PREMIER
• CARE MANAGEMENT •

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 children and young people accessing our services and settings.

July 2026

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SECTION ONE: INTRODUCTION

This policy applies to all Premier Care Management Limited ("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. Everyone should understand the importance of safe and robust recruitment. PCM are committed to:

- **Ensuring the safeguarding of children and young people remains paramount.**
- **Maintaining zero tolerance of any inappropriate behavior towards children and young people.**
- **A belief that prevention is essential in safeguarding children and young people.**

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.

SECTION TWO: POLICY STATEMENT

PCM fully recognise that in meeting the needs of children and young people accessing our services, we can only be as effective and as safe 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 values, knowledge, competencies, and personal attributes are appointed. PCM managers and appropriate senior colleagues must ensure that their recruitment functions are carried out with implicit regard to safeguarding and promoting the welfare of children and young people.

Our recruitment and selection procedures are in place to help deter, reject, or identify people who might abuse children and 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 the mandatory procedures confirmed in this policy have been followed to an acceptable standard, without compromise.

OUR SAFEGUARDING STATEMENT

We are committed to safeguarding children and young people who access our services. Everyone employed by PCM will be subject to a robust recruitment process, including an Enhanced DBS check. All employees must hold a valid and in-date Enhance DBS in order to continue working with and supporting our children and young people.

We expect colleagues, contractors or volunteers will report any concerns relating to the safeguarding. No form of inappropriate behaviour around children or young people will be tolerated.All colleagues are expected to share this commitment.

SECTION THREE: AGENCY WORKERS

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 if all other options have been exhausted.

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.

For concerns about the conduct of agency staff, colleagues should refer to our Allegations Policy.

SECTION FOUR: DIVERSITY & INCLUSION

PROMOTING DIVERSITY & INCLUSION



Premier Care Management Limited ("PCM") are committed to promoting diversity and inclusion in all we do. We are proud of being an inclusive employer and welcome of all backgrounds.

PCM aim to ensure that colleagues are equally valued and respected and that our organisation is representative of all members of society. We will actively promote anti-discriminatory, anti-racist and anti-oppressive practices and policies.

SECTION FIVE: TRAFFICKING & MODERN SLAVERY

PCM are committed to the aims and principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

Anti-slavery policies were introduced by the government in the United Kingdom in 2015 under the Modern Slavery Act 2015. The policies aim to ensure organisations supply chains are slavery free.

We seek to consistently maintain a non-discriminatory and respectful working environment for all our colleagues. We believe colleagues should feel confident that they can expose wrongdoing without any risk to themselves, which we consider as a fundamental principle of safe practice.

Our safer recruitment procedures and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK. This helps to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

SECTION SIX: SCOPE OF THIS POLICY

COMPLIANCE WITH THE EXPECTATIONS OF THIS POLICY IS MANDATORY.

It is vital that measures detailed in this policy are applied thoroughly whenever someone is recruited to work with children and young people. This is particularly important where they must be regarded as safe and trustworthy because of their regular presence.

SECTION SEVEN: LEGISLATION & GUIDANCE

The conditions of this policy apply to all everyone 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 to Safeguard Children and Keeping Children Safe in Education (2023), as well as other relevant guidance:

CARE & EDUCATION

- Care Act 2014
- Care Leavers (England) Regulations 2010
- Keeping Children Safe in Education (KCSIE) 2023
- The Children Act 1989
- The Protection of Children Act 1999
- Working Together to Safeguard Children (2023)

POLICE

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

OTHER

- Safeguarding Vulnerable Groups Act 2006.
- Sexual Offences Act 2003 (Sections 16 & 17).
- Protection of Freedoms Act 2012.
- Equality Act 2010.
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended.
- General Data Protection Regulation (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 and the Supported Accommodation (England) Regulations 2023 are used in our approach to safe recruitment. 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 and effective practice when recruiting personnel.

SECTION EIGHT: IMPLEMENTATION

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 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 children and 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. DBS outcomes with a positive trace will evoke an assessment of the individual's suitability. 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 all those who have lived outside the UK, such as a criminal record check/certificate of good character.
- Must provide evidence of proof of identity, such as (for example) original copies of their:
    i. Driving Licence
    ii. Car Insurance and proof of a valid MOT
    iii. Passport
    iv. Birth Certificate
- May be required to present a fitness to work certificate/letter from a General Practitioner (GP).

SECTION NINE: ADMINISTRATION

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 Regulation (2018).

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

- Application Form
- Job Description & Person Specification
- DBS Positive Trace Form
- Disciplinary Action Notification Form
- Dismissal Notification Form
- Employment Reference Request Form
- Invitation to Interview
- Notice of Successful Application
- Notice of Unsuccessful Application
- Vaccination Form
- New Starter Form
- Employment Health Questionnaire
- Confidentiality Agreement

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 TEN: ROLES & RESPONSIBILITIES

The Managing Director is responsible for the management and implementation of this policy, in consultation with the Board of Directors. They 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 children and young people:

- Are subject to rigorous scrutiny about their suitability to work with children and young people.
- Are of integrity, and good character.
- Have the appropriate knowledge, experience, qualifications, and skills for the work.
- Are mentally and physically fit for the purposes of the work that the individual is to perform.

SECTION ELEVEN: SELECTION & SHORTLISTING

PCM are committed to safeguarding and promoting the welfare of all children and young people who access our services. All colleagues are expected to share this commitment. We believe children and young people 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 are in place to deter, reject, or identify people who might abuse vulnerable individuals, or are otherwise unsuited to work with them.

To ensure that this policy and related procedures remain effective, 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.
- 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 reasonable (i.e., reflecting the person's duties and responsibilities, and their knowledge, qualifications, skills, experience) and are applied fairly.
- When formulating the budget, ensure that mandatory training and relevant Continuous Professional Development (CPD) requirements are included within the scope of the budget.
- Ensure that there is scope to meet any required reasonable adjustments, as prescribed by relevant duties under the Equality Act 2010.

The remaining part of this section provides clarification of our selection and shortlisting process.

STEP ONE

Having established the need to recruit, a "recruitment panel" comprising nominated colleagues (including at least one person with relevant safer recruitment training, and a lead professional) should be established. The recruitment panel will ensure:

- The safeguarding statement appears in public facing literature, including our website.
- Sufficient knowledge of the job description that clearly states the main duties and responsibilities of the post, as well as safeguarding responsibilities (Continued Over)

- Sufficient knowledge of the person specification. The person specification must a safeguarding statement to deter unsuitable individuals, as well as:

    i. Required qualifications, skills, knowledge, and experience.
    ii. A description of the competences and qualities that the successful candidate should be able to demonstrate.

Working in partnership with the lead professional, Human Resources/administrative personnel will send out an application pack upon receipt of a request. This should include:

- A letter to the applicants, requiring them to provide references as part of the application. This requirement is 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, qualifications, ID checks, Enhanced DBS checks, successful and verified references, and right to work checks for example.
- A copy of the Safeguarding Policy Manual.

PLEASE NOTE:

- If an applicant 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 friends.
- An application form should be completed for every applicant prior to offer of an interview (N.B. a CV will not be accepted).

Once the post has been advertised and applications have been received, the process can move to shortlisting candidates who have demonstrated that they could meet the conditions of the person specification.

STEP TWO

The recruitment panel have responsibility for shortlisting candidates for interview. To do this effectively they 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 is required to:

- 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.

The panel will:

- Not accept a Curriculum Vitae (CV) as part of the safe recruitment process.
- Obtain independent professional references that answer specific questions to help assess an applicant's suitability to work with children and young people. N.B., 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 or bias.
- Either discuss or arrange a meeting to discuss arrangements for interviews.

SECTION TWELVE: INTERVIEWS

INTERVIEW QUESTIONS

The panel are required to prepare and 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.

Bespoke questions in response to potential issues or concerns will be presented arising from the information provided in the candidate's application and verified references (if the latter are available). The candidate's response to a question about an issue will determine whether and how that is followed up, so some flexibility will be required.

Where possible it is best to avoid hypothetical questions because they allow for 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.

The 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 children and 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. Please note: the panel must complete further checks for all those who have lived outside the UK, such as a criminal record check/certificate of good character.

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

- Motivation to work with young people, which could be addressed in part by Warner style questions (where colleagues have received relevant training).
- Ability to maintain appropriate relationships and personal boundaries with children and 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 professional's feel uncomfortable in a person's presence, then a child or young person is just as likely to experience such feelings.

SECTION THIRTEEN: 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).
- Completion of satisfactory 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 the candidate's 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, and
- Followed up where there are discrepancies in the information provided.

IMPORTANT: NO POTENTIAL APPOINTMENT CAN BE CONFIRMED UNTIL ALL THE ABOVE CHECKS HAVE BEEN COMPLETED AND VERIFIED.

SECTION FOURTEEN: DBS UPDATER SERVICE

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

GOV.UK CLICK OR TAP HERE TO ACCESS DBS UPDATE SERVICE

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 FIFTEEN: 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 number of convictions**
- **The type of conviction**
- **The detail of information given**

HOW WILL 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.

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 (Page 13) 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 children and young people. This remains the primary consideration when making any of the former decisions. Please note that a director will make the final decision in respect of any appointment concerning these matters.

SECTION SIXTEEN: 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 a director.

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

SECTION SEVENTEEN: DISCIPLINARY ACTION (BY A FORMER EMPLOYER)

If an individual discloses that they have been previously subject to disciplinary action, particularly regarding conduct in relation to safeguarding, such as a low-level concern, an interview must take place and a Disclosure/Allegation of Previous Disciplinary Action Form must be completed. This applies to a disclosure by former employer or if a colleague alleges that an individual has been subject to disciplinary action by a former employer.

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 director.

SECTION EIGHTEEN: DISCIPLINARY ACTION (BY A FORMER EMPLOYER)

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) 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 [children and young people] is embedded in all [PCM's] 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 [children and young people]. This can assist [PCM] to support staff, where there is a need, and help them manage [children and 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 [children and 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 NINETEEN: DUTY TO REFER

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

- **Engaged in harmful behaviour/conduct in relation to children and/or adults.**
- **Satisfied the "harm test" in relation to children and young people (and/or vulnerable adults).**
- **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.

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Registered in England and Wales under
Company Number: 7035703

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