

# ACTIVITIES 4 KIDS: SAFE RECRUITMENT POLICY



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**ACTIVITIES 4 KIDS | 215 ELM DRIVE, HOVE, BN3 7JD**



# SAFE RECRUITMENT POLICY

Activities 4 Kids — Ofsted-registered children's holiday camp

|                                 |                                                                                                                                         |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy owner</b>             | Activities 4 Kids Management / Designated Safeguarding Lead (DSL)                                                                       |
| <b>Policy adopted / updated</b> | 15 October 2026                                                                                                                         |
| <b>Next review date</b>         | 15 October 2027, or sooner if legislation or guidance changes                                                                           |
| <b>Applies to</b>               | Employees, casual and seasonal staff, volunteers, agency workers, contractors and anyone engaged to work on behalf of Activities 4 Kids |

**Important:** This policy is written for a children's holiday camp in England. The precise legal and Ofsted requirements depend on Activities 4 Kids' registration category, the ages of children cared for and the duties of each role. Management must check those details before approving and applying the policy.

## 1. Purpose and policy statement

Activities 4 Kids is committed to protecting children from harm and providing a safe, welcoming environment. Safe recruitment is a key part of safeguarding: we will take proportionate, lawful and consistent steps to identify people who are suitable to work with children, reduce the risk of unsuitable people gaining access to children, and respond promptly to information that raises a concern.

No recruitment check can guarantee that a person poses no risk. Checks must therefore be combined with clear role descriptions, safeguarding induction, supervision, a code of conduct, ongoing oversight and a culture in which concerns are reported.

## 2. Scope

This policy applies to all people recruited, appointed, placed or engaged by Activities 4 Kids, whether paid or unpaid. This includes permanent, temporary, casual and seasonal staff; managers; volunteers; agency staff; contractors; students and work-experience placements where relevant; and people whose role gives them access to children or children's information.

The policy applies from workforce planning and advertising through selection, pre-appointment checks, induction, employment and the ending of an engagement. Where a third-party provider supplies staff, Activities 4 Kids will establish who is responsible for each check and obtain suitable written assurance and evidence.

## 3. Principles

- The safety and welfare of children comes first.



- Recruitment decisions will be fair, transparent, non-discriminatory and based on evidence relevant to the role.
- Checks will be proportionate to the duties and legal eligibility of the role; a DBS check or barred-list check will not be requested unless the role is legally eligible.
- No person will be appointed where information establishes that they are barred from the activity they would undertake, or otherwise legally disqualified from the role.
- Information will be handled securely, confidentially and in accordance with data-protection law.
- Any safeguarding concern arising during recruitment will be escalated to the DSL or manager and assessed before an appointment decision is made.

## 4. Responsibilities

### Management / recruiting manager

- Ensure each role has a clear description, person specification, safeguarding responsibilities and an assessed DBS eligibility level.
- Make sure recruitment checks are completed, verified and recorded before the person starts, unless a lawful and documented exception has been approved.
- Ensure interviewers understand safer recruitment and that decisions and reasons are recorded.
- Keep recruitment records secure and arrange induction, supervision and probation or review.

### Designated Safeguarding Lead (DSL)

- Advise on safeguarding risks, concerns, suitability decisions and referrals.
- Ensure new starters receive safeguarding information and know how to report concerns.
- Coordinate action where information raises a concern about a candidate or existing worker, including referral to relevant agencies where required.

### All staff and volunteers

Everyone involved in recruitment must follow this policy, declare any conflict of interest, protect candidate information, and report concerns about a candidate, colleague or recruitment practice without delay.

## 5. Recruitment process

### 5.1 Planning and advertising

- Prepare a role description and person specification identifying duties, required skills, experience, qualifications, contact with children, supervision responsibilities and any lone-working or transport duties.
- Include a clear statement that Activities 4 Kids is committed to safeguarding children and that the successful applicant will be subject to identity, reference, right-to-work, qualification and DBS checks where lawful and applicable.
- Use appropriate, traceable recruitment channels and avoid promises of appointment before checks are complete.
- For agency or contractor roles, confirm in writing which party will carry out each check and how Activities 4 Kids will verify completion.



## 5.2 Application and employment history

- Use a consistent application process that obtains enough information to assess suitability, relevant experience and employment or activity history.
- Ask candidates to explain significant gaps, overlapping dates or unclear entries in their history. Record explanations and any follow-up.
- Do not rely solely on a CV or social-media profile as evidence of suitability.
- Ask candidates to disclose relevant information lawfully and at an appropriate stage. Criminal-record questions must comply with the Rehabilitation of Offenders Act 1974 and applicable exceptions; do not ask for spent convictions unless the role and law permit this.

## 5.3 Identity, right to work and qualifications

- Verify the candidate's identity using original documents or an approved digital identity process, as appropriate.
- Complete the required right-to-work check before employment begins and retain the evidence in accordance with Home Office requirements.
- Verify qualifications, certificates, professional registrations and training that are essential to the role, directly with the awarding body where appropriate.
- If documents are inconsistent, appear altered or cannot be verified, pause the appointment and resolve the issue before the person starts.

## 5.4 Interview and suitability assessment

- Where practicable, use at least two people on the selection panel, with one person taking responsibility for safeguarding questions and notes.
- Ask consistent, role-related questions about working with children, professional boundaries, responding to disclosures, behaviour support, inclusion and safeguarding concerns.
- Explore gaps, frequent changes of employment, unexplained departures, discrepancies and relevant concerns without making assumptions.
- Assess the candidate's attitude towards children, willingness to follow policies, ability to maintain boundaries and openness to supervision and training.
- Record the questions, evidence, any concerns, how they were explored and the reasons for the decision.

## 5.5 References

- Obtain at least two references where reasonably practicable, including the most recent relevant employer or organisation when the candidate has worked or volunteered with children. If this is not possible, document why and obtain alternative evidence.
- Request references directly from a verified organisational or professional contact, rather than relying only on contact details supplied in an unverified document.
- Ask about the candidate's dates and role, performance, conduct, reliability, suitability to work with children and any safeguarding concerns or disciplinary matters that the referee is lawfully able to disclose.
- Follow up vague, incomplete or inconsistent references. Record attempts to obtain references and the outcome.
- A reference is one part of the assessment and must not replace identity, DBS eligibility or other required checks.



## **5.6 DBS and barred-list checks**

Before requesting a criminal record check, the recruiting manager must assess the actual duties and legal eligibility of the role using current Disclosure and Barring Service (DBS) guidance. Different roles may qualify for different checks. An Enhanced DBS check with Children's Barred List information may only be requested where the role is legally eligible for it, including where the role is regulated activity with children.

- For eligible roles, request the appropriate DBS check and, where the role is regulated activity, the Children's Barred List check before the person undertakes that activity.
- Do not assume that every person at a holiday camp is automatically eligible for an Enhanced DBS check or a barred-list check; eligibility depends on the role and applicable legal tests.
- From 1 September 2026, the supervision exemption for certain unpaid work with children was removed. Volunteers undertaking qualifying regulated activity may therefore require an Enhanced DBS check with Children's Barred List information even when supervised. Check the current DBS guidance for each volunteer role.
- A DBS certificate must be checked for identity, workforce, level, barred-list status where applicable, and any disclosed information relevant to suitability. A certificate is not a guarantee of ongoing suitability.
- If a certificate contains information, the recruiting manager and DSL will conduct a fair, confidential and role-specific risk assessment before deciding whether the appointment can proceed. Consider relevance, seriousness, recency, pattern, circumstances, age at the time and the candidate's explanation. Do not automatically exclude a person solely because information is disclosed.
- If a check is delayed, the person must not undertake regulated activity before the necessary checks and barred-list safeguards are completed. Any exceptional interim arrangement must be lawful, risk-assessed in writing, approved by management and must not permit barred or unchecked people to carry out work they are not legally permitted to do.
- Where Activities 4 Kids is acting as a regulated activity provider, management must understand and comply with the legal duty to refer to DBS when the referral conditions are met.

## **5.7 Other checks and declarations**

- Check any statutory suitability or disqualification requirements that apply to the specific childcare registration and role, including relevant childcare disqualification rules where applicable.
- Ask candidates to declare any change in circumstances that could affect their suitability, including relevant criminal matters, barring, disqualification or restrictions, in a way that is lawful and appropriate.
- Check previous names and relevant overseas history where appropriate. An overseas criminal record check may be sought where available, but it does not replace a UK DBS check where one is legally required.
- Check whether the person has any restrictions, conditions or professional sanctions relevant to the role.

## **6. Appointment and starting work**

1. Confirm the appointment is conditional on satisfactory completion of all checks applicable to the role.
2. Complete and record identity, right-to-work, references, qualifications, DBS and any other required checks.
3. Ensure the person has read and agreed to follow the safeguarding and child protection policy, behaviour management policy, staff code of conduct, whistleblowing procedure and relevant online-safety and health-and-safety procedures.



4. Provide safeguarding induction before the person works with children, including how to recognise and report concerns, how to respond to a disclosure, professional boundaries, physical contact, photography and devices, toileting/personal care where relevant, missing children and emergency procedures.
5. Explain the DSL's identity and how to contact the DSL or deputy, including what to do if the concern involves the DSL or manager.
6. Provide appropriate supervision, a named supervisor, role-specific training and a documented probation or early performance review.

## 7. Volunteers, students, agency staff and contractors

The same safeguarding principles apply to unpaid and temporary roles. DBS eligibility must be assessed under the law currently in force, not assumed from the title of the role or the fact that a person is supervised. Activities 4 Kids will verify the identity and role of agency workers and contractors, confirm the checks undertaken and their dates, and ensure they receive a site-specific safeguarding briefing. A third party's assurance does not remove Activities 4 Kids' responsibility to protect children while they are on site.

## 8. Concerns, allegations and changes after appointment

- Staff must report concerns about a worker's conduct, suitability or boundaries promptly to the DSL or manager. If the concern involves that person, report it to another appropriate senior person or the relevant external authority.
- The DSL/manager will take immediate steps to protect children, preserve relevant records and follow the safeguarding policy and local allegations procedures, including contacting the Local Authority Designated Officer (LADO) where the threshold or local procedure requires it.
- Any decision to suspend, restrict duties or remove access to children will be risk-based, fair and consistent with employment law. Suspension is not an automatic response and is not a disciplinary finding.
- Where a person has been removed from regulated activity, or would have been removed had they not left, because the relevant harm criteria are met, management must consider and make any DBS referral required by law.
- Staff must tell management about relevant changes in circumstances. Management will reassess suitability when duties change, a new concern arises, a check is no longer appropriate to the role, or new legal requirements take effect.

## 9. Fairness, equality and data protection

Recruitment will comply with the Equality Act 2010 and relevant employment law. Decisions must be based on evidence relevant to the role and safeguarding risks, not stereotypes or protected characteristics. Adjustments will be considered for disabled candidates where required.

Recruitment records, references and criminal-record information are confidential and must be accessed only by people who need them for a legitimate purpose. Activities 4 Kids will follow the UK GDPR, Data Protection Act 2018 and DBS handling guidance, including appropriate access controls, secure storage, retention and disposal. DBS certificate information must not be retained longer than necessary; the date, level and outcome of a check may be recorded where appropriate, alongside the decision and risk assessment. Information must not be shared informally or used for an unrelated purpose.



## 10. Record keeping and audit

For each appointment, Activities 4 Kids will maintain a secure recruitment record showing, as applicable: role and eligibility assessment; application and employment history; interview notes; identity and right-to-work verification; references and follow-up; qualifications; DBS check type, date and outcome; barred-list check where applicable; risk assessments; declarations; appointment decision and rationale; induction and training completion; and any follow-up actions. Access will be restricted and retention periods will be set in line with legal requirements and the organisation's retention schedule.

Management will periodically sample recruitment files to check that the policy is being followed, identify gaps and arrange corrective action. Any audit must respect candidate privacy and data-protection requirements.

## 11. Legal and guidance framework

This policy should be read alongside Activities 4 Kids' Safeguarding and Child Protection Policy, Behaviour Management Policy, staff code of conduct, whistleblowing procedure and relevant risk assessments. The legal framework includes, as applicable:

- Children Act 1989 and Children Act 2004.
- Safeguarding Vulnerable Groups Act 2006, as amended, and the Protection of Freedoms Act 2012.
- Crime and Policing Act 2026 changes to regulated activity, including removal of the supervision exemption from 1 September 2026.
- Rehabilitation of Offenders Act 1974 and applicable exceptions.
- Equality Act 2010; UK GDPR and Data Protection Act 2018.
- Childcare Act 2006 and the current Early Years Foundation Stage (EYFS) statutory framework, where the provision and role are within scope.
- Current DBS eligibility and regulated activity guidance. Keeping Children Safe in Education applies to schools and colleges within its scope and is not treated as automatically applying to every holiday camp.

Management must check the latest official guidance before applying this policy, particularly DBS eligibility, barred-list requirements and any EYFS or Ofsted conditions that apply to the camp's exact registration and age range.

## 12. Policy review and approval

This policy will be reviewed at least annually and sooner following a relevant change in legislation or official guidance, a safeguarding incident, an Ofsted requirement or a learning review.

**Approved by:** Activities 4 Kids Management

**Name / signature:** \_\_\_\_\_ Briony Jacobs \_\_\_\_\_

**Date:** 15 October 2026

## Official guidance checked for this update

- DBS — Eligibility for Roles working with children (published 1 September 2026) — <https://www.gov.uk/government/publications/eligibility-for-roles-working-with-children>
- DBS — Regulated activity with children (updated 17 September 2026) — <https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-children>



- Department for Education — Removal of the supervision exemption (effective 1 September 2026) — <https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children/regulated-activity-removal-of-the-supervision-exemption-comes-into-force-1-september-2026>
- Department for Education — Keeping Children Safe in Education 2026 (applies to schools and colleges) — <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>