



PONY PARTNERSHIPS



Safer Recruitment Policy – 2025–2026

Name of Organisation: Pony Partnerships CIC

Venue/Address: All venues

Date of Review: 1 September 2025

Date of Next Review: 31 August 2026

Author: Danielle Mills

1. Purpose and scope

Pony Partnerships CIC is committed to safeguarding and promoting the welfare of children and adults at risk. Safer recruitment is a whole-organisation, preventative approach designed to deter, identify and reject people who might pose a risk, and to embed a safeguarding culture before, during and after appointment.

This policy applies to: employees, sessional staff, contractors, agency/supply staff, trainees, students on placement, and volunteers (including trustees/Directors where relevant to regulated activity or management checks).

2. Legal and guidance framework

This policy reflects (as applicable to a CIC alternative provision setting working with children/young people and vulnerable adults):

- Children Act 1989 & 2004; Education Act 2002
- Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012)
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974 (Exceptions Order 1975, as amended)
- Data Protection Act 2018 & UK GDPR
- Equality Act 2010
- DfE *Keeping children safe in education* (KCSIE) (current edition)
- DfE *Staffing and employment advice for schools* (current edition)
- DfE *Searching, screening and confiscation* (current edition)
- Home Office: right to work checks and Identity Service Provider (IDSP/IDVT) guidance

Note: Although KCSIE is statutory for schools/colleges, we align to its standards through contracts, commissioning, and best practice for AP/therapeutic settings.

3. Training and safer recruitment responsibility

- At least one member of every recruitment panel will have completed recognised Safer Recruitment training.
- Current trained personnel: **Danielle Mills (Director)/Claire Jacob**
- All staff involved in recruitment will understand this policy and their safeguarding duties.

4. Safer recruitment process (end-to-end)

We embed safeguarding at every step:

a. Workforce planning & role design

- Define whether the role is **regulated activity** (children) and/or involves **substantial contact** with adults at risk.
- Draft job descriptions and person specifications that:
 - state our safeguarding commitment,
 - set clear responsibilities, conduct standards, and supervision arrangements,
 - specify essential safeguarding knowledge/behaviours and professional boundaries.

b. All adverts, role briefs and application packs will:

- Include our safeguarding commitment and expectation of an enhanced DBS check (and barred list where the role is regulated activity).
- State that online due-diligence checks may be undertaken for shortlisted candidates.
- Make clear that CVs are not accepted without a completed application form.

c. Applications

- Candidates must complete our application form (full work history, explanation of **all gaps**, references, declarations).
- We screen for tailored, role-specific evidence; generic/open references won't be accepted.

d. Shortlisting

- Use objective criteria from the person specification.
- Explore gaps/anomalies, reasons for moving roles, and suitability to work with children/vulnerable adults.
- Online due-diligence: For shortlisted candidates, a proportionate open-source check (e.g., public social media, press) to identify potential safeguarding red flags (e.g., hateful/sexualised content). We:
 - do not request passwords or access to private accounts;
 - only collect data relevant to role/safeguarding;
 - record outcomes succinctly (risk/no risk) in the recruitment file.

e. Interviews/assessment

- At least one safer-recruitment trained panel member present.
- Use values-based/safeguarding questions (e.g., boundaries, whistleblowing, low-level concerns, online safety, managing disclosures).
- Probe any gaps, anomalies, or changes in direction.
- Check identity documents **at interview** where possible.

f. References

- Obtain two references, including the most recent employer (and the last child-related role, if different).
- Use our reference template asking about:
 - substantiated safeguarding concerns/allegations,
 - disciplinary action related to children/vulnerable adults,
 - suitability to work with children/vulnerable adults.
- Do not accept "to whom it may concern" or character-only references.
- Resolve discrepancies before confirming appointment.

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g. Conditional offer and pre-employment checks

A conditional offer is issued subject to satisfactory completion of all applicable checks:

Identity and right to work

- Photographic ID and address verification.
- Right to work (in-person document check or compliant IDVT/IDSP for eligible British/Irish passport holders).

DBS

- Enhanced DBS for all roles with access to children; Enhanced + Barred List where the role is regulated activity.
- Update Service: where used, we will obtain the original certificate and perform an online status check annually.
- Positive DBS disclosures: complete a documented, role-specific risk assessment (see Appendix One/Two).

Overseas police checks

- Where an individual has lived or worked overseas, obtain a **certificate of good conduct** or equivalent, and take **additional references** if required.

Professional/qualification checks

- Verify required qualifications/registrations (e.g., professional bodies), insurance where applicable for associate team members.

Employment history

- Verify full chronology; explain and record all gaps.

Prohibition / management checks (where applicable)

- Teacher prohibition (TRA Teacher Services) where a role is teaching in a commissioned education context.
- Section 128 direction check where an individual undertakes management of education provision (applies in some settings; we apply as a risk-based best practice where our role intersects with education management).

Health/fitness for role

- Post-offer health declaration proportionate to the role's demands.

Childcare Disqualification (if applicable)

- If any element falls within the scope of the Childcare (Disqualification) Regulations (e.g., wrap-around care for under-8s), complete the required declaration and apply statutory rules.

We will not confirm appointment until mandatory checks are satisfactorily completed. In rare, justified cases where a start is urgently needed before a new certificate is seen, the Director will complete a DBS Risk Assessment (Appendix Two), ensure an application has been submitted, and put in place constant, recorded supervision and no lone working/1:1.

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h. Induction & probation

All starters (including volunteers/contractors on longer placements) receive an induction covering:

- Safeguarding Children and Adults policies; DSL/Deputy DSL contacts; reporting (including LADO and low-level concerns); code of conduct; online safety; information sharing & GDPR; whistleblowing; behaviour/physical intervention; searching & confiscation; first aid; H&S; lone working.
- Role-specific boundaries and supervision arrangements.
- Minimum Safeguarding training Level 2 on appointment (or within agreed timeframe) and Prevent awareness.
- Probation with documented reviews; concerns are addressed promptly (support plan or termination if risks can't be mitigated).

5. Ongoing safeguarding & re-checking

- Annual confirmation of reading key policies and Part 1 of KCSIE (or summary) for those working with children, plus updates refresh.
- Supervision and performance management include conduct/boundaries.
- Where risk changes (e.g., concerns, role change to regulated activity), we may require an updated DBS or additional checks.
- Staff must declare any new cautions/convictions immediately.
- For agency/supply staff, we obtain written confirmation from the agency that all required checks are complete; we verify identity on arrival and keep confirmation on file.

6. Volunteers, trainees, contractors, visitors

Volunteers

- Never left unsupervised or in regulated activity without an appropriate Enhanced (and where applicable Barred List) check.
- For supervised volunteers not in regulated activity, complete a written risk assessment to determine if an Enhanced DBS (without Barred List) is prudent.

Students/trainees/placements

- We obtain written assurance from the placing institution about completed checks, verify identity on arrival, and assess whether any additional checks are required.

Contractors

- Where contractors engage in regulated activity, we require Enhanced DBS (+ Barred List); otherwise, contractors working during service hours are supervised and identity-checked on arrival. We record contractor arrangements and access limits.

Visitors

- Managed, escorted, and not given unsupervised access to children.

External/commissioned providers

- Require written assurance ("Letter of Comfort") that all KCSIE-equivalent checks are completed for staff working with our learners. Where DBS content is disclosed to the provider, Pony Partnerships must see the certificate where relevant to risk assess presence on site.

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7. Single Central Record (SCR)

We maintain an SCR recording (as relevant to role):

- Identity; right to work
- Enhanced DBS (date/number/status, barred list where applicable)
- Overseas checks (if applicable)
- Professional/qualification checks (where required)
- Prohibition/Section 128 (where applicable)
- References; chronology verified
- Date of induction & safeguarding training
- Who undertook each check

8. Equity, data protection and record retention

- We are committed to fair and lawful processing of personal data (UK GDPR & DPA 2018).
- Recruitment files for unsuccessful applicants are kept securely for 6 months then deleted/destroyed.
- Personnel files (including check evidence) are retained in line with our Data Protection & Privacy Policy and statutory/insurer requirements.
- We never conduct intrusive or disproportionate online vetting. Any online findings are recorded briefly and relevantly.

9. Allegations, low-level concerns, and referrals

- Any allegation meeting the harm threshold against an employee/volunteer/contractor is reported immediately to the LADO and managed under our Safeguarding/Allegations procedures.
- Low-level concerns about staff behaviour are welcomed, recorded, reviewed for patterns, and addressed early.
- We have a legal duty to refer to the DBS anyone removed (or would have been removed) from regulated activity for harm/risk of harm to a child/adult at risk.
- Where applicable, we refer to TRA (teacher prohibition) if a teacher-like role is commissioned within education.

10. Monitoring and review

- The Director reviews safer recruitment practice after each campaign and annually, updating forms and templates (including risk assessments) in line with law/guidance and commissioning requirements.
- Policy review schedule: annual or sooner following legislative or guidance changes.

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Appendix 1: DBS RISK ASSESSMENT

Previous DBS certificate:

Is the member of staff (to include volunteers) working in regulated activity?

Yes		No	
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(See Appendix Two for Definition of Regulated Activity) Decision:

(Please tick level of risk)

High Risk – Person should not be allowed to start without a new Enhanced DBS, as there has been a break in service of more than three months (or they do not have an Enhanced DBS certificate) and/or there is insufficient information about the person in the 'known information' list above.	
Medium Risk – Person may start and although there is sufficient other information listed above, because there is a gap in service of three months or more (or they do not have an Enhanced DBS certificate), the person must be supervised* at all times and should not undertake 1:1 work, personal care activities or residential visits. (*the unchecked person must always be 'within sight and hearing' of a person with an Enhanced DBS check)	
Low Risk – Person can start work, without additional supervision, as they hold an Enhanced DBS check and there is no break in service for 3 months or more and all other checks have been satisfactorily completed.	

Authorisation

Print Name:	
Role	
Signature	
Date	

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Appendix 2: DBS RISK ASSESSMENT CHECKLIST

Starting work prior to a DBS certificate being seen:

This risk assessment should be completed when considering whether to allow a new member of staff to work before a new DBS certificate has been seen by Pony Partnerships CIC

Name of person	
Role	
Interview date	
Proposed start date	
DBS check application date	

(The person must not start without an application being made)

Is the person in 'Regulated' activity?			
Yes		No	

A member of Staff (to include volunteers) should not work unsupervised in regulated activity without an Enhanced DBS and barred list check – see Appendix Two)

Reason for starting without seeing a new DBS Check

	Continuity of Pony Partnerships CIC's provision to pupils
	Other (Please state)

Known Information

Have all the following checks been satisfactorily completed?

	Signed by PP	Date
2 x References received and verified		
Safeguarding training level 2 verified		
DBS Received and verified		
Identity (Photographic) verified		
Right to work in UK verified		
Verification of current address		
Qualifications verified		
Professional Liability insurance verified		
Mental and physical fitness verified		

Any other information (please state):

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