

Safer Recruitment Policy

Introduction

InterAct is committed to safeguarding and promoting the welfare of children, young people, vulnerable adults, and everyone who accesses the Charity's services.

The Charity recognises that safer recruitment is one of the most important safeguarding measures it can implement. Recruiting suitable staff, volunteers, trustees, contractors, consultants, and others working on behalf of the Charity helps protect children, young people, vulnerable adults, colleagues, and the wider community from harm.

Safer recruitment is not a single recruitment check, but an ongoing process that begins before a role is advertised and continues throughout an individual's engagement with the Charity. It includes careful recruitment, appropriate pre-engagement checks, induction, supervision, training, and ongoing monitoring of suitability.

InterAct is committed to ensuring that recruitment decisions are fair, transparent, consistent, and based upon merit whilst maintaining appropriate safeguarding standards and complying with all relevant legislation.

Purpose

The purpose of this policy is to:

- promote safe recruitment practices throughout the Charity;
- help prevent unsuitable individuals from working with children, young people, vulnerable adults, or other people accessing the Charity's services;
- ensure appropriate pre-employment and pre-engagement checks are completed;
- promote fair, transparent, and non-discriminatory recruitment practices;
- ensure recruitment decisions are based upon suitability, competence, qualifications, experience, and values;
- support compliance with safeguarding, employment, equality, and data protection legislation; and
- promote a safe organisational culture through effective recruitment, induction, supervision, and ongoing monitoring.

Scope

This policy applies to all recruitment and appointment processes undertaken by or on behalf of InterAct.

Definitions

Safer Recruitment - A recruitment process designed to help identify, deter, reject, and prevent unsuitable individuals from working with children, young people, vulnerable adults, or others who may be at risk.

Regulated Activity - Work which legally requires enhanced safeguarding checks under the Safeguarding Vulnerable Groups Act 2006 and associated legislation.

Disclosure and Barring Service (DBS) - The Disclosure and Barring Service helps employers make safer recruitment decisions by providing criminal record information and maintaining the lists of individuals barred from working with children or vulnerable adults.

Barred List - A list maintained by the Disclosure and Barring Service of individuals who are legally prohibited from engaging in certain regulated activities.

Right to Work - Checks carried out to verify that an individual has the legal right to work in the United Kingdom.

Professional Registration - Registration with an appropriate professional or regulatory body where this is required for a particular role.

Legal and Regulatory Framework

This policy has been developed with reference to relevant legislation and guidance, including but not limited to:

- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Police Act 1997;
- Rehabilitation of Offenders Act 1974 (Exceptions Order);
- Equality Act 2010;
- Immigration, Asylum and Nationality Act 2006;
- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- Working Together to Safeguard Children;
- Keeping Children Safe in Education (where relevant to the Charity's activities);
- Care Act 2014;
- Disclosure and Barring Service guidance; and
- Charity Commission safeguarding guidance.

The Charity will review its recruitment arrangements periodically to ensure they remain compliant with current legislation and recognised good practice.

Roles and Responsibilities

Board of Trustees

The Board of Trustees has overall responsibility for ensuring that appropriate governance arrangements are in place to support safer recruitment throughout the Charity.

This includes ensuring that:

- appropriate recruitment policies and procedures are maintained;
- sufficient resources are available to implement this policy;
- safeguarding remains central to recruitment decisions; and
- significant safeguarding or recruitment concerns are appropriately monitored.

Chief Executive Officer

The Chief Executive Officer has overall responsibility for implementing this policy and ensuring safer recruitment practices are consistently applied throughout the Charity.

The Chief Executive Officer will ensure that:

- recruitment processes remain compliant with current legislation and guidance;
- appropriate recruitment checks are completed before appointments are confirmed;
- safer recruitment training is available where appropriate;
- recruitment decisions are fair, objective, and appropriately documented;
- safeguarding concerns arising during recruitment are managed appropriately; and
- this policy is reviewed periodically.

Managers and Recruitment Panels

Managers and those involved in recruitment are responsible for ensuring that recruitment is undertaken safely, fairly, and consistently.

They must:

- follow this policy;
- assess applicants objectively against the person specification;
- identify and explore any safeguarding concerns;
- ensure appropriate recruitment checks are completed;
- maintain appropriate recruitment records;
- seek advice where concerns arise; and
- ensure appointments are not confirmed until all required checks have been satisfactorily completed or an appropriate risk assessment has been approved.

Policy

Principles of Safer Recruitment

The Charity seeks to ensure that everyone appointed to work for or on behalf of InterAct is suitable for their role and shares the Charity's commitment to safeguarding children, young people, vulnerable adults, and others who access its services.

InterAct recognises that safer recruitment is an ongoing process rather than a single recruitment check. Safer recruitment begins before a vacancy is advertised and continues throughout an individual's employment or volunteering with the Charity.

InterAct will seek to:

- recruit individuals who demonstrate appropriate values, behaviours, skills, and experience;
- clearly communicate the safeguarding responsibilities associated with each role;
- use recruitment processes that are fair, transparent, and based on merit;
- identify and explore any concerns arising during recruitment;
- complete appropriate pre-employment or pre-engagement checks before confirming appointments;
- make recruitment decisions based on all available information;
- maintain appropriate recruitment records;
- provide safeguarding induction, supervision, and training; and
- continue to monitor suitability throughout employment or volunteering.

The Charity recognises that safeguarding responsibilities continue throughout an individual's relationship with InterAct and do not end once recruitment checks have been completed.

Equality, Diversity and Inclusion

InterAct is committed to recruiting the best person for each role through fair, transparent, and inclusive recruitment practices.

Recruitment decisions will be based upon an individual's suitability, skills, experience, qualifications, behaviours, and ability to fulfil the requirements of the role.

The Charity will not unlawfully discriminate on the grounds of any protected characteristic under the Equality Act 2010, and will seek to:

- provide equal opportunities throughout recruitment;
- make reasonable adjustments for disabled applicants where appropriate;
- ensure recruitment processes are accessible;
- treat all applicants fairly and consistently;
- remove unnecessary barriers to employment or volunteering where reasonably practicable; and
- promote a diverse workforce and volunteer community that reflects the values of the Charity.

The need to safeguard children, young people, vulnerable adults, and others who access the Charity's services will remain a primary consideration throughout every recruitment process.

Recruitment Planning

Before advertising any vacancy, the recruiting manager should consider:

- whether the role is required;
- the duties and responsibilities of the role;
- the level of contact with children, young people, vulnerable adults, or others accessing the Charity's services;
- whether the role involves regulated activity;
- the level of DBS check required;
- any professional qualifications or registrations required;
- whether references or other checks are required in addition to standard pre-engagement checks;
- the skills, experience, behaviours, and values required; and
- any reasonable adjustments that may be required during the recruitment process.

An up-to-date Job Description and Person Specification should be prepared for each role and should accurately reflect the safeguarding responsibilities associated with the position.

Advertising Vacancies

Recruitment information should clearly communicate InterAct's commitment to safeguarding and safer recruitment.

Advertisements, recruitment packs, and recruitment information should, where appropriate:

- include the Charity's safeguarding statement;
- identify any safeguarding responsibilities associated with the role;
- specify where an Enhanced DBS check or other safeguarding checks are required;
- state where professional registration or qualifications are essential;
- confirm that appointments are subject to satisfactory pre-employment or pre-engagement checks; and
- encourage applications from suitably qualified individuals from all sections of the community.

A safeguarding statement similar to the following should normally be included:

InterAct is committed to safeguarding and promoting the welfare of children, young people, vulnerable adults, and everyone who accesses our services. We expect all staff, volunteers, trustees, and others working on our behalf to share this commitment. Appointments are subject to appropriate safer recruitment checks, which may include an Enhanced Disclosure and Barring Service (DBS) check, barred list checks where applicable, verification of identity, references, and other pre-engagement checks appropriate to the role.

Applications and Shortlisting

Applicants should complete the Charity's application process in full and provide all information requested.

Curriculum Vitae (CVs) should not normally be accepted as the sole application for roles involving safeguarding responsibilities, although they may be accepted as supporting information where appropriate.

Applications should enable the Charity to:

- verify the applicant's employment history;
- identify and explore any gaps in employment or education;
- confirm relevant qualifications and experience;
- identify any professional registrations where required;
- obtain details of suitable referees; and
- identify any information requiring clarification during the recruitment process.

Shortlisting should be undertaken objectively against the Job Description and Person Specification.

Recruitment decisions should be based on evidence of the applicant's knowledge, skills, experience, behaviours, and values.

Where applications raise safeguarding concerns, inconsistencies, unexplained gaps, or other matters requiring clarification, these should be explored further before any appointment is confirmed.

References

References form an important part of the Charity's safer recruitment arrangements and help to verify an applicant's suitability for the role.

InterAct will normally seek a minimum of two satisfactory references before confirming an appointment.

Where reasonably practicable:

- one reference should be obtained from the applicant's current employer or, if they are not currently employed, their most recent employer;
- references should be obtained directly from the referee using contact details independently verified where appropriate;
- open or generic testimonials should not normally be accepted in place of references;
- references from family members or individuals living in the same household will not be accepted; and
- any concerns, inconsistencies, or omissions should be explored before an appointment is confirmed.

Referees may be asked to comment on matters including:

- the applicant's suitability for the role;
- their reliability, conduct, and professional standards;

- any known safeguarding concerns relevant to the role;
- disciplinary matters where appropriate and lawful;
- attendance and performance where relevant; and
- whether they would be suitable to work with children, young people, vulnerable adults, or other individuals accessing the Charity's services.

Where references are incomplete, contradictory, or raise concerns, the Charity will seek clarification before making a recruitment decision.

Online Searches

Where appropriate and proportionate, InterAct may carry out searches of publicly available online information relating to shortlisted applicants as part of its due diligence and safer recruitment process.

The purpose of these searches is to identify publicly available information that may be relevant to an applicant's suitability for the role or which may indicate behaviour that is incompatible with the Charity's values or safeguarding responsibilities.

Online searches will only consider information that is publicly available and will be undertaken fairly, consistently, and in accordance with applicable data protection legislation.

Where concerns arise, applicants will normally be given an opportunity to respond before any recruitment decision is made. Recruitment decisions will not be based solely on online information without appropriate consideration of the context and relevance of the information identified.

Interviews

Interviews provide an opportunity to assess not only an applicant's knowledge, skills, qualifications, and experience, but also their values, behaviours, judgement, and commitment to safeguarding.

Interviews should normally be conducted by at least two people and should be planned in advance using appropriate interview questions linked to the Job Description and Person Specification.

Before or during the interview, applicants should be required to provide evidence of:

- their identity;
- their right to work in the United Kingdom;
- relevant qualifications where required;
- professional registration where applicable; and
- any other documentation necessary to complete pre-employment or pre-engagement checks.

Interviewers should seek to:

- assess the applicant's suitability for the role;
- explore their understanding of safeguarding responsibilities;
- assess their attitudes towards working with children, young people, vulnerable adults, and others accessing the Charity's services;
- explore any gaps in employment or education;

- clarify any inconsistencies within the application or references;
- discuss any relevant criminal convictions, cautions, or other matters declared by the applicant where appropriate and lawful; and
- provide the applicant with an opportunity to explain any concerns identified during the recruitment process.

Interview notes should be sufficiently detailed to demonstrate how recruitment decisions were reached and should be retained in accordance with the Charity's Data Protection and Data Retention Policies.

Pre-Employment and Pre-Engagement Checks

No appointment should be confirmed until all required recruitment checks have been satisfactorily completed, unless an appropriate risk assessment has been undertaken and approved by the Chief Executive Officer or another authorised manager.

The checks required will depend upon the nature of the role but may include:

- verification of identity;
- verification of the right to work in the United Kingdom;
- verification of qualifications;
- verification of employment history;
- satisfactory references;
- professional registration where required;
- an appropriate Disclosure and Barring Service (DBS) check;
- barred list checks where legally permitted;
- overseas criminal record checks or certificates of good conduct where appropriate;
- health declarations or occupational health assessments where appropriate and lawful; and
- any other checks required by legislation, regulation, funding requirements, or the nature of the role.

Disclosure and Barring Service (DBS) Checks

InterAct will obtain Disclosure and Barring Service (DBS) checks where required by legislation or where the Charity determines that such checks are appropriate for safeguarding purposes.

The level of DBS check obtained will reflect the responsibilities of the role and whether it involves regulated activity.

The Charity will ensure that:

- DBS checks are completed before individuals begin regulated activity unless exceptional circumstances apply;
- barred list checks are undertaken where legally permitted and required;
- DBS information is handled confidentially and in accordance with the DBS Code of Practice and data protection legislation;

- applicants are given the opportunity to discuss any information disclosed during the recruitment process; and
- recruitment decisions take account of all relevant information rather than relying solely upon DBS disclosures.

Where concerns arise from any DBS check, these will be considered fairly and proportionately. A criminal record, safeguarding information, or other concern will not automatically prevent an appointment. Each case will be considered individually, taking account of:

- the nature of the role;
- the relevance of the information;
- the seriousness of any offence or concern;
- the time that has elapsed;
- any pattern of behaviour;
- evidence of rehabilitation; and
- the Charity's safeguarding responsibilities.

Appropriate risk assessments will be completed where required, and the reasons for recruitment decisions will be documented.

Where an individual is permitted to begin work before all recruitment checks have been completed, this will only occur following a documented risk assessment approved by an authorised manager. Such individuals must be appropriately supervised and must not undertake unsupervised regulated activity until all required checks have been satisfactorily completed.

The Charity encourages eligible staff to subscribe to the DBS Update Service where appropriate, although this is not mandatory unless required by the Charity for a particular role.

Overseas Applicants

Where an applicant has lived or worked outside the United Kingdom, InterAct may require additional checks to obtain sufficient assurance regarding their suitability for the role.

Depending upon the circumstances, this may include:

- overseas criminal record checks;
- certificates of good conduct;
- verification from overseas employers;
- verification of professional registration;
- additional references; or
- other checks recommended by Government guidance.

The Charity will follow current Government guidance regarding overseas criminal record checks and safer recruitment for applicants who have lived or worked abroad.

Again, a criminal record, safeguarding information, or other concern will not automatically prevent an appointment. Appropriate risk assessments will be completed where required, and the reasons for recruitment decisions will be documented.

Conditional Appointments and Risk Assessments

Offers of employment or volunteering will normally be conditional upon the satisfactory completion of all required recruitment checks.

Where exceptional circumstances require an individual to commence work before every check has been completed, the Charity will complete a documented risk assessment before any duties begin.

Risk assessments will consider:

- the nature of the role;
- the level of contact with children, young people, vulnerable adults, or others accessing the Charity's services;
- the supervision arrangements that will be in place;
- the outstanding recruitment checks;
- any known safeguarding concerns; and
- any additional control measures required.

Individuals subject to outstanding recruitment checks must not undertake duties that would place them in unsupervised regulated activity unless all legal requirements have been met.

Risk assessments will be reviewed if circumstances change or additional information becomes available.

Induction

Safer recruitment does not end when an individual is appointed. Effective induction helps ensure that staff, volunteers, trustees, and others working on behalf of InterAct understand their responsibilities and are able to carry out their role safely and appropriately.

All new starters will receive an induction appropriate to their role. This will normally include:

- the Charity's mission, values, and objectives;
- safeguarding responsibilities and reporting procedures;
- the Staff Code of Conduct and Professional Boundaries;
- Equality, Diversity and Inclusion;
- health and safety arrangements;
- information security and data protection requirements;
- whistleblowing arrangements;
- the role and responsibilities of the Designated Safeguarding Leads;
- emergency procedures appropriate to the role; and
- any mandatory training required before or shortly after commencing duties.

Where appropriate, induction will also include familiarisation with the Charity's policies, procedures, risk assessments, and working practices relevant to the individual's role.

Training, Supervision and Ongoing Suitability

InterAct recognises that safeguarding responsibilities continue throughout an individual's employment or volunteering with the Charity.

The Charity will seek to ensure that staff and volunteers:

- receive safeguarding training appropriate to their role;
- receive any role-specific training required to undertake their duties safely;
- understand and comply with the Charity's policies and procedures;
- receive appropriate supervision and support;
- participate in regular performance reviews or appraisals where applicable;
- identify and address ongoing learning and development needs; and
- continue to demonstrate the behaviours and standards expected by the Charity.

Managers should use supervision sessions, team meetings, and appraisals as opportunities to discuss safeguarding, professional conduct, wellbeing, and any concerns relating to an individual's continuing suitability for their role.

Where concerns arise regarding an individual's conduct, behaviour, or suitability, these will be managed promptly in accordance with the Charity's safeguarding, disciplinary, capability, or other relevant procedures.

Contractors, Agency Workers and Partner Organisations

InterAct expects all contractors, consultants, agency workers, commissioned providers, and partner organisations delivering services on its behalf to maintain safeguarding standards equivalent to those expected of the Charity's own staff and volunteers.

Before engaging third parties, InterAct will, where appropriate:

- satisfy itself that suitable safer recruitment arrangements are in place;
- verify that appropriate DBS checks have been completed where required;
- ensure appropriate safeguarding policies and procedures are maintained;
- confirm that individuals are appropriately trained and supervised;
- include safeguarding requirements within contracts or service level agreements; and
- monitor compliance where appropriate.

Where concerns arise regarding the safeguarding arrangements of another organisation, the Charity will take appropriate action, which may include seeking further assurances, requiring improvements, or reviewing the ongoing relationship.

Volunteers

InterAct recognises the significant contribution that volunteers make to the Charity and is committed to ensuring that volunteers are recruited safely, fairly, and proportionately.

The level of recruitment checks completed for volunteers will reflect the nature of the role, the activities they will undertake, the level of responsibility they will hold, the degree of contact with children, young people, vulnerable adults, and others accessing the Charity's services, and whether the role constitutes regulated activity.

Before commencing their role, volunteers will normally:

- complete an application or registration process appropriate to the role;
- participate in an interview or informal discussion to assess their suitability;
- provide suitable references where appropriate;
- provide evidence of their identity;
- complete Disclosure and Barring Service (DBS) checks where required;
- complete any other recruitment checks appropriate to the role; and
- receive an induction and safeguarding information before undertaking activities on behalf of the Charity.

Volunteers will receive appropriate supervision, guidance, and support throughout their time with InterAct. They are expected to comply with the Charity's policies, procedures, and Code of Conduct and to complete any mandatory training required for their role.

Where concerns arise regarding a volunteer's conduct, suitability, or safeguarding responsibilities, InterAct will take appropriate action. This may include providing additional support or supervision, temporarily restricting activities whilst concerns are considered, or ending the volunteering arrangement where appropriate.

The Charity recognises that safer recruitment is an ongoing process, and the suitability of volunteers will continue to be reviewed throughout their involvement with InterAct.

Record Keeping and Confidentiality

InterAct will maintain appropriate records to demonstrate compliance with its safer recruitment responsibilities.

Recruitment records may include:

- advertisements and recruitment information;
- applications and supporting documentation;
- interview notes and scoring records;
- references;
- recruitment decisions;
- identity verification;
- DBS and other pre-employment checks (where lawful to retain);

- professional registration checks;
- right to work checks;
- risk assessments; and
- induction records.

Personal information obtained during recruitment will be processed in accordance with the UK GDPR, the Data Protection Act 2018, and the Charity's Data Protection and Privacy Policies.

Access to recruitment records will be restricted to those with a legitimate business need.

Recruitment records will be retained and securely disposed of in accordance with the Charity's Data Retention Schedule.

Referrals to the Disclosure and Barring Service

InterAct recognises its legal duty to make referrals to the Disclosure and Barring Service (DBS) where the legal criteria are met.

Where the Charity has removed an individual from regulated activity, or would have done so had they not resigned or otherwise left, because they have harmed or posed a risk of harm to a child or vulnerable adult, the Charity will make a referral to the DBS in accordance with its statutory obligations.

Where appropriate, the Charity will also:

- report safeguarding concerns to the Police or Local Authority;
- cooperate fully with safeguarding investigations;
- maintain appropriate records of decisions and actions taken; and
- seek advice where necessary to ensure legal obligations are fulfilled.

Monitoring and Review

InterAct will monitor the effectiveness of its safer recruitment arrangements to ensure they remain appropriate, proportionate, and compliant with current legislation and recognised good practice.

This may include reviewing:

- recruitment practices and procedures;
- safeguarding incidents or concerns relating to recruitment;
- recruitment risk assessments;
- recruitment training;
- changes to legislation or Government guidance;
- lessons learned from complaints, investigations, or audits; and
- feedback from managers, staff, volunteers, and trustees where appropriate.

This policy will normally be reviewed every two years, or sooner where there are significant changes to legislation, guidance, organisational activities, or identified safeguarding risks.

References

This policy has been developed with reference to relevant legislation and guidance, including:

- Working Together to Safeguard Children;
- Keeping Children Safe in Education (where relevant);
- Care Act 2014;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Police Act 1997;
- Rehabilitation of Offenders Act 1974 (Exceptions Order);
- Equality Act 2010;
- Immigration, Asylum and Nationality Act 2006;
- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- Disclosure and Barring Service guidance;
- Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees; and
- Home Office guidance on Right to Work checks and overseas criminal record checks.

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Change history

Version 1 [November 2021] Initial issue

Version 2 [September 2026] Reviewed and updated to align with legislation changes. Added more practical guidance for staff.

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Approved By: Vickie Perkins-(CEO) and Sonal Patel (Trustee)