British
Guardianship

Safer Recruitment Policy

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1. Scope & Purpose

This policy sets out the safer recruitment requirements for all appointments of staff, volunteers, local coordinators, homestay primary carers and all homestay household members aged 16 and over. It must be read alongside our Safeguarding & Child Protection Policy (latest version) and applies to recruitment, re-checks and ongoing monitoring. We follow the AEGIS Guardianship Organisation Quality Standards (September 2026), Keeping Children Safe in Education (KCSIE 2026), and UKVI Child Student Rules.

For services operating in Scotland, British Guardianship also follows relevant Care Inspectorate guidance, including Safer Recruitment Through Better Recruitment, and applicable Scottish safeguarding legislation.

Linked policies: Safeguarding & Child Protection; Low-Level Concerns; Whistleblowing; Data Protection & Privacy; Missing Student; Online Safety. You can find all our policies in the following link [**https://www.britishguardianship.com/our-policies/**]

2. Principles

- The welfare of children is paramount; safer recruitment is everyone's responsibility.
- We operate a culture of safe recruitment, scrutiny and professional curiosity.
- We only appoint/engage individuals who are suitable to work with children and who meet immigration and regulatory requirements.
- All checks are completed and verified BEFORE employment/hosting begins.

3. Roles & Responsibilities

Designated Safeguarding Lead (DSL):

- Oversees safer recruitment practice, signs off risk assessments for any criminal record disclosures, and ensures records are complete and secure.
- Any concerns about the conduct or suitability of adults, including low level concerns or self reports, are directed at the DSL and managed in line with our Low Level Concerns (Safeguarding Children & Child Protection) and Whistleblowing policies, with LADO involvement where required. This includes staff, volunteers, local coordinators and homestay hosts.

Hiring Managers/Recruiters:

- Ensure panels include at least one safer-recruitment-trained interviewer
- Take and retain detailed interview notes; ensure references and checks are obtained and verified.

All Staff/Homestays:

- Must disclose any change in circumstances that might affect suitability and cooperate with ongoing checks, updates and training.

4. Safer Recruitment Process – Staff, Volunteers & Local Coordinators

4.1 Role design & advertising

Job descriptions and person specifications explicitly include safeguarding responsibilities and expectations, with clear reporting lines to the DSL. All roles are independent of any school attended by our students.

4.2 Applications & shortlisting

We use an application form. Shortlisted candidates undergo an online search (open-source) to help identify publicly available concerns to be explored at interview. Any gaps or anomalies in

employment/experience must be accounted for prior to appointment.

4.3 Interviews
At least one panel member holds current safer recruitment training refreshed at least every 3 years (or sooner if guidance changes). Interviews probe suitability to work with children and explore any gaps/anomalies. Detailed interview notes are made and kept on file.

4.4 References
Two WRITTEN references are required. For staff/volunteers, at least one must be from the current or most recent employer; for homestays, at least one should be professional. Referees must not be related. Open "to whom it may concern" references are not accepted.
On receipt, references are checked for legitimacy, completeness and internal consistency against the application/interview. Any concern triggers a verification call; we file the call log (date/time/summary and name of caller) together with the references. Reference records are retained for the duration of engagement and then 5–7 years.

4.5 Pre-appointment checks
Identity: original photographic ID verified and recorded.
Right to work: evidence checked and the date, documents and checker recorded.
Qualifications (where applicable): originals viewed/verified and recorded.
DBS / Disclosure Scotland / PVG: Enhanced DBS, Disclosure Scotland or PVG checks relevant to role prior to start; where a role meets the definition of Regulated Activity with children, we will complete a Children's Barred List check in addition to the Enhanced DBS, before the individual starts any duties. Written permission will be obtained before DBS, Disclosure Scotland or PVG checks are undertaken.
Overseas checks: if an individual has lived or worked overseas for 3 months or more in the last 5 years, we obtain a police check from that country or, if unobtainable, alternative checks plus a written DSL risk assessment.
DBS Update Service: Where subscribed, we will complete at least an annual online status check with written consent and record the outcome; otherwise, DBS is renewed at least every 3 years.

4.6 Decision, conditional offer & onboarding
All checks are completed before start. In exceptional operational circumstances only, and subject to a written DSL risk assessment, an individual may begin only under line of sight supervision with no unsupervised contact until all checks are cleared. Induction includes safeguarding/child protection, code of conduct and role-specific guidance.

5. Safer Recruitment – Homestay Primary Carers & Household Members

Primary carer status: the homestay primary carer must be a British citizen or hold settled status and live in the UK full-time; evidence is viewed and recorded.

Household members: ALL persons aged 16+ resident at the address (including those temporarily away who will be present during hosting, and regular overnight visitors) must complete the appropriate Enhanced DBS or Disclosure Scotland checks before any placement. For homestays located in Scotland, PVG children and adults list checks will be considered where regulated activity applies.

Self-Declaration: the primary carer completes a Homestay Self-Declaration on behalf of the household at application and annually thereafter and agrees to notify us immediately of any

change in circumstances.

Risk assessment: any disclosure triggers a written DSL risk assessment to determine suitability; we will consult the Local Authority as needed.

6. Criminal Record Information, Risk Assessment & UKVI considerations

Any criminal record information is considered case-by-case by the DSL using a written risk assessment (Appendix D). For homestays/guardians, we consider UKVI Child Student Rules regarding custodial and non-custodial sentences as part of suitability decisions. Decisions (including conditions) are documented and signed by the DSL.

7. Record-Keeping – Single Central Record (SCR)

We maintain a Single Central Record (SCR) for staff, volunteers, homestays and 16+ household members. The SCR records identity, DBS or Disclosure Scotland/PVG level and certificate number/date, barred list checks (where applicable), right-to-work evidence, references and verification, safer-recruitment training, overseas checks, British/settled status (for homestays), risk-assessment outcomes and who checked/when. Copies of DBS certificates are not normally retained; where retained, they are held only with a valid reason and for no longer than 6 months.

8. Training & Induction

All new starters and homestays receive safeguarding induction prior to engagement. All staff, volunteers and homestay primary carers receive safeguarding training and at least annual updates. At least one interviewer on each panel holds current safer-recruitment training.

9. Data Protection & Retention

Recruitment data are processed in line with UK GDPR and our Data Protection & Privacy Policy. Records are kept securely, access-controlled and retained only as long as necessary. Photocopies of right-to-work and identity documents are stored securely; we do not routinely retain copies of DBS certificates; where exceptionally retained, they are kept no longer than 6 months and then securely destroyed.

10. Monitoring, Non-Compliance & Review

The DSL audits recruitment files and the SCR periodically. Any non compliance is rectified immediately and, where relevant, reported via safeguarding governance routes. This policy is reviewed at least annually or sooner if legislation/standards change. Ongoing suitability monitoring takes account of information arising from the Low Level Concerns and Whistleblowing processes.

About the Appendices

The following appendices form part of British Guardianship's Safer Recruitment Policy. They contain the templates, core data fields and risk assessment tools required to comply with **AEGIS Guardianship Organisation Quality Standards (September 2026)** and **Keeping Children Safe in Education.**

They are used in all recruitment, homestay approval and monitoring procedures.
Where an appendix is already incorporated into another compulsory document (e.g., the Homestay Registration Form), this policy references it rather than duplicating it.

Appendix A – Homestay Self Declaration Form
Required by AEGIS Standard 5.1.2.
This form is not duplicated in this policy because it is already fully incorporated into the British Guardianship Homestay Registration Application Form and is completed at application and annually thereafter.

Appendix B – Single Central Record (SCR) – Core Fields
Required to meet AEGIS Standard 2.8 and Appendix 7.
Sets out all safer recruitment data that must be recorded for staff, volunteers, homestay primary carers and household members aged 16+.

Appendix C – Standard Reference Request Template
Required by AEGIS Standard 2.8.4.
Ensures references include safeguarding related questions and that open "to whom it may concern" references are not accepted.

Appendix D – Criminal Record Disclosure Risk Assessment (DSL)
Required by AEGIS Standard 2.8.7.
Used by the Designated Safeguarding Lead to assess the suitability of any individual where a criminal record disclosure is present, including UKVI Child Student Rule considerations.

These appendices must be used consistently to ensure safe, lawful and fully compliant recruitment and homestay approval processes.

Appendix A – Homestay Self-Declaration (Annual)

Note: This Self-Declaration is already contained within the **Homestay Registration Application Form** and is completed at application and annually thereafter. The organisation retains the right to request an updated version at any time.

Appendix B – Single Central Record (SCR) core fields

- Role/Position; Start date
- Full name; DOB; Address
- Identity check docs seen + date + checker initials
- Enhanced DBS, Disclosure Scotland or PVG level; certificate number; issue date; original seen by + date; DBS Update Service status check date; and DBS renewal due (if not on Update Service).
- Children's Barred List check (Y/N) + date (if regulated activity)
- Right to work evidence; date; checker
- British/Settled status evidence (homestay primary carer); date; checker
- Overseas check(s): country; result; date; checker (or alternative checks + DSL risk assessment)
- References: received dates; verification call log date(s); checker initials
- Interview notes on file (Y/N)
- Safer Recruitment training (panel member): provider; date; renewal due
- Outcome notes / risk assessment reference; DSL sign-off; date

Appendix C – Standard Reference Request (extract)

Please comment on the applicant's suitability to work with children, safeguarding awareness, integrity, reliability, and any disciplinary history (including safeguarding/child protection). We cannot accept open "to whom it may concern" references. We may contact you by phone to verify this reference.

Appendix D – Criminal Record Disclosure Risk Assessment (DSL)

- Applicant/Role
- Disclosure details (offence/date/outcome)
- Context & relevance to role
- Applicant explanation / mitigation
- Reference triangulation & online search findings
- UKVI Child Student Rules considerations (if homestay/guardian) – custodial/non-custodial thresholds
- Safeguards/conditions (if proceeding)
- Decision (Suitable / Not suitable / Suitable with conditions)
- DSL name/sign/date