

Safer Recruitment Policy: Staff and Volunteers

FASD HUB South West / FASD Informed UK™

Document owner	FASD HUB South West, trading as FASD Informed UK™
Original issue date	30 September 2022
Last reviewed and updated	2 August 2026
Approved	7 August 2026
Next review	1 September 2027, or sooner following a significant safeguarding incident, organisational change, or relevant change in law or statutory guidance
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1. Policy statement

Safeguarding is everyone's responsibility. FASD HUB South West, trading as FASD Informed UK™, is committed to recruiting and retaining people who are suitable to work with children, young people and adults at risk. Safer recruitment is a continuing safeguarding process, not a single criminal-record check. We apply proportionate checks, structured assessment, accessible communication, professional curiosity, clear decision-making and ongoing supervision while treating applicants fairly, lawfully and with dignity.

2. Purpose and scope

This policy applies to directors, employees, workers, volunteers, trustees or committee members, students, sessional workers, agency workers, contractors, consultants and any person supplied to work for or on behalf of the organisation. It covers roles with direct or indirect contact with children, young people or adults at risk, access to sensitive information, influence over services, unsupervised access to premises, transport, online contact, home visits, outreach, training and indoor or outdoor events. A child is a person under 18. An adult at risk is an adult who may be unable to protect themselves from abuse or neglect because of care and support needs or other circumstances.

3. Principles

- Safeguarding and suitability are considered at every stage and throughout the appointment.
- Selection decisions are evidence-based, recorded and made against published role criteria.
- Applicants receive equal treatment and reasonable adjustments; disability, neurodivergence, care experience, communication differences or a need for support will not be treated as evidence of unsuitability.
- Only checks legally available and proportionate to the role will be requested.
- Information is handled confidentially under the organisation's Data Protection Policy.
- No person starts unsupervised or regulated activity until all required checks and risk decisions are complete.
- Concerns, discrepancies and disclosures are explored fairly and must not be ignored or resolved by assumption.
- The organisation will make any legally required referral to the Disclosure and Barring Service, police, local-authority designated officer or other appropriate body.

4. Governance and responsibilities

As a Community Interest Company, accountability rests with the directors, who approve this policy and appoint a Safer Recruitment Lead and Designated Safeguarding Lead. The Safer Recruitment Lead maintains procedures, training, role-assessment records and recruitment files. The Designated Safeguarding Lead advises on safeguarding concerns, allegations, referral duties and risk controls. Recruiting managers plan each process, apply consistent criteria, complete checks and ensure induction and supervision. At least two people should normally take part in shortlisting and interview; at least one must have current safer-recruitment knowledge appropriate to the role. No panel member may participate where a conflict of interest could affect, or appear to affect, impartiality.

5. FASD-informed and inclusive recruitment

Recruitment information and assessments will use clear, concrete and non-shaming language. Applicants may request reasonable adjustments and accessible formats without disadvantage. Adjustments may include questions in advance where appropriate, one question at a time, extra processing time, rest or sensory breaks, reduced-distraction space, written or visual prompts, assistive technology, an accessible venue or remote attendance. Panels will assess evidence against the role criteria rather than eye contact, speed of response, memory under pressure, handwriting, social style or verbal fluency. Structured adjustments must preserve the essential requirements and fairness of the process.

6. Role planning and advertising

Before advertising, the recruiting manager will confirm the need for the role, reporting line, duties, location, working pattern, safeguarding responsibilities, degree and frequency of contact, lone or online working, travel, personal care, access to confidential information, supervision and whether the activities are regulated activity. A written role description and person specification will distinguish essential from desirable criteria and state the conduct, boundaries, competence and FASD-informed practice expected.

6.1 Advertising and candidate information

Advertisements and candidate packs will state the organisation's commitment to safeguarding, equal opportunity and FASD-informed practice; describe the selection stages and required evidence; explain that references, identity and right-to-work checks will be undertaken; and identify any DBS check, barred-list check or other statutory check only where the role is eligible. They will invite requests for reasonable adjustments and explain how applicant information will be used.

7. Applications, scrutiny and shortlisting

Applicants will normally complete a consistent application form or supply equivalent information requested for the role. This will cover identity and contact details, qualifications, relevant employment and voluntary history, reasons for leaving, gaps or overlaps, references, eligibility to work and a statement addressing the criteria. Equality monitoring information will

be separated from selection. Health or disability questions before an offer will be limited to what the Equality Act 2010 permits, including arranging adjustments or establishing whether an intrinsic function can be carried out. Criminal-record information will be requested only where lawful, with filtering rules respected.

7.1 Scrutiny and shortlisting

Panel members will assess each application independently against the same published criteria, then agree and record decisions. They will identify incomplete answers, unexplained gaps, inconsistent dates, repeated brief appointments, unusual career changes, discrepancies and matters requiring clarification. These are prompts for fair enquiry, not automatic evidence of risk. Relevant contextual information and reasonable adjustments will be considered. Shortlisting records will show the evidence used and reasons for selection or rejection.

7.2 References

At least two satisfactory references will normally be obtained, including the current or most recent employer where practicable and the most recent relevant children's or adult-services employer where applicable. References must be requested directly from an authorised organisational source and verified where necessary; open references, testimonials from the candidate, relatives or friends will not be accepted. Requests will ask for dates, role, relationship to the applicant, suitability, conduct, reason for leaving and factual information about relevant disciplinary findings, substantiated safeguarding concerns or allegations and their outcomes. Health or absence information will be requested only where lawful and necessary. Any discrepancy, vague response or concern must be followed up and resolved before confirmation of appointment.

8. Interview and assessment

Interviews will be structured, use agreed questions and scoring, and explore evidence against the role description and person specification. The panel will examine motivation, safeguarding understanding, professional boundaries, use of authority, information sharing, accountability, teamwork, emotional regulation, inclusive practice and responses to realistic scenarios. It will clarify gaps, discrepancies and relevant matters from references or declarations. Notes will distinguish what the applicant said from the panel's evaluation and will be retained securely.

8.1 Specialist and practical assessment

Where proportionate to the role, the organisation may use a safeguarding-focused interview, presentation, written exercise, observed activity or scenario. Assessment involving children, young people or adults at risk must be risk-assessed, supervised and designed so the participant is not responsible for the appointment decision. Participants will receive accessible preparation, an appropriate way to give views and a debrief. Their contribution and the weight given to it will be agreed in advance. No applicant may have unsupervised access during selection.

9. Conditional offer and pre-appointment checks

- Verification of identity and current address using approved evidence.

- A compliant right-to-work check before employment begins, with follow-up checks where permission is time-limited.
- Direct verification of essential qualifications, professional registration or licences.
- At least two satisfactory references and satisfactory resolution of gaps or discrepancies.
- The legally available DBS level and barred-list information where the role is eligible.
- Relevant overseas criminal-record or conduct checks where the applicant has lived or worked abroad, recognising that these supplement rather than replace other checks.
- Any health enquiry or assessment permitted after a conditional offer and necessary for the role or reasonable adjustments.
- Any role-specific disqualification, prohibition, direction or regulator check required by law.
- A documented suitability decision by an authorised manager.

Offers will state that appointment remains conditional until the specified checks are completed satisfactorily. Where an exceptional operational need requires a person to begin before a non-statutory check is complete, the Safer Recruitment Lead and Designated Safeguarding Lead must approve a written, time-limited risk assessment with named supervision and prohibited duties. A person must never undertake regulated activity where a required barred-list check has not been completed or where the organisation knows or has reason to believe the person is barred.

DBS and regulated activity. The organisation will assess the actual activities, frequency, workforce and setting of each role against current DBS eligibility guidance before requesting a check. From 1 September 2026, the supervision exemption for regulated activity with children no longer applies in England and Wales: teaching, training, instructing, caring for or supervising children may be regulated activity even when supervised if the statutory frequency or overnight condition is met. This change does not alter regulated activity with adults. The organisation will request children's or adults' barred-list information only where legally entitled, record the eligibility decision and reassess it when duties change.

10. DBS certificates, Update Service and suitability decisions

A criminal record or other disclosure will not automatically prevent appointment unless the law prohibits the work. An authorised panel will assess relevance to the role, nature and circumstances, age at the time, time elapsed, frequency or pattern, explanation, evidence of change, safeguarding implications and available controls. The reasons for appointment or rejection will be recorded. The organisation will follow the Rehabilitation of Offenders Act 1974, current filtering rules and its policy on recruiting applicants with convictions.

Where an applicant uses the DBS Update Service, the organisation will obtain consent, inspect the original certificate, confirm identity, workforce and that the certificate level and barred-list information match the role, then complete and record the online status check. A new certificate will be required where the status has changed or the existing certificate is unsuitable. Certificate information is confidential. The organisation will record only the permitted check details and outcome, store any certificate copy securely and destroy it as soon as no longer required, normally within six months unless a lawful reason justifies longer retention.

11. Agency workers, contractors and overseas applicants

For agency workers, contractors, consultants and people supplied by partners, the organisation will obtain written assurance of the identity, right-to-work, references, qualifications, DBS and barred-list checks, overseas checks, safeguarding training and suitability assessment required for the role. Identity will be checked on arrival and duties must match the assurance received. Contracts will require prompt notification of concerns and cooperation with investigations and referrals.

Applicants who have lived or worked outside the UK will receive the same core checks as other applicants plus proportionate criminal-record, certificate-of-good-conduct, professional-regulator or employer checks available from the relevant country. The absence of an overseas check is not evidence of suitability or unsuitability. Where reliable evidence cannot be obtained, the organisation will document additional enquiries, references, interview exploration, supervision and any residual-risk decision. Immigration status, nationality or origin will not be used as a proxy for risk.

12. Induction, probation and supervision

All appointees will complete role-appropriate induction before undertaking unsupervised duties. Induction will cover safeguarding and reporting routes, code of conduct, professional boundaries, whistleblowing, information sharing, health and safety, lone and online working, FASD-informed communication, equality and reasonable adjustments, incident reporting and role-specific procedures. A named supervisor will set objectives, observe practice, provide regular reflective supervision and review suitability during probation or an equivalent settling-in period. Concerns will be addressed promptly and not deferred to the annual review.

13. Supporting volunteers, lived experience and sustainable involvement

Volunteers, including parents, carers and people with FASD or other neurodevelopmental conditions, disability or relevant lived experience, are valued members of the team. Their knowledge can strengthen trust, accessibility and FASD-informed practice, but lived experience will not be treated as an unlimited resource or a requirement to disclose personal history. The organisation will actively prevent compassion fatigue, secondary traumatic stress, overload and burnout through proportionate role design, realistic workloads, clear boundaries, induction, regular reflective supervision, debriefing after difficult work, access to a named support contact, planned breaks and opportunities to pause or step back safely. Volunteers may raise fatigue, distress, changing capacity or support needs without blame or fear that their contribution will be devalued.

Support and adjustments will be agreed confidentially with the volunteer and reviewed when circumstances change; a formal diagnosis will not be required before support is explored. Depending on the person and role, arrangements may include predictable duties, written or visual instructions, one task at a time, additional processing time, reminders and checklists,

reduced-distraction work, flexible or shorter shifts, remote or paired working, a consistent supervisor, sensory breaks, limits on traumatic material or crisis contact, temporary reassignment, a planned pause, phased return or additional training. Adjustments will preserve essential safeguarding requirements and will be recorded only to the extent necessary. Health, disability, neurodevelopmental difference, FASD lived experience, compassion fatigue or burnout will not on their own be treated as misconduct, unreliability or unsuitability. Before formal capability or conduct action, the organisation will consider whether workload, role clarity, supervision, trauma exposure, communication barriers or unmet adjustments contributed, while acting promptly where there is an immediate safeguarding risk.

13.1 Accommodations for volunteers with FASD

Accommodations will be person-led, strengths-based and based on functional needs rather than assumptions about diagnosis, age, verbal ability or previous performance. Volunteers may request support at recruitment, induction or at any later point, and may involve a trusted supporter or advocate in planning where appropriate. Disclosure of a diagnosis is voluntary unless specific information is lawfully required to manage an immediate and material risk; only necessary information will be recorded and shared with those responsible for arranging support.

- A clear written role description with concrete duties, boundaries, expected hours, named contacts and tasks that are essential or optional.
- A structured induction delivered in manageable stages, with repetition, demonstration, practice, visual or written prompts and opportunities to check understanding without shame.
- One instruction or task at a time where helpful, plain language, consistent terminology, checklists, calendars, reminders, templates and written follow-up after verbal discussions.
- A consistent named supervisor, predictable check-ins, prompt supportive feedback and clear escalation routes when the usual contact is unavailable.
- Predictable schedules and advance notice of changes wherever practicable, with support for transitions, travel, unfamiliar venues and changes of task.
- Flexible start and finish times, shorter or split shifts, additional breaks, pacing of cognitively or emotionally demanding work, and recovery time after events where compatible with the role.
- A quieter or lower-stimulation workspace, permission to use sensory aids, reduced background noise, remote or paired working, and access to a calm space.
- Tasks matched to the volunteer's strengths, with complex duties broken into steps and safeguards against overload, competing demands, unplanned lone working or unclear responsibility.
- Support with time awareness, prioritising, recording expenses, forms, digital systems, travel planning and remembering required checks or training.
- An agreed plan for signs of overload, shutdown, distress, memory difficulty or loss of regulation, including who will help, how duties may be paused or reassigned, and how the volunteer can leave safely without penalty.

The accommodation plan will identify agreed adjustments, who will arrange them, any relevant safeguarding controls and a review date. It will be reviewed with the volunteer after induction, following a material change, after an incident or concern, or whenever the volunteer asks.

Adjustments will not remove essential safeguarding boundaries, authorise duties outside the volunteer's competence or replace necessary supervision. Where a proposed adjustment cannot be provided, the organisation will explain the evidence-based reason, consider effective alternatives with the volunteer and record the decision. Disability-related mistakes, memory differences, slower processing, communication differences or the need for repeated support will not automatically be treated as misconduct; concerns will be considered in context while immediate risks to children, adults at risk or the volunteer are addressed promptly and proportionately.

14. Ongoing suitability and safer culture

Safer recruitment continues after appointment. The organisation will maintain clear conduct standards, accessible reporting routes, supervision, training and periodic review of roles and checks. Workers and volunteers must promptly report changes that may affect their legal eligibility or suitability, subject to lawful and proportionate requirements. DBS rechecks or Update Service status checks will be undertaken according to current law, role risk and organisational procedure rather than an automatic fixed interval. Changes in duties will trigger reassessment of regulated activity and check eligibility.

15. Concerns, allegations and referrals

Any concern about the conduct or suitability of a worker, volunteer, contractor or applicant must be reported immediately under the Safeguarding Policy and allegations procedure. The organisation will protect people from retaliation, preserve evidence, manage immediate risk and consult the Designated Safeguarding Lead and relevant statutory authority. Concerns that do not meet a formal harm threshold will still be recorded and reviewed for patterns. Where the legal conditions are met, the organisation will make a referral to the Disclosure and Barring Service and any required report to the police, local-authority designated officer, regulator, professional body, funder or commissioning body. Settlement agreements, resignation or the end of an assignment will not be used to avoid a referral duty.

16. Records, confidentiality and monitoring

- Approved role description, person specification and role-risk or DBS-eligibility assessment.
- Advertisement, candidate information and declared adjustments.
- Applications, scoring, shortlisting reasons, interview questions and notes.
- Reference requests, responses, verification and resolved discrepancies.
- Identity, right-to-work, qualification, registration, DBS and overseas-check records.
- Conditional offer, risk assessments, appointment decision and authorised sign-off.
- Induction, probation, supervision, training and ongoing suitability review.
- Concerns, allegations, investigation outcomes and statutory referrals, retained under the applicable safeguarding and data-retention rules.

17. Training, assurance and review

- Recruitment panel members will receive training and updates proportionate to their responsibilities, including safeguarding, fair selection, FASD-informed practice, reasonable adjustments, DBS eligibility, criminal-record decision-making, data protection and unconscious bias.
- The Safer Recruitment Lead will audit a sample of recruitment files at least annually and report themes, breaches, overdue actions, training completion and recommendations to the directors.
- Monitoring will consider applicant and volunteer experience, adjustment requests and completion, time to complete checks, incomplete checks, withdrawals, turnover, probation or settling-in outcomes, workload, supervision, compassion-fatigue and burnout indicators, breaks or pauses requested, safeguarding concerns and referral compliance. Information will be used to improve systems and support, not to make adverse assumptions based on disability, neurodevelopmental difference, caring responsibility or lived experience.
- This policy will be reviewed by 1 September 2027 and sooner after a significant safeguarding incident, audit finding, material service change, or change in law or statutory guidance.
- This policy should be read with the Safeguarding Policy, Code of Conduct, Equality, Diversity and Inclusion Policy, Data Protection Policy, Whistleblowing Policy, Complaints Policy, Health and Safety Policy, allegations procedure and current GOV.UK guidance on DBS eligibility, regulated activity, right-to-work checks and overseas criminal-record checks. Keeping Children Safe in Education applies where the organisation is acting within a school or college context.

Approved on behalf of FASD HUB South West, trading as FASD Informed UK™, on 7 August 2026.

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