Safer Recruitment, Selection and DBS Policy

Supportive Bridge Ltd | Community Support and Healthcare Staffing | Bradford, England

POLICY AT A GLANCE

- **No one starts until every check is complete.** No exceptions, however urgently a shift needs filling.
- **Every worker needs:** proof of identity, right to work in the UK, an enhanced DBS check with the adult barred list, a full employment history with gaps explained, and at least two references including the most recent employer.
- **References are taken up by us,** from a company address, never from a reference the applicant hands in.
- **Values matter as much as experience.** We recruit for kindness, reliability and honesty, and train for skills.
- **A criminal record is not an automatic bar,** but anyone on the adult barred list must never be employed. That is a criminal offence.
- **Checks are repeated:** DBS re-checked every three years or monitored through the Update Service, and right to work re-checked before any visa expires.
- **Records are kept** so that Durham County Council, CQC or a client can see our vetting at any time.

SERVICE DETAILS (fill in before issuing)

Registered Manager	
Nominated Individual	
Person responsible for recruitment and vetting	
DBS umbrella body / provider used	
Office phone	
Date issued	
Next review date	

This summary is a quick guide only. All staff involved in recruitment must read and follow the full policy.

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

1. PURPOSE

1.1 This policy explains how Supportive Bridge Ltd ("Supportive Bridge", "we", "us") recruits and vets the people who work for us, so that only suitable, honest and capable people support adults and older people, or are supplied to work in our clients' services.

1.2 Safer recruitment is the first line of defence in safeguarding. Most abuse in care is prevented not by policies written after the event, but by not employing the wrong person in the first place.

1.3 It reflects Regulation 19 (Fit and proper persons employed) and Regulation 5 (Fit and proper persons: directors) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, the Conduct of Employment Agencies and Employment Businesses Regulations 2003 for our staffing arm, and the Safeguarding Vulnerable Groups Act 2006.

2. SCOPE

2.1 Supportive Bridge Ltd operates two arms, and this policy applies to both: our **healthcare staffing service**, supplying care and support workers to care homes, hospitals and other providers; and our **community support service**, where our own support workers visit adults and older people in their own homes, including council housing, on morning and evening shifts, to support them with daily living.

2.2 Supportive Bridge does **not** provide personal care. Personal care is a regulated activity under the Health and Social Care Act 2008 and we will provide it only if and when we are registered with the Care Quality Commission. Our support workers provide non-personal support such as companionship, meal preparation, shopping, domestic help, prompting, and support to get out and about. This policy is written to meet both local authority provider assurance requirements and the standards we will be assessed against at CQC registration.

2.3 This policy applies to the recruitment of everyone who works for us in any capacity: support workers, workers supplied to clients, office staff, coordinators, managers, directors, bank and zero-hours workers, volunteers, students on placement, and anyone engaged through another agency or as a self-employed contractor.

2.4 Everyone involved in recruitment must follow it. Failure to do so may lead to action under our Disciplinary Policy, and employing someone who is barred is a criminal offence for which the company and the individual manager can be prosecuted.

3. OUR RECRUITMENT PRINCIPLES

- **Safety first.** No one works, on any shift, until every pre-employment check is complete and signed off by the Registered Manager.
- **Fair and open.** We recruit on merit. We do not discriminate on any protected characteristic under the Equality Act 2010, and we make reasonable adjustments at every stage.
- **Values-based.** Skills can be taught; values cannot. We look for kindness, patience, reliability, honesty and respect, and we test for them at interview.
- **Honest advertising.** Adverts and job descriptions describe the real job, the real hours and the real pay, including travel between people's homes.
- **Properly recorded.** Every decision, check and document is recorded, so we can show a commissioner, CQC or a client exactly how someone was cleared to work.

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

4. ROLES AND RESPONSIBILITIES

Role	Responsibilities
Nominated Individual	Makes sure recruitment is safe, lawful and properly resourced, and that directors and managers meet the fit and proper person requirements. Audits recruitment files at least twice a year.
Registered Manager	Signs off every appointment. Makes sure no one starts before checks are complete, decides on any disclosed criminal record after a risk assessment, and keeps vetting records up to date.
Person responsible for recruitment	Runs the process day to day: adverts, applications, identity and right to work checks, DBS applications, references, and the recruitment file.
Interviewers	Prepare properly, ask the agreed questions including safeguarding and values questions, record their notes and scores, and never interview alone where this can be avoided.
All staff	Tell the Registered Manager immediately if their own circumstances change, for example a caution, charge or conviction, a change to their right to work, or a health condition affecting their work.

5. ADVERTISING AND APPLICATION

5.1 Every role has a written job description and person specification setting out duties, the values we expect, and the checks that will be carried out. Adverts state that appointment is subject to an enhanced DBS check and satisfactory references.

5.2 All applicants complete our own application form. We do not accept a CV on its own, because a CV lets an applicant leave out jobs and gaps. The application form requires:

- a full history of employment, education and other activity since leaving school, with dates;
- an explanation of any gaps of more than one month;
- the names of at least two referees, including the most recent employer, and where the applicant has worked with adults or children, a referee from that employer;
- a declaration of any unspent convictions, and any cautions, convictions or other matters that are not protected under the filtering rules;
- a declaration that the applicant is not on either DBS barred list;
- a declaration of any current or past investigation by an employer, the police, a local authority or a professional body relating to the care of adults or children;
- a signed statement that the information given is true, with a note that giving false information is grounds for dismissal and may be a criminal offence.

6. INTERVIEW AND SELECTION

6.1 Every applicant who meets the person specification is interviewed by at least two people wherever possible. Interviews use the same core questions for all candidates, including questions on safeguarding, dignity, confidentiality, reliability and how the applicant would respond to realistic situations in someone's home.

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

6.2 Interviewers must explore any gaps in employment, frequent job changes, and reasons for leaving previous care roles, and record the answers. Vague or inconsistent answers are followed up, not overlooked.

6.3 Interview notes, scores and the reasons for the decision are kept on file for at least six months for unsuccessful candidates, and on the personnel file for successful ones.

7. PRE-EMPLOYMENT CHECKS

7.1 All of the following must be completed, verified and recorded before a start date is confirmed. The checklist at Appendix A must be completed and signed by the Registered Manager.

Identity

7.2 Original documents are seen in person (or verified through a certified digital identity provider), copied, dated and signed as "original seen". We check photographic identity, date of birth, and proof of current address dated within the last three months. Any change of name is evidenced, for example by a marriage certificate or deed poll.

Right to work in the UK

7.3 A right to work check is completed before the first day of work, using the Home Office online check where the person has a share code, or by examining original documents from the Home Office list. The check is recorded with the date it was carried out. Where a person's permission to work has an expiry date, a follow-up check is diarised and completed before it expires. Employing someone without the right to work carries a civil penalty and may be a criminal offence.

Disclosure and Barring Service (DBS)

7.4 Most of the work our people do is **regulated activity** with adults. Under the Safeguarding Vulnerable Groups Act 2006, regulated activity with adults includes providing personal care or health care, social work, assisting with a person's cash, bills or shopping because of their age, illness or disability, assisting in the conduct of their affairs, and conveying them to health or care appointments. There is no minimum frequency: doing it once is enough.

7.5 Because our support workers help people with shopping, bills and getting to appointments, and because our supplied workers work in care settings, we obtain an **enhanced DBS certificate including a check of the adult barred list** for every worker, and also the children's barred list where a role involves contact with children.

- No one starts work until the certificate has been seen and assessed. We do not allow someone to start "pending DBS".
- The original certificate is seen by the Registered Manager; we record the certificate number, date of issue and the outcome. We do not keep a copy for longer than six months unless there is a clear reason to.
- Workers are required to join the DBS Update Service where possible, and we then carry out an online status check before their first shift and at least every 12 months, recording each check.
- Where a worker is not on the Update Service, a new enhanced DBS check is obtained at least every three years.
- A DBS check carried out for another employer is only accepted if it is an enhanced check at the right level, for the right workforce, and is being monitored through the Update Service with a satisfactory status check.

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

- It is a criminal offence to employ a barred person in regulated activity. Anyone found to be on a barred list will not be employed, and existing staff will be removed from work immediately and referred as required.

References

7.6 At least two references are obtained, and always one from the most recent employer. Where the applicant has worked with adults or children, we insist on a reference from that employer.

- References are requested by us, in writing, to a company email address or postal address. We do not accept open references, references handed in by the applicant, or references from personal email addresses without verifying the referee.
- We do not accept references from relatives, friends or partners.
- References are checked against the application form for any difference in dates or job titles, and any difference is followed up.
- We ask specifically about attendance and timekeeping, reliability, honesty, conduct, any disciplinary action, any safeguarding concerns or investigations, and whether the employer would re-employ the person.
- Where a reference raises a concern, the Registered Manager follows it up by telephone and records the conversation before making any decision.
- Where an applicant has no employment history, we accept character references from a suitable professional person, such as a tutor, and take extra care with induction and supervision.

Other checks

- Qualifications relevant to the role are seen in original and copied, including any care qualifications, the Care Certificate, or a nursing or professional registration, which is verified with the register.
- A health declaration, to identify any reasonable adjustments and to confirm the person is able to carry out the role safely. Any health information is handled confidentially and separately from the personnel file.
- For drivers: a valid driving licence, business-use insurance, MOT and vehicle roadworthiness, checked at recruitment and at least once a year.
- For directors and managers: the fit and proper person requirements under Regulation 5, including checks on bankruptcy, disqualification from being a director, and previous regulatory history.

8. OUR STAFFING ARM: ADDITIONAL REQUIREMENTS

8.1 Where we supply workers to care homes, hospitals and other providers, we are an employment business and must also meet the Conduct of Employment Agencies and Employment Businesses Regulations 2003. Before supplying any worker to a role working with adults at risk, we:

- confirm the worker's identity and that they have the experience, training, qualifications and any authorisation the client requires;
- obtain copies of any relevant qualifications and authorisations, and two references from people not related to the worker;
- take all reasonably practicable steps to confirm that the worker is suitable for the role;
- give the client, in writing, confirmation of the checks carried out before the worker starts;
- provide each worker with a Key Information Document and written terms before any work is agreed.

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

8.2 We keep a record of the checks supplied to each client for each worker, so that a client's own audit can be answered quickly.

9. RECRUITING PEOPLE WITH A CRIMINAL RECORD

9.1 Having a criminal record does not automatically prevent someone from working for us, and we welcome applications from people with convictions. We follow a fair and consistent process:

- we only ask about convictions and cautions that are not protected under the DBS filtering rules;
- any disclosure is discussed with the applicant before a decision is made, and they are given a chance to explain;
- the Registered Manager completes a written risk assessment considering the nature and seriousness of the offence, how long ago it happened, the person's age at the time, the pattern of any offending, its relevance to the role, and any evidence of change;
- the decision and reasons are recorded and kept on file;
- anyone on a DBS barred list relevant to the role is never employed in regulated activity.

10. OFFERS, CONTRACTS AND PROBATION

10.1 Any offer is made in writing and is conditional on all checks being satisfactory. The written statement of employment particulars is given on or before the first day.

10.2 New workers complete induction and the Care Certificate as set out in our Staff Training and Competency Policy, and are not permitted to work unsupervised until their competency has been assessed.

10.3 New workers serve a probation period, with review meetings, and probation may be extended or employment ended where standards are not met. Concerns raised during probation, especially about reliability, attitude to people we support, or honesty, are taken seriously and acted on.

11. ONGOING SUITABILITY

11.1 Recruitment checks are not a one-off. Everyone who works for us must tell the Registered Manager immediately if:

- they are arrested, charged, cautioned or convicted of any offence, including motoring offences;
- they are subject to any investigation by an employer, local authority, police or professional body relating to the care of adults or children;
- their right to work in the UK changes or is due to expire;
- their health changes in a way that affects their ability to work safely;
- they are asked to work for a person we support privately, outside our service (which is not permitted without written agreement).

11.2 Failing to report any of these is a disciplinary matter. The Registered Manager records what is reported, risk-assesses it, and takes advice where needed.

11.3 Where a worker is dismissed, or would have been dismissed, because they harmed or put at risk an adult or a child, we have a legal duty to refer them to the DBS, even if they resign first (see our Safeguarding Adults Policy).

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

12. RECORDS, RETENTION AND DATA PROTECTION

12.1 A recruitment file is kept for every worker, containing the application form, interview notes, copies of identity and right to work documents, the DBS record, references, qualifications and the signed pre-employment checklist.

12.2 Files are stored securely, with access limited to the Registered Manager, the Nominated Individual and the person responsible for recruitment, in line with UK GDPR and our Data Protection Policy.

12.3 Records for unsuccessful applicants are kept for six months and then securely destroyed. Records for employed staff are kept for the duration of employment and for six years after it ends. DBS certificate copies are not retained beyond six months.

13. MONITORING AND REVIEW

13.1 The Registered Manager checks every personnel file before a worker starts, and the Nominated Individual audits a sample of files at least twice a year against the checklist at Appendix A, recording the findings and any actions.

13.2 We also monitor recruitment for equality, looking at who applies, who is shortlisted and who is appointed, and act on any pattern that suggests unfairness.

13.3 This policy is reviewed every year, or sooner if the law or guidance changes, or if an audit or incident shows it needs to change.

14. LEGISLATION AND GUIDANCE

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, especially Regulation 19 (fit and proper persons employed), Regulation 5 (fit and proper persons: directors) and Schedule 3
- Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012
- Police Act 1997 (DBS disclosures) and the DBS filtering rules
- Conduct of Employment Agencies and Employment Businesses Regulations 2003, especially regulations 19 and 22
- Employment Agencies Act 1973
- Immigration, Asylum and Nationality Act 2006 and Home Office right to work guidance
- Equality Act 2010
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Employment Rights Act 1996
- UK General Data Protection Regulation and Data Protection Act 2018
- Skills for Care: Safer recruitment and values-based recruitment guidance

15. RELATED POLICIES AND FORMS

Related policies: Safeguarding Adults; Staff Training and Competency; Supervision and Appraisal; Disciplinary; Grievance; Equality, Diversity and Inclusion (Staff); Whistleblowing; Data Protection and Confidentiality; Staff Code of Conduct; Driving and Transporting People.

Forms: Application Form; Job Description and Person Specification; Interview Question Set and Score Sheet; Reference Request; Pre-Employment Checklist (Appendix A); Criminal Record Risk Assessment; DBS Record Log; Right to Work Check Record; Key Information Document (staffing arm).

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

16. DOCUMENT CONTROL

Version	Date	Approved by	Role	Reason
1.0			Nominated Individual	New policy for local authority assurance and CQC registration

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.

APPENDIX A: PRE-EMPLOYMENT CHECKLIST

Every box must be completed and the checklist signed by the Registered Manager before a start date is confirmed. No one works a shift until this is done.

Applicant: _____ Role: _____ Checks completed by: _____

Check	Done (Y/N)	Date	Notes
Application form fully completed, signed and dated			
Employment history since leaving school; gaps over 1 month explained			
Photo ID seen in original, copied, signed and dated			
Proof of current address, dated within the last three months			
Evidence of any change of name			
Right to work check completed and dated			
Visa expiry recorded and follow-up check diarised (if applicable)			
Enhanced DBS + adult barred list: certificate seen, number recorded			
Children's barred list check obtained (if role involves children)			
Update Service check done, or renewal date diarised			
Reference 1 from most recent employer, on company paper or email			
Reference 2 received and verified			
References checked against application; discrepancies followed up			
Safeguarding query on a reference followed up by phone and recorded			
Qualifications / Care Certificate / registration seen and verified			
Health declaration completed; adjustments identified			
Licence, business insurance and MOT checked (if driving)			
Criminal record risk assessment (if anything disclosed)			
Interview notes and scores on file			
Written conditional offer issued and accepted			
Written statement of employment particulars issued			
Induction and Care Certificate booked; competency sign-off planned			

All checks complete and satisfactory. Approved to start work.

Signed (Registered Manager): _____ Date: _____ Agreed start date: _____

© Supportive Bridge Ltd. Uncontrolled when printed; check you are using the latest version.