

Safer Recruitment, Selection and Pre-Employment Checks Policy

Skills Bootcamp Provision | Adult Learners 19+ | Version 2.0

<u>Policy field</u>	<u>Current position</u>
Provider	Quack Recruitment & Training Ltd
Applies to	Employees, directors, workers, tutors, assessors, IQAs, learner engagement and progression staff, managers, contractors, agency workers, consultants, volunteers, visitors, subcontractors and partners involved in recruitment or learner-facing activity
Policy owner	Jessica Roughton - Quality & Compliance Lead, DSL and SEND Lead
Senior accountable lead	Dion Bishop - Director of Contracts & Operations
Safer Recruitment Lead	Dion Bishop - Education and Training Foundation safer recruitment training completed 13 June 2025
Designated Safeguarding Lead	Jessica Roughton
Deputy Designated Safeguarding Lead	Aaron Jones
SCR operational owner	Quality & Compliance Lead
Approved systems / records	Single Central Record (SCR), secure HR files, approved email and Microsoft Teams, DBS application / umbrella-body records, Home Office right-to-work service, staff training matrix and safeguarding records
Current assurance position	All current staff hold enhanced DBS checks recorded on the SCR. Safeguarding and Prevent training are mandatory components of staff onboarding.
Effective date	August 2026
Next review	August 2027, or sooner following legislative, DBS, safeguarding, Ofsted, funder, awarding-organisation, staffing or operational change

Policy intent:

Quack recruits people who are suitable, competent and safe to work with adult learners. Safer recruitment is a continuous safeguarding control: it begins when a role is designed, continues through advertising, shortlisting, interview and pre-employment checks, and remains active through induction, probation, supervision, training, the Single Central Record and ongoing suitability monitoring.

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1. Purpose and Policy Intent

Quack Recruitment & Training Ltd is committed to recruiting and retaining staff whose conduct, competence, integrity and values support safe, inclusive and high-quality adult learning. This policy establishes the provider's controls for recruitment, selection, pre-employment checks, onboarding, the Single Central Record (SCR), ongoing suitability and action where concerns arise.

Safer recruitment is not limited to obtaining a Disclosure and Barring Service (DBS) certificate. It requires leaders to understand the role, identify the level of safeguarding risk, verify the candidate's identity and employment history, explore suitability at interview, obtain reliable references, complete the legally appropriate checks and ensure that information is accurately recorded and reviewed.

The intended impact is that learners are taught, supported, assessed and contacted only by adults whose suitability has been assessed proportionately and whose conduct continues to be monitored. Recruitment decisions must be evidence-based, fair, auditable and capable of withstanding commissioner, awarding-organisation, DBS, employment, safeguarding and Ofsted scrutiny.

2. Scope and Application

This policy applies to every appointment or engagement made by, or on behalf of, Quack Recruitment & Training Ltd. It covers permanent, fixed-term, temporary, casual, agency, self-employed, contractor, consultant and volunteer arrangements, whether paid or unpaid, where the individual may have access to learners, learner information, assessment evidence, safeguarding information, systems, premises or decision-making authority.

Applies to	Examples
Employees and directors	Senior leaders, managers, quality/compliance staff, tutors, assessors, IQAs, learner engagement, progression, MIS/data and administrative staff.
Workers and external personnel	Agency workers, associates, consultants, contractors, guest contributors, self-employed tutors, invigilators and volunteers.
Subcontractors and partners	Organisations supplying staff or delivering activity that gives adults access to Quack learners, records, systems or delivery.
Recruitment activity	Role design, advertising, applications, shortlisting, interviews, conditional offers, checks, onboarding, probation, promotion or material role change.
Delivery settings	Head office, regional offices, hired venues, employer premises, online delivery, remote working and other approved locations.

The current funded provision is designed for adult learners aged 19+. Where Quack expands into provision involving learners under 18, leaders will complete a formal policy review and apply all additional statutory requirements relevant to children and young people before delivery begins.

3. Legal, Regulatory, Funding and Inspection Context

The policy is informed by current legislation and official guidance. It must be read alongside Quack's Safeguarding, Prevent, Staff Code of Conduct, Managing Allegations and Low-Level Concerns, Whistleblowing, Equality Diversity and Inclusion, GDPR, Information Security, Disciplinary and Conflict of Interest arrangements.

Framework/requirement	Relevance to Quack
Equality Act 2010	Recruitment must be fair and objective. Reasonable adjustments must be offered. Pre-employment health questions are restricted and must not be used unlawfully.
Immigration, Asylum and Nationality Act 2006 and Home Office guidance	Quack must complete a prescribed right-to-work check before employment and repeat checks where permission is time limited.
Police Act 1997, Rehabilitation of Offenders Act 1974 and Exceptions Order	The level of criminal-record information requested must be lawful, relevant to the role and handled fairly. Protected information must not be requested or used.
Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012	Barred-list checks and DBS referrals apply only where statutory conditions and regulated-activity criteria are met.
UK GDPR and Data Protection Act 2018	Recruitment and criminal-record information must be lawful, minimised, secure, access controlled and retained only as long as necessary.
Care Act 2014 and care and support statutory guidance	Adult safeguarding considerations apply where learners have care and support needs and may be unable to protect themselves from abuse or neglect.
Ofsted further education and skills inspection toolkit	Inspectors consider leaders' safer-recruitment training, knowledge of required checks, risk assessment, checks on staff and other adults, subcontractor assurance and the accuracy of the SCR where applicable.
Funder and awarding-organisations requirements	Contracts and centre-approval rules may require specified checks, declarations, training, role competence and audit-ready records.

Framework/requirement	Relevance to Quack
Legal control: Quack will only request a Standard, Enhanced or barred-list DBS check where it is legally entitled to do so for the specific role and activities. The current staffing model results in enhanced checks for existing staff; future check levels and workforce selections must still be confirmed role-by-role using current DBS eligibility guidance.	

4. Definitions

Term	Meaning for this policy
Safer recruitment	The end-to-end process used to prevent unsuitable people from gaining access to learners, learner information, systems or safeguarding responsibilities.
Pre-employment checks	Checks completed before an individual begins work, including identity, right to work, references, employment history, qualifications and the legally appropriate DBS or other checks.
Single Central Record (SCR)	Quack's controlled electronic register showing the status and date of recruitment, vetting, training and review checks.
Regulated activity	Specified activities defined in safeguarding law. Whether a role is regulated activity determines whether a barred-list check may or must be requested.
Enhanced DBS check	A criminal-record check that may include spent and unspent convictions, cautions and relevant local police information. It may include a barred-list check only where legally permitted.
Conditional offer	An offer of work that is not final until specified checks and conditions have been satisfactorily completed.
Suitability risk assessment	A documented assessment of identified information, missing checks or exceptional circumstances, the risk to learners and the controls required.
Low-level concern	Behaviour that is inconsistent with Quack's Staff Code of Conduct, including inappropriate conduct that does not meet the harm threshold for a formal allegation.

5. Safer Recruitment Principles and Current Control Position

- Learner safety and welfare take precedence over convenience, speed of appointment or staffing pressure.
- Recruitment decisions are based on the role requirements, objective evidence, safeguarding suitability and professional conduct.
- No applicant is appointed solely because they are known personally to a director, manager, staff member, employer or partner.
- Conflicts of interest and family or personal relationships must be declared and managed through independent decision-making.
- No person undertakes unsupervised learner-facing duties until all required checks are complete and recorded, except under the tightly controlled exceptional process in section 15.
- All current staff are enhanced DBS checked and are recorded on Quack's SCR. The legally permissible level and workforce for future checks must be determined role-by-role.
- Safeguarding and Prevent training are mandatory onboarding requirements and are recorded through the SCR and/or training matrix.
- Recruitment records must be accurate, contemporaneous and available for quality assurance, audit and inspection.

6. Governance, Accountability and Competent Recruitment

Role	Core responsibilities	Evidence / assurance
Director of Contracts & Operations / Safer Recruitment Lead	Approves the policy; ensures adequate resources; leads or oversees senior and safeguarding-sensitive appointments; verifies that recruitment decisions are defensible; escalates serious risks.	Recruitment approvals, interview records, risk assessments, leadership review.
Quality & Compliance Lead / DSL	Owns implementation; maintains and audits the SCR; advises on safeguarding risk; reviews DBS or suitability concerns; ensures links with allegations, low-level concerns and referrals.	SCR, audit checklist, safeguarding records, action logs.
Deputy DSL	Provides safeguarding advice and continuity where the DSL is unavailable or conflicted.	Consultation and escalation records.
Recruiting manager	Creates accurate job documentation; follows the approved process; completes shortlisting and interview records; does not allow work to begin before clearance.	Job pack, shortlist, interview and conditional-offer records.
Independent panel member / governor where required	Provides independent challenge where a conflict, senior appointment or significant suitability decision exists.	Panel notes, conflict declaration, decision record.

Role	Core responsibilities	Evidence / assurance
All staff	Declare conflicts, report concerns, protect candidate data and challenge departures from this policy.	Declarations, whistleblowing or safeguarding reports.

At least one person substantively involved in designing or conducting recruitment for a learner-facing or safeguarding-sensitive role must have completed suitable safer-recruitment training. Dion Bishop completed the Education and Training Foundation course “Safer Recruitment in Further Education and Skills” on 13 June 2025. Training should be refreshed when guidance changes materially or when leaders identify a knowledge gap.

7. Role Planning and Safeguarding Risk Assessment

Before advertising or engaging an individual, the recruiting manager must complete a role-planning assessment. The assessment determines the role’s purpose, learner contact, system access, supervision, delivery location, contractual status, competence requirements and legally appropriate checks.

Planning question	Required decision/record
Will the person teach, assess, support, supervise, communicate with or make decisions about learners?	Record the nature, frequency and setting of learner contact.
Will the person access safeguarding, SEND, health, assessment, eligibility or funding data?	Define permissions and confidentiality requirements.
Is the role eligible for a Standard or Enhanced DBS check or a barred-list check?	Use current DBS eligibility guidance and record the rationale and workforce.
Are qualification, assessor, IQA, teaching, trade or professional requirements essential?	List them in the specification and identify how they will be verified.
Could a conflict of interest arise?	Identify alternative panel members or decision-makers before recruitment starts.
Will the person work remotely, alone, at third-party venues or across multiple geographies?	Identify supervision, lone-working, online-safety and venue controls.
Is the person supplied by an agency, subcontractor or partner?	Define written assurance and evidence Quack must receive before access is granted.

8. Advertising, Candidate Information and Applications

Job advertisements and candidate information must state that Quack is committed to safeguarding learners and that appointments are subject to appropriate suitability and pre-employment checks. The wording must accurately describe the level of DBS check only after eligibility has been confirmed for the role.

- Each role must have an approved job description and person specification, including safeguarding, professional boundary, data-security and conduct responsibilities relevant to the role.
- Advertisements must use inclusive language and explain how candidates can request reasonable adjustments.
- Applications must provide a complete employment history, explanations for gaps, qualifications and information relevant to suitability. CV-only recruitment is not sufficient for learner-facing roles; a structured application or supplementary declaration must be completed.
- Candidates must receive a privacy notice explaining how recruitment, equality and criminal-record information will be used and retained.
- Where the role is eligible for an exempted-question process, candidates must receive clear information about the Rehabilitation of Offenders Act, filtering and the requirement to disclose relevant information only.
- Quack may undertake a proportionate search of publicly available online information for shortlisted candidates where this is justified by the role. Candidates must be informed in advance, the scope must be consistent, and findings must be verified and discussed rather than assumed.

9. Shortlisting and Selection

Shortlisting must be completed against the published person specification. Learner-facing and safeguarding-sensitive roles should normally be shortlisted by at least two people. Where this is not practicable, the reason and an independent review of the decision must be recorded.

- Panel members must declare personal, family, financial or professional conflicts before seeing candidate information.
- Applications must be checked for unexplained gaps, inconsistent dates, repeated short appointments, missing references, discrepancies, safeguarding concerns and evidence of required competence.
- The shortlist record must show how each essential criterion was assessed and why candidates were selected or rejected.
- Reasonable adjustments must be agreed without lowering legitimate role requirements.
- Equality monitoring information must be separated from selection information wherever practicable.
- Information obtained online or from third parties must not be used in a discriminatory, speculative or unverified way.

10. Interviews and Assessment

Interviews must test competence, values, judgement, professional boundaries and safeguarding suitability. Questions must be planned, asked consistently and scored against objective criteria. Candidate identity must be checked against original or approved digital evidence at or before interview.

- Learner-facing interviews must include safeguarding and professional-boundary questions relevant to adult learners, online delivery, disclosures, confidentiality and escalation.
- Candidates must be asked to explain employment gaps, inconsistencies, reasons for leaving roles and any concerns emerging from references, declarations or online checks.
- Practical assessment may include a micro-teach, assessment exercise, data-quality task, learner-support scenario or role-specific test. Candidate work must be retained with the selection record.
- Interview notes and scores must be sufficiently detailed to explain the decision. Generic comments such as “good fit” are not adequate.
- Candidates must be reminded that any offer is conditional and that deliberate omission or false information may result in withdrawal of the offer or disciplinary action after appointment.
- No single person should make the final decision where a declared conflict exists or where the appointment is to a senior, safeguarding or quality-assurance role.

11. Conditional Offers and Pre-Employment Checks

A successful candidate must receive a written conditional offer identifying the checks that must be completed. Employment or engagement becomes unconditional only when an authorised manager confirms that the evidence is satisfactory and the SCR has been updated.

Check	Minimum control
Identity	Original or approved digital identity evidence checked, dated and recorded by a named checker.
Right to work	Prescribed manual, digital identity-service or Home Office online check completed before work starts. Time-limited permission entered into a follow-up schedule.
Application / employment history	Complete history reviewed; gaps and inconsistencies explained and recorded.
References	Normally two written references obtained directly from referees, including the most recent relevant employer where possible. Safeguarding-specific questions included for learner-facing roles.
DBS / barred list	Legally appropriate level determined and completed. Barred-list information requested only where the role is eligible.
Qualifications / competence	Essential qualifications, awarding-body approvals, licences and professional status verified with the issuing body or reliable evidence.
Overseas information	Additional checks considered where the candidate has lived or worked outside the UK and the DBS certificate may not provide a complete history.
Health / adjustments	After conditional offer, obtain only information required to consider reasonable adjustments, fitness for specific duties and safe working.
Conflict declaration	Candidate declares relevant personal, family, commercial, assessment or employer conflicts.
Safeguarding declaration	Candidate confirms there is no known reason they are unsuitable or prohibited from carrying out the role and agrees to report relevant changes.

Authorisation point:

The Quality & Compliance Lead or authorised senior manager must confirm that the required checks are complete, satisfactory and recorded before the individual is given unsupervised learner access, learner-system permissions or safeguarding information.

12. DBS, Barred-List and Criminal-Record Checks

DBS checks are one element of safer recruitment. A clear certificate does not remove the need for references, employment-history review, safeguarding questioning, supervision and ongoing monitoring. A DBS certificate has no official expiry date; leaders must respond to role changes, breaks in service, disclosures, concerns and contractual requirements.

- The recruiting manager and Quality & Compliance Lead must determine the lawful check level and workforce using current DBS eligibility guidance before an application is submitted.
- Quack’s current operating model uses enhanced checks for existing staff. The policy does not authorise blanket barred-list requests: barred-list information may only be requested for legally eligible regulated activity.
- The original DBS certificate or valid digital status information must be checked by an authorised person. The certificate number, issue date, workforce, level, outcome and check date are recorded on the SCR.

- Where the individual is subscribed to the DBS Update Service, Quack may complete a status check only with the individual's permission and where Quack remains legally entitled to the same level and workforce of check.
- A certificate containing information must not lead to automatic rejection. The DSL and senior accountable lead must complete an individual risk assessment considering relevance, seriousness, age of information, pattern, explanation, role, access, evidence of rehabilitation and potential impact on learners.
- Protected cautions or convictions must not be requested, considered or recorded.
- Copies of DBS certificates or detailed disclosure information must not normally be retained longer than necessary. In line with the DBS Code of Practice, copies should usually be securely destroyed within six months, while the SCR retains the permitted check details and decision outcome.
- Any uncertainty about eligibility or disclosure information must be referred to the DBS umbrella body, DBS guidance or appropriate legal/HR advice before a decision is made.

13. References, Employment History, Qualifications and Overseas Checks

13.1 References

- References must be obtained directly from a verifiable organisational address or independently verified referee; open testimonials supplied by the candidate are not sufficient.
- For learner-facing roles, referees should be asked about dates, role, conduct, safeguarding concerns, disciplinary findings relevant to suitability, reason for leaving, re-employment and any known concern about working with learners or adults at risk.
- Where a reference is brief, ambiguous, inconsistent or contains a concern, the recruiting manager must seek clarification and record the discussion.
- If a suitable reference cannot be obtained, leaders must not simply waive the requirement. They must decide whether alternative evidence is reliable and complete a documented risk assessment.

13.2 Employment history and qualifications

- All periods of employment, self-employment, education, unemployment, caring responsibilities and travel should be accounted for to the extent necessary to understand the candidate's history.
- Gaps are not inherently negative, but explanations must be credible and recorded.
- Essential certificates, assessor/IQA qualifications, licences and professional registrations must be verified before the person carries out duties that depend on them.
- Where qualifications are still being completed, the role, supervision and assessment-authority limits must be explicitly recorded.

13.3 Overseas checks

A DBS check does not normally contain criminal-record information from outside the UK. Where a candidate has lived or worked overseas, Quack must consider additional evidence such as an overseas criminal-record certificate, certificate of good conduct, employer reference, professional-regulator check, identity verification and a documented risk assessment. The action must be proportionate to the country, duration, role and information reasonably obtainable.

14. Contractors, Agency Workers, Volunteers, Visitors and Subcontractors

Category	Required control
Agency worker / supplied staff	Written confirmation before deployment that identity, right to work, employment history, references, qualifications and the legally appropriate DBS checks have been completed. Quack verifies identity on arrival and retains assurance.
Self-employed contractor / consultant	Role risk assessment, identity, right to work where applicable, contract, competence, confidentiality and legally appropriate DBS check. Access is restricted to role need.
Regular volunteer or guest contributor	Proportionate checks based on duties, frequency, supervision and learner access. No unsupervised learner contact until required checks are complete.
Occasional visitor	Identity and purpose confirmed, signed in, briefed on conduct and safeguarding, supervised where appropriate and prevented from accessing confidential records.
Subcontractor / delivery partner	Written annual and pre-deployment assurance, named staff list, evidence that required checks and training have been completed, and a Quack sample or audit where risk warrants it.
Employer interviewer / external contributor	Role and activity agreed, learner information minimised, conduct and safeguarding expectations communicated, and sessions supervised or controlled proportionately.

Individuals with regular, unsupervised or substantial access should be entered on the SCR or a linked controlled register. Occasional visitors may be managed through the visitor record and risk controls, provided leaders can provide evidence of what checks and supervision applied.

15. Exceptional Starts Before All Checks Are Complete

The normal rule is that all required checks are complete before work begins. An exceptional start may be considered only where the missing item is genuinely pending, all legally mandatory checks that can be completed have been completed, the role can be safely restricted and the need cannot reasonably be met in another way.

- No exceptional start is permitted without a written risk assessment approved by both the Director of Contracts & Operations and the DSL or Deputy DSL.
- Identity and right-to-work checks must always be complete before employment begins.
- An individual must never undertake regulated activity if required barred-list information has not been obtained or if there is any indication they may be barred.
- The risk assessment must identify the outstanding check, reason, evidence already obtained, learner contact, supervision, system restrictions, end date and responsible reviewer.
- The person must remain directly supervised, have no one-to-one learner contact, no access to safeguarding records and no independent assessment or funding-evidence authority unless specifically cleared.
- The arrangement must be reviewed at least weekly and end immediately if the check is adverse, delayed without satisfactory explanation or the controls cannot be maintained.
- The SCR must clearly show the pending item and the linked risk assessment rather than incorrectly showing the check as complete.

16. Single Central Record Management

Quack maintains an electronic Single Central Record as a central assurance tool. The SCR does not replace the underlying recruitment evidence. It must accurately summarise the status of checks and allow leaders, auditors and inspectors to identify any gap immediately.

SCR field group	Minimum information
Identity and appointment	Full name, role, start date, identity verification, checker and check date.
DBS and barred-list information	Check level, workforce, certificate issue date and number, outcome, barred-list status where legally applicable, and date verified.
Right to work	Check completed, method/date and repeat-check date where permission is time limited.
History and competence	CV/application obtained, employment history reviewed, references and dates, qualifications verified.
Role-specific checks	Teaching prohibition, Section 128 or other regulatory check recorded as Yes, No or Not Applicable with rationale where relevant.
Mandatory training	Safeguarding, Prevent, DSL and safer-recruitment training dates according to role.
Assurance and maintenance	Notes, pending actions or risk assessment reference, date last reviewed and name of updater.

- The Quality & Compliance Lead is the operational owner of the SCR and controls editing permissions.
- Each entry must be supported by source evidence in the secure HR or recruitment file.
- “No” must not be used where a check is not legally applicable; “N/A” and, where necessary, the reason should be recorded to avoid creating a false compliance concern.
- DBS certificate numbers and sensitive details must be visible only to authorised staff and inspectors/auditors with a legitimate need.
- The SCR is checked when a person is appointed, before access is granted, after any role change and through a planned monthly review.
- A quarterly leadership or governance sample should test source evidence against the SCR and confirm that actions are closed.
- Departed staff must be marked as leavers or moved to an archived section without destroying the audit trail.

17. Mandatory Onboarding, Probation and Ongoing Suitability

Safer recruitment continues after the offer. Every new starter must complete structured onboarding and remain subject to supervision and probation appropriate to their role.

Stage	Required action	Evidence
Before learner-facing duties	Confirm clearance; issue Staff Code of Conduct; complete safeguarding and Prevent training; explain DSL/DDSL, whistleblowing, low-level concern and allegation routes; set system permissions.	SCR, training matrix, policy acknowledgements, access record.
First week	Health and safety, data protection, information security, EDI, learner support, online safety, funding/data integrity and role-specific procedures.	Induction checklist and CPD record.

Stage	Required action	Evidence
Probation	Review conduct, punctuality, learner feedback, record quality, professional boundaries, safeguarding confidence, competence and training completion.	Probation reviews and action plan.
Ongoing	Annual suitability declaration; mandatory refresher training; supervision and appraisal; role-change review; immediate consideration after any concern or disclosure.	Declaration, appraisal, CPD, SCR review.
Leavers / access removal	Remove system access, recover equipment and records, review outstanding concerns, retain required records and consider referral duties.	Leaver checklist, access log, referral decision.

All staff must report any matter that may affect their suitability or legal eligibility to perform the role, including being barred, subject to a safeguarding or professional investigation, or charged with an offence materially relevant to the role. Staff are not required to disclose protected criminal-record information.

18. Concerns, Allegations, Referrals and Leaving Employment

Information arising after appointment must be acted on promptly. Recruitment clearance is not a defence to ignoring concerning conduct. Safeguarding allegations, low-level concerns, disciplinary matters, criminal information and regulator concerns must be managed under the relevant procedure, with the DSL involved where learner safety may be affected.

- Immediate protective action and a proportionate risk assessment must be considered where a concern relates to learner safety, professional boundaries, abuse, exploitation, falsification or serious misconduct.
- Quack must continue necessary investigation and disciplinary processes even if the individual resigns or the engagement ends.
- Where statutory conditions are met, Quack will make a referral to the DBS. The duty may apply even if another body has also referred the matter.
- Where relevant to a regulated teaching role, leaders will consider referral to the Teaching Regulation Agency or other professional body.
- References provided after an employee leaves must be accurate, fair, evidence-based and include safeguarding information where legally appropriate.
- The SCR and HR file must record the employment end date and any referral decision without placing confidential allegation detail on the general SCR.

19. Data Protection, Confidentiality and Record Retention

- Recruitment data must be processed under an identified lawful basis, restricted to people who need it and stored in approved secure systems.
- Criminal-record information is highly sensitive. It must not be emailed, copied, discussed or retained more widely than necessary.
- DBS certificate copies and disclosure detail should normally be destroyed securely within six months of the recruitment decision unless a documented exceptional reason applies. The permitted check details and decision can remain on the SCR.
- Application, shortlisting, interview, reference, verification, risk-assessment and decision records must be retained in line with Quack's retention schedule, funder and legal requirements.
- Unsuccessful-candidate records should normally be retained only for the period needed to respond to recruitment complaints or claims, unless the candidate has consented to a talent-pool arrangement.
- Access to the SCR and recruitment files must be role based and periodically reviewed.
- Any loss, unauthorised disclosure or incorrect sharing of recruitment or DBS information must be reported immediately under the personal-data-breach procedure.

20. Monitoring, Quality Assurance and Review

Monitoring activity	Purpose	Frequency / trigger
Recruitment file check	Confirm that the decision, references, checks, interview evidence and approvals are complete and consistent.	Every appointment before final clearance.
SCR review	Identify missing, overdue, inconsistent or incorrectly recorded checks and training.	Monthly and after each appointment or role change.
Source-evidence sample	Test SCR entries against HR evidence and confirm that N/A decisions and check levels are justified.	Quarterly leadership/governance sample.
Training review	Ensure safer-recruitment, safeguarding and Prevent competence remains current and role relevant.	At least annually and after guidance change.
Incident / concern review	Identify whether recruitment, induction, supervision or conduct controls need improvement.	After relevant concern, allegation or complaint.
Policy review	Update role titles, legal references, DBS processes, check requirements and operational controls.	Annually or sooner after material change.

Findings must be assigned to a named owner, deadline and evidence requirement. Significant or repeated gaps must be escalated to the Senior Leadership Team and reflected in the organisational risk register and Quality Improvement Plan where they affect learner safety, leadership assurance or inspection readiness.

Appendix A: End-to-End Safer Recruitment Workflow

1. Approve the vacancy or engagement and complete the role/safeguarding risk assessment.
2. Confirm job description, person specification, contract status, competence requirements and lawful DBS level.
3. Appoint an appropriate panel and record conflicts of interest.
4. Advertise with safeguarding, checks and reasonable-adjustment statements.
5. Receive a structured application, complete employment history and required declarations.
6. Shortlist objectively against the person specification and record reasons.
7. Undertake any notified proportionate online check and verify findings.
8. Interview using scored competence, values, safeguarding and professional-boundary questions.
9. Complete practical assessment where relevant and retain evidence.
10. Make a conditional offer identifying all outstanding checks.
11. Complete identity, right-to-work, reference, employment-history, DBS, qualifications, overseas and role-specific checks.
12. Review discrepancies or disclosed information through a documented suitability risk assessment.
13. Update the SCR and obtain formal clearance before access or unsupervised learner contact.
14. Complete mandatory safeguarding, Prevent, conduct, data and role-specific onboarding.
15. Monitor suitability through probation, supervision, learner feedback, training and annual declarations.
16. Act immediately on concerns, remove access where necessary and consider external referral duties.

Appendix B: Pre-Employment Checks Matrix

Control	Owner	Required before start?	Record / evidence
Approved role risk assessment	Recruiting manager / DSL	Yes	Role approval and DBS eligibility rationale.
Application and full history	Recruiting manager	Yes	Application, CV and gap explanations.
Identity verification	Authorised checker	Yes	Document type, checker and date.
Right to work	Authorised checker	Yes - mandatory	Prescribed check evidence and follow-up date.
Two references	Recruiting manager	Normally yes	Original responses, verification and clarification notes.
DBS / barred-list check	Quality & Compliance Lead	Yes where required	Certificate/status check and SCR entry.
Qualifications/approvals	Quality/recruiting manager	Yes if essential	Certificates and verification.
Overseas checks	Recruiting manager / DSL	Where relevant	Certificates, references and risk assessment.
Conflict declaration	Candidate and panel	Yes	Signed declaration and management action.
Safeguarding suitability decision	DSL / senior lead	Yes	Clearance or risk-assessment decision.
SCR completed	Quality & Compliance Lead	Yes	Entry checked against source evidence.
Safeguarding and Prevent onboarding	Manager / DSL	Before learner-facing duties	Training records and acknowledgement.
System permissions	Line manager/system owner	After clearance only	Access-authorisation record.

Appendix C: SCR Audit Checklist

- Is every current staff member, worker or regularly deployed learner-facing adult included?
- Do name, role and employment start date match the HR file?
- Are identity, checker and check date recorded?
- Is the right-to-work check complete, correctly dated and scheduled for repeat where time limited?
- Is the DBS level, workforce and barred-list status legally appropriate to the role?
- Are DBS issue/check date, certificate number and outcome recorded accurately?
- Are references, employment history and qualifications evidenced and dated?
- Are prohibition, Section 128 or other role-specific checks marked Yes, No or N/A correctly?
- Are safeguarding and Prevent training dates current and supported by certificates or training records?
- Are DSL and safer-recruitment training recorded only for relevant trained staff?
- Are pending checks linked to a current approved risk assessment rather than shown as complete?
- Are leavers identified and system access removed?
- Has the record been reviewed and updated by a named authorised person?
- Has a sample of entries been tested against source evidence and actions closed?

Appendix D: Exceptional-Start Risk Assessment Checklist

Question	Required evidence / decision
What check is outstanding and why?	Name the check, application date, expected completion and reason it is not complete.
Which checks are complete?	Confirm identity, right to work, references, history, qualifications and DBS/barred-list status as applicable.
What access would the person otherwise have?	Learners, one-to-one contact, systems, safeguarding records, assessment, funding evidence and premises.
What restrictions will apply?	Direct supervision, no one-to-one contact, restricted systems, no assessment authority, no safeguarding-record access.
Who supervises and reviews?	Named supervisor, weekly review date and escalation route.
What would end the arrangement?	Adverse information, control failure, further delay, concern or expiry date.
Who approves?	Director of Contracts & Operations and DSL/DDSL signatures or recorded approvals.
How is it shown on the SCR?	Pending status and reference to the risk assessment; never mark the check complete early.

Appendix E: Safeguarding Interview Prompts

Questions must be adapted to the role and followed by probing questions. The panel should assess judgement, not memorised policy language.

Prompt	What a strong response should demonstrate
An adult learner becomes distressed and discloses abuse but asks you not to tell anyone. What do you do?	Listen, do not investigate or promise secrecy, clarify immediate safety, record accurately and report promptly to DSL/DDSL.
A learner begins messaging you through a personal social-media account outside working hours. How would you respond?	Professional boundaries, approved channels, record/report concern and avoid private relationships.
You notice a colleague regularly humiliating learners and making sexualised jokes. It does not appear to meet the harm threshold. What do you do?	Challenge or protect immediately where safe, report as a low-level/safeguarding concern, do not normalise or investigate alone.
A learner's attendance falls suddenly and their behaviour changes during remote delivery. What would you consider?	Engagement, welfare, safeguarding, SEND/digital barriers, timely follow-up, record and escalation.
A manager asks you to amend a register or learner record to show activity that did not happen. What do you do?	Refuse, preserve evidence, report through management/whistleblowing/compliance routes and understand funding/safeguarding integrity.
How would you maintain professional boundaries while still being supportive?	Clear role limits, approved communication, confidentiality boundaries, impartiality, records and escalation.

Appendix F: Version Control and External References

Version	Date	Author / owner	Summary of change	Next review
1.0	2024	Dion Bishop / Quality Team	Original safer recruitment policy.	Superseded
2.0	August 2026	Jessica Roughton / Dion Bishop	Full rewrite for adult Skills Bootcamp provision; aligned to current Ofsted safer-recruitment expectations, lawful DBS eligibility, right-to-work checks, SCR controls, mandatory safeguarding and Prevent onboarding, contractors, subcontractors, conflicts, ongoing suitability and referral duties.	August 2027

External reference sources

[Ofsted - Further education and skills inspection toolkit, for use from September 2026](#)

[Disclosure and Barring Service - Eligibility guidance for Enhanced DBS checks](#)

[Disclosure and Barring Service - DBS checks guidance for employers](#)

[Disclosure and Barring Service - DBS Code of Practice](#)

[Disclosure and Barring Service - The legal duty to refer to DBS](#)

[Home Office - Right to work checks: employer guidance](#)

[Department of Health and Social Care - Care and support statutory guidance](#)

[UK Government - DBS filtering guidance](#)

Implementation record:

This policy must be issued to recruiting managers, the DSL/DDSL and staff responsible for the SCR. Policy acknowledgement, safer-recruitment training evidence, monthly SCR checks and quarterly source-evidence sampling provide the operational evidence that the policy is implemented.