely to extend over 12 weeks in duration the recruiting manager must provide relevant authorisation. All new posts must be authorised in accordance with the sections below.

## **New Positions**

To create a new post, the following steps must be taken:

1. The need for the new post must be identified by the line manager and supported by the Managing Director.

2. A job description (including person specification) must be prepared by the line manager prior to the post being referred to HR (who will then escalate to the Managing Director).
3. The pay scale for the position and timeframe for vacancy must be identified by the line manager ahead of advertisement.

## **Vacant Positions**

When an existing post becomes vacant the following steps must be taken:

1. The need for the continuation of the position must be determined by the line manager and agreed with the Managing Director.
2. When an employee resigns, an exit interview must be held to ascertain the factors which influenced the decision, with a view to taking any necessary steps to prevent others leaving for the same reason.
3. If recruitment is difficult in certain jobs or skill sets, consideration may need to be given to re-design the job or to introduce more flexible working arrangements eg job sharing, part-time etc – likewise; the HR manager may utilise a recruitment agency.
4. If it is determined the post should continue, the decision to fill the vacancy should be supported by the Managing Director.
5. The job description and person specification must be amended by the line manager.
6. If significant changes are proposed, the position must be formally re-graded by the line manager.

If a vacancy is filled by an internal staff member, the notice period for the changeover in role will be four-six weeks.

## **Re-deployment**

Prior to commencing the any recruitment procedure, consideration will be given to individuals identified for re-deployment.

## **Advertising**

To maximise internal promotion opportunities and to recognise the development and full potential of existing DBC Training employees, for example, Aspiring Managers, consideration should always be given to filling any vacancy internally before seeking external applicants.

All external adverts will carry a statement regarding DBC Training's commitment to equality of opportunity and the safeguarding of children and vulnerable adults. Candidates will be advised in the advert of a requirement for a Disclosure and Barring Service check (DBS), Digital Screening & Satisfactory References. The RRM will give advice on the nature and timing of recruitment campaigns to ensure effectiveness.

When necessary, a job information pack should be sent to prospective applicants. This will include the job description and an application form which will need to be returned upon offer of an interview.

Any applications received will be held for a period of four months in case of any queries relating to shortlisting, or interviews. These will then be destroyed.

## **Shortlisting**

The shortlisting panel should be the interviewing manager, ideally the post holder's immediate supervisor and senior manager/s. Any internal applicants not shortlisted should be contacted and given verbal feedback by the shortlisting panel.

DBC Training has made a commitment under the 'Disability Confident' initiative that any disabled candidate who meets the essential criteria for a post, must be invited for the interview. The HR manager will alert managers to any application to which this relates, and specific adjustments during the selection process will be offered as appropriate.

All potential candidates will have their CVs sent to the relative IQA (if in a delivery role), who will submit feedback to the HR manager as to whether or not each in individual will be put forward for telephone interview.

## **Selection Method**

All shortlisted candidates will be required to go through a formal interview process.

Prior to interviews being offered all candidates will undergo an online search to check for any incidents or flags that would deem the candidate to be unsuitable for employment. Details of anything discovered to be documented on the candidates record and reasons for not continuing the application.

The purpose of the interview will be to make an assessment of the candidate's suitability for the post and also to work with, or in an environment with children and vulnerable adults.

The interview panel should consist of the HR manager and the line manager of the post. Additional representatives, for example, senior management, may also be present as deemed appropriate. Consideration should be given to the make-up of the panel in terms of diverse representation.

In addition to a formal interview, consideration may be given to the use of a range of selection methods including presentations tasks, psychometric testing, group exercise, the involvement of students and/or an in-tray exercise. Advice must be sought from the HR manager as to the appropriateness of the selection methods used for the role in question. All vacancies for teaching and learning posts shall include a teaching task or recent lesson observations. When using psychometric testing, this must be approved by senior management and shall only be given and assessed by suitably qualified and accredited personnel and will usually be used only for senior posts.

Candidates will complete part 1 of the DBS process either prior to or during interview. Two references will be requested by HR, at least one of which should be a senior person at the applicant's current or most recent employer. This individual will need to have access to relevant HR information including any low level safeguarding concerns raised about the candidate. This includes internal as well as external candidates. References will be requested using a standard pro-forma document, within 24 hours of the candidate being selected.

The document will ask questions regarding the candidate's suitability for the post and their suitability to work with children and vulnerable adults. Information provided on a reference may be verified with the Designated Safeguarding Lead.

All offers will be subject to an Enhanced Disclosure and Barring Service (DBS) check subject to role requirements. A link will be emailed to the candidate following the provisional offer of employment by the HR team. It is the company's policy to re-check employee's DBS

Certificates every 3 years and signed up to the update service. All provisional offers of appointment to successful candidates will be subject to receipt of the following:

- Pre-interview online search
- 2 Satisfactory references
- Satisfactory DBS check
- Satisfactory Application Form
- Evidence of identification and right to work in the UK
- Validation of qualification certificates
- Agreement to undertake any qualifications required.

All interviewed candidates will be offered feedback by the HR manager.

All suitable candidates who have contact with learners, access to the learner information or visit the sites of our employers as part of their job role will be required to submit and receive a suitable Disclosure and Barring Service check (DBS) and 2 suitable references before starting their role. In any circumstances an employee is required to start before either the DBS or both references have been received the HR manager will work with the hiring manager to put a risk assessment in place and a self-declaration will need to be completed and signed by the relevant staff member

In the case of a disclosure of a conviction, the hiring manager and Managing Director and Designated Safeguarding Lead will decide about an applicant's suitability for a role. An individual's criminal background will be assessed against risk to learners and DBC Training in line with Rehabilitation of Offenders Act 1974 (Exceptions Order) 1975. We will take into consideration the guidance on spent convictions. All decisions are documented and stored in line with GDPR provisions.

## **Safer environments**

DBC Training endeavours to develop and maintain an environment that prevents the appointment or employment of unsuitable people and challenges inappropriate behaviour.

Safeguarding and promoting the welfare of young people and vulnerable adults is an essential part of creating 'safer' environments. In order to achieve this, we have vigorous recruitment and employment practices which comply with the following statutory duties:

- [Rehabilitation of Offenders Act \(ROA\)](#)
- [Disclosure and Barring Service \(DBS\) Code of Practice](#)
- [Keeping Children Safe in Education 2024](#)
- [Working Together to Safeguard Children 2023](#)
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#)
- [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](#)

## **Salary**

The salary offered to the individual will normally be at the lowest point of the appropriate incremental scale. Exceptionally, a higher salary on the scale may be offered to reflect the market rate or recruitment difficulties in attracting the most appropriate candidate. Where a higher salary than the minimum is offered this must be in accordance with the starting salary guidelines provided by the HR manager.

## **Expenses**

Reasonable out of pocket expenses based on standard-class public transport costs will be paid to external candidates who live outside of the delivery area or who incur excessive expenses to attend an interview away from head office eg travel more than 3 hours from their base. The cost of such expenses will be reimbursed by arrangement with the HR manager upon production of receipts.

## **Use of agency staff**

With the exception of flexible assessing staff, requests for agency staff must be approved by the Managing Director. In general, such staff should only be used on a short-term basis to cover temporary staffing needs of no more than four weeks. The HR manager will consider if any staffing needs can be filled prior to engaging the services of any agency.

Occasionally, specific business needs require specialised staff that cannot be sourced through traditional routes. In such circumstances, all terms of business must be reviewed by the Managing Director prior to entering into any agreement. The authorisation to proceed must be obtained from the Managing Director and documentation signed and logged.

Prior to commencement, DBS and reference checks must be undertaken for all agency staff that will have direct, unsupervised access to children or vulnerable adults. DBC Training engages the services of specific agencies for the provision of flexible assessing staff.

## **Documentation and retention**

DBC Training will seek to ensure that any data collected as a result of recruitment and selection is essential and relevant to the process, is kept securely and destroyed when appropriate in line with the Data Protection Act 2018 and The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

As stipulated in the Privacy Policy, DBC Training holds unsuccessful application data for a period of four months whilst successful candidates will have their data moved to secure HR files. Rights and regulations around the processing and storage of data is detailed in the Privacy Policy.

If an unsuccessful applicant feels unhappy with the outcome of a job application /interview they have a grace period of three months to raise a concern/complaint with DBC Training.

## **Awareness**

All employees must be made aware of, and understand the need for, DBC Training's policies which relate to the wellbeing and safety of young people, vulnerable adults, employees and prospective employees. DBC Training will send out a clear message about our commitment to safer recruitment and employment and ensure that there is an ongoing culture of vigilance within the organisation. Any concerns are forwarded to our Designated Safeguarding Lead and will be fully investigated. External agencies will be contacted where appropriate, for example, DBS, police etc.

## **Review**

This policy will be reviewed every year and amended where appropriate, aligning itself with legislative changes. Upon completion of recruitment process, employee will then follow guidance as set out in the Employee Handbook (this is inclusive of probationary periods etc)



## Appendix 1 – Safer Recruitment Process

Job Role identified as being vacant – permission sought from Board to recruit



Recruiting manager to inform marketing team to advertise.  
*Approval to be sought by Board member to place the vacancy with a recruitment agency*



All candidates to supply a CV and cover letter for the position



Initial sift to be undertaken by recruiting manager and any suitable shortlisted candidates to be invited to interview. HR informed so Digital Check can be undertaken

Complete application form at this stage?



Interview to be conducted and notes recorded on the specific template. Once complete, successful candidate forward to HR along with Job Title, Job Description and Salary etc



Candidate Successful - proceed to offer or provide feedback if unsuccessful

HR to collate a Contract, Offer Letter, DBC Information and Request suitable references & Undertake Right to Work Check

Induction Plan to be collated by Recruiting Manger and sent to HR

**In readiness for Employee Start Date:**

