Safe Recruitment Policy

Number:	SRP-01	**Issue:**	1.0	**Issue Date:**	October 2026
Approved By:	Sport & Communities Director				

1.0 About This Policy

1.1 Active Bolton is committed to safeguarding children (anyone under 18) and adults at risk. This policy sets out the safer recruitment arrangements used to help ensure a consistent and thorough process for paid and voluntary roles.

1.2 The purpose of this policy is to deter unsuitable people from applying for roles where they may have access to children or adults at risk, and to make sure appropriate checks are completed before employment or engagement begins.

1.3 Criminal record checks, including Disclosure and Barring Service (DBS) checks and overseas criminal record checks where appropriate, will form part of the recruitment and vetting process for applicable positions.

2.0 Who Does This Policy Apply To?

2.1 This policy applies to all employees, coaches, volunteers, agency workers, contractors and service providers recruited or engaged to deliver or support Active Bolton activities.

2.2 It also applies to managers and any other individuals involved in advertising, shortlisting, interviewing, selecting, appointing, inducting or supervising staff and volunteers.

2.3 The policy will be applied consistently regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

3.0 Who Is Responsible for This Policy?

3.1 The Board of Trustees has overall responsibility for the effective operation of this policy. Operational responsibility sits with recruiting managers, Human Resources and the designated safeguarding lead.

3.2 Recruiting managers must make sure the correct recruitment and vetting process is followed and that nobody begins regulated activity before all required checks are satisfactorily completed.

3.3 Everyone involved in recruitment and selection must familiarise themselves with this policy

and apply it consistently.

4.0 Recruitment Process

4.1 Where a role involves working with children or adults at risk, the duties and level of contact will be reviewed to determine the appropriate DBS check and whether the role is regulated activity.

4.2

- Vacancies will normally be advertised. Adverts and role descriptions will state any requirement for a DBS check, barred list check, overseas criminal record check or other relevant vetting.
- Applicants must complete Active Bolton's standard application process and provide relevant employment and voluntary work history, education, qualifications and information needed to assess suitability.
- Applicants will be asked to confidentially self-disclose relevant offences and safeguarding investigations in line with the level of check required.
- Where information raises a safeguarding concern, details may be shared with the designated safeguarding lead and, where relevant, the appropriate governing body safeguarding team.

4.3

- Reasonable steps will be taken to verify qualifications and professional memberships.
- Relevant skills, knowledge, experience and values will be assessed.
- Identity and right to work will be checked where applicable.
- Significant gaps or repeated changes in employment or voluntary work history will be explored.
- Values-based and safeguarding questions will be used where the role involves children or adults at risk.

4.4 Applicants will be asked to provide suitable referees. Wherever possible, one referee should be able to comment on the applicant's previous work with children or adults at risk.

4.5 All offers of employment or engagement are conditional upon satisfactory completion of the required references, identity checks, qualifications, professional registrations and criminal record checks.

5.0 DBS and Criminal Record Checks

5.1 Any person undertaking regulated activity with children or adults must complete an Enhanced DBS check and the appropriate barred list check before starting that activity. The check must be renewed at least every three years during employment or engagement, unless an earlier check is required.

5.2 Regulated activity means work that a barred person must not undertake and is defined by the

Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

5.3 A person whose role involves work with children or adults at risk but is not regulated activity may still be required to complete an Enhanced DBS check where the role is eligible for that level of check.

5.4 Roles will be reviewed regularly to confirm whether duties continue to meet the definition of regulated activity and whether the level of check remains appropriate.

5.5 A person must not begin regulated activity until all required checks have been satisfactorily completed.

5.6 For a role that is not regulated activity but requires an Enhanced DBS check, supervised duties may be authorised in exceptional circumstances while a delayed check is completed. A written risk assessment, defined supervision arrangements and management approval will be required.

5.7 A new check may be required where an existing worker takes on additional duties or moves into a role involving regulated activity or a different workforce.

6.0 References, Offers and Induction

6.1 References will normally be sought after a conditional offer, although consent may be requested to contact a referee earlier.

6.2 A conditional offer may be withdrawn where a check is unsatisfactory, an applicant does not cooperate with the vetting process, or required checks are not completed within a reasonable timescale.

6.3 All new employees, coaches and volunteers will complete an induction that includes safeguarding policies, reporting procedures and relevant Codes of Conduct.

6.4 Where applicable, an initial probationary or review period will be used to assess conduct, performance, behaviour and attendance.

7.0 Agency Workers, Contractors and Service Providers

7.1

- Agency workers and contractors must meet the DBS and barred list requirements in this policy before carrying out eligible work.
- Agencies and contractors must confirm that appropriate recruitment and vetting checks have been completed.
- If adverse information emerges or required checks have not been completed, the individual may be withdrawn immediately.

• Service agreements should reflect the safeguarding and vetting requirements applying to roles involving children, young people or adults at risk.

8.0 DBS Checks Revealing Content

8.1 A DBS certificate may disclose convictions, cautions or other information that is not protected or filtered. It may also include relevant information based on the position applied for.

8.2 Information disclosed will be considered fairly, confidentially and on a case-by-case basis. A criminal record or other disclosed information will not automatically prevent appointment.

8.3 Consideration will include relevance to the role, seriousness, circumstances, any pattern, time elapsed, evidence of rehabilitation and the risk to children or adults at risk.

8.4 The applicant may be asked to provide the original certificate for review. If the applicant does not provide a requested certificate or otherwise fails to cooperate, the conditional offer may be withdrawn.

9.0 Records, Confidentiality and Ongoing Disclosure

9.1 Recruitment and vetting information will be handled confidentially, stored securely, retained only for as long as necessary and accessed only by authorised people in accordance with data protection and retention requirements.

9.2 Employees, coaches and volunteers must promptly report any new criminal investigation, charge, caution, conviction, barring decision, safeguarding allegation or other information that may affect suitability for their role.

9.3 Safeguarding and Human Resources colleagues will provide advice where information raises a concern, the required level of check is unclear, or a risk assessment is needed.

10.0 Related Policies and Procedures

10.1 This policy should be read alongside:

10.2
- Active Bolton Safeguarding Policies and Procedures;
- relevant Active Bolton Codes of Conduct;
- Active Bolton Anti-Bullying Policy;
- Active Bolton Diversity and Inclusion Policy;
- Online Safety and Communication Policy;
- Photography and Filming Policy;
- Use of Changing Rooms Policy;

- Safeguarding at Events, Activities and Competitions;
- Data Protection and Retention Policies; and
- Disciplinary Procedure.

11.0 Policy Review

11.1 This policy will be reviewed every three years, or earlier where there is a change in legislation, statutory guidance, national governing body requirements or Active Bolton operating arrangements.

11.2 The designated safeguarding lead may recommend an earlier review following a significant safeguarding incident or learning from recruitment practice.

Updates of Policy:

Issue No	Description of Revision	Date
1.0	First Active Bolton issue, using the QMS policy layout and updated for Active Bolton operations.	October 2026