



## Forest Sports Education Safer Recruitment Policy

Date: September 2025

Signed: Richard Kear

## 1. Introduction

- 1.1 Forest Sports Education are committed to providing an environment which recognises that the delivery and management of effective safeguarding of children and adults identified as 'vulnerable', requires sound procedures, good inter-agency co-operation and highly competent and managed staff who are confident via ongoing training and development.
- 1.2 This policy provides a framework which incorporates the advised nationally recommended safeguarding practices, thereby ensuring that Forest Sports Education has in place a robust and rigorous recruitment and selection procedure which precludes unsuitable applicants from gaining a position with Forest Sports Education.
- 1.3 To ensure a secure environment is maintained the policy covers (at para: 3.8 - 3.11) 'Visiting, Agency, Contracted and Casual Staff,' who are not directly employed by Forest Sports Education

## 2. Legal

2.1 Forest Sports Education recognises its explicit duty under Section 175 of the Education Act 2002, the Children Act 2004 and Working Together to Safeguard Children 2010 to provide an environment which safeguards and promotes the welfare of children.

2.2 The Policy refers to the provisions of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and defines the activities and work considered to be a 'regulated activity' (work that a barred person must not do.)

### 2.3 The new definition of 'regulated activity' in relation to children now comprises:

- i **Unsupervised activities**, namely to teach, train, instruct children, care for or supervise\* children, or provide advice/guidance on well-being, and drive a vehicle only for children.

***(\*supervision means day to day supervision as is reasonable in all circumstances for the protection of the children concerned.)***

- ii Work undertaken by individuals in Forest Sports Education (a 'specified place' as defined by the Safeguarding Vulnerable Groups Act 2006) with the opportunity for contact

Work carried out by volunteers supervised to a reasonable level, in accordance with the statutory guidance on supervision within Forest Sports Education is not a regulated activity. However, a supervised paid Forest Sports Education employee does come under regulated employee status because of the definition applied under the Safeguarding Vulnerable Groups Act 2006 as working in a 'specified place.'

- iii **Work under (i) or (ii) is a 'regulated activity' only if it is done regularly. Regularly means carried out by the same person either:**

- Once a week or more often or,
- 4 or more days in a 30 day period or,
- Overnight between 2.00 a.m. and 6.00 a.m.

**2.4 The new definition of ‘regulated activity’ in relation to adults (any person aged 18 or over) has removed the previous reference ‘vulnerable’ adult.**

- i Under the Protection of Freedom Act 2012, any adult is regarded as ‘vulnerable’ if they require regulated activities to be provided on their behalf at a particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics, or circumstances of the adult receiving the activities. There is also no requirement for a person to do the activities a certain number of times before they are engaged in regulated activity.

2.5 The policy has also been developed in accordance with the Department for Education guidance contained in ‘Safeguarding Children and Safer Recruiting in Education’ issued in January 2007.

## **2 POLICY SCOPE AND PURPOSE**

3.1 The Secretary of State has the power to bar anyone from employment as a teacher and from work involving regular contact with Children or young people in Schools and Colleges. Forest Sports Education is under a statutory duty not to employ anyone that is barred by the Secretary of State whose name appears on any Vetting and Barring list.

3.2 Since the introduction of the new ‘regulated activity’ on 10 September 2012 there are now three types of criminal record check that are available through the DBS:

- **Standard DBS check** – this checks only the information held on the Police National Computer
- **Enhanced DBS with barred list information** (for those individuals that fall under the new definition of regulated activity)
- **Enhanced DBS without barring information** (for those previously falling within regulated activity but not meeting the terms required under the new definition) This will therefore not check the ISA barring lists (Adults/Children/List 99)

3.3 Under the Protection of Freedoms Act 2012 if a role within Forest Sports Education requires an enhanced DBS check Forest Sports Education will therefore request if appropriate the barred list check (for children, adults or both). Enhanced DBS checks for work within ‘regulated activity’ will tell Forest Sports Education (when requested) if the person is on one of the Independent Safeguarding Authorities barred lists.

### **3.4 Equality and Diversity**

#### **3.4.1 Transgender applicants**

The Criminal Records Bureau has a confidential checking process for Transgender Applicants who do not wish to reveal details of their previous identity to the person who asked them to complete an application form for a DBS check. Further information from the DBS is available by telephoning: 0151 676 1452 or by sending an e-mail to the DBS Sensitive Applications Team.

### **Applicants who have lived outside the United Kingdom**

- 3.5 All new staff providing education at Forest Sports Education who have lived outside the United Kingdom are subject to such additional checks as are deemed appropriate where the required DBS Enhanced Disclosure check is not considered sufficient to establish suitability to work with Children and Adults in a regulated activity.
- 3.6 Applicants who have resided outside the UK in the past 5 years will need to provide Criminal Convictions Clearance from the country(ies) which they were residing in, because the DBS cannot generally trace individuals abroad. If Forest Sports Education recruits an individual from overseas, or an individual who has lived abroad in recent years prior to appointment, and needs to check their overseas criminal record, a DBS check may not provide a composite picture of the criminal record.
- 3.7 Applicants will be asked to contact the relevant Embassy to obtain a disclosure which should not be dated more than 6 months at the time of receipt. The DBS information line for overseas queries is: 0870 90 90 811 or the Foreign and Commonwealth website is [www.fco.go.uk](http://www.fco.go.uk).
- 3.8 Documents that are evidence of an individual's overseas identity will be retained securely by Forest Sports Education in accordance with the UK Border Agency guidance for the duration of the individual's employment and for a further two years after the individual's employment with Forest Sports Education has ceased.

### **Visiting staff**

- 3.9 Visiting staff such as education mentors **who do not** have regular and unsupervised access to children will not receive a DBS check, provided they are always directly supervised.
- 3.10 Visiting staff **who do** have unsupervised regular access to children and adults requiring 'regulated activities' such as volunteer sports coaches - their 'providing organisation' will request the check. Human Resources will prior to an individual's commencement seek written confirmation from the respective agencies, thereafter annually that the appropriate checks, including the DBS checks have been carried out and by whom.

### **Agency, Contracted and Casual staff**

- 3.11 Forest Sports Education will seek written confirmation from the respective agencies that the appropriate checks, including the DBS checks have been carried out and by whom, providing where reasonable and practicable the necessary reference number.
- 3.12 When an Agency has obtained an enhanced criminal record certificate, the Agency will confirm to Forest Sports Education in writing that the disclosure provides the full

details, namely the Police have not using their common law powers under the Protection of Freedom Act 2012 passed on such relevant information to the Agency about the individual which they consider to be justified and proportionate and this has been withheld.

#### Students on work /volunteer placements

- 3.13 A minimum age limit for criminal record checks has been set in the Protection of Freedoms Act 2012. This means that Forest Sports Education will not apply for a criminal check for individuals unless in circumstances of employment.
- 3.14A separate procedure is provided for all categories of students who require checks i.e. work/volunteer placements and Forest Sports Education will take all reasonable and appropriate steps to ensure that other employers comply with the DBS Code of Practice and the safeguarding legislative framework.

#### Staff

3.15 Forest Sports Education will ensure that the full range of employment checks for all staff are carried out to minimize the possibility of any learners suffering harm from those whom they consider to be in positions of trust in whatever capacity.

3.16 Where a member of staff changes role and the role is directly concerned with dealing with learners in the Safeguarding Children and Adult regulated categories, a further appropriate DBS Enhanced Disclosure check will be carried out to update their record.

3.17 If there is a break in service of 3 months or more a new DBS check will be carried out.

**For the purposes of undertaking a DBS check, a ‘child’ is defined as an individual under the age of 18, except in employment situations where the age limit is 16.**

## **4 Employment checks**

- 4.1 In addition to the above **mandatory employment** checks, Forest Sports Education will also, as part of its safer recruitment and selection process, undertake the following checks on prospective staff, this will involve:
- Sourcing of a minimum of two written professional references (where appropriate one of the references should be from the most recent employer where the person worked with, or was in contact with children) to confirm previous academic and employment gaps (checking the reasons provided for any identifiable gaps)
  - Evidence of relevant qualifications and current memberships of professional bodies
  - Right to Work within the United Kingdom, through checking the authenticity of pre-employment documentation i.e. passport:

- A 'crown seal' watermark repeated down the right-hand-side of the disclosure, which is visible both on the surface and when holding the disclosure up to the light

## 5 Appointment to post prior to receipt of a DBS check

5.1 Managers wishing to appoint staff into post prior to the DBS check being received by Forest Sports Education may only in exceptional circumstances and when allowing an individual within a non student facing role (to attend induction training, or to undertake other duties which would not include them in engaging in any form of regulated activity) submit the Safer Recruitment and Vetting – Risk Assessment Form - Appendix A to the Directors, together with the Prospective Employee Statement of No Convictions Appendix B as only the Directors may sign this form.

## 6 General

6.1 Any person refusing to be checked by Forest Sports Education will be unable to be employed, as this is a pre-requisite to offering or continuing in any contract of employment.

## 7 Legislative change

7.1 The policy acknowledges that certain changes will arise in the future.

## 8 The Secure Storage, Handling, Use, Retention of Disclosures and Disclosure Information

8.1 Forest Sports Education will continue to use the Disclosure service Disclosure and Barring Service to help assess the suitability of applicants for positions of trust. It will also continue to comply fully with the respective Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

8.2 Forest Sports Education complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

8.3 Disclosure information will never be kept on an applicant's personal file and will always be kept separately and securely in a lockable cupboard, with access strictly controlled and limited to those who are entitled to see it as part of their duties.

8.4 In accordance with section 124 of the Police Act 1997, Disclosure information will only be passed to those who are authorised to receive it in the course of their duties. Forest Sports Education maintains a record of all those to whom Disclosures or Disclosure information has been revealed and recognises that it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

8.5 Disclosure information will only be used for the specific purpose for which it was requested and for which the applicants' full consent has been given.

8.6 Once a recruitment (or other relevant) decision has been made, Forest Sports Education does not keep Disclosure information for any longer than absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstance, it is considered necessary to keep Disclosure information for longer than six months, Forest Sports Education will consult with the DBS and will give full consideration to the Data Protection and Human Rights of the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

8.7 Once the retention period has elapsed, Forest Sports Education will ensure that any Disclosure information is immediately, and, suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

## 9 RESPONSIBILITIES FOR IMPLEMENTATION OF THE POLICY

9.1 Forest Sports Education will be responsible for ensuring that a regular review of the effectiveness of this Policy and Procedures takes place annually or in accordance with statutory change.

9.2 Senior Leadership Team will ensure that all aspects of the policy are adhered to in order to ensure that there is no discrimination against any employee.

9.3 It will be the Senior Leadership Team's responsibility to ensure that risk assessments are carried out in accordance with this policy and procedure and particularly in the case of paragraph 5.1 above and this is approved by the managing director.

9.4 It will be the responsibility of the senior coaches to seek advice from the managing director when employee needs to be removed immediately from an area/activity where it is felt a learner may be put at risk.

9.5 It is the Senior Leadership Teams responsibility to ensure that the Disciplinary Procedure is where appropriate invoked within **10 days of the incident occurring and the member of staff must be removed from site during this time**. The employee will have the right to be accompanied during this process by a nominated work colleague, Trade Union or staff representative whilst an investigation is carried out.

9.6 The management staff will support the managing director in implementing the process at paragraph 9.5.

9.8 Visitors to Forest Sports Education sites, in whatever capacity, must be signed in and out and provided with a visitor's badge. You should clarify with the visitor(s) the areas in which they are working and identify with them where, when and how the facilities they require can be assessed. Please ensure that you are fully aware of their movements and whereabouts at all times whilst at Forest Sports Education sites.

9.9 The management staff and managing director will ensure compliance with the policy and be responsible for advising partners on its effectiveness, by recommending where appropriate any revision and developments of the policy and procedure.

## **10 REVIEW AND MONITORING**

The policy and procedure will be reviewed on a regular basis according to legislative change. The initial review will take place one year after the Policy and Procedure comes into effect.

Appendix A – Safer Recruitment – Vetting and Barring Checks – Risk Assessment

Appendix B – The Prospective Employee's statement of no convictions

Appendix C – Recruitment of Ex-Offenders Statement

## **11 Single Central Record of Recruitment Vetting Checks**

11.1 Forest Sports Education's single central record of recruitment checks will record:

- All staff employed who are employed to work at Forest Sports Education, and those staff providing education, regularly caring for, training, supervising or being in sole charge of children and all other staff who have been employed to work in regular contact with children.
- All staff who are employed as supply staff providing education to Forest Sports Education, whether employed directly by Forest Sports Education or through an agency
- Any volunteers that Forest Sports Education has recruited to work regularly with children and for whom DBS checks have been requested because they are working unsupervised
- People brought into Forest Sports Education to provide regular additional teaching or instruction who are not staff members; for example, a specialist sports coach
- Confirmation and the details of whether the individual's identity was checked
- Where the individual has been living outside the United Kingdom, whether further checks considered appropriate in respect of the person have been carried out.
- Whether a check has been carried out to confirm that the person has a right to work in the United Kingdom

11.2 The Single Central Record will record the date when the check was completed, or the relevant certificate obtained and will document who carried out the check.

11.3 In recording individual educational attainments the primary qualifications required to perform the responsibilities of the role will be recorded i.e. coaching badges.



## APPENDIX A

### RISK ASSESSMENT: SUPERVISION PENDING DBS DISCLOSURE

It is a legal requirement that all new staff appointed to Forest Sports Education who are providing education and regularly caring for, teaching, training, instructing, supervising or being solely in charge of persons under 18 and/or adults who require '***regulated activities***' *to be provided on their behalf at a particular time* MUST **have the appropriate type of Enhanced DBS Disclosure with children and or adult barred list information.**

The policy of Forest Sports Education is that staff working for Forest Sports Education will have one of the levels of Enhanced DBS Disclosure. All contractors and visitors (working in Forest Sports Education for a period of time) must provide written confirmation that their staff have been checked as this forms part of any contract with Forest Sports Education.

In circumstances where a DBS Disclosure is pending, the management staff have the discretion to allow an individual within a non-student facing role only to commence work, and **PROVIDED** that the following Risk Assessment form is completed and the name of the Supervisor/s is provided. This permission will only be given once all other Vetting and Barring checks have been carried out and these prove satisfactory. **Completion of this Risk Assessment form is compulsory by the appropriate management staff.**

This applies to staff working on or off all Forest Sports Education sites.

Name of new member of staff .....

Club .....

Proposed start date .....

Brief Description of their Job Role
What is their previous experience and do they currently hold a DBS?
If they hold a current DBS what is the Disclosure No
Who will their Supervisor/s be (e.g. contact name)?

Briefly describe the supervisory arrangements and restrictions to their role that are proposed (these might typically include wearing a visitors badge at all times, regular rotation of duties, restriction of movement to social areas of Forest Sports Education, being accompanied and supervised at all times )

Briefly describe the business reasons why the new starter needs to join Forest Sports Education urgently

**HR Department to complete**

Have all the reference checks been completed (e.g most recent employer) Yes/No

Are these satisfactory?  
Yes/No

List 99 check and date  
Yes/No

DBS & Vetting and Barring checks Yes/No Ref No: F

Any other relevant information:

***I understand that this person will not have access to any student or any staff data while employed under this arrangement***

Signed .....(management staff)

Date received by HR --/--/----

Date forwarded to Principal --/--/----

**Decision of Managing Director**

*The Risk Assessment is approved/not approved*

Signed .....

Date .....

*This risk assessment is valid until --/--/---- only.*

***This form should be destroyed upon receipt of a clear enhanced DBS clearance certificate***

## APPENDIX B

### SAFEGUARDING CHILDREN AND VULNERABLE ADULTS STATEMENT

The area you are to work in wishes to ensure they have cover for the safety of all learners and you are therefore asked to sign the following statement and return this immediately to the Forest Sports Education, with the completed DBS application form and identification documents.

1 I understand that Forest Sports Education will carry out a Vetting and Barring list check and I declare that I do not have a record of being barred from working with young people and vulnerable adults.

2 If the Vetting and Barring check shows this statement to be untrue I acknowledge that VLUK will inform the relevant authorities.

3 As I have not previously had a DBS check I hereby declare that I have had no convictions or cautions.

4 I understand that I must be supervised at all times whilst I am working for Forest Sports Education during the period.

#### Declaration

I confirm that the information I have provided is complete and true and understand that knowingly to make a false statement is a criminal offence

Signature ..... Date .....

## **APPENDIX C**

### **Policy Statement on the Recruitment of Ex-offenders**

It is a requirement of the DBS Code of Practice that all Registered Bodies must treat DBS applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed. It also obliges Registered Bodies to have a written policy on the recruitment of ex-offenders; a copy of which can be given to DBS applicants at the outset of the recruitment process.

#### **Statement**

- As an organization using the DBS service to assess applicants' suitability for positions of trust, Forest Sports Education complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.
- Forest Sports Education is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, marital status, age, disability or offending background.
- Forest Sports Education actively promotes equality of opportunity for all with the right level of talent, skills and potential and welcomes applications from a wide range of candidates.

Having a criminal record will not necessarily be a bar from working at Forest Sports Education. It will depend on the nature of the position and the circumstances and background of the offence.

- Forest Sports Education selects all candidates for interview based on their skills, qualifications and experience.
- A DBS check is only requested after a thorough risk assessment has indicated that one is proportionate and relevant to the position concerned. For those positions where a DBS check is required, all job adverts and job descriptions will contain a statement that a DBS check will be requested in the event of the individual being offered the position.
- Where a DBS check is to form part of the recruitment process, Forest Sports Education will encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. Forest Sports Education will request that this information is passed under separate, confidential cover, to Human Resources. Forest Sports Education guarantees that this information will only be seen by those who need to see it as part of the recruitment process.
- Forest Sports Education will ensure that all those involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

- Forest Sports Education will also ensure that all recruiting staff have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- On the subject of any offences or other matter that might be relevant to the position Forest Sports Education will ensure that an open and measured discussion takes place as defined in the Rehabilitation of Offenders Act 1974. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer.
- Forest Sports Education will make every individual who is the subject of a DBS check aware of the existence of the DBS Code of Practice and will make a copy available upon request.
- Forest Sports Education will undertake to discuss any matter revealed in a DBS check with the individual seeking the position before withdrawing a conditional offer of employment.