



Safer Recruitment Policy (including DBS)

Policy Owner: Geoffrey Hunter, Director and Designated Safeguarding Lead

Organisation: Gtec Media Ltd

Version: 1.0

Effective Date: July 2026

Review Date: July 2027

1. Purpose

Gtec Media Ltd is committed to safeguarding and promoting the welfare of learners and creating a safe, respectful and inclusive learning environment.

This policy sets out the procedures used to recruit, select and engage staff, tutors, contractors and other individuals involved in the delivery of adult learning provision. Its purpose is to ensure that individuals are suitable for their roles and that safeguarding risks are identified and managed appropriately.

The policy includes Gtec Media Ltd's approach to Disclosure and Barring Service (DBS) checks and should be read alongside the organisation's Safeguarding and Prevent Policy, Equality and Diversity Policy, Health and Safety Policy, Data Protection Policy and other relevant organisational procedures.

2. Scope

This policy applies to all employees, tutors, contractors, sessional workers and volunteers whose roles involve delivering, supporting, managing or overseeing Gtec Media Ltd's adult learning provision.

The level of pre-engagement checks undertaken will be proportionate to the responsibilities of the role, the nature of contact with learners, the delivery environment and any applicable legal, contractual or commissioning requirements.

3. Responsibilities

The Director has overall responsibility for ensuring that safer recruitment procedures are implemented and reviewed.

Geoffrey Hunter, as Director and Designated Safeguarding Lead (DSL), is responsible for ensuring that safeguarding considerations are incorporated into recruitment decisions and for advising on concerns relating to an individual's suitability to work with learners.

Darren Walker, Contracts Manager, supports operational compliance by ensuring that required recruitment documentation and checks are completed and recorded before an individual begins relevant delivery duties.

All individuals involved in recruitment must act fairly, consistently and without unlawful discrimination.

4. Safer Recruitment Principles

Gtec Media Ltd will:

- clearly define the duties and safeguarding responsibilities associated with each role;
- assess the level and nature of contact the role will have with learners;
- obtain sufficient information to assess an applicant's suitability;
- verify identity and right to work in the UK where required;
- verify relevant qualifications, experience or professional competence where these are necessary for the role;
- obtain and consider references where appropriate;
- consider unexplained or concerning gaps in employment history;
- apply appropriate DBS and barred-list checks where the role is legally eligible and such checks are required;
- assess safeguarding concerns before confirming an individual's suitability for relevant duties; and
- maintain appropriate recruitment and vetting records securely.

5. Role Assessment and Recruitment Planning

Before recruitment or engagement, Gtec Media Ltd will consider:

- the purpose and responsibilities of the role;
- whether the individual will have direct or unsupervised contact with learners;
- whether learners may include children or adults who meet the relevant legal criteria for regulated activity;
- whether delivery will take place online or face-to-face;
- the frequency and nature of learner contact;
- any safeguarding risks associated with the role; and

- any specific requirements imposed by a commissioner, funding body, local authority or contract.

This assessment will determine the recruitment checks and safeguarding controls required.

6. Application and Selection

Applicants may be required to provide information about their employment history, relevant qualifications, professional experience and suitability for the role.

Selection decisions will consider the applicant's ability to perform the role safely and effectively. Where relevant, interviews or structured discussions will explore:

- experience of working with adult learners;
- understanding of professional boundaries;
- safeguarding awareness;
- ability to respond appropriately to concerns or disclosures;
- commitment to equality, diversity and inclusion; and
- understanding of the Prevent Duty where applicable to the role.

Any material discrepancies or unexplained concerns identified during recruitment will be explored before appointment.

7. Identity and Right-to-Work Checks

Before an individual commences employment or relevant contractual duties, Gtec Media Ltd will verify identity and, where legally required, the individual's right to work in the UK.

Original documents, approved digital identity verification methods or other legally recognised processes will be used as appropriate.

Records will be maintained in accordance with applicable legal requirements and Gtec Media Ltd's Data Protection Policy.

8. References and Employment History

Where appropriate to the role, references will be sought to verify previous employment, experience, conduct or suitability.

References should normally be obtained from a recent employer or other appropriate professional source. Where a role involves significant responsibility for learners or safeguarding, references may specifically seek relevant information about the individual's suitability for that responsibility, subject to applicable law.

Significant unexplained employment gaps, discrepancies or concerns will be discussed with the applicant and considered before a final recruitment decision is made.

9. Disclosure and Barring Service (DBS) Checks

Gtec Media Ltd recognises that DBS checks must only be requested where legally permitted and at the appropriate level for the role.

Before requesting a DBS check, the organisation will assess:

- the duties and responsibilities of the role;
- the nature and frequency of contact with learners;
- whether the role constitutes regulated activity;
- the age and circumstances of the learner group;
- whether the role is legally eligible for a Standard or Enhanced DBS check and, where applicable, a check of the relevant barred list; and
- any contractual or commissioning requirements.

Where a role is eligible and requires a DBS check, the appropriate check will be completed before the individual undertakes relevant unsupervised duties, unless a documented risk assessment and lawful interim safeguarding arrangements permit otherwise.

A DBS certificate containing information will not automatically prevent an individual from being appointed. Any disclosed information will be considered fairly and individually, taking account of:

- relevance to the role;
- seriousness and nature of the matter;
- time elapsed;
- circumstances and pattern of behaviour;
- evidence of rehabilitation;
- safeguarding implications; and
- applicable legal requirements.

Decisions will be documented confidentially.

10. DBS Update Service

Where an individual is subscribed to the DBS Update Service and the original certificate is appropriate for the workforce and level of check required, Gtec Media Ltd may carry out a status check with the individual's consent and in accordance with DBS requirements.

The organisation will not assume that an existing DBS certificate is automatically transferable or suitable for a different role.

11. Where a DBS Check Is Not Legally Available or Required

Not every role within adult learning is legally eligible for a Standard or Enhanced DBS check.

Where a DBS check is not legally available or is not required, Gtec Media Ltd will use other appropriate safeguarding measures, which may include:

- identity and right-to-work verification;
- references;
- employment history checks;
- qualification or experience verification;
- safeguarding and Prevent induction;
- clear codes of conduct and professional boundaries;
- supervision and management oversight;
- secure online delivery arrangements;
- risk assessments; and
- procedures for reporting and escalating concerns.

The absence of a DBS check will not remove the requirement to assess and manage safeguarding risks appropriately.

12. Conditional Appointments and Outstanding Checks

Where a required check has not been completed, an individual will not normally undertake unsupervised duties for which that check is necessary.

In exceptional circumstances, and only where lawful, any interim arrangement must be supported by a documented risk assessment and appropriate safeguards. These may include supervision, restricted duties or prevention of unsupervised learner contact.

The decision and safeguards must be authorised by the Director and reviewed until the outstanding checks are completed.

13. Safeguarding and Prevent Induction

Before undertaking relevant learner-facing duties, staff and tutors will be made aware of:

- Gtec Media Ltd's Safeguarding and Prevent Policy;
- the identity and contact route for the Designated Safeguarding Lead;
- how to recognise and report safeguarding concerns;
- how to respond to disclosures;
- professional boundaries and expected conduct;
- confidentiality and appropriate information sharing;
- online safety requirements;
- Prevent responsibilities; and
- procedures for reporting allegations or concerns involving staff.

Safeguarding knowledge will be reinforced through updates, briefings and learning from incidents or near misses where appropriate.

14. Allegations and Concerns About Staff

Any allegation or safeguarding concern involving a member of staff, tutor, contractor or volunteer must be reported immediately to the Designated Safeguarding Lead or, where the concern involves the DSL, to another appropriate senior person or external safeguarding authority.

Gtec Media Ltd will take immediate action to protect learners where necessary and will follow applicable safeguarding, employment, contractual and referral procedures.

The organisation will not conduct an inappropriate internal investigation where a matter requires referral to the police, local authority safeguarding services, the Disclosure and Barring Service or another relevant authority.

15. Ongoing Suitability and Duty to Disclose

Safer recruitment does not end when an individual is appointed.

Staff and tutors are expected to maintain appropriate professional conduct and disclose any matter that may materially affect their suitability to undertake their role, subject to applicable law.

Gtec Media Ltd may review an individual's suitability where:

- a safeguarding concern or allegation arises;
- relevant information is disclosed;
- the individual's duties change significantly;
- a commissioning or contractual requirement changes;
- a DBS status check indicates a change, where applicable; or
- other information raises a legitimate safeguarding concern.

Appropriate action may include additional assessment, changes to duties, increased supervision, suspension from relevant activities or referral to appropriate authorities.

16. Record-Keeping and Data Protection

Gtec Media Ltd will maintain appropriate records of recruitment and vetting checks. Depending on the role, these may include:

- identity verification;
- right-to-work checks;
- references;
- qualifications or experience verification;
- DBS check details where applicable;
- risk assessments;
- recruitment decisions; and

- safeguarding-related suitability decisions.

Personal information will be handled confidentially, securely and in accordance with applicable data protection legislation and Gtec Media Ltd's Data Protection Policy.

DBS information will not be retained for longer than necessary and will only be accessed by authorised individuals with a legitimate need to know.

17. Equality and Fair Treatment

Recruitment decisions will be made fairly, consistently and without unlawful discrimination.

Having a criminal record will not automatically prevent appointment. Information will be considered only where relevant and lawful, taking account of the nature of the role, safeguarding responsibilities and individual circumstances.

Reasonable adjustments will be considered throughout the recruitment process for applicants who require them.

18. Monitoring and Review

The Director is responsible for monitoring implementation of this policy.

The policy will be reviewed annually, or sooner where there are:

- changes to legislation or DBS requirements;
- changes to safeguarding guidance;
- changes to Gtec Media Ltd's provision or learner groups;
- significant safeguarding incidents or near misses;
- findings from quality assurance activity; or
- new commissioning or contractual requirements.

Lessons identified through safeguarding concerns, recruitment issues, incidents or near misses will be used to strengthen future recruitment and safeguarding practice.

19. Policy Approval

Approved by: Geoffrey Hunter, Director

Role: Director and Designated Safeguarding Lead

Effective date: July 2026

Next review date: July 2027