

Safe Recruitment Policy

This policy clarifies our approach to ensuring all reasonable measures are taken to assess the suitability of all potential employees. The emphasis is upon promoting the safety and welfare of young people accessing our services and settings.

Implemented: October 2021

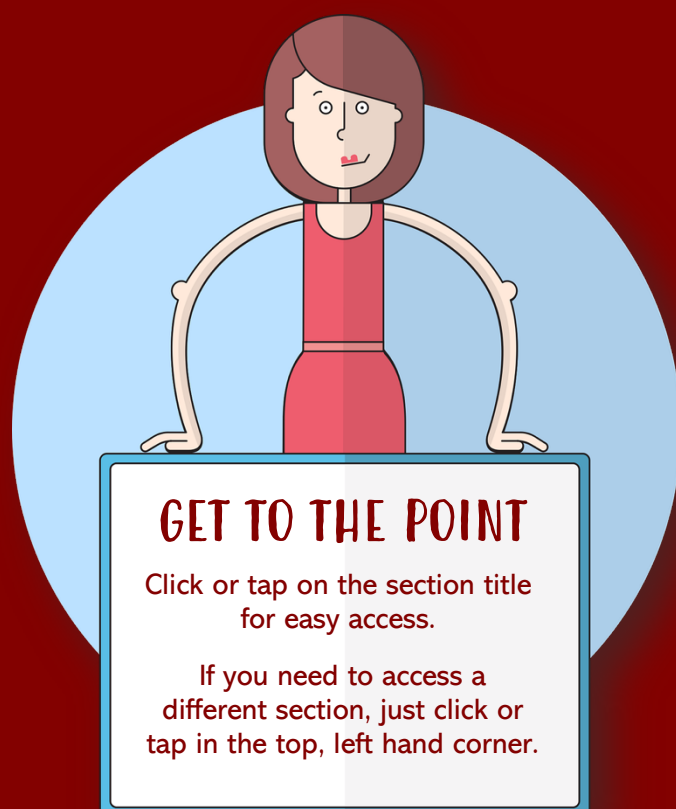
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“For those agencies whose job it is to protect children and vulnerable people, the harsh reality is that if a sufficiently devious person is determined to seek out opportunities to work their evil, no one can guarantee that they will be stopped. Our task is to make it as difficult as possible for them to succeed”

Bichard Report (2004) (p.12, para 79)

Premier Care Management (PCM) aim to ensure that they don't succeed. People that seek to harm children are not welcome and nor will they ever be.



Introduction

This policy applies to all Premier Care Management (PCM) colleagues, as well as all potential employees.

The systems and procedures identified within this policy are mandatory. The duties and responsibilities of colleagues are clarified. All stakeholders should understand the importance of safe and robust recruitment.

PCM are committed to:

- Ensuring the safeguarding of young people remains paramount. This policy is part of a wider duty to protect young people;
- Zero tolerance of any inappropriate behaviour towards young people by colleagues;
- A belief that prevention is essential in safeguarding young people and promoting their welfare.

The purpose of this policy and integrated procedures is to ensure the continued safety and welfare of all children and young people accessing our services.



We will check every applicant's suitability for employment.

Agency Staff

It is general policy that PCM will not use agency staff. This is to maintain consistency of approach and ethos, but importantly it contributes towards safe practice, trust, continuity, and assurance.

PCM aim to use 'bank' colleagues wherever possible. They can be deployed to services or settings as required. Senior management will provide cover where possible. This is good practice, as it is an opportunity for senior managers to experience frontline practice, which will contribute towards overall service development through an increased understanding of day-to-day experiences.

In extreme circumstances agency staff may be used, but only when all other options have been exhausted.

Managers must note that all agency staff must have all checks in place as required by safe recruitment protocol. These checks must be evidenced and held 'on site'. No individual is permitted to work with young people without an up-to-date, enhanced DBS check in place.

Section One: Policy Statement

Our colleagues are our most important resource. In meeting the needs of young people accessing our services, we can only be as effective as the people we employ.

Successful and thorough recruitment and selection has a fundamental role to play in ensuring the people with the right combination of knowledge, competencies, and personal attributes are appointed.

PCM managers and appropriate senior colleagues must ensure that their recruitment functions are carried out with a view to safeguarding and promoting the welfare of young people.

Our recruitment and selection procedures are in place to help deter, reject, or identify people who might abuse young people or who are otherwise unsuited to work with them. A relevant member of the Senior Management Team (SMT) will lead the process of making employee appointments and delegate duties and responsibilities as appropriate, in consultation with the Managing Director.

Appointments are only made after mandatory procedures have been followed (e.g., references and reference verifications, Enhanced Disclosure Check, and proof of identification and qualifications).

PCM Limited are committed to safeguarding and promoting the welfare of young people who access our services. All colleagues are expected to share this commitment.

OUR SAFEGUARDING STATEMENT

All adults employed by PCM will be subject to an enhanced DBS check. All colleagues, contractors or volunteers will be expected to report any concerns relating to the safeguarding of people in accordance with established procedures.

If any conduct in relation to the safeguarding of young people gives cause for concern, the company's safeguarding procedures will be followed, alongside implementation of the company's Disciplinary Procedure.

No form of inappropriate behaviour around young people will be tolerated.

Section Two: Equality & Diversity

Promoting Equality and Diversity

Premier Care Management (PCM) Limited are committed to ensuring anti-discriminatory and equal opportunities recruitment and selection practices.

We will actively promote anti-discriminatory, anti-racist and anti-oppressive practices and policies.

All offers of employment will be based upon candidate's suitability to work with young people.



Section Three: Scope of Policy

Compliance with the expectations of this policy is required by all colleagues.

It is vital that measures detailed in this policy are applied thoroughly whenever someone is recruited to work with young people.

This means people who are regularly in contact with young people, as well as those who regularly work in a setting with young people. This is particularly important where they must be regarded as safe and trustworthy because of their regular presence.

Section Four: Scope of Policy

All staffing requirements will be identified and agreed by Senior Management Team (SMT) in formal consultation with the Directors.

This policy and procedures have been designed to provide detailed guidance to colleagues with recruitment responsibilities. This aims to ensure high standards of professional, safe, and effective recruitment practice.

No part of this policy or related procedures can be compromised, regardless of circumstances. Safe recruitment is a fundamental component of effective and safe practice.

Good practice and equality of opportunity are integral to PCM's recruitment and selection processes.

Recruitment and selection will be approached in a fair, consistent, equitable, transparent, and effective manner, with due regard for Equal Opportunities legislation, including the Equality Act 2010.

Step-by-Step Guidance

All personnel, prior to a formal offer of employment:

- Must complete an application form before they are formally offered any position within the organisation. This should be completed prior to interview, to ensure that any areas requiring further scrutiny (e.g., gaps in employment history) are suitably addressed;
- Must provide no less than TWO references. One of those references must be from a most recent employer. Additionally, if the candidate has experience of working within a social care environment, a reference should be provided from that employer. This is essential if the person has been employed within a social care setting within the last five years;
- Will be subject to follow-up telephone reference verification by management within the service or setting, or a senior operational professional;
- Are required to declare any previous instances of dismissal or proven/substantiated allegations of misconduct. If a person has been historically subject to dismissal or allegations of misconduct, they must be able to demonstrate their suitability to work with young people. All discussion and assurances must be recorded. If any explanation is not satisfactory, any offer of employment will be withdrawn;
- Will be subject to an Enhanced Disclosure and Barring Service (DBS) check and subject to Vetting & Barring Scheme when in place. DBS outcomes with a positive trace will evoke an assessment of the individual's suitability to work with young people. This is completed and recorded using a DBS Positive Trace Form. All discussion and assurances must be recorded. If any explanation is not satisfactory, any offer of employment will be withdrawn;
- Must bring/provide evidence of relevant qualifications, training and experience, which will be copied and retained to personnel files if the candidate is offered employment;
- Must confirm that they have the right to work in United Kingdom (UK) and there will be further checks for those who have lived outside the UK;
- Must provide evidence of proof of identity, such as (for example) original copies of their:
 - i. Driving Licence;
 - ii. Car Insurance and MOT Certificates for copying;
 - iii. Passport;
 - iv. Birth Certificate.
- Required to present a fitness to work certificate/letter from a General Practitioner (GP) (depending upon the individuals' circumstances).

For successful applicants, all records will be retained and monitored through the implementation of a Single Central Register (SCR). It is the responsibility of the Human Resources Team to maintain the SCR and ensure that it is up to date.



In addition to maintaining administrative diligence in recruitment, colleagues must remember to take account of a person's presentation and their instincts about whether an individual is suitable to work with vulnerable young people.

Section Five: Clarification of Administrative Processes

This part aims to clarify the roles of Head Office (HO) staff and operational managers in issuing and handling recruitment administration. Staff are reminded that they will be handling personal data that is subject to the conditions of the General data Protection Regulations (2018).

Unless prior permission has been granted by a Director, the following documents must be issued by Head Office Staff only, as required:

- Application Form;
- Character Reference Request Form;
- Confidentiality Agreement;
- DBS Positive Trace Form;
- Disciplinary Action Notification Form;
- Dismissal Notification Form;
- Employment Health Questionnaire;
- Employment Reference Request Form;
- Health and Safety Employee Recognition;
- Invitation to Interview;
- Job Description and Person Specifications;
- New Starter Form;
- Notice of Successful Application;
- Notice of Unsuccessful Application;
- Protected Characteristics Form;
- Reference Request Form and Letter (Personal);
- Reference Request Form and Letter (Professional);
- Telephone Reference Verification Form;
- Vaccination Form.

The following may be issued by the relevant manager or delegated senior personnel, such as deputy managers and senior professionals with a service (at the discretion of the manager):

- Induction Book;
- Induction Health and Safety Checklist;
- Interview Record & Comment Form;
- Recruitment Checklist;
- Supervision Agreement;
- Supervision Record.

Copies of the above must be sent to Head Office upon completion.

Section Six: Relevant Legislation & Guidance

The conditions of this policy apply to all staff working with children and young people, as well as to those who have contact with children and young people. The basis of our approach is drawn from **Working Together (2018;2020)** and **Keeping Children Safe in Education (2021)**, as well as other relevant guidance.

This policy has been implemented with regard to the following legislation and regulations:

Applied Legislation, Guidance & Regulations

Care and Education

- Care Act 2014
- Care Leavers (England) Regulations 2010
- Children's Homes (England) Regulations 2015 (appropriate transferable sections)
- Keeping Children Safe in Education 2021
- The Children Act 1989
- The Protection of Children Act 1999
- Working Together to Safeguard Children (2018;2020)

Police

- 1) Police Act 1997
- 2) The Police Act 1997 (Criminal Records) Regulations 2002, as amended
- 3) The Police Act 1997 (Criminal Records) (No 2) Regulations 2009, as amended

Other

- 1) Safeguarding Vulnerable Groups Act 2006
- 2) Sexual Offences Act 2003 (Sections 16 & 17)
- 3) Protection of Freedoms Act 2012
- 4) Equality Act 2010
- 5) The Common Law Duty of Care
- 6) The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended
- 7) General Data Protection Regulations (GDPR) 2018

Please note:

PCM may introduce further standards, providing they do not conflict with these essential requirements. The above lists are not exhaustive.

Certain conditions arising from the Children's Homes (England) Regulations 2015 are used in our approach to safe recruitment. This is exclusively regarding recruitment and does not suggest or imply that PCM are providing care within our unregulated settings. The transposition of the above regulations, as well as guidance such as Keeping Children Safe in Education, is solely with a view to ensuring safe practice when recruiting new staff.

Section Seven: Roles & Responsibilities

The SMT is responsible for the management and implementation of this policy, in consultation with the Board of Directors. The SMT lead will ensure that colleagues involved in recruitment and selection are made aware of their responsibilities within this policy.

This will be delivered by:

- Mandatory training in safe recruitment for managers and relevant senior staff;
- Supervision and managers meetings;
- Firm expectations of professional behaviour and conduct.

Any instances of professional and/or wilful neglect regarding safer recruitment will result in disciplinary action, which may constitute gross misconduct and ultimately dismissal.

Colleagues with recruitment responsibilities, in whatever capacity, have a duty to ensure that people selected to work with young people:

- Are subject to rigorous scrutiny regarding their fitness and suitability to work with young people;
- Are of integrity, and good character;
- Have the appropriate knowledge, experience, qualifications, and skills for the work. (N.B. This does not exclude people new to work in the sectors provided, but inexperienced colleagues must be provided with a comprehensive induction process that includes shadowing and mentoring opportunities);
- Are mentally and physically fit for the purposes of the work that the individual is to perform.

The SMT is responsible for providing regular reports to the Managing Director on recruitment and selection decisions, as well as reports on the composition of the workforce (incl. anonymised analysis of any data held for monitoring purposes on the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).





Section Eight: Implementation

The young people for whom we provide support deserve highly motivated and skilled individuals, whose values and approach are safe, professional, and effective.

Our recruitment and selection procedures and other human resources management processes must help to deter, reject, or identify people who might abuse vulnerable individuals, or are otherwise unsuited to work with them. Our Safeguarding Policy Statement applies to everyone who is employed by Premier Care Management (PCM) Limited. PCM are committed to safeguarding and promoting the welfare of all young people who access our services. All colleagues are expected to share this commitment.

The Directors, in liaison with the Senior Management Team (SMT), will:

- Review the staffing structure at least once a year;
- Oversee recruitment procedures;
- Monitor and review this policy on an annual basis; and
- Agree or delegate agreement of membership of recruitment panels. There will no less than two interviewers and in some cases (e.g., for senior or specialist posts) a larger panel will be required.

Colleagues with financial oversight will:

- Ensure that all decisions about salaries are based on evidence, and are applied equitably;
- When formulating the budget, ensure that training needs have been identified through performance management and that they budgeted for.

Section Nine: Selection & Shortlisting

The following Section provides a two-step walkthrough regarding our selection and shortlisting process. Colleagues must be diligent in applying the below conditions of good practice.

STEP ONE: Recruitment Panel

The recruitment panel will:

- Ensure the safeguarding statement appears in public facing literature, including our website;
- Consist of (as a minimum) a lead practitioner and a member of the Human Resources team;
- Ensure sufficient knowledge of the Job Description that clearly states the main duties and responsibilities of the post, as well as the individual's responsibility for promoting and safeguarding the welfare of young people they are responsible for, or with whom they come into contact with;
- Ensure sufficient knowledge of the formal Person Specification, which should include a specific reference to suitability to work with young people. This should also:
 - i. Include the qualifications and experience, and any other requirements needed to perform the role in relation to working with young people;
 - ii. Describe the competences and qualities that the successful candidate should be able to demonstrate.

Working in partnership with a nominated lead manager, Human Resources/administrative personnel will send out an application pack upon receipt of a request.

- A letter to the applicants, requiring them to provide references as part of the application will be sent out with every application pack. The process of scrutinising evidence of a candidate's suitability will be completed following successful interview. This requirement is also identified within the Application Form. The letter should make it clear that at least one referee should be the applicant's current or most recent employer and that any offer of employment will be subject to intense scrutiny of the application form, evidencing (qualifications, ID checks, Enhanced DBS, successful and verified references, etc.);
- Where an applicant who is not currently working with children or young people but has done so in the past, a reference will be sought from the employer by whom the person was most recently employed in work with children and young people;
- References will not be accepted from relatives or from people writing solely in the capacity of friends;
- An application form must be completed for every applicant prior to offer of an interview (N.B. a CV will not be accepted).

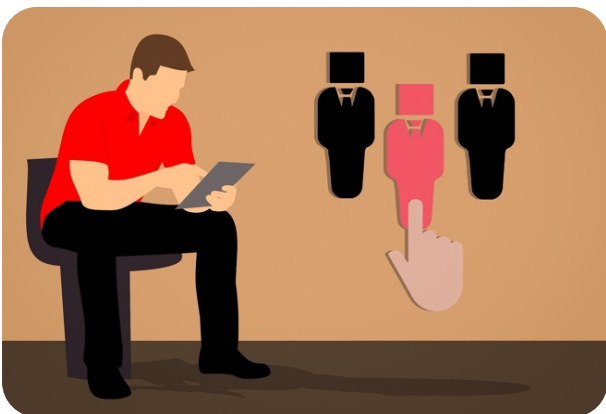
STEP TWO: Shortlisting

The recruitment panel will:

- Obtain and scrutinise all information from applicants, identifying any discrepancies or anomalies that should be addressed if the application is to be progressed;
- Assess any references received and verified in advance of any interview (where available);
- Assess and scrutinise public access social media accounts, such as Facebook for example. This will support the process of considering a person's suitability to work with vulnerable individual, based upon how they present their values and attitudes within a public forum. All checks should be recorded;
- Not accept a Curriculum Vitae as part of the safe recruitment process;
- Obtain independent professional and character references that answer specific questions to help assess an applicant's suitability to work with young people and resolve any arising concerns. The panel should not rely on references or testimonials provided by the candidate, or open references and testimonials, i.e., "To Whom It May Concern";
- Assess candidates equally against the Person Specification criteria without exception or variation, and without unlawful discrimination;
- Either discuss or arrange a meeting to discuss the details of the interview.

The Panel Must:

- Reach a consensus about the required standard for the post available;
- Consider the issues to be explored with each candidate, and who on the panel will ask about each of those;
- Agree their assessment criteria in accordance with the person specification.



The panel should agree a set of questions they will ask all candidates. These must relate to the requirements of the post and any issues they will explore with each candidate.

This will be based upon the information provided in the candidate's application and verified references (if the latter are available).

A candidate's response to a question about an issue will determine whether and how that is followed up.

Where possible it is best to avoid hypothetical questions because they allow theoretical answers. It is better to ask competence-based questions that require a candidate to talk about how they have responded to, or dealt with, an actual situation, or questions that test a candidate's attitudes and understanding of issues.

In addition to assessing and evaluating the applicant's suitability the interview panel should also explore:

- The candidate's projected attitude towards children and young people;
- His/her ability to safeguard the welfare of children and young people;
- Gaps in the candidate's employment history;
- Concerns or discrepancies arising from the information provided by the candidate and/or a referee.

The panel should also ask the candidate if they wish to declare anything regarding the requirement for an Enhanced DBS Check.

If, for whatever reason, references are not obtained before the interview, the candidate should also be asked at interview if there is anything s/he wishes to declare or discuss regarding the questions that have been (or will be) put to his or her referees. It is essential that the references are obtained, scrutinised, and verified before a person's appointment is confirmed.

Referees will be asked about disciplinary offences relating to the applicant and specifically those concerning children and young people, as well as vulnerable adults. This will include any offences for which the penalty is expired (i.e., where a warning could no longer be considered in any new disciplinary hearing for example). Referees will also be asked about whether the applicant has been the subject of any child protection concerns, and if so, the outcome of any enquiry or disciplinary procedure.

A suitable member of the administrative team will write a letter to shortlisted candidates, inviting them for an interview. This letter will contain the following information (i.e., as a 'Recruitment Pack'):

- The arrangements for interviews, such as time and place, directions to the venue and brief summary of membership of the interview panel;
- A reminder to the candidates about how the interview will be conducted, and the areas it will explore including suitability to work with vulnerable people;
- Notification that the identity of the successful candidate will need to be checked thoroughly to ensure the person is who they claim to be;
- Notification that an Enhanced DBS check will be undertaken if an offer of employment is made. Consequently, all candidates will be instructed to bring with them evidence of their identity that would satisfy DBS requirements;
- A request that the candidate brings to interview documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g., the original or a certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body);
- Notification that a copy of the documents used to verify the successful candidate's identity, right to work in the UK, and required qualifications will be retained in personnel files, in strict compliance with GDPR 2018 conditions;
- A copy of the current Safeguarding Policy and Data Protection Policy.

Section Ten: Interviews

The interview and selection panel will:

- Carry out a face-to-face interview that explores the candidate's suitability to work with vulnerable people, as well as their suitability for the post. The selection process for people who will work with young people must always include a face-to-face interview, even if there is only one candidate;
- Verify the candidate's identity from current ID information, and proof of address;
- Verify the candidate's qualifications;
- Check Enhanced DBS clearance information;
- Verify the candidate's right to work in the UK.

Interviews – and interview questions - must seek to establish and scrutinise a person's:

- Motivation to work with young people, which will be addressed at least in part by Warner style questions (See Appendix B);
- Ability to maintain appropriate relationships and personal boundaries with young people;
- Emotional resilience in working with challenging behaviours;
- Attitudes towards the use of authority and maintaining discipline.

The interview panel must take account of their instincts when interviewing. If something doesn't feel right, it probably isn't. In addition, if professionals feel uncomfortable in a person's presence, then a young person is just as likely to experience such feelings.

Section Eleven: Post-Interview

The Panel discuss and confirm (or otherwise) the candidate's potential for employment nomination, referencing the scoring and comment form.

Following the above, Human Resources (HR) or a suitable administrative colleague will process the preferred candidate's application by:

- Sending a conditional offer of appointment letter (subject to final suitability checks and assurances);
- Seeking references and verifying references, proof of professional qualifications and proof of academic qualifications;
- Checking all evidence provided and ensuring that the application form has been fully completed;
- Seeking HCPC or other Body for proof of Registration (inc. Registration Number & Certificate);
- Processing an Enhanced Disclosure and Barring Service (DBS) check.

HR will confirm that all the above information is in place for employment, following liaison with the senior manager leading on the recruitment process. Additionally, HR or a suitable administrative colleague must send out letters to unsuccessful candidates.

An Offer of Employment

An offer of appointment to the successful candidate will be conditional upon:

- A fully completed application form, with any employment gaps scrutinised (and evidenced as having been scrutinised);
- The receipt of at least two satisfactory references (if those have not already been received), and reference verification is completed with each referee);
- Verification of the candidate's identity (if that could not be verified on the day of the interview), using current photographic evidence as well as evidence of address;
- A satisfactory Enhanced DBS check;
- A check of the barred list;
- A right to work check;
- Verification of qualifications (if not verified on the day of the interview);
- Verification of professional status where required.

All checks must be:

- Confirmed in writing;
- Documented and retained on the personnel file, with relevant entries made in the Single Central Register (SCR); and
- Followed up where there are discrepancies in the information provided.

No potential appointment can be confirmed until all the above checks have been completed and verified.



DBS Updater Service

Individuals are encouraged to join the DBS Update Service when applying for an enhanced DBS check.



[Click or tap here to access the DBS Update Service Guidance](#)

This will allow them to re-use this check when applying for similar jobs. With the individual's consent, the manager can go online and carry out a free, instant check to see if a new certificate is required.

Section Twelve: Criminal Convictions

All applicants are required to complete a declaration of criminal record using company declaration form and/or the declaration section within the application form.

Questions are asked at an early stage in the recruitment process about criminal records to ensure that people with such records are not inadvertently placed in unacceptable/inappropriate positions within the organisation.

Having a criminal record would not necessarily prevent a person from being appointed to any post unless the offence bars the person. However, where it is felt that a recent or serious offence might mean that a person presents a risk to young people then that person would not be appointed.

In cases where the applicant has made a disclosure of a criminal offence, checks are made to ensure that the applicant has disclosed offences in full giving details as requested. If the details given are incomplete, it may be necessary to return the application form for completion.

When selecting applicants with criminal convictions for interview the following areas should be considered:

- The date of the convictions;
- The type of conviction;
- The number of convictions;
- The detail of information given.

How should any previous convictions be considered?

If an employee has an offence for criminal damage, but it is the only offence and it happened 20 years ago when they were 18 years old, then this would not be as serious as someone that has been convicted of Actual Bodily Harm 3 times in the last 3 years.

Driving convictions and disqualifications normally appear on police checks, but speeding convictions, etc., are common and would not normally be considered serious enough alone to not consider an applicant for a post. However, the nature of the speeding offence should be considered.

Pre-Interview Personal Disclosure Relating to an Offence

If an applicant is selected for interview and discloses that they have a previous criminal conviction, the details and circumstances of the offence should be obtained and must include information about:

- Why, When and How it happened;
- The outcome of the offence; and the
- Applicant's reflections (thoughts and feelings) upon the former questions, etc.

The above questions and responses must be recorded at the interview. If explanations and details given are acceptable then this should be noted on the application form notes section.

The following offences would ordinarily warrant automatic de-selection, as consistent with the nature and impact of the crime:

- Murder, manslaughter, kidnap, hijack, money laundering;
- Violence;
- Sexual crimes and exploitation;
- Substantiated/proven safeguarding or child protection concerns

Please Note: If there is any doubt about whether or not an application should be progressed following a personal disclosure or positive trace (DBS recorded conviction), it must be escalated to a Director for a final decision on that person's suitability for employment.

DBS Positive Trace

A DBS Positive Trace Form must be completed in all instances where a DBS check is returned with a Positive Trace, whether disclosed in the Application Form or otherwise. A positive trace means that a conviction is recorded.

If the Disclosure raises any specific concerns and it is decided not to employ the applicant a letter must be sent explaining the reason for them being unsuccessful. The content of the letter should only confirm that the DBS check was unsatisfactory. All correspondence will be sent by Head Office and kept on file and a copy with the DBS check and application form.

All staff when shortlisting, interviewing, and appointing any applicant have a primary duty to the safety and welfare of young people. This remains the primary consideration when making any of the former decisions

A Director will make the final decision in respect to any appointment being made concerning these matters.

Section Thirteen: Allegation/Notification of Non-Disclosed Dismissal by a Former Employer

If an individual discloses that they have been previously dismissed by a former employer or colleagues are subsequently made aware that an individual has been previously dismissed by a former employer, an interview must take place and a Dismissal Notification Form must be completed.

The form must be used to record information made available during the interview. Following the interview, a decision will be made regarding the individual's suitability for the position, which must be agreed by the Service Manager or a Director.

A Risk Assessment must be set in place around the individual concerned until matters are concluded, as appropriate to the circumstances.

Section Fourteen: Allegation of Non-Disclosed Previous Disciplinary Action

If an individual discloses that they have been previously subject to disciplinary action by a former employer or a member of staff alleges that an individual has been subject to disciplinary action by a former employer, an interview must take place and a Disclosure/Allegation of Previous Disciplinary Action Form must be completed.

The form must be used to record information made available during the interview. The form will clarify:

- What has been done and by whom;
- Any action that needs to be taken;
- A decision regarding the individual's appropriateness for employment.

Following the interview, a decision will be made regarding the individual's appropriateness for the position, which must be agreed by the SMT Lead Manager or a Director.

Section Fifteen: Post-Interview Ongoing Safeguarding of Young People

This part explains the importance on continued safeguarding diligence beyond the recruitment process. It has been extracted and adapted from Keeping Children Safe in Education (KCSIE, 2021) and transposed into our procedures to ensure effective, safe practices are maintained by PCM.

Safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from [Board and colleagues] to ensure the safety and welfare of [young people] is embedded in all [PCMs] processes and procedures, and consequentially enshrined in [our] ethos.

[PCM will seek to] ensure [we] have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

To support this, it is important that [management] create the right culture and environment so that colleagues feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of [young people]. This can assist [PCM] to support staff, where there is a need, and help them manage [young people's] safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard [young people accessing support].

Prolonged Breaks in Service

In line with KCSIE, we expect that staff who have had a break in service for more than 12 weeks will be subject to a further enhanced DBS check. This can be done through the updater service, but those who did not sign up to it will need to resubmit a DBS application.

Section Sixteen: Duty to Refer to the DBS

PCM maintain a mandatory requirement to make a referral to the DBS where we believe an individual has:

- Engaged in relevant conduct in relation to children and/or adults,
- Satisfied the "harm test" in relation to young people (and children and/or vulnerable adults); or
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Once the referral is received, the DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found within [Making Barring Referrals to the DBS](#) government website.

Referrals should be made as soon as possible by the DSL or a suitably delegated senior colleague, with ultimate responsibility remaining with the DSL and NSL.

Referrals can be made when an individual is suspended, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as they rely upon the quality of information provided to them.

