

## Safer Recruitment Policy

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### 1. Introduction

Suffolk Coastal Poverty Action (“SCPA”) is committed to providing the best possible service to its service users and the wider community. SCPA is also committed to providing a supportive and flexible working environment to all its members of staff and volunteers. SCPA recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The aims of SCPA's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief (recognising that some roles have a Genuine Occupational Requirement around Christian faith), sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age
- to ensure compliance with all relevant legislation, recommendations and guidance including any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- to ensure that SCPA meets its commitment to safeguarding and promoting the welfare of clients, and children & young people by carrying out all necessary pre-employment checks

### 2. Data protection and recording of checks

SCPA is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to SCPA to enable SCPA to carry out the checks that are applicable to their role. Any checks carried out will be recorded as required on SCPA's GDPR Policy. SCPA will also be required to provide certain information to third parties, such as the Disclosure and Barring Service. Failure to provide requested information may result in SCPA not being able to meet its employment, safeguarding or legal obligations. SCPA will process personal information in accordance with SCPA Data Protection policy and the Information and records retention policy.

### 3. Recruitment and selection procedure

All adverts posted by SCPA will include a statement about its commitment to safeguarding and promoting the welfare of service users (and associated children), and make clear that safer recruitment checks will be undertaken.

All applicants for employment will be required to provide a curriculum vitae or statement outlining their academic and employment history and their suitability for the role. Applicants will receive a job description and person specification for the role applied for. This policy and SCPA's Safeguarding policy and procedures are available to download from SCPA's website (to be found within the SKC Church website at [www.skc.church](http://www.skc.church)). Copies can be forwarded to applicants on request.

SCPA will then conduct a shortlisting exercise by reviewing all applications received in order to determine which applicants will be invited for interview. The shortlisting exercise will usually be conducted by two members of the SCPA leadership team who will ideally also be involved in the interview process.

Shortlisted applicants will be invited to attend an interview at which their skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with relevant service users.

All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with relevant service users and children. This information will be considered and discussed with applicants at interview.

If SCPA decides to make an offer of employment following the interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating SCPA's terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified)
- verification of qualifications, whether professional or otherwise, which SCPA takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not
- verification of the applicant's employment history
- SCPA being satisfied that any information generated through online searches does not make the applicant unsuitable to work at SCPA
- the receipt of two references (one of which should be from the applicant's most recent employer) which SCPA considers to be satisfactory
- the receipt of an enhanced disclosure from the DBS which SCPA considers to be satisfactory (only in very rare circumstances will a post not require an enhanced DBS check)

- verification of the applicant's right to work in the UK; and
- any further checks which SCPA decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

Additionally:

- for positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency
- where the position amounts to "Regulated Activity" (see section 4.3.1 below) confirmation that the applicant is not named on the Children's Barred List

#### 4. Pre-employment checks

In fulfilling its obligations to carry out pre-employment checks the SCPA does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age. SCPA is a ministry of SKC Church and there is a Genuine Occupational Requirement that all employees must be Christians, associated with a Christian Church which is, or could be, in membership of the Council of Churches of Britain & Ireland.

- 4.1. **Right to work in the UK:** all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist': (Right to work checklist ([publishing.service.gov.uk](http://publishing.service.gov.uk))).
- 4.2. **Qualifications:** all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which SCPA requests.
- 4.3. **References:** please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by SCPA. One of the references should be from the applicant's current or most recent employer. Where there is no current employer, verification of the most recent period of employment and reasons for leaving should be obtained.

References will be taken up if an offer of employment is given.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied.

Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by SCPA. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

As part of the selection process, SCPA will use appropriate techniques to identify the best candidate for the post. Interviewers will agree structured questions and explore potential areas of concern. Full records will be kept of decisions made and all information considered

SCPA may at its discretion make telephone contact with any referee to verify the details of the written reference provided.

SCPA treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

#### 4.4. **Criminal records checks:**

Almost all posts at SCPA will require an enhanced disclosure from the DBS as our front-line workers and senior leadership work with Vulnerable Adults and/or Children. From May 2013, the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. Further details on the DBS filtering rules can be found at:

<https://www.gov.uk/government/publications/filtering-rules-for-criminal-record-check-certificates/new-filtering-rules-for-dbs-certificates-from-28-november-2020-onwards>

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

##### 4.4.1. **Regulated Activity**

In addition to an enhanced DBS check, SCPA will apply for a check of the Children's Barred List\* (now known as an Enhanced Check for Regulated Activity) in respect of all positions at SCPA which amount to "Regulated Activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of SCPA will amount to Regulated Activity if it is carried out:

- (1) frequently, meaning once a week or more; or
- (2) overnight, meaning between 2.00 am and 6.00 am; or
- (3) satisfies the "period condition", meaning four times or more in a 30 day

period; and

(4) provides the opportunity for contact with children.

Separate Barred List checks are carried out in the following circumstances:

for newly appointed staff who are engaging in Regulated Activity, pending the receipt of an Enhanced DBS Certificate with Barred List information;

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

It is for SCPA to decide whether a role amounts to Regulated Activity taking into account all the relevant circumstances. However, nearly all posts at the SCPA amount to regulated activity.

\* SCPA is not permitted to check the Children's Barred List unless an individual will be engaging in Regulated Activity. Whether a position amounts to Regulated Activity must therefore be considered by SCPA in order to decide which checks are appropriate. It is however likely that in nearly all cases SCPA will be able to carry out an enhanced DBS check and a Children's Barred List check.

#### 4.4.2. **The DBS disclosure certificate**

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to SCPA. It is a condition of employment with SCPA that the original disclosure certificate is provided to SCPA prior to their start date. Original certificates should not be sent by post.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by SCPA.

For those who are subscribed to the DBS Update Service, a check will be done to confirm that no new information has been added to the check since its issue. The original DBS certificate will still need to be provided.

#### 4.4.3. **Starting work pending receipt of the DBS disclosure**

If there is a delay in receiving a DBS disclosure, in exceptional circumstances the Manager and the Chair together have discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to Regulated Activity), have been completed and once appropriate supervision has been put in place.

If the formal check is delayed and the SCPA is not satisfied about the applicant's

suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

**4.4.4. Applicants with periods of overseas residence**

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. SCPA will take into account the "DBS unusual addresses guide" in such circumstances.

**4.5. Retention and security of disclosure information**

SCPA's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

**5. Queries**

If an applicant has any queries on how to apply for a post at SCPA or any other recruitment matter, they should, in the first instance, contact the Administrator by email at [debtcentreadmin@skc.church](mailto:debtcentreadmin@skc.church)