



SAFER RECRUITMENT POLICY

Date: May 2026

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1. Introduction to the Policy

This policy sets out the framework, principles and mandatory procedures that **Byram House** follows to recruit all staff, agency workers, volunteers, and contractors. The policy applies to the Registered Manager, Responsible Individual, HR, and any person involved in the recruitment, selection or vetting of individuals who will work at the home (whether at 62 Deighton Road, 66 Deighton Road or elsewhere). **The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road (in process).** This policy applies equally across both residences.

The home is legally required to recruit staff using procedures designed to ensure children's safety, and to obtain 'full and satisfactory information' as set out in **Schedule 2 of the Children's Homes (England) Regulations 2015**. This policy explains how the home meets these legal duties.

The objectives of this policy are to:

- Deter, identify and reject individuals who are unsuitable to work with children.
- Ensure that every individual working at the home (including agency and bank staff) is of integrity and good character, has the appropriate experience, qualifications and skills, and is mentally and physically fit for their role.
- Complete and document all statutory pre-employment checks **before** a person starts work, except for the limited exceptional circumstances defined in law.
- Integrate seamlessly with the **Schedule 2 Staff File Audit Policy** to guarantee that no individual works with children without a fully compliant staff file and sign-off by the Responsible Individual (RI).
- Maintain a **Staff Record** as required by **Regulation 33** of the Children's Homes Regulations 2015.

2. How this Policy Benefits the Home

This Safer Recruitment Policy benefits Byram House in the following ways:

- **Legal Compliance** – It meets duties under the **Children's Homes (England) Regulations 2015 (Regulations 32 and 33 and Schedule 2)** , the **Safeguarding Vulnerable Groups Act 2006**, the **Equality Act 2010**, **Working Together to Safeguard Children 2026**, and relevant employment legislation.
- **Child Protection** – It provides a multi-layer vetting process (application, interview, DBS, references, Schedule 2 audit, RI sign-off) to prevent unsuitable adults from having unsupervised access to children.
- **Clear Accountability** – It defines who is responsible for each step of the recruitment and vetting process, and integrates with the Schedule 2 audit responsibility matrix (where the RI signs off every file before a start date).
- **Inspection Readiness** – It ensures that all required evidence (Schedule 2 documents, Staff Record, audit checklists) is present, verified and stored in **Bright HR** for Ofsted inspection.
- **Agency & Bank Staff Control** – It sets out the same vetting standards for agency, bank and temporary staff, with the home taking direct responsibility for obtaining Schedule 2 information (not relying solely on the agency).

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, comprising 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD.
Byram House	The name used throughout this policy to refer to the home and its staff.
Schedule 2	Schedule 2 of the Children's Homes (England) Regulations 2015, which lists the information that must be obtained for each person seeking to work at a children's home.
Bright HR	The home's secure electronic HR information system for storing staff files.
Staff Record	The record required by Regulation 33, listing all staff, agency workers and volunteers, along with the dates of key pre-employment checks.
Responsible Individual (RI)	The person appointed under Regulation 5 with oversight of the home's management and quality.
Regulation 44 Independent Visitor	An independent person who visits the home monthly and has the right to inspect staff files (excluding children's case records).
DBS	Disclosure and Barring Service. The home requires an enhanced DBS check including a children's barred list check for all staff.
Regulated Activity (Children)	Any activity that involves contact with children frequently (at least once a week) or intensively (on four or more days in a 30-day period), including care, supervision, training, transportation and overnight contact.

3.2 Key Legislation and Statutory Guidance (presented in a table)

Legislation / Guidance	Key Provisions	Relevance to this Policy
Children's Homes (England) Regulations 2015	Regulation 32(2) – a registered person may only employ an individual if they are of integrity and good character, have appropriate qualifications and skills, are mentally and physically fit, and 'full and satisfactory information' is available for each Schedule 2 matter. Regulation 33 – duty to maintain a record of staff and volunteers. Regulation 37 – placement plan and care plan requirements.	This is the core legal framework for recruiting staff.
Children's Homes (England) Regulations 2015 – Schedule 2	Lists the mandatory information and documents needed to assess suitability: proof of identity (including photo), DBS certificate, references, employment history with gap explanations, qualifications and right to work.	This policy implements Schedule 2 through a structured workflow.
Safeguarding Vulnerable Groups Act 2006	Makes it a criminal offence for a barred person to work in regulated activity. Places a duty on employers to refer individuals to the DBS who have caused harm or pose a risk of harm.	The home must check the children's barred list and has a mandatory duty to refer unsuitable individuals.
Equality Act 2010	Makes it unlawful to discriminate on the basis of protected characteristics (age, disability, gender reassignment, race, religion, sex, sexual orientation, etc.).	Recruitment decisions must be based on

		objective, job-related criteria.
Immigration, Asylum and Nationality Act 2006	Requires employers to conduct right-to-work checks and imposes penalties for employing illegal workers.	The home must verify the right to work before any individual starts employment.
Data Protection Act 2018 / UK GDPR	Regulates the processing and retention of personal data (including DBS certificates and other sensitive information).	Staff files and the Staff Record must be stored securely on Bright HR with restricted access.
Working Together to Safeguard Children 2026	Multi-agency framework.	Emphasises robust vetting and organisational culture to prevent abuse.
Social Care Common Inspection Framework (SCCIF) 2026	Ofsted's framework for inspecting children's homes.	Inspectors will evaluate the home's recruitment and vetting processes as part of leadership and management.
Sexual Offences Act 2003	Sections 16–19 cover position of trust offences. A person in a position of trust who engages in sexual activity with a 16 or 17-year-old child is guilty of an offence.	Staff must be made aware of this legal restriction as part of induction.

4. The Policy

4.1 Policy Statement and Legal Framework

Byram House will recruit all staff, agency workers, volunteers and contractors in a manner that prioritises the safety and welfare of children. The home operates a **zero-tolerance approach** to the employment of individuals who are barred from working with children, who do not have the right to work in the UK, or whose background indicates they pose a risk of harm.

The home's recruitment process follows the **deter, check, record and refer** model:

1. **Deter** – Job advertisements and candidate communications make clear the home's commitment to safeguarding, deterring unsuitable applicants.
2. **Check** – The home completes all necessary pre-employment checks (section 4.4) **before** an individual starts work, except for the limited exceptional circumstances permitted by Regulation 32(7).
3. **Record** – All checks and decisions are recorded in the staff file (Bright HR) and on the **Staff Record** (Regulation 33).
4. **Refer** – If a staff member or volunteer is dismissed or removed because they have caused harm or pose a risk of harm, the home makes a mandatory referral to the DBS and the Local Authority Designated Officer (LADO).

4.2 Safer Recruitment Principles and the Recruitment Process

All recruitment must be conducted in a fair, transparent and non-discriminatory manner (Equality Act 2010). The home follows the British Standard on Safer Recruitment (BS 7858) wherever applicable.

The registered person (IMS Care LTD) is the data controller for all recruitment information.

4.3 Pre-Recruitment (Deterrence and Planning)

4.3.1 Job Descriptions and Person Specifications

Every post must have a written job description and person specification. The person specification must identify:

- The essential and desirable qualifications, skills and experience for the role.
- The level of contact with children (regulated activity).
- The requirement for an enhanced DBS check with a children's barred list check.

4.3.2 Applicant Packs and Social Media

All candidate communications must contain a clear statement of the home's commitment to safeguarding, the requirement for pre-employment checks, and the expectation that staff will adhere to the Code of Conduct.

The home reserves the right to undertake proportionate, publicly available, online searches (e.g. social media) as part of the vetting process. Any such search must be:

- Documented.
- Conducted with a clear safeguarding rationale.
- Reviewed by a trained manager to avoid bias.

4.4 Recruitment and Selection (DBS, Pre-Employment Checks & Schedule 2)

4.4.1 Application Form and Shortlisting

All applicants (except volunteers, who may be assessed by a written risk assessment) must complete a standard application form. A CV alone is not acceptable. The application form must request:

- Full employment history, with written explanations for any gaps.
- Disclosure of criminal convictions, cautions, reprimands and warnings.

Shortlisting decisions must be based on the person specification. The home will not discriminate on the basis of protected characteristics.

4.4.2 Interviewing

At least one member of the interview panel must have successfully completed **Safer Recruitment Training** within the last three years. Interview questions must be designed to:

- Assess the candidate's motivation, attitudes and values concerning safeguarding children.
- Explore any gaps in employment or concerning information in the application form.
- Ask 'scenario' questions to determine the candidate's understanding of professional boundaries and acceptable behaviour.

Written notes of the interview must be taken, retained and stored in the staff file (Bright HR).

4.4.3 Pre-Employment Checks – Disclosure and Barring Service (DBS)

Mandatory checks: All staff (including agency, bank and volunteers in regulated activity) must have an **enhanced DBS check with a children's barred list check**. This is a criminal offence to fail to obtain this check before an individual starts work (except for the limited exceptional circumstances in Regulation 32(7)).

Procedure:

1. The candidate must complete the DBS application via the home's online provider (**uCheck** – see Schedule 2 Staff File Audit Policy, section 4.2A).
2. The Registered Manager verifies the candidate's identity using primary identity documents (passport, driving licence photocard, birth certificate etc.).
3. The home subscribes to the **DBS Update Service** and will perform an online status check **before** the candidate starts work and **annually** for all staff.
4. Where the candidate is not registered with the Update Service, the home requires a new DBS certificate every 12 months (or more frequently if risk-assessed).

4.4.4 Pre-Employment Checks – Driving Licence (Roles Involving Driving)

For any role that involves driving (including transporting children, driving a company vehicle, or using a personal vehicle for work purposes), the home must obtain a copy of the candidate's full driving licence and perform an online DVLA check. See the **Schedule 2 Staff File Audit Policy (section 4.2C)** for the full procedure.

4.4.5 References

The home will obtain **two written references**, including one from the applicant's most recent employer. The reference request must ask specifically about the individual's suitability to work with children, their employment history, and any concerns. The home will verify any gaps or concerns, and will follow up on references by telephone where there is doubt about their quality or reliability.

4.4.6 Overseas Checks and Right to Work

If a candidate has lived or worked outside the UK, the home must obtain a criminal record certificate from the relevant country (or countries) and seek additional checks from the DBS via the **Overseas Information Service**. The Registered Manager will also use any available international vetting portal (such as the International Child Protection Certificate – ICPC).

Right to work: The home verifies the right to work before the candidate starts, using Home Office online checking services (share code).

4.4.7 Fitness, Integrity and Good Character Assessment

The home will obtain a medical questionnaire (self-declaration) from each candidate. The Registered Manager will review this for any health issues that may affect the role, and may refer for an occupational health assessment if needed. The home will not discriminate against disabled individuals under the Equality Act 2010.

The Registered Manager must be satisfied, on the basis of all of the above, that the individual is of **integrity and good character** and **mentally and physically fit** for the role (Regulation 32(3)(a) and (c)).

4.5 The Mandatory Schedule 2 Compliance Workflow

The home's recruitment process is **not complete** until the Responsible Individual has signed off the Schedule 2 file. This mandatory step is defined in the **Schedule 2 Staff File Audit Policy**.

Workflow:

Candidate → applies → shortlisted → interviewed → conditional job offer → Registered Manager collects and verifies all Schedule 2 documents (including DBS) → RI Pre-Start Audit Checklist completed and signed → RI signs off (Tier 2 approval) → individual authorised to start work → file uploaded to Bright HR; Staff Record (Regulation 33) updated.

No individual (including agency, bank, or volunteer) may start work without a complete RI Pre-Start Sign-Off.

4.6 Exceptional Circumstances for Allowing a Staff Member to Start Work

Regulation 32(7) of the Children's Homes (England) Regulations 2015 permits an individual to start work without full Schedule 2 information only in **exceptional circumstances**. The home will rely on this provision very rarely. If it is used, the Registered Manager must be able to demonstrate that:

1. All reasonable steps have been taken to obtain the full Schedule 2 information.
2. Full and satisfactory proof of identity and an enhanced DBS certificate with children's barred list check have been obtained.
3. The circumstances are genuinely exceptional.

4. The individual is **appropriately supervised** while working with children until all outstanding information is received and found to be satisfactory.

Supervision means a qualified and vetted staff member will remain with the individual at all times when they are with children. The fact that an individual has started under this provision does **not** remove the requirement for the RI Pre-Start Sign-Off; the RI must still review the outstanding documents as soon as they are obtained.

4.7 Agency and Bank Staff

The home will **not** rely solely on the agency's assurance that checks have been completed. For every agency worker, bank worker, or temporary worker:

1. The home will obtain a complete Schedule 2 file from the agency (including DBS, references, identity documents, right to work, and employment history).
2. The Registered Manager will verify the documents.
3. The Responsible Individual will complete the RI Pre-Start Sign-Off (Appendix B of the Schedule 2 Staff File Audit Policy) **before** the agency worker's first shift.
4. The home will record the agency worker on the Staff Record (Regulation 33).

4.8 The Staff Record (Regulation 33)

In place of a school-style Single Central Record, the home maintains a **Staff Record** as required by **Regulation 33 of the Children's Homes (England) Regulations 2015**. This record is a statutory document that acts as the compliance register, confirming that the following checks have been completed for every individual (including agency and bank staff):

- Identity (including photograph)
- Enhanced DBS check with children's barred list check
- Right to work in the UK
- Two written references
- Employment history and gap explanations
- Qualification checks (as applicable)
- Driving licence check (for roles that require driving)

The Staff Record will include for each individual:

- Full name, sex, date of birth, home address.
- Details of any qualifications and experience relevant to their position.
- Date of start of employment.
- For agency workers: the name of the agency, the date the worker was supplied, and confirmation that Schedule 2 checks have been completed and signed off by the RI.

The Staff Record will be available for Ofsted inspection at all times. Copies of source documents (including DBS certificates, identity documents, and RI sign-off checklists) are held separately in **Bright HR**.

4.9 Volunteers

For volunteers who are not working in regulated activity (e.g. occasional visitors), the home will conduct a **written risk assessment** and apply proportionate checks. For volunteers who will engage in regulated activity (i.e. unsupervised contact with children), the home will obtain an enhanced DBS check (including children's barred list) and follow the full Schedule 2 process, including RI sign-off.

4.10 Duty to Refer to the Disclosure and Barring Service (DBS) and LADO

If an individual (employee, agency worker, volunteer or contractor) is removed from working with children because they have **caused harm or posed a risk of harm** to a child, the home has a **mandatory duty to refer** the individual to the DBS under the Safeguarding Vulnerable Groups Act 2006.

The registered person (IMS Care LTD) will also refer the matter to the **Local Authority Designated Officer (LADO)** where the criteria for an allegation against a staff member are met (behaved in a way that has harmed a child, may have committed a criminal offence, or indicates unsuitability to work with children).

This duty applies regardless of whether the individual resigns before the conclusion of an investigation.

5. How the Home Trains its Staff About this Policy

Training Element	Frequency	Method / Content
Safer Recruitment Training (Panel members)	Every 2 years	Accredited face-to-face or virtual training covering: the recruitment and selection process, barriers to safe recruitment, application forms, shortlisting, interviewing (including scenario questions), pre-employment checks, DBS Update Service, and the duty to refer.
Induction (RM, RI, HR)	Upon appointment	Overview of the Safer Recruitment Policy, the legal framework (Regulations 32, 33, Schedule 2, Equality Act 2010), the 'deter, check, record, refer' model, the Staff Record (Regulation 33), and the interface with the Schedule 2 Staff File Audit Policy.
Annual refresher	Every 12 months	Updates to legislation (Working Together 2026, SCCIF 2026), changes to vetting systems (uCheck, DVLA), and refresher on the duty to refer.
HR / Administration	At induction and as needed	Practical training on identity verification, right-to-work checks (share code), DBS application processes, DVLA online checks, and uploading documents to Bright HR.

Staff are required to:

- Read and sign this policy annually.
- Complete all mandatory training.
- Never allow a new start without a completed RI Pre-Start Sign-Off (Schedule 2 Staff File Audit Policy).

6. Related Policies and Guidance

- **Schedule 2 Staff File Audit Policy** (mandatory companion policy)
- Code of Conduct and Ethics Policy
- Whistleblowing Policy
- Disciplinary Policy
- Data Protection Policy
- Equality and Diversity Policy
- Transporting Children and Young People Policy
- Children's Homes (England) Regulations 2015 (Regulations 32, 33, Schedule 2)
- Working Together to Safeguard Children 2026
- Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026
- DBS Code of Practice

7. Appendix – Safer Recruitment Decision-Making Flowchart

This flowchart summarises the steps that must be followed before any individual is authorised to start work.

Flowchart Text Description:

Step 1 – Planning & Advertising

1. Advertise using job description and person specification.
2. Candidate information includes safeguarding statement and requirement for pre-employment checks.

Step 2 – Application & Shortlisting

1. Candidate submits full application form (CV only is not permitted).
2. Shortlist based on person specification.
3. At least one panel member must have current Safer Recruitment Training.

Step 3 – Interviewing

1. Panel assesses suitability, motivation and values.
2. Questions must include safeguarding scenarios and gap exploration.
3. Written notes are taken, signed, retained in Bright HR.

Step 4 – Conditional Offer & Pre-Employment Checks (Regulation 32(3))

Must be completed before start (except for exceptional circumstances in Regulation 32(7)):

1. **DBS** – Enhanced check with children's barred list.
2. **Identity** – Two forms of ID, one with a photograph.
3. **Right to work** – Home Office online share code check.
4. **Two references** – One from most recent employer.
5. **Employment history** – Gaps must be explained.
6. **Reason for leaving previous employment** – Verified as far as reasonably possible.
7. **Qualification checks** – Documentary evidence obtained.
8. **Medical questionnaire** – Review any health issues.
9. **Driving licence (if driving role)** – DVLA online check.

Step 5 – Schedule 2 Staff File Audit (per the Schedule 2 Staff File Audit Policy)

1. RM collates and verifies all Schedule 2 documents (Tier 1 pre-employment audit).
2. **RI Pre-Start Sign-Off (Tier 2)** conducted (Appendix B of that policy).
3. **RI signs off** – approval recorded.
4. File uploaded to Bright HR.
5. **Staff Record (Regulation 33)** updated.

Step 6 – Start of Employment (or 'Exceptional Start' under Regulation 32(7))

- **Standard:** Start only after full RI sign-off.
- **Exceptional Start (Regulation 32(7)):**

- Only used if conditions in policy section 4.6 are met.
- Only applies to **minor** Schedule 2 items.
- **Identity and DBS must be completed.**
- The staff member must be **supervised** at all times while working with children.
- RI sign-off must be obtained as soon as outstanding checks are completed.

Step 7 – Onboarding

1. Induction completed and recorded.
2. Staff file finalised.
3. Access to children granted.

8. Policy Approval and Review Details



Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	