WHOLISTIC
CARE & SUPPORTED LIVING LIMITED

Safer Recruitment Policy

Policy and Procedure

Aligned to Regulations 17–19 and Schedule 1 of the Supported Accommodation (England) Regulations 2023

Registered provider	Wholistic Care And Supported Living Ltd
Ofsted URN	2796287
Registered Service Manager	Kenneth Ennin
Principal office	157–159 Cherry Orchard Road, Croydon, CR0 6BF
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Next scheduled review	20 September 2027

CONTROLLED DOCUMENT • Uncontrolled when printed

1. Purpose

The purpose of this policy is to ensure that every person recruited, supplied or engaged to work in or for the supported accommodation service is suitable for the role and that recruitment decisions place children's safety first. Recruitment must be fair, evidence-based, properly documented and compliant with the checks required by law for the particular role.

2. Scope

- Permanent and temporary employees.
- Bank and agency workers.
- Volunteers, students and work placements.
- Contractors or other people working at premises where they may have contact with children.
- Managers and any person involved in recruitment, vetting or appointment decisions.

3. Core regulatory standard

Regulation 17 requires recruitment procedures designed to ensure children's safety. Before a person is employed, or permitted to work in a role with regular contact with children, the registered person must be satisfied as to integrity and good character; appropriate experience, qualifications and skills; fitness for the work; and the Schedule 1 information required for that person.

4. Recruitment responsibilities

- The Registered Service Manager is accountable for lawful safer recruitment and final appointment decisions.
- At least two people should take part in shortlisting/interview wherever practicable, with at least one person trained in safer recruitment.
- HR/administration maintains the recruitment checklist and evidence register; managers remain accountable for the quality of checks and must not treat a completed checklist as a substitute for professional judgement.

5. Workforce planning and advertising

- A current job description and person specification are approved before advertising.
- The advert states that the organisation is committed to safeguarding children and that appointment is subject to the checks legally applicable to the role.
- Essential criteria are linked to the Statement of Purpose, workforce plan and needs of young people.
- Recruitment material does not unlawfully discriminate and reasonable adjustments are offered throughout the process.

6. Application, shortlisting and employment history

Applicants must provide sufficient information to allow a complete safer-recruitment assessment. A CV may support an application but must not replace the information needed to establish identity, full employment history and suitability.

- Full employment history with written explanations for gaps.
- Previous work with children or vulnerable adults and, so far as reasonably practicable, verification of why such employment ended.
- Relevant qualifications and professional registrations.
- Declarations required by the organisation about conflicts, restrictions and criminal matters that may lawfully be requested.
- Two referees, including the most recent employer where there is one.

7. Interview and selection

- Use a structured scoring framework linked to the person specification.
- Explore safeguarding values, professional boundaries, responding to disclosures, risk, record keeping and working with care-experienced young people.
- Probe unexplained gaps, inconsistencies or concerns identified during shortlisting.
- Record the rationale for the decision and any conditions that must be met before appointment.

8. Mandatory pre-employment information and checks

Area	Standard / requirement
Identity	Proof of identity, including a recent photograph.
Criminal-record check	The level of DBS/criminal-record certificate required by Schedule 1 and the Police Act framework for the role; enhanced and barred-list information is obtained only where the role is legally eligible.
References	Two written references, including the most recent employer where applicable; authenticity and material concerns are verified.
Previous relevant employment	Reason for leaving previous work with children or vulnerable adults verified so far as reasonably practicable.
Qualifications	Documentary evidence of qualifications relied upon for the role.
Employment history	Full history with satisfactory written explanations for gaps.
Right to work	Current right-to-work check in accordance with Home Office requirements.
Health / fitness	Proportionate assessment of fitness to perform the role, with reasonable adjustments considered; medical information is handled confidentially.
Overseas history	Where relevant, additional overseas criminal-record or good-conduct checks and risk assessment, recognising that a UK DBS does not show all overseas history.

DBS accuracy Do not apply a blanket “enhanced DBS with children’s barred list” requirement to every role. The check must match legal eligibility and the duties actually undertaken. Where regulated activity applies, barred-list information must be obtained as permitted by law.

9. References

- References are sought directly from the referee using organisational/professional contact details where possible.
- Open testimonials are not accepted as the sole reference evidence.
- Any safeguarding concern, disciplinary finding, unexplained discrepancy or ambiguous reason for leaving is clarified before appointment.
- A factual record is kept of verification calls or emails.

10. Exceptional start before all Schedule 1 enquiries are complete

Regulation 17 permits an exceptional start only in tightly controlled circumstances. The organisation will use this route rarely and only where all reasonable steps have been taken to obtain the outstanding information, the required identity and criminal-record information is satisfactory, the circumstances are genuinely exceptional, and the individual is appropriately supervised pending satisfactory completion of the remaining enquiries.

- Written authorisation by the Registered Service Manager.
- Documented risk assessment identifying what is outstanding and why the start cannot reasonably wait.
- No lone working or unsupervised contact where this would create avoidable risk.
- Daily/shift oversight until checks are complete.
- Immediate removal from duties if new information raises a suitability concern.

11. Agency, temporary staff and contractors

Before an agency worker is permitted to work, the service obtains written confirmation of the relevant checks and verifies identity on arrival. The service remains responsible for ensuring the person is suitable for the duties assigned and that temporary staffing does not undermine continuity of support.

12. Induction, probation and ongoing suitability

- Every employee completes role-appropriate induction, including safeguarding, whistleblowing, professional boundaries, behaviour support, information governance and emergency procedures.
- Permanent appointments are subject to satisfactory probation.
- Employees receive supervision and annual appraisal.
- Staff must promptly declare changes that could affect suitability, including criminal or regulatory matters.
- The organisation considers whether referrals to the DBS or professional regulators are legally required when a person is removed from regulated activity or leaves in relevant circumstances.

13. Allegations and concerns about suitability

Allegations or conduct suggesting a person may pose a risk to children are managed under the Safeguarding Policy, including consultation/referral to the Local Authority Designated Officer (LADO) where the threshold is met. Internal disciplinary action must not compromise statutory safeguarding enquiries.

14. Recruitment records and quality assurance

- Maintain a central recruitment/checks register recording completion dates and decision status without retaining more sensitive DBS detail than necessary.
- Recruitment files are access-controlled and retained in accordance with the retention schedule and data-protection law.
- The Registered Service Manager audits recruitment files and the checks register at least quarterly and before any unsupervised deployment of a new worker.

15. Safer recruitment checklist

Check	Complete
Application and full employment history	☐
Identity + recent photo	☐
Interview and safeguarding assessment	☐

Check	Complete
Two references verified	☐
Previous relevant employment reason verified	☐
DBS/criminal-record check appropriate to role	☐
Qualifications/professional registration verified	☐
Right to work	☐
Overseas checks/risk assessment where relevant	☐
Health/fitness and adjustments	☐
Final suitability decision signed off	☐
Induction/probation plan	☐

Reference framework

- Care Standards Act 2000.
- The Supported Accommodation (England) Regulations 2023, including the four Quality Standards.
- Department for Education: Guide to the Supported Accommodation Regulations, including Quality Standards.
- Ofsted social care common inspection framework for supported accommodation and current registration/responsibilities guidance.
- Children Act 1989 and Children Act 2004.
- Working Together to Safeguard Children 2026.
- Human Rights Act 1998; Equality Act 2010; Data Protection Act 2018 and UK GDPR.
- Disclosure and Barring Service/Home Office guidance relevant to the role and right-to-work checks.

Where legislation, statutory guidance or local safeguarding procedures change, the current legal requirement takes precedence and this document must be reviewed without waiting for the scheduled review date.

Document approval

Approved by: _____ **Approval date:** _____
Role: Nominated Individual / Registered Service Manager **Signature:** _____