

Safer Recruitment and DBS Policy

Policy Statement

Norton Webb Ltd is committed to safeguarding and promoting the welfare of all learners, including children, young people, and adults at risk. Robust safer recruitment practices are central to that commitment. This policy sets out how Norton Webb recruits, vets, and inducts staff, contractors, and volunteers; how it carries out and handles Disclosure and Barring Service (DBS) checks; and how it ensures that applicants with criminal records are treated fairly and without unlawful discrimination.

The company is committed to deterring unsuitable applicants from applying for roles that involve contact with vulnerable individuals, to identifying any unsuitability through a consistent set of pre-employment checks, and to handling all personal data obtained during the recruitment process securely and lawfully.

Policy Scope

This policy applies to all paid and unpaid roles at Norton Webb Ltd, including employees, self-employed consultants, agency workers, contractors, and volunteers. All such roles may involve contact with learners, some of whom may be children (under 18) or adults at risk; accordingly, all positions are treated as requiring a DBS disclosure at the appropriate level.

This policy also serves as Norton Webb's written policy on the recruitment of ex-offenders for the purposes of the DBS Code of Practice, and as its written policy on the secure handling, use, storage, retention, and disposal of DBS certificate information. A copy of this policy will be made available to any DBS applicant on request, and is provided to shortlisted candidates as part of the recruitment information pack.

Legal Framework

This policy is informed by:

- Police Act 1997 (Part V — disclosure functions; section 122 — DBS Code of Practice; section 124 — handling of certificate information).
- Rehabilitation of Offenders Act 1974 (as amended by the Police, Crime, Sentencing and Courts Act 2022, in force from 28 October 2023).
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended).
- Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act 2006 (Regulated Activity) (Transitional Provisions) Order 2012.
- Protection of Freedoms Act 2012 (definition of regulated activity).
- Children Act 1989; Children Act 2004; Care Act 2014.
- Apprenticeships, Skills, Children and Learning Act 2009 (as amended) — duty on Independent Training Providers to safeguard and promote the welfare of children receiving education or training.
- Equality Act 2010.

- Asylum and Immigration Act 1996 and Immigration, Asylum and Nationality Act 2006 (right-to-work checks).
- Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- Human Rights Act 1998.
- DBS Code of Practice for registered persons and other recipients of disclosure information.
- Keeping Children Safe in Education (DfE, September 2025) – statutory guidance for schools and colleges, applying to Independent Training Providers in respect of learners under 18.
- Working Together to Safeguard Children (DfE, 2026).

Recruitment Process

Advertising

All vacancies will be advertised in appropriate media, which may include but is not limited to JobCentre Plus, internet sites, and local press. All advertisements will carry a statement detailing Norton Webb’s commitment to safeguarding children, young people, and adults at risk, and will state that an application for a DBS certificate will be submitted in respect of the successful candidate.

Job Description and Person Specification

Prior to advertising any vacancy, the HR Manager will draw up a job description and person specification with due regard to the qualifications and experience required by the role, including any qualifications required by the relevant awarding organisation.

Application and Shortlisting

Applications will be shortlisted by the HR Manager or Managing Director, giving due regard to the skills and experience required for the post. Norton Webb’s Equal Opportunities Policy applies throughout the recruitment process, including at shortlisting.

Online Searches

In line with the expectations of Keeping Children Safe in Education (2025), Norton Webb may carry out an online search on shortlisted candidates as part of its due diligence. Where this is done, shortlisted candidates will be informed in advance. The purpose of any such search is limited to identifying issues that are publicly available and that may be relevant to the candidate’s suitability for a role with vulnerable groups; it is not used to access private content, and any findings will be discussed openly with the candidate at interview.

References

References will be sought for shortlisted applicants prior to interview wherever practicable. References will be obtained directly from the referee, not from copies provided by the candidate, and will normally include

the candidate's most recent employer.

Self-Disclosure

Candidates should complete a self-disclosure form prior to the interview. This should be provided in a separate, sealed envelope marked 'Confidential'. The self-disclosure form will only be opened if the candidate is selected for the role; any disclosed matter will be discussed openly with the candidate before any final decision is taken. Where a candidate is not selected, the unopened self-disclosure form will be disposed of confidentially.

Interview

Candidates successful at shortlisting will be invited for interview. Interviews will involve a panel of at least two managers. Managers will receive appropriate Equality and Diversity training and Safer Recruitment training before being involved in the interview selection process. At least one member of the interview panel will hold a current Safer Recruitment qualification.

Candidates will be asked whether they have any special requirements in relation to the interview, to allow Norton Webb to make any reasonable adjustments for disabled applicants in line with the Equality Act 2010.

Scoring sheets will be used during the interview process. They will be retained for 6 months following interview, after which they will be destroyed in a secure manner.

Notification of Outcome

All applicants, both successful and unsuccessful, will be contacted within five working days of their interview to notify them of the outcome. Unsuccessful applicants will be offered feedback on their performance.

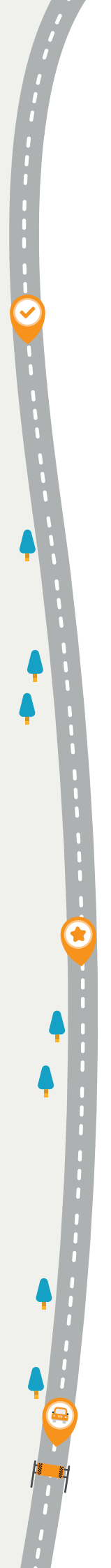
Conditional Offer

Conditional offers of appointment will be made subject to the satisfactory completion of all required pre-employment checks, including references, right-to-work verification, and a satisfactory DBS disclosure at the appropriate level.

Pre-Employment Checks

For every successful candidate, Norton Webb will complete the following pre-employment checks before the start of employment:

- **Identity** — verified against original photographic identification documents.
- **Right to work in the United Kingdom** — verified in accordance with Home Office guidance, with original documents seen and copied.

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- **Qualifications** — verified where they are required for the role (for example, by an awarding organisation).
 - **References** — at least two, taken up directly from the referee.
 - **Self-disclosure** — opened and reviewed.
 - **DBS check** at the appropriate level (see below).
 - **Prohibition checks** — for any role involving “teaching work” with learners under 18, a check of the Teaching Regulation Agency prohibition register will be carried out where applicable.
 - **Overseas check** — where the candidate has lived or worked outside the UK for six months or more in any single country within the last ten years, an overseas police certificate or equivalent check will be sought.
 - **Online search** — on shortlisted candidates, where Norton Webb has determined this is proportionate.

A record of all checks completed will be entered onto the Single Central Record (see below).

DBS Check Levels and Regulated Activity

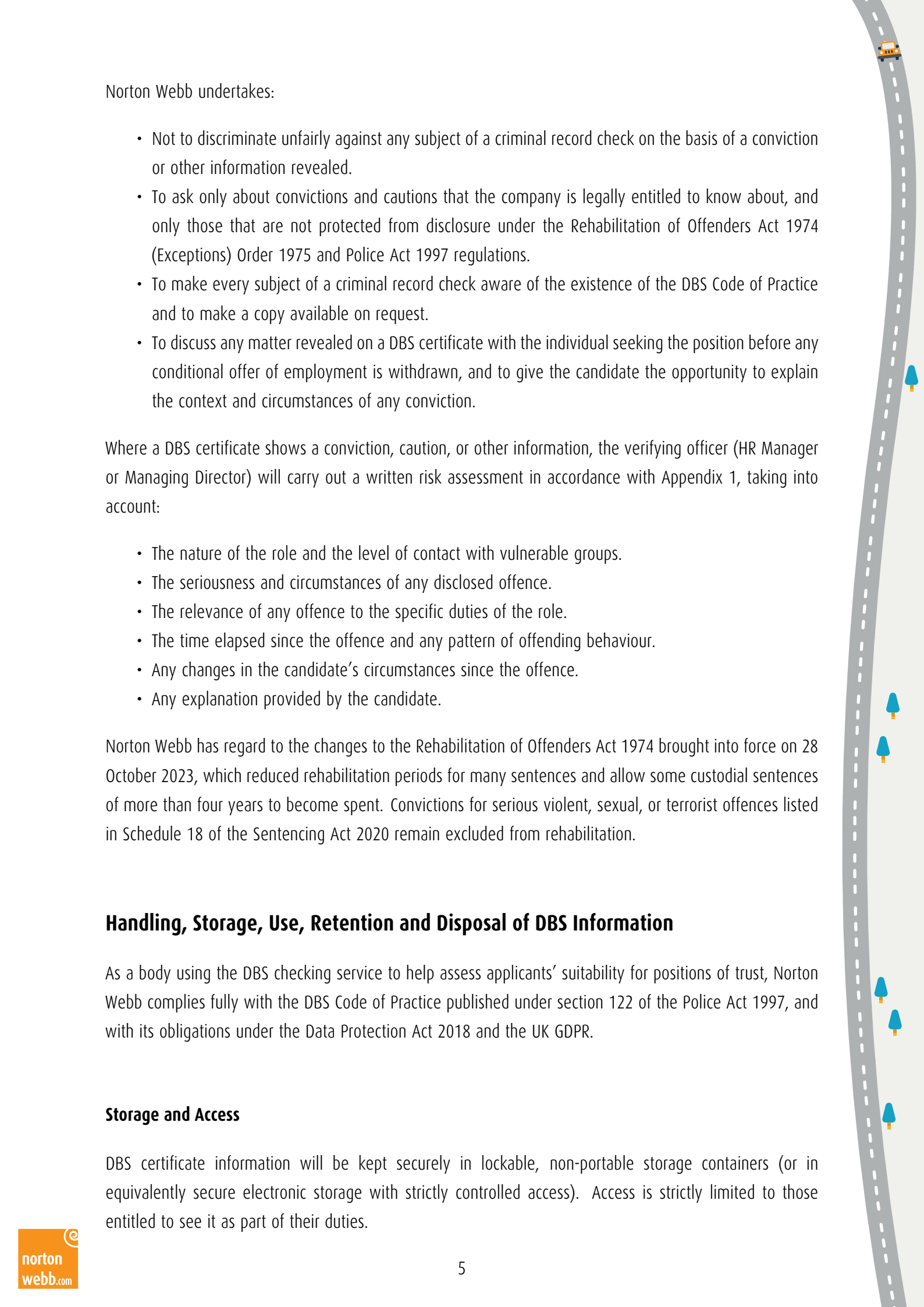
Norton Webb determines the appropriate level of DBS check for each role based on the nature of the role and the type of contact with vulnerable groups. The following categories apply:

1. **Roles undertaking Regulated Activity with children or adults** — eligible for an Enhanced DBS Check plus a check of the relevant barred list (children’s, adults’, or both).
2. **Roles previously classed as Regulated Activity but no longer falling within scope** (for example, supervised volunteers) — eligible for an Enhanced DBS Check without a barred list check. Before commissioning the check, a written risk assessment will be completed to confirm whether the check is proportionate and necessary.
3. **Roles listed under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 but not within the definition of Regulated Activity** — eligible for a Standard DBS Check.
4. **Roles outside scope of any of the above** — Norton Webb will not request enhanced or standard DBS checks for roles where the law does not permit them. A Basic DBS check (which the individual can apply for themselves) may be appropriate in some circumstances.

An application for a criminal record check is only submitted to the DBS after a thorough risk assessment confirms that the check is both proportionate and lawful for the position concerned.

Recruitment of Ex-Offenders

Norton Webb is committed to the fair treatment of staff, applicants, and users of its services, regardless of offending background. Norton Webb actively promotes equality of opportunity and welcomes applications from a wide range of candidates, including those with criminal records. All candidates are selected for interview based on their skills, qualifications, and experience.



Norton Webb undertakes:

- Not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.
- To ask only about convictions and cautions that the company is legally entitled to know about, and only those that are not protected from disclosure under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and Police Act 1997 regulations.
- To make every subject of a criminal record check aware of the existence of the DBS Code of Practice and to make a copy available on request.
- To discuss any matter revealed on a DBS certificate with the individual seeking the position before any conditional offer of employment is withdrawn, and to give the candidate the opportunity to explain the context and circumstances of any conviction.

Where a DBS certificate shows a conviction, caution, or other information, the verifying officer (HR Manager or Managing Director) will carry out a written risk assessment in accordance with Appendix 1, taking into account:

- The nature of the role and the level of contact with vulnerable groups.
- The seriousness and circumstances of any disclosed offence.
- The relevance of any offence to the specific duties of the role.
- The time elapsed since the offence and any pattern of offending behaviour.
- Any changes in the candidate's circumstances since the offence.
- Any explanation provided by the candidate.

Norton Webb has regard to the changes to the Rehabilitation of Offenders Act 1974 brought into force on 28 October 2023, which reduced rehabilitation periods for many sentences and allow some custodial sentences of more than four years to become spent. Convictions for serious violent, sexual, or terrorist offences listed in Schedule 18 of the Sentencing Act 2020 remain excluded from rehabilitation.

Handling, Storage, Use, Retention and Disposal of DBS Information

As a body using the DBS checking service to help assess applicants' suitability for positions of trust, Norton Webb complies fully with the DBS Code of Practice published under section 122 of the Police Act 1997, and with its obligations under the Data Protection Act 2018 and the UK GDPR.

Storage and Access

DBS certificate information will be kept securely in lockable, non-portable storage containers (or in equivalently secure electronic storage with strictly controlled access). Access is strictly limited to those entitled to see it as part of their duties.



Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those authorised to receive it in the course of their duties. Norton Webb maintains a record of all those to whom certificates or certificate information has been disclosed. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Norton Webb does not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

In limited circumstances — for example, to demonstrate safer recruitment practice for the purpose of a safeguarding audit, or where retention is required to evidence compliance with regulator inspection requirements — certificate information may be retained for longer than six months. Any such retention will be specifically considered, justified, recorded, and compliant with the Data Protection Act 2018, the UK GDPR, and the Human Rights Act 1998. Where retention beyond six months is considered necessary in exceptional circumstances unrelated to the purposes above, the DBS will be consulted before doing so.

Throughout any retention period, the usual conditions regarding secure storage and strictly controlled access will continue to apply.

Disposal

Once the retention period has elapsed, DBS certificate information will be destroyed by secure means — for example, by shredding, pulping, or burning, or (for electronic records) by secure deletion. While awaiting destruction, certificate information will not be kept in any insecure receptacle (such as a waste bin or confidential waste sack).

Norton Webb will not keep any photocopy or other image of a DBS certificate, or any copy or representation of its contents. The company may, however, keep a record of the date of issue of the certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate, and details of the recruitment decision taken.

DBS Update Service

Norton Webb encourages all staff and applicants to register for the DBS Update Service, which allows the portability of a DBS certificate across employers.

Where an applicant or employee is signed up to the Update Service, Norton Webb will:

- Obtain written consent from the individual before carrying out an Update Service status check.
- Confirm the original certificate matches the individual's identity (by sighting the original certificate).
- Ensure the certificate is for the appropriate workforce and at the correct level of check.
- Record the date of each Update Service status check on the Single Central Record.

Re-Checking Where the Update Service Is Not Used

Due to the nature of the regulated activity undertaken at Norton Webb, individuals not registered with the Update Service will be required to complete a new DBS check at regular intervals, to a maximum of every three years, at the company's cost where the role continues to require the check. A further DBS check may also be requested where a risk assessment or other company process indicates it is necessary.

Single Central Record

Norton Webb maintains a Single Central Record (SCR) of recruitment and vetting checks for all staff, contractors, and volunteers. The SCR is retained by the HR Manager and kept up to date.

The SCR contains, for each person:

- Identity check completed.
- Right-to-work check completed.
- Where required, qualifications check completed.
- Where applicable, prohibition check (Teaching Regulation Agency or other relevant register) completed.
- DBS check details: type and level of check, certificate number, date of issue, and the date the certificate was sighted by the verifying officer.
- Where the individual is registered with the DBS Update Service: the date of the most recent Update Service status check.
- Where applicable, overseas police check or equivalent completed.
- Date of most recent safeguarding training, Prevent training, and equality and diversity training.

Personal contact details, dates of birth, and similar identifying information are held on the individual's personnel file rather than on the SCR, in line with data minimisation principles.

The SCR is available for inspection by Ofsted and other relevant regulators on request.

Induction and Ongoing Training

Norton Webb provides a full induction to all new staff members, contractors, agency workers, and volunteers. Induction includes safeguarding, Prevent, equality and diversity, and data protection.

Safer recruitment is part of a wider framework for the ongoing safety and competence of staff. All staff receive ongoing training and refresher training at intervals determined by their role and risk assessment. All those involved in the recruitment process receive training on the relevant legislation, including the Rehabilitation of Offenders Act 1974 (as amended) and the DBS Code of Practice, and this training is updated to reflect legislative or guidance changes.

Allegations Against Staff

This policy is primarily concerned with the promotion of safer recruitment and the pre-employment checks that will be undertaken before employment is confirmed. Where concerns or allegations about a representative of Norton Webb are raised once they are in post, the company's Safeguarding Policy and Disciplinary Policy and Procedure will be followed, alongside any statutory reporting obligations to the Local Authority Designated Officer (LADO), the DBS, the Teaching Regulation Agency, or other relevant authority.

Document Control

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Appendix 1 — Risk Assessment: DBS Certificate Showing a Criminal Record

To be completed by the verifying officer (HR Manager or Managing Director) where a DBS certificate shows a conviction, caution, reprimand, final warning, or other information.

Field	Detail
Candidate name	
Position applied for	
Date of DBS certificate	
Certificate reference number	
Level of check (Standard / Enhanced / Enhanced + Barred List)	
Information disclosed (summary)	
Date(s) of offence(s)	
Sentence(s) or disposal(s)	
Time elapsed since the most recent offence	
Is the offence listed in Schedule 18 of the Sentencing Act 2020?	
Relevance of offence(s) to the duties of the role	
Pattern of offending (single incident / pattern of behaviour)	
Candidate’s explanation of context and circumstances	
Evidence of changed circumstances since the offence	
Self-disclosure form: was the offence disclosed by the candidate?	
Risk assessment outcome (offer to be made / withdrawn / further information required)	
Reasons for outcome	
Mitigating measures (if proceeding with offer): supervision, restricted duties, review periods	
Verifying officer name	
Signature	
Date	

This risk assessment will be retained on the individual’s personnel file. The DBS certificate itself is not retained beyond the period set out in the Retention section of this policy.

