



Holden Knight Healthcare Ltd

Safer Recruitment Policy

Human Resources v1.2 November 2026

Review Date: November 2026



Safer Recruitment Policy

1. Overview

- 1.1 In line with the Company's statutory duties, Holden Knight is required to carry out a number of checks on all staff, whether they are permanent, temporary, casual, voluntary or agency-based supply. Holden Knight aims to provide a safe and secure environment in which the children we look after and the adults responsible for their education may grow to their own true potential.
- 1.2 This policy does not form part of any employee's terms and conditions of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Company who are required to familiarise themselves and comply with its contents. The Company reserves the right to amend its content at any time.

2. Recruitment and Applications Forms

- 2.1 All our recruitment advertising has a statement about our commitment to safeguarding:
"Ensuring the safety and well-being of children and young people, as well as protecting vulnerable individuals from any form of abuse, is a paramount focus throughout all of Holden Knight's services. We are fully dedicated to effectively promoting safeguarding measures across our organisation."
- 2.2 Adverts for vacancies will demonstrate the Company's commitment to safeguarding in recruitment and vetting procedures, protecting every potential applicant from unfair practice and ultimately safeguarding children as much as possible. Promoting commitment to safeguarding and child protection can act as a deterrent to would-be abusers.
- 2.3 Every applicant appointed to a position within the Company must complete a Holden Knight application form in order for the Company to scrutinise employment histories and associated gaps in employment.

3. Application Packs

- 3.1 The importance of safeguarding and protecting children at the Company will be promoted throughout the recruitment process in order to deter unsuitable candidates. The Company's Application Pack will normally include the following: Application Form, Job Description and Person Specification, Holden Knight Safeguarding and Child Protection Policy Statement, information Sheet about the Company, the Company's Equal Opportunities Policy and information on an Enhanced DBS check.

4. Job Descriptions and Role Definitions

- 4.1 All posts within Holden Knight have a Job Description/Role Definition. Job descriptions will define the purpose, duties and responsibilities of the post, as well as the qualifications and experience needed to perform the job, with particular attention to working with vulnerable groups. The Job Description and Person Specification will make reference to the Company's commitment to the safeguarding of young people.

5. Shortlisting

- 5.1 The same panel of people who will be interviewing the candidate should ideally carry out Shortlisting. Shortlisting should never be carried out alone. At least one member of the panel should have attended training in Safer Recruitment and Selection.
- 5.2 All applications should be scrutinised to ensure that they are fully and properly completed; that the information provided is consistent and does not contain any discrepancies, and to identify any gaps in employment. Incomplete applications should not be accepted and should be returned for completion.

- 5.3 Any anomalies or discrepancies or gaps in employment identified by the scrutiny should be noted so that they can be taken up as part of the consideration of whether to short list the applicant. As well as reasons for obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression need to be explored and verified.
- 5.4 All candidates should be assessed equally against the criteria contained in the person specification without exception or variation. It is recommended that each member of the panel use a Shortlisting Matrix. This ensures that candidates are assessed objectively against the criteria set out in the person specification

6. Invitation to Interview

- 6.1 In addition to the arrangements for interviews - time and place, directions to the venue, membership of the interview panel (where this is available) – the invitation should remind candidates about how the interview will be conducted and the areas it will explore, including suitability to work with vulnerable children.
- 6.2 All applicants who are invited to an interview will be required to bring the following evidence of identity, address and qualifications in order for the Company to verify their name, date of birth and current address:-
- current driving licence (including photograph) or passport or full birth certificate; and
 - two utility bills or statements (from different sources) less than three months old showing their name and home address; and
 - documentation confirming their National Insurance number (P45, P60 or National Insurance card); and
 - documents confirming any educational and professional qualifications referred to in their Application Form.
- 6.3 These identification documents will also be sufficient to enable an enhanced Disclosure and Barring Service (DBS) check to be carried out (see below). Where an applicant claims to have changed his/her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change. In all cases original (not photocopy) documents must be provided.
- 6.4 Original documentation in respect of any specific qualifications relevant to the post that has been entered on the application will also be required. If a successful candidate cannot produce original documents or certified copies, written confirmation of his/her relevant qualifications must be obtained from the awarding body.
- 6.5 A copy of any documents used to verify the successful candidate's identity and qualifications should be kept for the personnel file (where financial statements are presented, and it is considered that applicants may be sensitive about the retention of copies of such documentation, one option may be to simply record that such information has been seen).

7. Interview Panels

- 7.1 The Interview panel will consist of a minimum of two interviewers, one of whom will be the safeguarding representative. A panel of at least two people allows one member to observe and assess the candidate, and make notes, while the candidate is talking to the other. It also reduces the possibility of any dispute about what was said or asked during the interview.

- 7.2 The panel should agree a set of questions they will ask all candidates relating to the requirements of the post, and the issues they will explore with each candidate based on the information provided in the candidate's application and references (if available).
- 7.3 The interview will assess the merits of each candidate against the job requirements and will explore their suitability to work with children. A face-to-face interview will always be carried out as part of the recruitment process. In all cases a range of optional questions can be selected from the bank of key Principles Questions and all Safeguarding Questions from the bank will be mandatory.
- 7.4 A candidate's response to a question about an issue will determine whether and how that is followed up. Where possible it is best to avoid hypothetical questions because they allow theoretical answers.
- 7.5 It is better to ask competency-based questions that ask a candidate to relate how s/he has responded to, or dealt with, an actual situation, or questions that test a candidate's attitudes and understanding of issues. Past behaviour is often the best predictor of future behaviour.

8. Conditional Offers of Employment

- 8.1 Any offer of employment with Holden Knight will be conditional on the satisfactory completion of the following:-
- The receipt of at least two satisfactory references including the last employer and from any previous employment in the sector (see below)
 - Satisfactory Enhanced DBS Disclosure and where the appointee has lived outside the United Kingdom, a certificate of good conduct (or equivalent) if applicable;
 - Confirmation of the candidates medical fitness (through a pre-employment health check);
 - Verification of qualifications by the individual by providing original certificates;
 - Verification of professional status where required;
 - Verification that the candidate has not been prohibited from working with children or vulnerable adults;
 - Verification of the candidates identity;
 - Verification of the candidate's right to work in the UK.
- 8.2 A record will be kept to show that the above checks have been carried out for all employees.

9. References

- 9.1 The purpose of obtaining a reference is to ensure that the Company has objective and factual information to support appointment decisions. References will normally be taken up on short listed candidates prior to interview including staff who may already be employed by the Company.
- 9.2 All offers of employment will be subject to the receipt of a minimum of two satisfactory references, one of which must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second referee should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.
- 9.3 All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the Job Description and Person Specification for the role that the applicant has applied for. If the referee is a current or previous employer, they will also be asked to confirm the following: -

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired);
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people;
- The Company will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials;
- The Company will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant before any appointment is confirmed.

9.4 Once received all references will be subject to scrutiny by the employing Manager and Human Resources who will agree any actions going forward in terms of obtaining further information, probing concerns etc before undertaking a process of verification.

9.5 We will always attempt to obtain references from any previous employer where employment has involved working in regulated employment or with vulnerable groups. For applicants who have worked outside the UK we will always endeavour to follow up references from employment undertaken whilst working outside the UK.

9.6 We will try, as far as possible, to find out why a prospective staff member's previous employment ended if their previous jobs involved working with children or vulnerable adults. We will attempt to obtain this information from their most recent employer, and other employers where relevant. For example, this could be a conversation with the previous employer and we will record the detail of this on the staff member's file.

10. Criminal Record Check

10.1 As a Company Holden Knight will ensure that all appointments (including volunteers and agency staff) are subject to an Enhanced Disclosure application through the Disclosure and Barring Service (DBS). This involves completion of a Disclosure form, on which personal information and an address history is "disclosed" so that data can be collated through the Police and other agencies, including relevant criminal convictions, cautions, police intelligence and other sources.

10.2 The Enhanced Check with Barred List will also reveal whether the individual is barred from working with children by virtue their inclusion on the lists of those considered unsuitable to work with children.

10.3 Having a criminal record would not necessarily mean that an applicant could not be employed. However, if somebody failed to include relevant information on an application form, which then surfaces through the DBS checking process, in most cases this would prevent us from pursuing an application to work for us further.

10.4 No employee should work or commence duties until such time a satisfactory DBS has been received and authenticated as there being no contra-indication to them working with our children. This authentication will be undertaken by the HR department who will also advise any further steps that need to be taken if the DBS is deemed to be unsatisfactory.

10.5 The term "positive disclosure" refers to a DBS disclosure containing information relating to convictions, cautions and reprimands etc. plus "soft information" relating to non-convictions, but which police forces deem relevant to disclose. Having a positive disclosure would not necessarily mean someone could not work for Holden Knight and will be fully considered in keeping with our Positive Disclosure Policy.

- 10.6 Applicants with recent periods of overseas residence and those with little or no previous UK residence may also be asked to apply for the equivalent of a Disclosure if one is available in the relevant jurisdiction(s).
- 10.7 The Company expects supply/temporary worker agencies/contractors that are used by the Company to register with the Enhanced DBS Disclosure on their own account and to follow this policy or their own comparable policy. Proof of registration will be required before the Company will commission services from any such organisation.
- 10.8 The agency must provide evidence of the checks carried out on their central record. The Company reserves the right to terminate the contract with the agency and send home an agency staff member without notice should these terms of safe recruitment practice be breached by the agency or the member of agency staff. In this instance the Company will not be liable for any charges connected to the booking.
- 10.9 In view of the fact that all positions within the Company will amount to "regulated positions", all applicants for employment must declare all previous convictions, cautions, reprimands or warnings (except those which are "protected" as defined in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013).
- 10.10 A failure to disclose a previous conviction, caution, reprimand or warning may lead to an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.
- 10.11 Under the relevant legislation, it is unlawful for the Company to employ anyone who is included on the lists, maintained by the DfE and the Department of Health, of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the Company to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence.
- 10.12 It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the Company, if:
- the Company receives an application from a disqualified person;
 - is provided with false information in, or in support of an applicant's application; or
 - the Company has serious concerns about an applicant's suitability to work with children, it will report the matter to the Police, DBS and/or Ofsted.

11. Retention and Security of Disclosure Information

- 11.1 The Company's policy is to observe the guidance issued or supported by the DBS on the use of Disclosure information. In particular, the Company will:-
- store Disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of HR only;
 - not retain Disclosure information or any associated correspondence for longer than is necessary. In most cases, the Company will not retain such information for longer than 6 months although the Company will keep a record of the date of a Disclosure, the name of the subject, the type of Disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
 - ensure that any Disclosure information is destroyed by suitably secure means such as shredding; and
 - prohibit the photocopying or scanning of any Disclosure information.

11.2 The Company complies with the provisions of the DBS Code of Practice, a copy of which is available on request.

12. Retention of Records

12.1 If an applicant is appointed, the Company will retain any relevant information provided on their application form (together with any attachments) on their personnel file. This file will be stored by the Company for up to 6 years following termination of employment.

12.2 If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after 6 months, unless the applicant specifically requests the Company to keep their details on file.