Safer Recruitment Policy

The Hub Educational Services CIC

Organisation	The Hub Educational Services CIC
Applies to	All staff, directors, workers, volunteers, agency staff, contractors and others working for or on behalf of The Hub
Approval	Approved by the Directors
Review	Reviewed at least annually and sooner after any relevant legal, statutory, local-procedure or organisational change

This policy applies across all Hub provision and activities.

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1 Purpose and status

The purpose of this policy is to prevent unsuitable people from gaining access to children through work at The Hub and to ensure that every recruitment decision is fair, evidence based and properly recorded. Safeguarding is considered at every stage, from defining the role to induction and ongoing supervision.

The Hub is an independent alternative provision and is not a school or college. Keeping Children Safe in Education 2026 is therefore used as an authoritative safeguarding benchmark where its recruitment and allegation-management standards are relevant to The Hub. Working Together to Safeguard Children 2026 applies across organisations and agencies with functions relating to children, including voluntary, community, social enterprise and private-sector organisations.

Non negotiable safeguard

No applicant will be permitted to carry out regulated activity with children until The Hub has seen an appropriate enhanced DBS certificate including children's barred list information and all other required pre-appointment checks have been completed satisfactorily.

2 Scope

This policy applies to recruitment, engagement and deployment across all Hub sites, outreach, mentoring, transport, off-site activities and remote work involving learners. It covers:

- employees, workers, casual staff and directors who undertake operational duties;
- volunteers, students on placement and work-experience adults;
- agency and supply staff;
- self-employed tutors, therapists, mentors, coaches and consultants;
- contractors and third-party personnel who may have contact with learners; and
- any other adult engaged to work for or on behalf of The Hub.

3 Principles

- The welfare and best interests of children are paramount.
- Selection is based on the published requirements of the role and not on protected characteristics or assumptions.
- The Hub makes reasonable adjustments for disabled applicants throughout the process.
- Recruitment decisions are made by more than one person wherever practicable and are supported by contemporaneous records.
- Safer recruitment checks do not replace professional curiosity, induction, supervision or a culture in which concerns are reported.
- Information is collected only where relevant and lawful, kept secure and retained only for an identified purpose.

4 Responsibilities

Role	Responsibility
Directors	Approve this policy, ensure adequate recruitment controls and resources, appoint a recruitment lead, and make or authorise final appointment decisions.
Recruitment lead	Plans the process, confirms the role's safeguarding and DBS requirements, maintains the recruitment file and ensures that no appointment is confirmed before all conditions are met.

Role	Responsibility
Interview panel	Applies the agreed criteria consistently, explores safeguarding suitability, records decisions and declares any conflict of interest.
Designated Safeguarding Lead or deputy	Advises on safeguarding risk, receives concerns and takes immediate safeguarding action. A referral is never delayed while awaiting a separate Director decision.
All staff	Discloses conflicts, follow this policy and report any concern about an applicant or adult working for The Hub without delay.

At least one person substantively involved in each recruitment process will have completed appropriate safer recruitment training covering the current safer recruitment standards in Part three of KCSIE. Training is refreshed when guidance changes or competence needs updating.

5 Planning and advertising

Role assessment

Before advertising or engaging an individual, the recruitment lead will record the nature of the work, the degree and frequency of contact with children, whether the activity is regulated activity, the appropriate level of DBS check, any qualification or professional-registration requirement, supervision arrangements and any additional risks arising from lone working, transport, home visits, personal care or online contact.

Role information and advert

Every role will have a current job description or role profile and person specification. These will state the safeguarding responsibilities, expected conduct and whether the role is eligible for a criminal-record check. Adverts and candidate information will state that The Hub is committed to safeguarding children, that safeguarding checks will be undertaken and, where applicable, that the role is exempt from the Rehabilitation of Offenders Act 1974 subject to the statutory filtering rules.

6 Applications and shortlisting

- Applicants complete The Hub application form. A curriculum vitae may provide supporting information but will not replace the application form.
- The form requires a complete employment and education history, explanations for gaps and reasons for leaving relevant roles.
- Applicants declare any relationship or close connection with a Hub employee, director, learner or family that could create a conflict of interest.
- The application includes a signed declaration that the information is true and complete and explains the lawful disclosure requirements for criminal records.
- At least two panel members shortlist independently against the person specification where practicable. Reasons are recorded before scores are moderated.
- Shortlisted applicants complete a confidential criminal-record self-disclosure appropriate to the role. Applicants must not disclose protected convictions or cautions that are filtered by law.
- The Hub may conduct a proportionate search of publicly available information using an online search engine. Shortlisted candidates are told in advance. The search is used only to identify relevant matters for discussion, is normally completed by a person not making the final selection decision, and is not used to seek protected-characteristic information.

Any discrepancy, unexplained gap, repeated short employment, overseas period, name change or concern is explored and resolved before appointment. An explanation is recorded; a plausible explanation is not treated as evidence unless it is reasonably verified.

7 References and employment history

The Hub obtains at least two satisfactory references, normally before interview so that concerns can be explored. Where this is not possible, the offer remains conditional and no work with children begins until the references are received, verified and assessed.

- References are requested directly from the referee. Open references and references supplied by the applicant are not accepted.
- One reference is from the current or most recent employer. If the applicant is not currently working with children, a reference is also sought from the most recent employer where they worked with children. If self-employed, The Hub seeks suitable professional or commissioning references.
- The referee must be a senior person with appropriate authority. Personal references are accepted only as an additional reference where there is a clear reason.
- The request asks about dates, role, reason for leaving, disciplinary matters, substantiated safeguarding concerns that met the harm threshold, suitability to work with children and whether the referee would re-employ the applicant in a similar role.
- The Hub verifies the identity and authority of the referee and the legitimate source of electronic references, including by independent contact where necessary.
- References are compared with the application. Vague statements, omissions, inconsistencies and concerns are clarified with the referee and discussed with the applicant before appointment.

8 Selection and interview

A panel of at least two people conducts a face-to-face interview, which may be in person or by live video where justified. At least one panel member will have appropriate safer recruitment training. Panel members declare conflicts and use the same core questions and scoring framework for every applicant.

- The panel tests the applicant’s values, motivation, boundaries, understanding of safeguarding, response to disclosures and willingness to report concerns about adults.
- Questions explore employment gaps, discrepancies, disciplinary history, reasons for leaving, any self-disclosed information and matters arising from references or proportionate online searches.
- Practical tasks may be used where relevant but will not place learners at risk or allow unsupervised contact.
- Original identity and qualification documents are checked against the applicant. Any change of name is reconciled through appropriate evidence.
- Notes record the evidence considered, scores, concerns, explanations, panel discussion and decision. They do not contain discriminatory or irrelevant comment.

9 Conditional offers and pre appointment checks

Every offer is conditional. The recruitment lead records the completion, date, result and checker for each check that applies to the role. The minimum checks are:

- identity, including any name change;
- right to work in the United Kingdom using the current Home Office process;
- two satisfactory and verified references and a resolved employment history;
- the correct level of DBS certificate and children’s barred list information where the role is regulated activity;
- qualifications and professional registration required for the role;
- further checks considered appropriate for any period lived or worked outside the United Kingdom;
- teaching prohibition or other professional restriction checks where the work and access route make these relevant;

- a role-specific assessment of physical and mental capacity after conditional offer, limited to what is necessary to establish ability to perform the intrinsic functions of the role with reasonable adjustments; and
- any other check required by law, a regulator, commissioner, professional body or the assessed duties of the role.

No assumed clearance

A pending check, silence from a referee, a previous employer's assurance, an agency badge or an applicant's statement is not treated as a completed check.

10 DBS and barred list controls

The Hub determines eligibility and the level of check from the actual duties, not the job title. A children's barred list check is requested only where the person will engage in regulated activity and The Hub has a lawful route to request it. It is unlawful to knowingly permit a barred person to engage in regulated activity.

- The applicant shows the original DBS certificate. The Hub checks identity details, certificate level, workforce, barred-list status where applicable and all disclosed information.
- Where the DBS Update Service is used, the original certificate is seen first, identity and role eligibility are confirmed, consent is obtained and the online status result is dated and recorded.
- Disclosure information is assessed fairly and individually against the role. The assessment considers relevance, seriousness, age at the time, time elapsed, pattern, circumstances, responsibility, rehabilitation, safeguarding risk and available evidence.
- Protected convictions and cautions must not be requested, relied upon or taken into account.
- The Hub does not keep a copy of a DBS certificate for longer than six months unless a lawful and documented reason permits longer retention. It may retain the certificate number, type, date, result, decision and checker in line with the DBS Code of Practice and data-protection law.

A person awaiting a DBS certificate may undertake induction or other duties that do not amount to regulated activity only where a Director has approved a written risk assessment, every other required check is complete, the person is continuously and directly supervised, has no unsupervised access to learners or records and does not undertake transport, personal care, home visits or one-to-one work. This is exceptional and reviewed at least daily. It does not permit regulated activity before the required enhanced DBS with barred-list information has been seen.

11 Overseas and professional checks

For an applicant who has lived or worked outside the United Kingdom, The Hub considers the duration, recency, country, role and available evidence and obtains appropriate additional checks. These may include overseas criminal-record evidence, a letter of professional standing or confirmation from an overseas employer. The absence of an available overseas check is not treated as a clear result; the recruitment lead records the enquiries, limitations, risk assessment and any safeguards.

Qualifications and registrations are checked directly with the awarding or registration body where proportionate. Any restriction, sanction or discrepancy is resolved before appointment. For work that meets the definition of teaching work, The Hub uses the current Department for Education service where access and the role make a prohibition check appropriate.

12 Agency staff contractors and volunteers

Agency and third party personnel

Before deployment, The Hub obtains written confirmation from the supplying organisation that all checks required for the role have been completed, including identity, right to work, references, qualifications,

enhanced DBS and barred-list information where applicable, and any overseas or professional checks. The confirmation records the DBS certificate details or states that the certificate contains information. The Hub sees the certificate where information is disclosed and completes its own suitability decision. On arrival, identity is checked against the agency confirmation. The Hub remains responsible for site induction, supervision and reporting concerns to both the employer and safeguarding agencies.

Contractors and self employed practitioners

The Hub agrees in writing who will obtain each check and verifies the evidence before access is granted. No contractor for whom checks are incomplete is left unsupervised with learners. Where a contractor's employee may have regular contact with children, The Hub requires the employer to apply the correct safer recruitment controls and provides The Hub with written assurance.

Volunteers and placements

The Hub completes a written role and supervision assessment for each volunteer or placement adult. An enhanced DBS with barred-list information is obtained where the individual will carry out regulated activity. Where the activity is not regulated, The Hub requests only the level of check for which the role is legally eligible. Volunteers are never used to avoid the checks, supervision or training required for paid roles.

13 Decision making and risk assessment

The final decision is made by a Director or delegated senior manager who has not ignored or overridden a safeguarding concern without recorded reasons. A concern does not automatically exclude an applicant unless the law prohibits the appointment, but it must be resolved through a documented, child-centred assessment.

- If a person is barred from regulated activity, they are not appointed or deployed to regulated activity. The Hub takes advice and reports suspected unlawful applications or deployment to the appropriate authority.
- False or materially misleading information is assessed for relevance, intent and safeguarding significance. An offer may be withdrawn and legal or safeguarding advice sought.
- Where information suggests that a person who currently works with children may have harmed a child, committed a relevant offence, posed a risk of harm or may be unsuitable to work with children, the LADO route is considered immediately. Internal recruitment enquiries do not delay that contact.
- Any decision to appoint despite relevant adverse information requires a written assessment, specified safeguards, a named reviewer and Director approval.

14 Recruitment records and data protection

The Hub maintains a Single Central Record as an organisational safeguarding control. It records the checks relevant to each person, the date completed, outcome and checker. It distinguishes employees, agency staff, contractors, volunteers and leavers. When a person leaves, the live record is updated promptly and the former worker's recruitment evidence is archived under the retention schedule; it is not simply destroyed because employment has ended.

- Recruitment information is processed lawfully, fairly and transparently under the UK GDPR, Data Protection Act 2018 and Data Use and Access Act 2025.
- Access is restricted to people who need it for recruitment, safeguarding, legal, regulatory or commissioning purposes.
- Special-category and criminal-offence data are subject to the appropriate lawful condition, policy safeguards and retention controls.
- Unsuccessful applicant records are retained only for the period set out in The Hub retention schedule and then securely destroyed unless a lawful reason requires longer retention.

- The recruitment file contains enough evidence to explain the decision but avoids unnecessary copies and irrelevant personal data.

15 Induction probation and ongoing suitability

Safer recruitment continues after appointment. Before unsupervised work, the individual receives induction on safeguarding and child protection, the identity and availability of the DSL and deputies, the staff code of conduct, professional boundaries, whistleblowing, allegations and low-level concerns, online safety, information sharing, behaviour, attendance and emergency procedures relevant to the role.

- A named manager provides role-specific supervision and reviews conduct and competence during probation.
- Staff confirm that they have read the required policies and completed required training.
- The Hub responds to new information, patterns of concern or changes in duties and repeats or updates checks where lawfully required and proportionate.
- Adults must disclose any new matter that may affect their suitability, including relevant criminal, professional, safeguarding or barring information, subject to the lawful filtering rules.

16 Allegations referrals and legal reporting duties

Immediate action

If a concern may meet the harm threshold, the DSL or a deputy protects the child and contacts the LADO without delay. Contact or referral is not postponed for an internal investigation, completion of recruitment enquiries or a separate Director-level decision.

The Hub follows its Safeguarding and Child Protection Policy and Low Level Concerns Policy. Where the legal conditions are met, The Hub makes a referral to the Disclosure and Barring Service when a person has been removed from regulated activity, or would have been removed had they not resigned or ceased work, because they harmed or posed a risk of harm to a child or satisfied another statutory referral condition. Failure to make a required DBS referral is an offence. The Hub also considers any required referral to a professional regulator or the Teaching Regulation Agency where applicable.

17 Monitoring and review

Directors monitor recruitment files and the Single Central Record through scheduled checks and after any concern. Checks test completeness, decision quality, delays, agency assurances, DBS handling, induction and compliance with this policy. Learning is recorded and acted upon. This policy is reviewed at least annually and sooner after a legal or guidance change, a safeguarding incident, a commissioning finding or a material change in The Hub's work.

Current legal and guidance framework

The Hub applies the following framework in its current form. Where a source is updated, the current version takes priority and this policy will be reviewed without waiting for the annual cycle.

- Keeping Children Safe in Education 2026 - relevant Parts three and four adopted as safeguarding benchmarks
- Working Together to Safeguard Children 2026 - current statutory multi-agency guidance
- DBS Code of Practice - handling and use of criminal-record information
- DBS filtering guidance - protected cautions and convictions
- Making barring referrals to the DBS - statutory referral duties
- Leicestershire LADO service - current local referral route
- Right to work checks - current Home Office process
- Criminal records checks for overseas applicants - country-specific evidence

- Equality Act 2010 - non-discrimination and reasonable adjustments
- Safeguarding Vulnerable Groups Act 2006 - regulated activity and barring framework
- Rehabilitation of Offenders Act 1974 - spent convictions and lawful exceptions
- Data Protection Act 2018 - personal and criminal-offence data
- Data Use and Access Act 2025 - current data-protection amendments

19 Recruitment assurance checklist

Stage	Required evidence	Done
Role assessment	Safeguarding duties, contact with children, regulated activity, DBS eligibility and supervision recorded	☐
Advertising	Safeguarding statement, role responsibilities and ROA wording included where applicable	☐
Application	Signed form, full history, gaps and conflicts completed	☐
Shortlisting	Criteria applied consistently and decisions recorded	☐
Online search	Candidate informed; public, proportionate and relevant search completed if used	☐
References	Two received directly, verified, compared and concerns resolved	☐
Interview	Two panel members; trained member; safeguarding suitability tested	☐
Identity and right to work	Original or approved digital evidence checked and dated	☐
DBS	Correct workforce and level; original certificate seen; barred-list information where lawful and required	☐
Other checks	Qualifications, registration, overseas and prohibition checks completed as applicable	☐
Decision	All concerns resolved; risk assessment and approval recorded where needed	☐
Record and induction	Single Central Record updated; conditions lifted in writing; induction and supervision arranged	☐

Recruitment lead name and signature _____ Date _____

Final authorisation _____ Date _____