

# TRAINING CAVE



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|-----------------------------------|---------------------------------------------------------------|
| <b>Policy Title</b>               | Safer Recruitment Policy                                      |
| <b>Version</b>                    | 2.0                                                           |
| <b>Effective Date</b>             | 27.01.2026                                                    |
| <b>Current Issues/Review Date</b> | 24.09.2026                                                    |
| <b>Next Review Date</b>           | 24.09.2027                                                    |
| <b>Approved By</b>                | Jack Sunderland<br><br>Director<br><br>Training Cave Club Ltd |

## **1. Purpose**

Training Cave Club Ltd is committed to safeguarding children and young people by recruiting people who are suitable, capable and aligned with the organisation's values. Safer recruitment is a continuing safeguarding process: it begins when a role is designed and continues through advertising, selection, pre-appointment checks, induction, supervision and the management of concerns.

This policy sets the minimum arrangements for paid and unpaid roles. It is intended to deter unsuitable applicants, identify and examine concerns fairly, prevent barred or otherwise unsuitable people from carrying out regulated activity, and provide an auditable basis for appointment decisions.

## **2. Organisational Status and Scope**

Training Cave is an independent alternative provision and boxing provider. It is not a maintained school, academy, independent school or pupil referral unit. School-specific statutory requirements are therefore not presented as powers or duties that automatically apply to Training Cave. Relevant principles in Keeping Children Safe in Education are adopted as proportionate good practice and to support commissioner assurance.

This policy applies to employees, casual and self-employed workers, coaches, tutors, mentors, volunteers, agency workers, contractors, consultants, students and work-placement personnel. It applies whether a role is permanent, temporary, paid, unpaid, full-time, part-time or occasional. Visitor management is covered where a visitor may have contact with children; a routine visitor is not treated as a worker simply because they enter the premises.

## **3. Legal and Guidance Framework**

Recruitment decisions and checks will be made with regard to the following, as applicable to the role and Training Cave's status:

- Children Act 1989 and Children Act 2004 safeguarding principles;
- Safeguarding Vulnerable Groups Act 2006 and regulated-activity legislation, as amended;
- Protection of Freedoms Act 2012;
- Rehabilitation of Offenders Act 1974 and Exceptions Order, as amended;
- Police Act 1997 and Disclosure and Barring Service eligibility guidance;
- Equality Act 2010, including restrictions on pre-employment health questions;
- Immigration, Asylum and Nationality Act 2006 and current right-to-work guidance;
- UK GDPR and Data Protection Act 2018;
- Keeping Children Safe in Education 2026, used proportionately as relevant safer-recruitment practice; and

- Working Together to Safeguard Children and relevant local safeguarding arrangements.

Where a commissioner, awarding organisation, insurer, governing body for sport or contract sets an additional lawful requirement, Training Cave will record and meet it without requesting a criminal-record check above the level for which the role is legally eligible.

#### **4. Core Principles**

- Safeguarding requirements will be explicit in role design, advertising, assessment and appointment decisions.
- Checks will be appropriate to the actual duties, contact with children and legal eligibility of each role; they will not be requested by default merely because Training Cave works with children.
- Recruitment will be fair, consistent, evidence-based and non-discriminatory, with reasonable adjustments offered throughout the process.
- A conviction or other disclosed information will not automatically prevent appointment unless the law prohibits the work; relevance, seriousness, circumstances, time elapsed and risk will be assessed.
- No one will undertake unsupervised child contact or regulated activity until all checks required for that work have been satisfactorily completed.
- Any conflict of interest or prior relationship with a candidate must be declared and managed.

#### **5. Roles and Responsibilities**

##### **5.1 Director and recruiting manager**

- Approve the role, recruitment method, selection panel and appointment decision;
- Ensure the role's DBS and barred-list eligibility is assessed and recorded before advertising;
- Ensure checks, any risk assessment and the central register are complete before child-facing work starts;
- Ensure concerns are referred to the Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS), police or professional body when the relevant threshold is met; and
- Audit the operation of this policy and address gaps promptly.

##### **5.2 Selection panel**

- At least two people will shortlist wherever practicable, and at least one person involved in selection will have current safer-recruitment knowledge or training. Panel members will use agreed criteria, keep defensible notes, explore discrepancies and make decisions collectively. A person with a material conflict will not decide the appointment.

### 5.3 Designated Safeguarding Lead

- The DSL will advise on safeguarding risk, professional boundaries, concerns revealed during recruitment and appropriate external consultation or referral. The DSL's involvement does not replace the recruiting manager's accountability.

### 5.4 All applicants and personnel

- Applicants must provide accurate information and cooperate with lawful checks. Appointed personnel must report any change in circumstances, investigation, allegation, charge, caution, conviction, barring or professional restriction that may affect their role, subject to the law on protected information.

## 6. Workforce Planning and Role Assessment

Before recruitment begins, Training Cave will prepare or review the job description and person specification. These will describe safeguarding responsibility, child contact, professional boundaries, supervision, essential qualifications and whether the role is expected to involve regulated activity.

A documented eligibility assessment will decide the lawful level of criminal-record check. It will consider the workforce, duties, frequency, place of work and whether the person will teach, train, instruct, care for or supervise children, provide specified advice, provide healthcare or personal care, or manage someone carrying out regulated activity.

| Role position                            | Usual check approach                                                          | Important limit                                                           |
|------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| Regulated activity with children         | Enhanced DBS with children's barred-list information                          | Only where the actual duties meet the legal regulated-activity definition |
| Child contact but not regulated activity | Enhanced DBS without barred-list information, only where the role is eligible | No barred-list request merely as a precaution                             |
| Role not eligible for an Enhanced check  | Basic DBS only if justified, proportionate and permitted                      | Do not ask the applicant to obtain a higher-level check independently     |
| Routine visitor                          | Identity, purpose, sign-in and supervision proportionate to risk              | A DBS check is not required simply for visiting                           |

## 7. Advertising and Information For Applicants

Advertisements and recruitment information will state Training Cave's commitment to safeguarding, that suitability to work with children will be assessed, and the type of DBS check anticipated where the role is eligible. They will not promise appointment before checks are complete.

Applicants will receive the job description, person specification, application form, this policy or a summary, the privacy information relevant to recruitment, and information

about the organisation's criminal-record assessment process. The application form will require:

- Full identifying and contact information;
- A complete education, employment, volunteering and activity history with dates and explanations for gaps;
- Relevant qualifications, training and experience;
- Details of two suitable referees, including the current or most recent employer where possible;
- A declaration that the information supplied is complete and accurate; and
- Only the criminal-record and suitability information Training Cave is legally entitled to request for that role.

A curriculum vitae may support an application but will not normally replace a completed application form. Protected convictions and cautions must not be requested or taken into account. Information about offences will be requested at the appropriate stage using wording that reflects the role's eligibility under the Rehabilitation of Offenders Act framework.

## **8. Shortlisting and Online Due Diligence**

Shortlisting will use the published essential and desirable criteria. Panel members will look for unexplained gaps, conflicting dates, frequent unexplained changes, incomplete answers and other matters requiring clarification. Concerns will not be treated as proof of unsuitability; they will be explored fairly.

For shortlisted candidates, Training Cave may conduct a proportionate search of publicly available online information to identify matters relevant to safeguarding or suitability for the role. Candidates will be told that this may occur. Searches will be applied consistently, limited to relevant public information, recorded factually and kept separate from decisions based on protected characteristics or irrelevant private life. A candidate will be given an opportunity to address relevant findings at interview.

## **9. References**

Training Cave will normally obtain two satisfactory professional references. One should be from the current or most recent employer and, where relevant, one should cover recent work with children. Personal references will be used only where a professional reference is genuinely unavailable and the reason is recorded.

- References will be requested directly by Training Cave, preferably before interview and always before appointment is confirmed.
- Open references, testimonials supplied by the applicant or references from a personal email address will not be relied upon without verification.
- The request will ask about dates, role, reason for leaving, suitability for the proposed work, substantiated safeguarding concerns or disciplinary matters that may lawfully be disclosed, and whether the referee would re-employ the person.

- The recruiting manager will compare the reference with the application, resolve discrepancies and contact the referee using independently verified details where authenticity is uncertain.
- A reference that is vague, incomplete or raises concern will be followed up and the response recorded.

## 10. Interview and Selection

Candidates will normally attend a structured interview. Questions and assessment methods will be relevant to the role and applied consistently. The panel will assess technical competence and the candidate's motivation, values, understanding of safeguarding, professional boundaries, use of authority, response to concerns, and ability to work safely with vulnerable learners.

At interview the panel will explore gaps, discrepancies, online-search findings and any relevant declarations. Original identity and qualification documents may be examined, but formal verification remains part of the conditional-offer process. Selection notes will record the evidence supporting the decision.

## 11. Conditional Offer and Pre-appointment Checks

Any offer will be conditional on satisfactory completion of the checks applicable to the role. Training Cave will not permit regulated activity or unsupervised child contact while a required check remains outstanding. Administrative induction without access to children may occur only where the Director has approved a written risk assessment and clear restrictions.

| Check                     | Minimum action                                                                                                                                                                                                                                       |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identity                  | Verify original or approved digital evidence and ensure identity is consistent across the application and checks.                                                                                                                                    |
| Right to work             | Complete the prescribed manual, online or digital check before employment begins and retain the required evidence.                                                                                                                                   |
| DBS / barred list         | Request only the level for which the role is eligible. For regulated activity, obtain an Enhanced DBS check with children's barred-list information.                                                                                                 |
| References                | Obtain, scrutinise and verify satisfactory references; resolve discrepancies.                                                                                                                                                                        |
| Qualifications            | Verify qualifications or professional registration essential to the role with the awarding or registering body where necessary.                                                                                                                      |
| Employment history        | Resolve gaps, inconsistencies and reasons for leaving relevant child-facing roles.                                                                                                                                                                   |
| Overseas history          | Where a person has lived or worked abroad, consider additional criminal-record or professional-standing evidence available from the country concerned. Record any limitation and risk assessment; overseas evidence does not replace a UK DBS check. |
| Professional restrictions | Check prohibitions, sanctions or restrictions only where they are relevant, available and lawful for the particular role. School-only checks will not be presented as universally applicable.                                                        |
| Health / fitness          | Before offer, ask only questions permitted by equality law, including reasonable-adjustment needs. After a conditional offer, seek only information necessary to assess ability to perform intrinsic duties safely and to arrange adjustments.       |

## 12. DBS and Barred-list Safeguards

Training Cave will use the current statutory definitions and official DBS eligibility guidance, not job titles alone. It is a criminal offence knowingly to allow a barred person to engage in regulated activity, and a barred person must not apply for or undertake that activity.

From 1 September 2026, the previous supervision exemption for volunteers carrying out specified child-related activities no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children frequently or overnight may therefore be in regulated activity even when supervised. The role assessment must be completed for every volunteer arrangement.

Where regulated activity requires barred-list information, Training Cave will obtain it through an Enhanced DBS check with the children's barred list. It will not request a standalone barred-list check unless Training Cave is legally entitled to use that service. A DBS certificate relates to the date it was issued; suitability will also be considered through references, interview, supervision and ongoing reporting.

The original certificate will be seen where required. The DBS Update Service may be used with the individual's consent only where identity, workforce and check level match the new role. A status check does not remove the need to assess eligibility or other recruitment evidence.

### **13. Criminal-record and Suitability Decisions**

Where a certificate or declaration contains information, the Director will complete a recorded, individual assessment. Relevant factors include the nature and seriousness of the matter, its relevance to the role, pattern and recency, age and circumstances at the time, evidence of rehabilitation, explanation offered, the needs of learners, supervision and whether the person is legally barred.

The applicant will be given a fair opportunity to discuss relevant information and factual discrepancies before a decision, unless doing so would prejudice a police or safeguarding process. Deliberate material dishonesty may itself affect suitability. The decision and reasons will be recorded confidentially.

### **14. Agency Staff, Contractors, Self-employed Workers and Placements**

The same safeguarding outcome is required regardless of contractual label. Before an agency worker or third-party contractor has child contact, Training Cave will obtain written confirmation that the supplier has completed the checks required for the duties, including identity, right to work and the appropriate DBS/barred-list check. Training Cave will verify the person's identity on arrival and record the confirmation on its register.

Self-employed applicants will be subject to the same role assessment, references, identity and suitability checks as equivalent employees. Where an Enhanced DBS check is required, it will be processed through a legally permitted route. Placement

students and visiting professionals will be covered by written arrangements identifying which organisation completes checks, how identity is verified and what supervision applies.

A contractor or visitor without the required assurance will not be left unsupervised with children. Emergency tradespeople and routine visitors will sign in, receive relevant safeguarding information and be escorted or supervised according to risk.

## **15. Volunteers**

Volunteers will complete an application and suitability process proportionate to their duties. This will include identity, references, interview or suitability discussion, induction and the DBS check for which the role is eligible. The role assessment will determine whether the frequency and nature of duties constitute regulated activity under the post-1 September 2026 rules. Supervision remains an important control but is not used to avoid a barred-list check where the activity is regulated.

## **16. Central recruitment and vetting register**

Training Cave will maintain a secure central recruitment and vetting register, sometimes described operationally as an SCR-style register. Training Cave does not claim that it is the statutory single central record required of schools. The register supports safeguarding oversight, commissioner assurance and prompt audit.

For each person, as applicable, the register will record:

- Full name, role, employment status, start date and end date;
- Identity and right-to-work checks, including completion dates and checker;
- DBS workforce and level, whether barred-list information was included, certificate number and issue date, date seen, checker and recruitment decision;
- References, essential qualifications and professional registration;
- Overseas or professional-standing checks and any approved risk assessment;
- Agency or third-party confirmation and identity verification; and
- Safer-recruitment and safeguarding induction/training where useful for assurance.

The register will be checked before a start date is authorised and audited at least annually. Errors or omissions will be escalated immediately to the Director and child-facing duties restricted where necessary.

## **17. Induction, Probation and Continuing Suitability**

Every new starter will receive induction appropriate to the role before unsupervised duties. This will cover the Child Protection and Safeguarding Policy, DSL

arrangements, staff code of conduct and professional boundaries, low-level concerns and allegations, whistleblowing, behaviour and physical intervention, online safety, data protection, health and safety, and emergency procedures.

New personnel will be supervised and reviewed during probation or an equivalent initial review period. Ongoing suitability will be supported through observation, supervision, appraisal, training, conduct management and prompt response to concerns. DBS rechecks or Update Service checks will be completed where required by law, contract, governing-body rule or a documented risk assessment; a fixed recheck interval will not be represented as a universal legal requirement.

## **18. Concerns, Allegations and Referrals**

Any concern about an applicant's or worker's suitability must be reported promptly to the Director and DSL. Allegations or safeguarding concerns about a person working with children will be managed under the Child Protection and Safeguarding Policy, including consultation with the LADO where the threshold may be met. Training Cave will not conduct an internal investigation that could compromise an external safeguarding or criminal process.

Training Cave will make a referral to the DBS where the legal referral conditions are met, including where a person is removed from regulated activity, would have been removed had they not resigned or otherwise left, and the relevant harm or conduct test is satisfied. Referrals to a professional regulator, police, commissioner or other body will also be made where required.

## **19. Equality, Adjustments and Fair Treatment**

Training Cave will not discriminate unlawfully because of a protected characteristic. Reasonable adjustments will be offered for application, interview and assessment. Selection will be based on the published role requirements and safeguarding evidence. Health or disability information will not be used to screen out applicants where the role can be carried out safely with reasonable adjustments.

## **20. Records, Confidentiality and Retention**

Recruitment information is confidential and will be accessible only to those who need it. Privacy information will explain the purposes, lawful bases, sharing and retention arrangements. Records will be accurate, secure and retained under Training Cave's retention schedule and legal requirements.

DBS certificate information is criminal-offence data and will receive additional protection. Training Cave will not normally retain a copy of a DBS certificate. If a copy is exceptionally required for a documented reason, it will be stored securely and kept only for the shortest necessary period, normally no longer than six months. Training Cave may retain the certificate number, issue date, level, workforce, date

seen, checker's name and recruitment decision. Certificate content will not be copied into the central register.

Unsuccessful-applicant records and interview notes will be retained only for a justified period that permits recruitment queries or legal claims to be addressed, then securely destroyed. Safeguarding or referral records may require a different retention period and will be managed under the relevant policy.

## **21. Monitoring and Review**

The Director will monitor completion of checks, register accuracy, exceptions, recruitment complaints, safeguarding themes and referrals. This policy will be reviewed annually and sooner after material legal or guidance changes, a significant incident, audit findings, a change in services or commissioner requirements.

## **22. Related Documents and Operational Records**

- Child Protection and Safeguarding Policy;
- Staff Code of Conduct and professional boundaries arrangements;
- Low-level concerns, allegations and whistleblowing arrangements;
- Equality, Diversity and Inclusion Policy;
- Data Protection Policy, recruitment privacy notice and retention schedule;
- job description, person specification and application form;
- shortlisting, interview, reference and conditional-offer records;
- DBS eligibility assessment and recruitment risk-assessment form; and
- Central recruitment and vetting register.

## **23. Contact Details**

Training Cave Club Ltd  
Unit 10, Carrmills Business Centre  
Birstall  
WF17 9JX  
Email: [info@trainingcave.co.uk](mailto:info@trainingcave.co.uk)

*Safeguarding concerns about an applicant or member of personnel must be reported immediately through the Child Protection and Safeguarding Policy rather than sent through a routine recruitment query.*