

PACE Northwest - Safer Recruitment Policy

Alternative Education Provider · Liverpool, England

Approved by: Board of Directors

Policy owner: HR & Compliance Manager

Effective date: 29 August 2025

Reviewed: 16 September 2026

Next review due: 16 September 2027 (or sooner if legislation, statutory guidance or organisational arrangements change)

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1. Purpose

PACE Northwest is committed to safeguarding and promoting the welfare of children, young people and adults at risk. Safer recruitment is an essential part of creating a culture in which unsuitable people are deterred from applying, applicants are appropriately scrutinised and those appointed understand their safeguarding responsibilities.

This policy sets out the recruitment, selection, vetting, appointment and induction arrangements used by PACE Northwest. Checks will be proportionate to the role and carried out only where PACE Northwest has a lawful basis and the role is eligible for the relevant check.

2. Scope

This policy applies to:

- all employees, directors, agency and supply staff, contractors, subcontractors, consultants, casual/freelance workers and volunteers engaged by PACE Northwest;
- all recruitment and selection activity, including fixed-term and temporary appointments; and
- any other person whose role requires PACE Northwest to obtain or verify safeguarding or suitability information.

3. Legal and regulatory framework

This policy has regard, where applicable, to:

- Children Act 1989 and Children Act 2004.
- Education Act 2002 safeguarding duties where applicable.
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012.
- Rehabilitation of Offenders Act 1974 and applicable Exceptions Orders.
- Equality Act 2010.
- Immigration, Asylum and Nationality Act 2006 and current right-to-work requirements.
- UK GDPR and Data Protection Act 2018, as amended.
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance.
- Keeping Children Safe in Education (KCSIE) 2026, particularly Part Three, where applicable to PACE Northwest's setting and activities.
- Working Together to Safeguard Children 2026.
- Current Disclosure and Barring Service (DBS) eligibility and checking guidance.
- Current Department for Education and Ofsted requirements relevant to PACE Northwest's provision.

4. Safer recruitment principles

PACE Northwest will:

- embed safeguarding throughout recruitment rather than treating vetting as a final administrative check;
- use fair, transparent and non-discriminatory recruitment processes;
- define the safeguarding responsibilities and level of contact with children or adults at risk for each role;
- scrutinise application information, employment history, references and any inconsistencies;
- undertake only those criminal-record, barred-list and other checks for which the role is legally eligible;
- ensure recruitment decisions are made by appropriately informed staff and recorded; and
- maintain suitable records of required pre-employment checks.

5. Recruitment planning, job descriptions and advertising

Before advertising, PACE Northwest will ensure the job description and person specification accurately describe the role, safeguarding responsibilities, required qualifications and whether the post involves regulated activity.

Advertisements will include PACE Northwest's commitment to safeguarding and promoting welfare and will make clear that appropriate pre-employment checks will be required. Where applicable, applicants will also be told that online searches may be undertaken on shortlisted candidates as part of safeguarding due diligence.

6. Applications and employment history

Applicants will normally be required to complete PACE Northwest's application process so that consistent information can be obtained. A CV alone will not normally provide sufficient information for safer-recruitment purposes.

Applicants should provide a complete employment and education history appropriate to the role and explain relevant gaps or discrepancies. Information supplied will be scrutinised and material inconsistencies explored during the selection process.

7. Shortlisting and online due diligence

Shortlisting will be undertaken against the published criteria. Wherever practicable, at least two people will participate in shortlisting and the same individuals should contribute to interview for continuity.

Shortlisted candidates may be subject to a proportionate search of publicly available online information as part of safeguarding due diligence. The purpose is to identify issues that may need to be explored at interview, not to make decisions on irrelevant personal information or protected characteristics.

Candidates will be informed where such searches form part of PACE Northwest's process. Relevant findings will be considered fairly, verified where appropriate and discussed with the candidate before any adverse conclusion is reached.

8. Interview and selection

At least one person involved in relevant recruitment should have appropriate safer-recruitment knowledge or training. Interviews will explore suitability for the role as well as technical competence.

Where relevant, questions will explore motivation to work with learners, safeguarding attitudes, professional boundaries, inclusion and equality, and any gaps, discrepancies or concerns arising from the application, references or due-diligence process.

Original or otherwise appropriately verifiable identity and qualification evidence will be checked at the appropriate stage. Recruitment records will show the basis for the appointment decision.

9. References

References will normally be sought directly from appropriate referees and, where the role involves work with children, should be obtained and scrutinised in accordance with current safer-recruitment guidance.

References should provide factual information relevant to suitability for the role and safeguarding. PACE Northwest will not rely solely on open references or testimonials supplied by the applicant. Material discrepancies or vague/incomplete safeguarding information will be followed up with the referee where appropriate.

Where practicable and appropriate, references will be obtained before interview so that relevant issues can be explored with the candidate. References will be verified as genuine.

10. Pre-employment checks

No individual will begin unsupervised work requiring checks until PACE Northwest is satisfied that the legally required and role-appropriate checks have been completed, or an exceptional documented risk-managed arrangement is lawful and appropriate.

Checks may include, depending on the role:

- verification of identity;
- right to work in the UK;
- an Enhanced DBS check, with children's and/or adults' barred-list information only where the role is legally eligible;
- prohibition from teaching and/or Section 128 checks where applicable to the role and setting;
- verification of relevant professional or academic qualifications;
- employment-history and reference checks;
- appropriate overseas criminal-record or other suitability checks where relevant and reasonably obtainable; and

- any other statutory check required for the particular role.

PACE Northwest will not apply a blanket rule that every role requires an Enhanced DBS or barred-list check. Eligibility will be determined by the duties of the role and current DBS legislation/guidance.

11. DBS and barred-list checks

The level and workforce of any DBS check will be determined from the actual duties of the role. A barred-list check will only be requested where the person will engage in regulated activity and the law permits the check.

Where an applicant has a criminal record or other information is disclosed, PACE Northwest will consider the information fairly and proportionately, taking account of the role, relevance, circumstances, legal restrictions on considering protected convictions/cautions and safeguarding risk.

Where the DBS Update Service can lawfully be used, PACE Northwest may use it in accordance with current DBS requirements after verifying identity and obtaining any required consent.

12. Overseas checks

Where an applicant has lived or worked outside the UK, PACE Northwest will consider what additional checks are appropriate in light of the country, duration, role and safeguarding risk. This may include overseas criminal-record information, professional standing or other evidence.

There is no automatic 'three months in the last five years' rule in this policy. The nature and extent of overseas checks will be assessed proportionately using current government guidance, and any inability to obtain information will be considered through a documented risk assessment.

13. Health and disability information

PACE Northwest will comply with Equality Act restrictions on pre-employment health and disability questions. Health enquiries will not be used as a routine pre-shortlisting test of suitability.

After an offer, PACE Northwest may seek information that is necessary and lawful to determine fitness for particular duties, workplace support or reasonable adjustments. Disability or health information will be handled confidentially and will not be used unlawfully to discriminate.

14. Conditional offers and risk assessment

Offers may be made conditional on satisfactory completion of required checks. Where a check produces relevant information, or where a required check cannot be completed in the usual way, HR, the DSL and appropriate senior leadership will consider the circumstances and document the decision.

Risk assessment will not be used to bypass a statutory prohibition, barred-list restriction or other legal requirement.

15. Agency and supply staff

Before an agency or supply worker starts, PACE Northwest will obtain written confirmation from the supplying organisation that the checks required for that individual's role have been completed, including the appropriate DBS/barred-list checks where legally required.

PACE Northwest will verify the person's identity on arrival and will consider whether any additional information must be obtained or checked directly. Concerns about an agency worker will be handled under safeguarding/allegations procedures and shared with the supplying organisation as appropriate.

16. Contractors, subcontractors and consultants

PACE Northwest will assess the safeguarding risk and legal checking requirements for contractors, subcontractors and consultants according to the work they perform, where it takes place and their opportunity for contact with learners.

PACE Northwest will not assume that every contractor requires a DBS check. Where a check is required, the appropriate level will be determined by eligibility. Where a person is not checked but may have contact with learners, suitable supervision or other controls will be put in place.

17. Volunteers

Volunteers will be subject to a proportionate safeguarding assessment. An Enhanced DBS check, with barred-list information where permitted, will be obtained only where the volunteer's duties make the role eligible.

PACE Northwest will consider the nature of the activity, frequency, supervision, learner contact and other relevant circumstances when deciding what checks and safeguards are required.

18. Work experience and employer settings

DBS checks will not be requested automatically from employers or staff who supervise learners on work experience. PACE Northwest will determine whether the particular arrangement meets the legal definition of regulated activity and will follow current KCSIE/DBS guidance.

PACE Northwest will also consider the wider safeguarding arrangements of the placement or employer as part of its placement risk and assurance processes.

19. Single Central Record and recruitment records

Where PACE Northwest is legally required to maintain a Single Central Record (SCR), it will record the checks required by the applicable statutory framework and keep the SCR accurate and up to date.

Where the statutory SCR requirement does not apply to a particular part of PACE Northwest's provision, PACE Northwest will nevertheless maintain an equivalent central record of relevant recruitment and vetting checks as an organisational safeguarding control.

The HR & Compliance Manager will oversee the record, with appropriate safeguarding/governance review. Records will distinguish the date a check was completed, who checked it and any other information required by law or guidance.

20. Induction and probation

Safer recruitment continues after appointment. New staff will receive induction appropriate to their role, including safeguarding and child-protection procedures, Prevent where applicable, Staff Code of Conduct, professional boundaries, low-level concerns/allegations reporting, whistleblowing, data protection, equality and health and safety.

Probation, supervision and performance-management arrangements will provide opportunities to identify conduct, capability or safeguarding concerns and ensure that required standards are understood.

21. Allegations and low-level concerns

Safeguarding concerns about an applicant, employee, volunteer, contractor or agency worker will be managed under PACE Northwest's Safeguarding Policy and Reporting Low-Level Concerns Policy.

Concerns that may meet the harm threshold will be escalated through the appropriate allegations/LADO process. PACE Northwest will not use resignation, termination of an assignment or a settlement arrangement as a substitute for considering safeguarding referrals or legal reporting duties.

22. Referrals to DBS and professional bodies

PACE Northwest will make a referral to the Disclosure and Barring Service where the statutory referral criteria are met. Where relevant, PACE Northwest will also consider referral to a professional regulator or other body.

Decisions and referrals will be documented and handled in accordance with safeguarding, employment and data-protection requirements.

23. Data protection and retention

Applicant and recruitment information will be processed in accordance with UK data-protection law, PACE Northwest's Data Protection Policy and relevant privacy information. Access will be restricted to those with a legitimate need.

PACE Northwest will retain recruitment and vetting information only for as long as necessary and lawful. DBS certificate information will not be copied or retained beyond what is permitted by current DBS rules, except for the limited record of the check that PACE Northwest is entitled or required to maintain.

24. Equality and reasonable adjustments

Recruitment will be fair and non-discriminatory. Reasonable adjustments will be offered during application, assessment and interview where required. Safeguarding checks will be applied consistently according to the role, not assumptions about an applicant's protected characteristics.

25. Training and quality assurance

Staff involved in recruitment will receive appropriate safer-recruitment guidance or training. PACE Northwest will periodically review recruitment files and central checking records to assure itself that procedures are being followed.

Relevant findings, trends and improvement actions will be reported to senior leadership and the Board at appropriate intervals.

26. Concerns and whistleblowing

Safeguarding concerns about staff or recruitment practice should be raised immediately with the DSL or HR & Compliance Manager through becs@pace-com.org or the agreed safeguarding route.

Where a person believes unsafe recruitment or safeguarding practice is not being addressed, they may use PACE Northwest's Whistleblowing Policy and, where appropriate, relevant external safeguarding or whistleblowing routes.

27. Related policies

- Safeguarding Policy.
- Reporting Low-Level Concerns Policy.
- Staff Code of Conduct.
- Equality, Diversity & Inclusion Policy.
- Data Protection Policy.
- Whistleblowing Policy.
- Complaints Procedure.
- Learner Support including SEND Policy.

Version control

v1.1 - reviewed 16 September 2026.