

RECRUITMENT OF EX-OFFENDERS POLICY

Policy owner: Diane Flynn
Next review due: September 2027
Version date: December 2026

DAMAR TRAINING

111 Piccadilly
Manchester
M1 2HY

T: 0161 480 8171
E: info@damartraining.com
W: damartraining.com

1. Policy context

Damar is committed to safeguarding all students and our aim is to ensure that they are healthy, safe and supported and, as far as reasonably practicable, are protected from the risk of preventable harm.

Our policy for Safeguarding and Promoting Student Welfare outlines in detail the measures we have put in place to support this aim, a crucial part of which is that we have made provisions to ensure Safer Recruitment.

This policy is an integral part of our Safer Recruitment practice and supports our Safer Recruitment Policy.

2. Legal compliance

Damar observes all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2026 (KCSIE), the Prevent Duty Guidance for England and Wales 2023 (the Prevent Duty Guidance), any guidance or code of practice published by the Disclosure and Barring Service (DBS) and the Rehabilitation of Offenders Act 1974.

We will treat all applicants fairly, including those with a criminal record, and, in line with legislation, will not automatically discriminate because of a conviction or other information that is revealed.

However, Damar's training provision is "regulated activity". The below extract from the Rehabilitation of Offenders Act 1974 provides further detail to support the employment checks which are included in our recruitment process:

"10. *Any employment as a teacher in a school or establishment for further education and any other employment which is carried out wholly or partly within the precincts of a school or establishment for further education, being employment which is of such a kind as to enable the holder to have access to persons under the age of 18 in attendance at the school or establishment for further education in the course of his normal duties."*

https://www.legislation.gov.uk/uksi/1975/1023/schedule/1/paragraph/2n10/made

As such, we must assess applicants' suitability for positions using criminal record checks which are processed through the Disclosure and Barring Service (DBS). Damar complies fully with the code of practice

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf

and in line with our Equality and Diversity Policy and will not discriminate unfairly against any applicant where a conviction or other information which raises a concern, is revealed.

Applications for a criminal record check will only be submitted to the Disclosure and Barring Service after a thorough risk assessment has indicated that it is both proportionate and relevant to the position concerned.

For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that all offers of employment remain conditional pending the receipt of a DBS certificate.

Applicants are made aware that a criminal record check will be submitted to the DBS and are directed to the DBS Code of Practice.

All shortlisted candidates must bring with them to interview a completed self-disclosure form in a sealed envelope. This provides an opportunity to disclose confidentially any convictions, child protection investigations or disciplinary procedures. We will only open the self-disclosure forms for candidates who have accepted a conditional offer. Unopened self-disclosure forms will be disposed of securely. In the case of a virtual interview the self-disclosure form will be password protected and emailed to the hiring manager.

Questions regarding entries on the certificate will only be asked in respect of convictions and cautions that are not protected.

All Damar hiring managers must complete safer recruitment training and read Part 3 of Keeping Children Safe in Education (version, September 2026) to ensure that they can identify and assess the relevance and circumstances of offences. They are also given guidance regarding relevant legislation, including the Rehabilitation of Offenders Act 1974.

We ensure that an open and measured discussion takes place at interview regarding any offences or other matter/discrepancy that is directly relevant to the position sought and that may lead to the withdrawal of an offer of employment.

3. Organisational responsibilities

Our Directors accept overall responsibility for safeguarding and promoting the welfare of our students and delegate specific responsibilities to individual members of staff as appropriate. This includes our policies and procedures that support Safer Recruitment.

4. Individuals with specific responsibilities

Safer Recruitment and Staff inductions planning: Chief People Officer: Diane Flynn

All Hiring Managers

Management of the Single Central Record: Steve Logan, Divisional Manager, Business Support Unit

Safeguarding/Safer Recruitment Quality Assurance: Rebecca Blackwood, Quality Manager

Designated Lead for Safeguarding: David Morley, (tel: 07960 888149)

Coach and Deputy Designated Lead for Safeguarding: Jennifer Mayne (tel: 07891 154701)

5. Data Protection

All data regarding applicants (which may include details of criminal history) that is obtained through the recruitment process will be managed in line with our Data Protection Policy. It will be stored securely and only accessed by and shared with relevant Damar staff for the purpose of the recruitment activity.

Unauthorised access to or disclosure of applicant data will be dealt with in accordance with our Data protection Policy and may result in disciplinary action in line with our Disciplinary Procedure which is part of our employee handbook “Delivering the Damar Difference”.

6. Documents Supporting the Policy

Other documents supporting this policy are:

- Safer Recruitment Policy
- Self-assessment report
- Damar Employee Handbook
- Professional Standards Policy
- Safeguarding and Promoting Student Welfare Policy
- Anti-Bullying and Behaviour Policy
- Health and Safety Policy
- Prevent Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Keeping Children Safe in Education – Part One must be read by all staff (version, September 2022)
- Keeping Children Safe in Education – Part Three must be read by all hiring managers (version, September 2022)
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order