UCQ
UNIVERSITY
CENTRE QUAYSIDE

Appendix G: Safer Recruitment Policy

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1. Purpose

1.1 The purpose of this appendix of the UCQ Safeguarding Policy is to provide a clear set of guidelines to students, their parent/carers, staff and other workers within the UCQ community regarding UCQ's recruitment procedures and how these will ensure people who might abuse children and/or vulnerable adults are deterred, rejected or identified to ensure inappropriate people do not work with UCQ students.

2. Scope

2.1 This policy applies to all students and staff, including agency, visiting, associate and hourly paid, irrespective of anyone's position within the organisation, together with associates and any workers who are at the premises on a voluntary, placement or other professional basis.

2.2 The term 'staff' is used as a generic term that encompasses all groups of workers as outlined in the paragraph above.

3. Definitions

3.1 The key terms in this document are defined as:

3.1.1 **Children:** Those under the age of eighteen
3.1.2 **Adults at risk of abuse or neglect**: Often referred to as 'Vulnerable Adults'. For the purpose of safeguarding, and UCQ's duty of care, a vulnerable adult is defined as any adult considered to be at risk of harm, abuse or neglect.

4. Relevant external guidance

4.1 This document has been prepared with reference to statutory requirements, including:

4.1.1 'Keeping Children Safe in Education', Department for Education
4.1.2 'An employer's guide to right to work checks', Home Office
4.1.3 The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013)

4.2 UCQ defines itself as a 'specified place' in accordance with the guidance outlined in 'Keeping Children Safe in Education' updated September 2025 and staff working within UCQ as in 'regulated activity' as their positions could involve regular contact with children under the age of 18. Therefore, UCQ is legally entitled to ask all applicants to disclose any convictions and cautions that are not protected under the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975 (as amended in 2013).

4.3 The ROA 1974 makes provision for most convictions and all cautions, reprimands and final warnings to be considered spent after a certain period for many types of employment. However, because all roles within UCQ are deemed to be 'regulated activity' UCQ is entitled to request details of all convictions and cautions that are not protected (i.e. eligible for filtering) under the amendments to the ROA Exceptions Order 1975 (2013).

4.4 The enhanced Disclosure and Barring Service (DBS) certificate requested by UCQ will reveal all non-protected convictions and cautions recorded on the Police National Computer (PNC). Offences which are serious, relate to sexual or violent offending, or are relevant in the context

of safeguarding will never be filtered and will always appear. The certificate will also show any information held on the barred lists for children and adults. The police may also provide additional information which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

5. UCQ requirements

5.1 UCQ requires all applicants to confirm on their application form whether or not they have any non-protected convictions and cautions. If the applicant is called for interview UCQ will ensure that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Applicants are not protected by the Rehabilitation of Offenders Act if they fail to disclose relevant information and will be warned that failure to reveal information could lead to the withdrawal of an offer of employment or the termination of employment if an appointment has already taken place.

5.2 UCQ is nevertheless committed to promoting equality of opportunity and will accept applications from candidates with criminal records where these offences are not relevant to employment at UCQ. UCQ undertakes to comply fully with the revised DBS Code of Practice and does not automatically exclude applicants on the basis of convictions or other information received (unless there is a legal bar). Candidates are selected for interview and for appointment based on their overall suitability for the post, which takes into account skills, qualifications, experience and attitude to the job they have applied for.

5.3 In order to comply with statutory requirements, UCQ maintains a Single Central Record (SCR) of the pre-employment checks UCQ is required to carry out on staff and non-supervised volunteers. It is essential that employees involved in the recruitment of staff work together to ensure that all the necessary checks are completed and recorded promptly to ensure that children and vulnerable adults are not put at risk and that UCQ complies fully with statutory requirements. Financial penalties and criminal action may be imposed on UCQ if a barred individual or someone who does not have the right to work in the UK is appointed to a post in UCQ. There are also penalties of up to five years in prison if a barred person is convicted of engaging, or attempting to engage, in work at UCQ.

5.4 The table in section 20 shows the pre-employment checks that must be undertaken for different groups of staff and non-supervised volunteers before they start work at UCQ. The relevant information, and the date of the check will be entered on the SCR and a copy of relevant documents (e.g. copies of photographic ID and qualifications) will be included on the individual's file.

5.5 It is the responsibility of the recruiting manager to ensure that UCQ HR are aware of all planned appointments, including hourly paid staff, visiting, associate, agency staff and volunteers in sufficient time to ensure that the correct checks are carried out and recorded on the SCR before the planned start date. Staff and volunteers who have had a 3 month+ break in UCQ service must complete all pre-employment checks as if they were a new appointment. It is the responsibility of UCQ HR to ensure that the appropriate checks are carried out, and that employees are not permitted to start work with UCQ prior to this. It is essential that all staff involved in recruitment comply with this guidance. Failure to do so may have consequences for students, UCQ and for the individual themselves if it can be demonstrated that he/she acted in contravention of the safer recruitment section of the safeguarding policy.

5.6 In all cases, an identity check, barred lists check, right to work in the UK check, qualification check and online search must be completed prior to staff commencing employment. In all but exceptional cases, the DBS certificate and two written references should also both have been received prior to employment. If these later checks have not been completed the actions outlined in sections 9 and 10 must have been completed. This includes clear and detailed risk assessments.

5.7 Pre-employment recruitment checks do not, however, take away the need for ongoing safeguarding awareness. Recruitment checks are only likely to identify those people that have been convicted or who have come to the attention of the police. Some individuals who are unsuitable to work with children and/or vulnerable adults will not have any previous convictions or appear on the barred lists. Ongoing awareness during the course of employment is essential, not only during the induction or probationary periods. All employees and volunteers must be aware of what is likely to constitute inappropriate conduct and their responsibilities to report it to UCQ HR through the correct channels if they have a concern about a colleague. A copy of the overarching UCQ Safeguarding Policy will be provided to all staff and volunteers by UCQ managers during induction. The role of the Designated Safeguarding Lead (DSL) will also be explained. This induction will be followed up by further and regular (at least yearly) refresher training for staff and volunteers to improve awareness of safeguarding issues.

6. Deterring unsuitable applicants from applying or volunteering to work at UCQ

6.1 In order to discharge its obligations under safer recruitment requirements, UCQ has put in place a number of actions that will help to prevent unsuitable people applying for positions at UCQ. These include:

6.1.1 All advertisements for posts carrying an explicit safeguarding statement and a requirement for the applicant to disclose all non-protected convictions, cautions and pending prosecutions

6.1.2 Job descriptions carrying a specific clause regarding UCQ commitment to safeguarding

6.1.3 Conditional offers of employment subject to UCQ receiving a satisfactory DBS certificate with a statement to this effect in all job advertisements

7. Shortlisting and interviews

7.1 All interview panels must have at least one panel member who has completed training in safer recruitment practices within the previous 3-year period.

7.2 Applications must be scrutinised prior to interview and any issues such as gaps in employment or contradictory information noted for discussion at interview.

7.3 A question to identify any potential safeguarding concerns or to test an applicant's attitude towards working with children and vulnerable adults must be incorporated into all interviews and it must also be established whether the applicant has the physical and mental capacity for the role. This will assess the applicant's ability to effectively contribute towards UCQ's commitment to safeguarding.

7.4 At least one panel member, who must have undertaken safer recruitment training, must ensure that any non-protected convictions, cautions or potential pending offences are fully explored (either before, during or after the interview as appropriate) in order to assess suitability for appointment. This should be discussed in private with the applicant.

7.5 Applicants should be made aware at interview that if they have committed an offence overseas they should seek independent expert or legal advice to ensure that they disclose information on their offending history that is in alignment with the UK guidance and that is truthful and accurate.

8. ID, barred lists and right to work in the UK checks

8.1 Identity will be established from the documents accepted by UCQ HR to support the applicant's DBS application. Information taken from a DBS certificate will not be kept for more than 6 months. UCQ will record the DBS reference number and date of issue in the Single Central Record but will not hold a copy of the DBS certificate.

8.2 Right to work in the UK checks for applicants for staff posts will be conducted in accordance with Home Office guidance. Applicants will need to provide acceptable documents in line with the guidance to establish either a permanent or temporary right to work in the UK. For example, a standard UK passport that confirms British citizenship establishes a permanent right to work in the UK. Documents will be checked in the presence of the applicant. Copies of documents used as part of the right to work checks will be kept for the duration of an individual's employment, and then for a further 2 years once employment has ceased before being destroyed.

8.3 Further checks will be conducted at an appropriate later date/s for individuals with a temporary right to work in the UK to ensure UCQ employment practice adheres to legislation.

9. Qualification checks

9.1 As all staff are in 'regulated activity' all shortlisted applicants are required to provide original certificates or academic transcripts prior to, or at interview to provide proof of the most significant qualifications noted on their application form. This must include all qualifications noted to be 'essential' on the person specification for the role, teaching and/or assessing qualifications for curriculum delivery staff and any level 2+ qualifications in English and Maths. Where academic staff have not achieved a level 2 in English and Maths they will be required to do so.

9.2 UCQ HR will ask for explicit consent in order to make copy of the most significant qualifications and the copy/ies will be retained on the individual's electronic UCQ personnel file. If explicit consent is refused then no copies will be held, but they must have been signed and vetted. All managers, curriculum delivery and curriculum support staff must have the qualifications or experience, deemed to be essential for their role. Any exceptions to this must be agreed, prior to appointment, by the appropriate senior manager.

9.3 A minority of other support staff may not have any relevant qualifications. Each case will be assessed with reasons for why a decision to proceed with an appointment was made. A qualification check is not required for volunteers.

10. Disclosure and Barring Service (DBS) checks

10.1 DBS checks are initiated by UCQ HRM, sent to the DBS via UCQ HRM and the DBS certificate returned from the DBS to the individual. It is essential that all new applicants provide UCQ HRM sight of their DBS certificate as soon as they receive it to ensure that there are no unnecessary delays within the recruitment process. Where an offence is disclosed, UCQ HRM, through the checking process, will liaise with the relevant line manager. If the offence has potential safeguarding implications (e.g. offences involving violence, sexual activity or drugs) HRM will inform the UCQ Strategic Safeguarding Lead. The offence/s will be assessed to determine whether an appointment can be confirmed. There may be offences which are not considered a safeguarding risk; however these will be considered and risk assessed on an individual basis.

10.2 UCQ staff may have the opportunity to be in contact with students under the age of 18 through regulated or non-regulated activity, or organisational volunteer work at local schools. As such, a satisfactory Child Workforce Enhanced DBS check is required.

10.3 In exceptional circumstances, a UCQ senior leader may require a member of staff to commence in post prior to the DBS certificate being available. In these cases, the following must apply:

10.3.1 The DBS certificate must have been applied for.
10.3.2 A risk assessment must have been completed by the UCQ senior leader prior to employment commencing.
10.3.3 The risk assessment must note the date and contents of any existing DBS certificate and clearly state the agreed arrangements for supervision
10.3.4 The DBS certificate must be viewed by UCQ HRM within 10 working days of being dispatched by the DBS service. If this does not happen the employee will be contacted by UCQ HRM and invited to an interview with the Vice Principal and

informed that the DBS certificate must be received by UCQ HRM on the next working day.

10.3.5 If the DBS certificate is not received within the allotted time, the employee will be informed by UCQ HRM, in discussion with appointing manager, that he/she will not be permitted to work in UCQ until the DBS certificate is received and deemed satisfactory.

10.3.6 The appropriate UCQ senior manager must review and update the risk assessment on a fortnightly basis until the DBS certificate has been received.

10.3.7 For those working in regulated activity, appropriate supervision will be in place until the DBS certificate is made available and is deemed satisfactory.

Further details for staff and volunteers are outlined in the DBS and Barred List Checks policy (Appendix (I).

10.4 Referrals to the Disclosure and Barring Service

10.4.1 If a member of staff in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been removed had they not resigned, UCQ will make a referral (either online or paper based) to the Disclosure and Barring Service (DBS).

10.4.2 The referral will be made by the Strategic Safeguarding Lead (SSL). If the SSL is not able to make the referral, the Principal/CEO will make the referral.

10.4.3 The Referrer should use the following link to make a referral to the DBS and follow the guidance and required steps: https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance

10.4.4 A record of this referral will be held securely on the Single Central Record.

11. Online update DBS checking service

11.1 Where an applicant has an enhanced DBS certificate that details the relevant checks covering either the Children or Adult workforce and they subscribe to the online DBS update service, they must provide UCQ HRM with sight of the original DBS certificate and details of their registration with the update service. They must agree to allow UCQ HRM to access the update service to check there have been no changes since the certificate was issued.

11.2 UCQ HRM will conduct a check to confirm the certificate matches the applicant's identity. Where a status check online reveals a change(s) to the certificate then the applicant must apply for a new certificate or provide the necessary birth/marriage/adoption certificate.

12. References

12.1 Two written references are required for all applicants. One reference should be from the current employer/line manager and the other from another appropriate person in their current or most recent post wherever possible.

12.2 UCQ HR will apply for written references directly from the referee for all shortlisted applicants, including internal applicants, so that any issues of concern can be discussed at interview.

Referees must be contacted if the information provided is vague or incomplete and requested to provide further information.

12.3 Additional references may be requested at the discretion of UCQ. Where an applicant is not currently working with children or vulnerable adults but has done so in the past, a reference may also be obtained from the employer by whom the person was most recently employed in relevant work.

12.4 References that appear to have been "agreed" and which may have been agreed as part of a settlement agreement with a previous employer should be fully explored prior to an appointment being made.

12.5 In exceptional circumstances, a UCQ senior leader may require a member of staff to commence in post prior to two written references being received. In these cases, the following must apply:

12.5.1 The written references must have been requested by UCQ HR
12.5.2 At least one verbal reference, from a valid source such as the current/previous employer, must have been obtained with a clear and dated record of this noted on the member of staff's file
12.5.3 A risk assessment must have been completed by UCQ senior leader.
12.5.4 The risk assessment must be reviewed every two weeks until the written references are received with rigorous action taken to secure them
12.5.5 If they are not received within one calendar month UCQ HRM will notify the Vice Principal who will provide advice on further actions

13. Further checks for applicants who have lived or worked outside the UK

13.1 UCQ HRM will carry out any additional checks it is felt to be necessary for applicants who have lived or worked outside the UK so relevant events can be considered. Home Office guidance for checks in relevant countries will be consulted and considered in each case.

14. Volunteers

14.1 Occasionally people may wish to volunteer to work at UCQ, for example to gain work experience. Volunteers will be eithers non-supervised or supervised. Where they are non-supervised, they are subject to the same level of scrutiny in terms of statutory checking as employed staff as UCQ deems them to be in 'regulated activity'. The required checks must be completed before the voluntary work begins.

15. Agency staff/partner organisations

15.1 UCQ needs to be confident that staff employed by agencies have been subject to the appropriate checks. Managers requiring this sort of provision must ensure that UCQ HR has been informed and that the relevant confirmation of pre-employment checks has been obtained from the agency prior to the appointment date. However, in all cases the agency worker must provide valid photographic evidence of identity, and where applicable, DBS confirmation, prior to starting work.

15.2 UCQ also needs to assure itself that staff from organisations that legitimately require access to UCQ students have been subject to appropriate checks.

15.3 Similarly, managers may receive requests for vetting information about UCQ staff that are engaged in activities with students from partner organisations e.g. staff working with students aged 14-16 students in local schools. Any requests should be referred to UCQ HR who will provide a letter to confirm the checks which have been completed.

16. Visitors to UCQ

16.1 Accompanied visitors to UCQ do not require DBS checks to be undertaken, however they must register their presence at reception on site upon arrival, obtain a visitor's lanyard from UCQ which must be worn at all times during their time on UCQ premises, and be accompanied by a member of staff at all times.

17. Secure storage, handling use, retention and disposal of DBS information

17.1 DBS information is only used for the specific purpose for which it is requested and for which the applicant's full consent has been given. DBS information will be kept separately and securely with access strictly controlled and limited to those entitled to see it as part of their duties.

17.2 Once a recruitment decision has been made, UCQ will return the DBS certificate to the member of staff or volunteer. UCQ will not keep any photocopy or other image of the certificate or representation of the contents. UCQ will (as required by law) keep a record of the certificate unique reference number and the date of issue.

18. Receiving a criminal record/conviction whilst in employment at UCQ

18.1 Ongoing awareness during the course of employment is vitally important in order to protect students. As part of this UCQ reserves the right to request any member of staff or any volunteer to undergo repeat checks, including a DBS check, at any time.

18.2 UCQ also requires staff and volunteers to disclose to UCQ HR details of any criminal offences or police investigations into potential criminal offences that are acquired, or occur, during the period of employment or placement with UCQ. Failure to disclose this information may be deemed to be gross misconduct and lead to summary dismissal. UCQ will share the information disclosed only with those who have a need and right to know (e.g. the line manager) and the information disclosed will be discussed with the member of staff or volunteer before reaching a decision about any action to be taken.

18.3 Receiving a criminal record, or being the subject of an ongoing investigation, whilst employed or placed at UCQ, does not automatically mean that the member of staff or volunteer cannot continue in their role. Where necessary, any action deemed necessary by UCQ will be pursued with reference to the relevant provisions within UCQ's Disciplinary Policy.

19. Referral to other agencies

19.1 UCQ has a duty to refer any suspected safeguarding issues involving staff or a volunteer to the Local Authority Designated Officer for Safeguarding.

19.2 Where UCQ ceases to use the services of a curriculum member of staff because of serious misconduct or would have dismissed them had they not left first, UCQ will consider whether to refer the case to the Secretary of State, as required by the Education Act 2002. The Secretary of State may investigate the case and may then decide to make a prohibition order in respect of the person.

19.3 UCQ has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or a vulnerable adult; where the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed if they had not left.

20. Table showing the checks required for each category of staff/volunteer

Full time, fractional, associate, visiting and hourly paid staff	**Agency staff**	**Non-supervised volunteers (excluding Board of Governors members)**	**Supervised volunteers**	**Board of Governors**
• Identity (ID) • Barred lists • Right to work in the UK • Qualification/s • Online search • Two references • Health declaration • Enhanced Disclosure and Barring Service	• Written confirmation from the agency that all pre-recruitment checks (as outlined in staff column) have been completed • Written confirmation from the training provider that ID, barred list, qualification, reference and DBS checks have been completed	• Identity • Barred list • Online search • Two references • Enhanced Disclosure and Barring Service, if appropriate	• Identity • Online search • Two references	• Identity • Enhanced Disclosure and Barring Service Barred list • Online search

21. Training and communication

21.1 All staff will receive annual safeguarding training. Staff with responsibility for recruitment will receive safer recruitment training every three years. Staff and students are invited to review the wealth of resources available on UCQ's safeguarding, Prevent and wellbeing page, available at https://ucq.ac.uk/safeguarding-and-prevent/

21.2 Ongoing support will be provided by the Safeguarding Team. This appendix will be made available on the UCQ website for all staff and stakeholders to access.

22. Review and revision

22.1 This appendix to the Safeguarding Policy will be reviewed annually, or earlier as required to ensure best practice.

23. Document history

ISSUE NO.	DATE	PAGE	REVIEWER	DETAIL OF AMENDMENT
06	02/02/2024	3, 11, 12	Tara Henderson	Periodic review conducted. Web links checked to ensure currency. Appendix revised to fit recommended document template as specified in quality procedure QP02. Sections 2, 21, 22 & 23 added. Para 5.2 prohibition order checks removed; confirmed by TRA no longer a requirement for UCQ unless working with under 18s. Note: UCQ will keep this under review. Para 5.7 and S20 updated to include 'online searches' as part of preliminary pre-employment checks as per recommendation of KCSIE. Paragraph numbers updated accordingly.
07	31/01/2025	7, 9, 10, 11	Michelle Elliott	Periodic review conducted. Web links checked to ensure currency. Updates to sections 10.3; 12.5; 15.1; 16.1; 19.2 and 20 to provide further clarity.
08	30/01/2026	All	Michelle Elliott	Period review undertaken. Web links checked for currency.

24. Initial equalities impact assessment

Department: All	**Completed by:** Tara Henderson, Head of Policy & Governance	**Date of initial assessment:** 23/04/2021
Area to be assessed:	SA-002 Safeguarding Policy: Appendix G	
Existing or new policy/procedure:	Existing	
What evidence has been used to inform the assessment and policy? (please list only)		
External guidance and requirements: ➢ All legislation and publications identified in section 2 of the Safeguarding Policy ➢ **Internal guidance and requirements:** ➢ Consultation with Strategic Safeguarding Lead		

1. Describe the aims, objectives or purpose of the policy/procedure		University Centre Quayside (UCQ) fully recognise their responsibilities to safeguard and promote the welfare of children and vulnerable adults, including the responsibilities their Academic Council, staff and volunteers have in regard to the protection of children and vulnerable adults from abuse; and to have due regard to the need to prevent people from being drawn into terrorism. This Safeguarding Policy sets out UCQ's safeguarding arrangements. This appendix is to provide a clear set of guidelines to students, their parent/carers, staff and other workers within the UCQ community regarding UCQ's recruitment procedures and how these will ensure people who might abuse children and/or vulnerable adults are deterred, rejected or identified to ensure inappropriate people do not work with UCQ students.		
2. Which stakeholders/groups are intended to benefit from this policy/procedure?		All stakeholders		
The Equality Act 2010 requires public bodies to have 'due regard' to the need to:- (1) Eliminate unlawful discrimination, harassment and victimization (2) Advance equality of opportunity between different groups; and (3) Foster good relations between different groups		**3. Could the policy/procedure have a disproportionately negative effect impact in terms of the aims set out in (1) to (3) of the Act on any of the protected characteristics?:-** **High** **Medium** **Low** **No effect**	**4. Briefly explain how the policy/procedure furthers or prevents the aims set out in (1) to (3).**	**5. If there is a disproportionately negative impact on any protected characteristics, can it be justified on the grounds of promoting equality or any other reason? If yes, please explain.**
Protected	**Age**	No effect	Not applicable	Not applicable
	Disability	No effect	Not applicable	Not applicable
	Gender	No effect	Not applicable	Not applicable

	Gender reassignment	No effect	Not applicable	Not applicable
	Marriage and Civil Partnership	No effect	Not applicable	Not applicable
	Pregnancy and Maternity	No effect	Not applicable	Not applicable
	Race	No effect	Not applicable	Not applicable
	Religion or Belief	No effect	Not applicable	Not applicable
	Sexual Orientation	No effect	Not applicable	Not applicable

6. Has there been any consultation/engagement with the appropriate protected characteristics?		Not applicable as no negative PC impact identified
7. What action(s) will you take to reduce any disproportionately negative impact, if any?		None required
8. Based on the information in sections 1 to 7, should this policy/procedure proceed to Full Impact Assessment? (recommended if one or more 'High' under section 2)		No
Assessor signature:	**Approved by:** **Michelle Elliott**	**Date approved:** 23/04/2021