

SAFER RECRUITMENT POLICY



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This policy applies to directors, employees, workers, tutors, mentors, therapists, volunteers, agency workers, self-employed persons, consultants, contractors and any other person engaged by Thrive Lincs Ltd who may have contact with children or vulnerable adults.

The aim of the Safer Recruitment Policy is to help deter people who might abuse children or vulnerable adults from applying for roles where they will have access to children or vulnerable adults.

Individuals involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

This Policy shall be applied consistently in relation to all staff regardless of age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity status, race, religion or belief, sex, or sexual orientation.

This policy is informed by and complies with statutory guidance, including **Working Together to Safeguard Children (DfE, latest edition)**, **Keeping Children Safe in Education 2026 (DfE)**, where **applicable**, and relevant adult safeguarding legislation. Thrive Lincs Ltd ensures that recruitment and selection processes meet these statutory standards and reflect best practice in safeguarding children and vulnerable adults.

Recruitment Process

If a role involves working with children (anyone under 18) or vulnerable adults, the role requirements will be carefully reviewed to determine if a DBS check is required.

All job advertisements and recruitment information for roles involving contact with children or vulnerable adults will state Thrive Lincs Ltd's commitment to safeguarding and promoting welfare. They will explain that appropriate safeguarding and pre-employment checks will be undertaken and will identify whether the role is eligible for a DBS check and exempt from the Rehabilitation of Offenders Act 1974.



All applicants for roles involving work with children or vulnerable adults must complete Thrive Lincs Ltd's standard application form. A curriculum vitae will not be accepted on its own, although it may accompany a completed application form.

The application form will require a complete chronological employment, education and volunteering history; explanations for gaps or repeated changes; relevant academic and vocational qualifications; details of professional memberships; two professional referees; and a signed declaration that the information supplied is accurate and complete. Materially false information or omissions may result in withdrawal of an offer or disciplinary action.

The application form will require a complete chronological employment and education history, explanations for gaps, relevant qualifications, two referees and a signed declaration that the information provided is true and complete. Materially false information or omissions may result in withdrawal of an offer or disciplinary action.

Shortlisted candidates will be required to complete a confidential self-declaration concerning relevant criminal history, whether they are barred from regulated activity, any prohibition, restriction or sanction relevant to the role, and any other information that may affect their suitability to work with children or vulnerable adults. Candidates will only be asked to disclose information that Thrive Lincs Ltd is legally entitled to request. Protected convictions and cautions must not be disclosed.

As part of the shortlisting process, Thrive Lincs Ltd may conduct a proportionate online search of publicly available information about shortlisted candidates. Candidates will be informed that this may take place. Searches will focus only on information relevant to suitability to work with children or vulnerable adults. Any concerns identified will be considered fairly and discussed with the candidate where appropriate. A consistent search process will be used and findings will be recorded securely.

Information disclosed will be considered fairly, confidentially and on an individual basis in accordance with the Rehabilitation of Offenders Act 1974, the Exceptions Order, DBS filtering rules and Thrive Lincs Ltd's Recruitment of Ex-Offenders Policy.

We will take reasonable steps to confirm the applicants' suitability for the role, including verifying qualifications and professional memberships, assessing skills and relevant experience. All applicants will be asked to provide an explanation for any significant gaps or repeated changes in employment history where no reasons have been provided on their application. We may also ask interview questions which are designed to allow candidates to demonstrate the attitudes and values that people working with children need to have.

Applicants will normally be required to provide details of two professional referees, including their current or most recent employer. References will be obtained directly from the referee before interview wherever possible. Open references, testimonials and references supplied by the applicant will not normally be accepted.

References will be scrutinised and compared with the application form to identify discrepancies, gaps, safeguarding concerns or contradictory information. Any concerns will be explored with the referee and the candidate. Electronic references will be verified as originating from a legitimate



source. No appointment will be confirmed until satisfactory references have been received and verified.

Thrive Lincs Ltd provides an induction programme for all new staff which includes our safeguarding policies and procedures. As part of the induction process all new staff are required to complete an initial probationary period to ensure that their conduct, performance, behaviours and attendance meet the required standards.

All recruitment panels involved in selecting candidates for roles that involve regulated activity or contact with children or vulnerable adults must include at least one member who has completed formal safer recruitment training. Panel members are responsible for ensuring that all recruitment decisions are made in line with safeguarding requirements. At Thrive Lincs Ltd, Daisy Haggis and Mark Haggis are the designated staff members who have completed appropriate safer recruitment training and are available to sit on recruitment panels.

DBS checks

The level of DBS check will be determined separately for each role using current DBS eligibility guidance. An Enhanced DBS check with the relevant barred-list information will only be requested where the duties legally qualify for that level of check. A barred-list check will only be requested where the individual will engage in regulated activity or where another statutory entitlement applies.

Regulated activity relating to children and regulated activity relating to adults are subject to different legal tests. Thrive Lincs Ltd will assess each role against the relevant statutory definition and maintain a written record of the decision.

Thrive Lincs Ltd adopts a risk-based DBS rechecking process. As an organisational safeguard, DBS status will normally be reviewed at least every three years, or earlier where there is a change of role, a break in service, new information, a safeguarding concern or another reason to believe a new check is appropriate. Staff may be required to subscribe to the DBS Update Service and provide consent for periodic status checks. The three-year review period is an organisational requirement and does not represent a statutory DBS expiry date.

All conditional offers of employment or engagement are subject to completion of the pre-employment checks required for the role. This includes the appropriate DBS check and a satisfactory assessment of any information disclosed, together with overseas criminal-record checks or other overseas checks where appropriate. No appointment will be confirmed until Thrive Lincs Ltd is satisfied that all required checks have been completed.

In order to minimise risk, if a role is not defined as regulated activity but requires an Enhanced DBS check and this check takes much longer than anticipated. In exceptional circumstances, where a role is not regulated activity but is legally eligible for an Enhanced DBS check and completion of the check has been significantly delayed, the Director may authorise the individual to begin limited duties under an approved risk assessment and documented supervision arrangements. The decision, reasons, restrictions and review date must be recorded. This exception will not apply where the duties constitute regulated activity.

If we are not satisfied with the outcome of any of the above checks (DBS check or Overseas Criminal Record check) we may decide to withdraw a conditional offer of employment or engagement. We may also withdraw a conditional offer of employment or engagement if an applicant has failed to co-



operate with this process or if the process has not been completed within reasonable timescales. Where a member of staff begins additional or different duties, the role will be reassessed against current DBS eligibility guidance. If the new duties constitute regulated activity, Thrive Lincs Ltd will obtain the legally appropriate Enhanced DBS check with the relevant barred-list information before the individual undertakes those duties.

Before an agency worker or contractor begins work, Thrive Lincs Ltd will obtain written confirmation from the supplying organisation that all checks required for the role have been completed, including identity, right to work, references, qualifications, overseas checks and the appropriate DBS and barred-list checks.

Thrive Lincs Ltd will verify the identity of the individual on arrival against the information supplied. Where a DBS certificate contains disclosed information, Thrive Lincs Ltd will obtain and assess the information necessary to make its own safeguarding decision before permitting the individual to work.

Agency and contractor agreements must require immediate notification of safeguarding concerns, allegations, disciplinary findings, changes to DBS status or other information affecting suitability.

All agency workers and contractors used by Thrive Lincs Ltd must comply with the pre-employment and safeguarding checks legally appropriate to their role. Enhanced DBS and barred-list checks will only be required where the role is eligible for those checks. If appropriate checks have not been completed, or new information raises a safeguarding concern, Thrive Lincs Ltd may prevent the individual from working and require the agency or contractor to take appropriate action.

Service agreements will specify the required safeguarding checks, notification obligations and arrangements for managing concerns or allegations.

All candidates must provide documentation confirming their **Right to work in the UK** prior to employment. For candidates with recent overseas residency, criminal record checks or equivalent background checks from relevant countries will be obtained where practicable, in addition to the standard DBS and reference checks.

Pre-employment checks

Depending upon the legal requirements and responsibilities of the role, Thrive Lincs Ltd will complete and record the following checks before employment or engagement is confirmed:

- Identity, including photographic identification
- Right to work in the UK
- The level and workforce of DBS check for which the role is eligible, including the relevant barred-list check where legally permitted
- Qualifications and professional registrations
- Complete employment history and gaps
- References
- Overseas residence or employment
- Prohibition from teaching
- Relevant professional sanctions or restrictions
- Section 128 direction, where legally relevant
- Disqualification under the Childcare Act, where applicable



- Mental and physical fitness to perform the role, after conditional offer and subject to Equality Act requirements
- Driving licence, insurance and business-use cover when transporting learners

Roles and responsibilities

Responsibility for the safer recruitment process is assigned as follows:

- HR/Recruitment Lead: prepares job descriptions, posts adverts, and ensures application forms include safeguarding questions.
- Recruitment Panel: evaluates applications, conducts interviews, and assesses suitability in line with safeguarding standards.
- Designated Safeguarding Lead (DSL): reviews DBS disclosures and provides guidance on suitability for roles involving regulated activity.
- Line Manager: ensures induction, probation, and ongoing supervision requirements are met.

DBS information and suitability decisions

Depending on the level and workforce of the check, a DBS certificate may disclose convictions and cautions that are not protected from disclosure under the applicable filtering rules. An Enhanced DBS certificate may also contain relevant information disclosed by the police. Information disclosed on a certificate will be considered fairly and individually, taking account of its relevance to the role, seriousness, circumstances, pattern, age and recency, and any evidence of rehabilitation.

Thrive Lincs Ltd will make a referral to the DBS where the legal referral conditions are met—for example, where an individual has been removed from regulated activity, or would have been removed had they not resigned or otherwise ceased working, because they harmed or posed a risk of harm to a child or adult at risk. Referrals to the Teaching Regulation Agency or relevant professional body will also be considered where applicable.

Record keeping

Thrive Lincs Ltd will maintain a secure central recruitment and vetting register covering employees, workers, volunteers, agency staff and relevant contractors. The register will show the checks required for each role, the date each check was completed, the person who completed it and any applicable review date. It will be available for authorised safeguarding and commissioning audits.

Recruitment documentation, including application forms, interview records, references, risk assessments and recruitment decisions, will be stored securely with access restricted to authorised personnel. Records relating to successful candidates will normally be retained for the duration of their employment or engagement plus six years. Records relating to unsuccessful candidates will normally be retained for 12 months before secure destruction.

Copies of DBS certificates and records containing criminal-record information will not normally be retained. Where there is a valid and documented reason to retain such information temporarily, access will be strictly limited and the information will normally be securely destroyed within six months.



Thrive Lincs Ltd may retain a record of the date of the DBS check, certificate number, level and workforce, whether barred-list information was included, the identity of the person who checked it and the resulting recruitment decision. The central register will not contain details of convictions, cautions or other unnecessary sensitive information.

All information will be processed in accordance with UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and Thrive Lincs Ltd's retention schedule.

Responding to Concerns About a Candidate or Person Working for Thrive Lincs Ltd

Any allegation that a person working for Thrive Lincs Ltd has:

- behaved in a way that has, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk of harm; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children,

must be reported immediately to the Director or designated allegations manager and managed under the Allegations Against Staff Policy. Advice will be sought from the relevant Local Authority Designated Officer without avoidable delay and normally within one working day.

Concerns that do not meet the harm threshold will be managed under Thrive Lincs Ltd's Low-Level Concerns procedure. Safeguarding concerns will not be treated solely as performance or disciplinary matters.

1. During the Recruitment Process

When concerns about the suitability of a candidate arise during the recruitment process, they must be addressed promptly and effectively. These concerns might include issues such as discrepancies in the candidate's application, inappropriate references, criminal-record information requiring further assessment, or any other red flags identified during interviews or assessment processes. The following steps should be followed:

- **Thorough Investigation:** Any concern raised during the recruitment process will be investigated fully and confidentially. The candidate will be given the opportunity to respond to the concerns and clarify any issues. This may involve asking the candidate to provide further details, reference checks, or additional documentation.
- **Risk Assessment:** A risk assessment should be conducted in relation to the concern. Considerations may include the nature of the concern, its relevance to the role, the severity of the issue, and whether the individual is likely to pose a risk to the safety and well-being of others.
- **Consideration of the Role:** In assessing whether a candidate is suitable for the role, the specific duties and responsibilities should be considered. If the concern is minor but relevant (e.g., an incident from many years ago that would not affect the role), this may not automatically disqualify a candidate. However, for roles involving children or vulnerable adults, concerns will be treated with extra caution.



- **Referral to Relevant Authorities:** Information will only be referred externally where there is a lawful, necessary and proportionate reason to do so. Where information indicates that a child or adult may be at immediate risk, Thrive Lincs Ltd will contact the police, children's social care, adult safeguarding services or another appropriate authority. Information will not be referred to the DBS merely because a concern has arisen during recruitment; a DBS referral will only be made where the statutory referral conditions are met.
- **Documentation:** All concerns raised, along with the steps taken to investigate and resolve them, must be thoroughly documented in a confidential record. This documentation will be retained according to the organisation's data protection policies.
- **Outcome Decision:** If the concern is deemed to pose a risk to Thrive Lincs Ltd or individuals in its care, the offer of employment or volunteering will be withdrawn. If the concern is not considered significant, the candidate will be allowed to proceed in the recruitment process.

2. Once the Individual Has Begun Their Role

Concerns about an employee or volunteer's suitability may also arise after they have begun their role. This could be due to performance issues, inappropriate behaviour, or new information that may come to light. In such cases, the following steps will be taken.

Any allegation that a person working for Thrive Lincs Ltd has:

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- possibly committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk of harm; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children,

must be reported immediately to the Director or designated allegations manager and managed under the Allegations Against Staff Policy. Advice will be sought from the relevant Local Authority Designated Officer without avoidable delay and normally within one working day.

Concerns that do not meet the harm threshold will be managed under Thrive Lincs Ltd's Low-Level Concerns procedure. Safeguarding concerns will not be treated solely as performance or disciplinary matters.

- **Ongoing Monitoring:** Continuous monitoring of the employee or volunteer's behaviour, performance, and conduct will be maintained throughout their tenure. This includes regular supervision, feedback sessions, and regular checks on their suitability for the role.
- **Raising Concerns:** If any concerns arise during their employment or volunteering, these must be raised promptly with the DSL or relevant manager. Concerns might include issues such as inappropriate behaviour towards service users, failure to follow safeguarding procedures, or performance issues that affect the safety and well-being of others.
- **Investigation Process:** Concerns will be assessed promptly and managed under the appropriate safeguarding, allegations, low-level concerns, disciplinary or capability procedure. Where the concern may meet the harm threshold, Thrive Lincs Ltd will consult the LADO before beginning an internal investigation that could compromise an external safeguarding or criminal investigation. This could involve a formal interview with the



employee or volunteer, gathering evidence, and speaking to relevant parties (e.g., colleagues, service users). The individual will be treated fairly and with respect throughout this process.

- **Suspension or Temporary Removal:** Suspension will not be automatic. Alternatives such as temporary redeployment, increased supervision, removal from direct contact with learners or temporary changes to duties will be considered. Suspension may be used where there is no reasonable alternative to protect children or vulnerable adults, preserve the integrity of an investigation or protect the individual concerned. The decision, reasons and alternatives considered will be documented, and the suspension will be regularly reviewed.
- **Outcome and Action:** Based on the investigation's findings, appropriate action will be taken. This could range from additional training and support to dismissal or removal from the volunteer arrangement. Where required, safeguarding concerns will be referred to the appropriate external authority, which may include the LADO, children's social care, the relevant adult safeguarding service, the police, the DBS, the Teaching Regulation Agency or another professional regulator. Referrals will be made according to the applicable legal threshold and referral procedure.
- **Record-Keeping:** All concerns, investigations, and outcomes will be documented and stored securely in accordance with Thrive Lincs Ltd's data protection policies.
- **Support and Re-training:** If the concern relates to an area of misunderstanding, lack of skills, or training, the employee or volunteer may be provided with support and re-training to improve their performance and ensure that they are suitable for their role.

Conclusion

Thrive Lincs Ltd is committed to maintaining a safe environment for all individuals, and we take all concerns about the suitability of employees and volunteers seriously. We will act quickly and fairly to investigate concerns and take the necessary steps to ensure that only those who are suitable remain in positions where they have access to children and adults at risk. The welfare and safety of those we serve is our highest priority.

This policy will be reviewed annually or sooner if statutory guidance changes. Thrive Lincs Ltd ensures that the policy and its implementation are fully auditable and compliant with Local Authority safeguarding expectations.

Links to other relevant policies

[Safeguarding policy](#)

[Allegations policy](#)

[Complaints and Whistleblowing policy](#)

