

SAFER RECRUITMENT POLICY

Policy owner: Chief People Officer

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INTRODUCTION

The professional and structured recruitment of new colleagues is the first step to safeguarding and promoting the welfare of our students. Damar is committed to safeguarding and promoting the welfare of all our students and prospective students. As an employer, Damar expects all staff (including self-employed staff) and volunteers to share this commitment. The recruitment steps outlined below are based on Part Three of Keeping Children Safe in Education (KCSIE) 2026, which sets out the statutory requirements and expectations for safer recruitment.

Keeping Children Safe in Education (KCSIE) 2026.

Damar recognises that safer recruitment is a vital component of an effective safeguarding culture. Recruitment processes are designed not only to prevent unsuitable individuals from gaining access to children and vulnerable adults, but also to attract and appoint colleagues who share Damar's commitment to promoting the welfare, safety and wellbeing of all students. Safeguarding considerations underpin every stage of the recruitment process, from advertising and selection through to induction, probation and ongoing employment.

AIMS AND OBJECTIVES

The aims of the Safer Recruitment policy are to help deter, reject or identify people who might abuse students or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

Our safer recruitment policy aims to ensure:

- that the best possible colleagues are recruited based on their merits, skills and abilities and suitability for the position;
- that all job applicants are considered equally and consistently;
- that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, gender identity, marital or civil partner status, disability or age;
- compliance with 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) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- that Damar meets its commitment to safeguarding and promoting the welfare of students by carrying out all necessary pre-employment checks.

Any colleague who is involved in the recruitment and selection of new colleagues is responsible for familiarising themselves with and complying with the provisions of this policy.

Damar has a principle of open competition in its approach to new roles approved for recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job based on the applicant's abilities, qualifications, experience and merit as measured against the job description.

Recruitment and selection will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE September 2026 and Prevent Duty Guidance).

If any colleague involved in the recruitment process has a close personal or family relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

ROLES AND RESPONSIBILITIES

It is the responsibility of the Board to:

- ensure that Damar has effective policies and procedures in place for recruitment of all new colleagues, including self-employed contractors and volunteers in accordance with DfE guidance and legal requirements.
- monitor Damar's compliance with them.

It is the responsibility of hiring managers involved in recruitment to:

- ensure that Damar operates safe recruitment procedures and makes sure all appropriate checks are carried out on all colleagues who work at Damar.
- monitor contractors' and agencies' compliance with this document.
- promote the welfare of apprentices at every stage of the procedure.

RECRUITMENT AND SELECTION PROCEDURE

Job Descriptions and Person Specifications

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the process. It will clearly and accurately set out the duties and responsibilities of the job role.

Damar's job descriptions also include a person attributes specification. This is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with students (including young people and vulnerable adults).

Business Case

All decisions to recruit a new colleague must be approved by the Board, following consideration of a business case from the relevant hiring manager.

Advertising

To ensure equality of opportunity, and to attract a wider and diverse talent pool, Damar will advertise all vacant posts on our website and (where appropriate) external sites.

All advertisements will make clear Damar's commitment to safeguarding and promoting the welfare of students.

All documentation relating to applicants will be treated confidentially in accordance with the General Data Protection Regulation (GDPR).

Application Forms

Damar uses its own application form, and all applicants will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history).

The application form will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

It is unlawful for Damar to employ anyone who is barred from working with children and it is a criminal offence for any person who is barred from working with children to apply for a position at Damar. All applicants will be made aware that providing false information is an offence and could result in the application being rejected, or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

Whilst candidates may submit their CV as part of any initial discussion relating to a vacancy, face-to-face interviews will not take place unless a fully completed application form has been submitted in advance. CVs will not be referred to at the face-to-face interview.

Interviews will not take place where the application form has not been completed in full.

Self-disclosure form

All candidates are required to bring to interview a completed self-disclosure form in, either a sealed envelope or (if shared electronically) as a password-protected file. This is an opportunity to disclose confidentially any convictions, child protection investigations or disciplinary procedures. Damar will only open the self-disclosure forms for candidates who have accepted a conditional offer. Unopened self-disclosure forms will be disposed of securely or deleted.

Interviews

Damar's business wide process for interviewing is as follows:

People Team – first screen, on teams, 30 mins

Hiring Manager – stage 1, on teams – 45 minutes

Final interview, two-three panel. Held at 111, face to face.

The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the interviewers at each stage to explore any anomalies or gaps which have been identified and to satisfy themselves that the chosen applicant can meet the safeguarding criteria.

Any information regarding past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has been disclosed on the application form.

At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable and will have read Part 3 (Safer Recruitment) of the DfE guidance document "Keeping children safe in education 2026".

For each role, interviewers will use a standard list of core questions, tailored for the role. This will always include at least one safeguarding question.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Only original documents will be accepted and photocopies will be taken. Unsuccessful applicants' documents will be destroyed 6 months after the recruitment process.

No questions will be asked about health or medical fitness prior to any offer of employment being made, save for any requirements that an applicant may have at interview.

References

All offers of employment will be conditional on the receipt of a minimum of two references which are considered satisfactory by Damar. One of the references must be from the applicant's current or most recent employer. It must not be from a personal contact but, either the HR department or business owner. If the current/most recent employment does/did not involve work with young people or vulnerable adults, then the second reference should be from the employer (if any) with whom the applicant most recently worked with young people or vulnerable adults. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions and will be checked fully before an offer is made.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with young people and vulnerable adults.

Any discrepancies or anomalies will be followed up and, where necessary, direct contact will be made by telephone to verify the reference.

Damar does not accept open references "to whom it may concern", testimonials or references from relatives.

OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

Damar carries out a number of pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the countersigning of a formal offer letter that incorporates Damar's standard terms and conditions of employment.
- verification of the applicant's identity (if not previously been verified).
- the receipt of two references (one of which must be from the applicant's most recent employer) which Damar considers to be satisfactory.
- where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which Damar considers to be satisfactory and confirmation that the applicant is not named on the children's barred list, the adults' barred list or both. Enhanced disclosure shows any spent and unspent convictions, cautions, reprimands and final warnings.
- where the position does not amount to "regulated activity", the receipt of an enhanced disclosure from the DBS which Damar considers to be satisfactory.
- verification of the applicant's medical fitness for the role;
- verification of the applicant's right to work in the UK;

- any further checks which are necessary as a result of the applicant having lived or worked outside the UK; and
- verification of professional and academic qualifications which Damar deems a requirement for the post, or which the applicant otherwise cites in support of their application (where not previously verified).

Whether a position amounts to "regulated activity" must therefore be considered by Damar in order to decide which checks are appropriate. It is however likely that, for all teaching, training, recruitment and business development roles and all roles that include exam invigilation Damar will carry out an enhanced DBS check and a check of the barred lists. An enhanced DBS check without a check of the barred lists will be required for other roles.

A checklist will be used to track and audit paperwork obtained in accordance with the Safer Recruitment Policy. The checklist will be retained on personnel files.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to, students aged under 18 (which is the case with all positions at Damar). Therefore, any convictions and cautions that would normally be considered 'spent' must be declared when applying for any position at Damar.

DBS (Disclosure and Barring Service) Checks

As outlined above in the section "Offer of Appointment and New Employee Process", appropriate DBS checks are required for all new staff, including those who are self-employed and sub-contracted.

Details regarding these checks and their expiry dates are retained on the Single Central Record, which is audited monthly by the DSL.

Members of staff at Damar are reminded of their responsibility to notify the Managing Director of any cautions or convictions that arise between these checks taking place.

Portability of DBS Certificates Checks

It is recommended that staff register for the DBS Update Service. Applicants may sign up to the Service for a fee (currently £16 per annum) which is payable by the applicant (employees may reclaim the cost via expenses).

This allows for portability of a Certificate across employers. Damar will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, i.e. enhanced certificate/enhanced including barred list information.

The update check would identify and advise whether there has been any change to the information recorded since the initial Certificate was issued. Applicants will be able to see a full list of those organisations that have carried out a status check on their account.

Where colleagues are not subscribed to this service, a further DBS check will be carried out after a period of 3 years.

DBS Certificate

The DBS no longer issues Disclosure Certificates to employers; therefore employees/applicants should provide their original Certificate to Damar (to, either the Business Support Unit manager or the Managing Director) within 7 days of issue or, before they commence work.

Dealing with convictions

Damar operates a formal procedure if a DBS Certificate is returned with details of convictions.

Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances; and
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with a director. A decision will be made following this meeting. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, a director will evaluate all of the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, Damar may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status

All applicants invited to attend an interview at Damar will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in the UK in accordance with the Immigration, Asylum and Immigration Act 2006 and DBS identity checking guidelines. Damar does not discriminate on the grounds of age.

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification required for the position and claimed in their application form.

Medical Fitness

Damar will verify the medical fitness of anyone to be appointed to a post at Damar, after an offer of employment has been made but before the appointment can be confirmed.

All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person

Specification for the particular role, together with details of any other physical or mental requirements of the role.

Damar is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

Onboarding and Induction Programme

All new colleagues will be on boarded, this includes an overview of Damar's policies and procedures, including our Safeguarding, Health and Safety, Equality and Diversity and Prevent policies, and make clear the expectations which will govern how staff carry out their roles and responsibilities.

Colleagues are required to complete all units of compulsory training as soon as practicable during induction.

Single Central Record of Members of Staff

In addition to the records kept on Sage HR, a single central record of recruitment and vetting checks is kept. This is kept up-to-date and retained by the Business Support Unit. The Single Central Record contains details of the following:

- All colleagues who are employed to work at Damar;
- Anyone employed with Damar on a self-employed basis whether employed directly or through an agency; and, in each case:
- confirmation of the receipt of a minimum of two suitable references
- confirmation of proof of ID and address
- their DBS certificate numbers and expiry dates
- verification of qualifications
- completion of compulsory training/reads on safeguarding and related topics

Record Retention/Data Protection

Damar is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, Damar will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help Damar to discharge its obligations as an employer, for example so that Damar may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by Damar for the duration of the successful applicant's employment with the company within Sage HR. Only authorised colleagues have access to this system.

Employment records are retained for six years after the final date of employment. Should there be a safeguarding concern or concerns on those records, their details and any subsequent discussions/referral arising as a result of the concern(s) will be retained with no end date. Damar will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.

Ongoing Employment

Damar recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. Damar will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

Low level concerns

Damar promotes a culture of openness, transparency and accountability in which all concerns about the behaviour of adults working with children and vulnerable adults are addressed appropriately and without delay.

A low-level concern is any concern, no matter how small, that an adult working for or on behalf of Damar may have acted in a way that:

- is inconsistent with Damar's Professional Standards, Code of Conduct or safeguarding expectations;
- does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO);
- may have caused a sense of unease regarding professional boundaries; or
- has the potential to develop into a more serious safeguarding concern if not addressed.

Examples may include, but are not limited to:

- over-familiarity with a student;
- inappropriate use of social media or electronic communication;
- failure to maintain professional boundaries;
- favouritism towards a particular student; or
- behaviour that could be perceived as unprofessional.

All low-level concerns should be reported promptly to the Chief Executive Officer, Designated Safeguarding Lead or Director of People and Performance. Concerns will be recorded, reviewed and managed fairly, proportionately and confidentially in accordance with Damar's safeguarding procedures.

Damar recognises that early identification and management of low-level concerns helps to safeguard students, maintain professional standards and promote a positive safeguarding culture. Staff who raise genuine concerns in good faith will be supported and will not suffer any detriment as a result of doing so.

Referrals to the DBS

Despite our best efforts to recruit safely, there may be occasions when allegations of serious misconduct or abuse against young people or vulnerable adults are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks, Damar also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position at Damar despite being barred from working with children or adults;
- has been removed by Damar from working in regulated activity or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child or a vulnerable adult.

If the individual referred to the DBS is a teacher, Damar may also decide to make a referral to the Teaching Regulation Agency.

Contractors and agency staff

Contractors engaged by Damar must complete the same checks for their employees that Damar is required to complete for its staff. Damar requires confirmation that these checks have been completed before employees of the Contractor can commence work at Damar.

Agencies who supply staff to Damar must also complete the pre-employment checks which Damar would otherwise complete for its staff. Again, Damar requires confirmation that these checks have been completed before an individual can commence work at Damar.

Damar will independently verify the identity of colleague supplied by contractors or an agency and will require the provision of the original DBS certificate before contractors or agency staff can commence work at Damar.

Monitoring and Evaluation

The Chief People Officer will be responsible for ensuring that this policy is monitored and evaluated throughout Damar. This will be undertaken through formal audits of job vacancies and a quarterly quality report to the Board.

Documents that support this policy

- Business case
- Job description
- Application form
- Self-disclosure form
- Interview questions
- Reference form
- Health questionnaire
- Pre-employment checklist
- Offer letter
- Employee Handbook (Delivering the Damar Difference)
- Self-assessment Report
- Safeguarding and Promoting Student Welfare Policy
- Equality and Diversity Policy
- Prevent Policy