

Vetting and Safer Recruitment Procedure

This procedure sets out how Young Epilepsy/St Piers (Young Epilepsy) ensures that all individuals engaged to work with, or who may have access to, children and vulnerable adults are subject to robust, proportionate, and lawful vetting and safeguarding checks.

1. Purpose

The purpose of this Procedure is to:

- safeguard children and vulnerable adults
- deter unsuitable applicants
- identify and manage safeguarding risks
- ensure compliance with statutory guidance and regulatory expectations
- provide a clear and defensible framework for recruitment and vetting decisions

This procedure is designed to support leaders, managers, and the Recruitment Team in demonstrating that safer recruitment principles are consistently applied in practice and can withstand regulatory scrutiny.

2. Scope

This procedure applies to all individuals engaged by Young Epilepsy, including:

- permanent and fixed-term employees
- agency and temporary workers
- volunteers
- work experience placements, students and apprentices (aged 16+)
- university placement students
- honorary contractors, including medical and therapy professionals
- Trustees and Governors

Role-specific requirements are set out in the appendices to this procedure.

3. Legal and Regulatory Framework

This Procedure reflects current statutory requirements and recognised good practice, including but not limited to:

- Keeping Children Safe in Education (KCSIE)
- Safer Recruitment in Education guidance
- Disclosure and Barring Service (DBS) legislation and Code of Practice
- Police Act 1997
- Rehabilitation of Offenders Act 1974 (as amended)
- Children Act 1989 and 2004
- Care Standards Act 2000
- Health and Social Care Act 2008
- Equality Act 2010 - UK GDPR and Data Protection Act 2018
- Immigration, Asylum and Nationality legislation

Where guidance or legislation is updated, this Procedure will be reviewed to ensure continued alignment.

4. Safer Recruitment Principles

Young Epilepsy is committed to safer recruitment and selection. Recruitment and vetting processes are designed to:

- place safeguarding at the centre of recruitment decision-making
- assess an individual's suitability as well as competence
- identify potential safeguarding risks at the earliest opportunity
- enable staff to apply professional judgement supported by clear governance

Safeguarding considerations form part of every stage of the recruitment and engagement process.

5. Roles and Responsibilities

Recruitment Team must:

- coordinate vetting and pre-engagement checks
- maintain accurate records, including the Single Central Record, where applicable

- escalate potential safeguarding concerns appropriately

Hiring Managers must:

- participate in safer recruitment training and processes
- ensure at least one interview panel member is 'safer recruitment' trained
- explore safeguarding matters/issues at interview
- comply with supervision and control measures where required

Designated Safeguarding Lead (DSL) must as part of their responsibilities:

- provide safeguarding oversight and advice
- contribute to suitability and risk-based decisions

Senior Leaders including Executive and Heads of Service must:

- approve exceptional decisions, including conditional starts
- provide governance, oversight and accountability

6. Recruitment and Vetting Overview

All offers of employment or engagement are conditional upon the satisfactory completion of required vetting checks.

The recruitment process includes:

- The applicant completing the application paperwork and safeguarding declarations
- interview and suitability assessment by approved Young Epilepsy staff
- verification of identity, right to work, qualifications, and experience
- appropriate criminal record checks, determined by job role
- references and employment history verification
- online searches in line with KCSIE guidance

7. Pre-Engagement Checks (Core Requirements)

The level and combination of checks required will depend on the nature of the role, duties, and level of contact with children or vulnerable adults. An up-to-date list of these checks is maintained and applied by the Recruitment Team.

7.1 Identity Verification

Original identity documents will be checked, copied, signed, and dated by an authorised member of staff. Young Epilepsy will carry out identity checks sensitively and in line with the Equality Act 2010.

7.2 Right to Work in the UK

Right to work checks will be carried out in accordance with Home Office requirements, including online share code checks, where applicable. Time-limited permissions will be monitored and rechecked as required.

7.3 References and Employment History

A minimum of two appropriate references should normally be obtained to verify recent employment, education, volunteering, or placement history covering the 3 years before the offer of employment. References are submitted to our external vetting partner.

7.3.1 Gaps or Discrepancies

Gaps or discrepancies in the information provided by the applicant will be explored and documented. All identified gaps within the three year referencing period will be explored by our vetting partner. All gaps identified out of the three year referencing period will be explored by the Recruitment Team.

7.3.2 Verification of references

All references received will be subject to verification to confirm the identity, role, and authenticity of the referee. Verification will normally be undertaken by contacting the referee using independently obtained contact details and confirming that the reference was provided by them. A record must be maintained of the method and date of verification.

7.3.3 Unverifiable references

Where a reference cannot be verified after reasonable attempts, this must be recorded, and a risk-based assessment undertaken. This may include obtaining alternative references, seeking additional safeguarding assurances, applying enhanced supervision, or delaying commencement. The rationale for any decision must be documented and subject to appropriate oversight.

7.3.4 Periods of Self-employment

Where an applicant has been self-employed during the referencing period, Young Epilepsy or the Vetting Partner will take reasonable steps to verify both the period of self-employment and the individual's suitability.

Evidence of self-employment may include confirmation of self-assessment registration with HM Revenue & Customs, confirmation from an accountant or tax adviser, business documentation, or other appropriate evidence.

In addition, references will be sought, where possible, from clients, commissioners, or professional contacts who can comment on the individual's conduct, reliability, and suitability, including any safeguarding-related concerns, where relevant.

Where traditional employment references are not available, alternative evidence and safeguarding assurances must be considered on a risk-based basis, and the rationale for decisions must be recorded.

7.4 Criminal Record Checks (DBS)

The appropriate level of DBS check will be determined by the role and whether it involves regulated activity. Enhanced DBS checks will include barred list checks, where these are legally required. Original DBS certificates must be seen before commencement.

A DBS certificate containing information will not automatically prevent engagement. Decisions will be made on a risk-based basis with senior leadership and safeguarding oversight.

Young Epilepsy recognises that some applicants may not wish to reveal a previous name, gender history or transgender status during the DBS process. Applicants may choose to contact the DBS Sensitive Applications Team, who can manage previous identity details confidentially and ensure that sensitive information is not disclosed to the organisation. This process allows the DBS to carry out all legally required checks without sharing protected information with Young Epilepsy.

All applicants will be made aware of this option during the DBS stage of recruitment.

Note that it is not possible to obtain a DBS certificate for anyone under the age of 18.

7.4.1 Use of the DBS Update Service

Where an individual is subscribed to the Disclosure and Barring Service (DBS) Update Service, Young Epilepsy may, where appropriate, rely on an existing DBS certificate rather than obtaining a new DBS check, provided that all safeguarding criteria set out below are met.

Before accepting a DBS certificate via the Update Service, Young Epilepsy will ensure that the:

- Individual has produced their original DBS certificate

- DBS certificate is at the appropriate level for their role (Standard or Enhanced, as required)
- DBS certificate includes barred list information, where the role involves regulated activity with children and/or vulnerable adults
- DBS certificate relates to the correct workforce (children, adults, or both) relevant to the role
- Individual's identity has been verified and matches the details on the DBS certificate
- Individual is currently subscribed to the DBS Update Service
- Online DBS status check has been completed by an authorised member of staff
- Status check confirms that the DBS certificate remains current with no new information
- Date, outcome, and name of the person completing the status check have been recorded
- Individual has confirmed that there have been no changes in circumstances that would affect their suitability since the DBS certificate was issued

Young Epilepsy will not accept a DBS certificate via the Update Service where any of the above criteria are not met.

7.4.2 Circumstances Requiring a New DBS Application

A new DBS application will be required where:

- the DBS certificate is at a lower level than required for the role being applied for
- barred list information is required, but is not included on the certificate
- the workforce type recorded on the certificate does not match the new role being undertaken
- the individual is not subscribed to the DBS Update Service
- the DBS Update Service status check indicates new or changed information
- the original DBS certificate cannot be produced
- identity cannot be confidently matched to the DBS certificate

Where a new DBS application is required, the individual will not normally commence duties until the appropriate DBS clearance has been obtained, unless a conditional start has been authorised in line with this procedure.

7.5 Overseas Criminal Record Checks

Where an individual has lived or worked outside the UK for a period of three months or more within the last 5 years a 'Certificate of Good Conduct' or equivalent check will be sought. Where unavailable, alternative safeguarding measures will be documented.

Certificates of Good Conduct presented to Young Epilepsy in any language other than English must be submitted with a certified translation in English.

7.6 Online Searches

In line with KCSIE, online searches will be undertaken for shortlisted candidates. Searches will be proportionate, consistent, and limited to publicly available information. Any information of concern will be discussed with the candidate and assessed on a risk basis. A brief record will confirm completion and outcome.

7.7 Qualifications and Professional Registration

Where a role requires specific qualifications, professional membership, or statutory registration, Young Epilepsy will verify this before commencement of duties. Verification will be undertaken using original documentation and, where applicable, confirmation through the relevant professional or regulatory body's public register. Appointments will not normally be confirmed unless the required qualifications and registrations are current, valid, and appropriate to the role.

Where registrations are subject to conditions, restrictions, or review, these will be assessed on a risk basis with appropriate safeguarding and senior oversight

Professional registrations will be monitored by the appropriate line manager during employment where required, and individuals are responsible for maintaining their registration and notifying Young Epilepsy of any change in its status.

Below is a list of qualifications, professional membership, and statutory registration checks required for specific positions:

Teachers

For teaching roles, Young Epilepsy will verify:

- evidence of Qualified Teacher Status (QTS), where required
- completion of appropriate initial teacher training

- confirmation of teaching registration or status through the Teaching Regulation Agency, where applicable

Where roles do not require QTS, this will be clearly defined and documented. Any restrictions, prohibitions, or conditions identified will be assessed before appointment, and appointments will not proceed where statutory requirements are not met.

Nurses

For nursing roles, Young Epilepsy will verify registration with the Nursing and Midwifery Council (NMC). Verification will confirm:

- current registration status
- appropriate field of practice
- whether there are any restrictions that would prevent the individual from undertaking the role

Registration will be checked before commencement and monitored on an ongoing basis in line with regulatory expectations.

Therapy Staff (Occupational, Speech & Language, Physiotherapy & Psychology)

Therapists (as listed above) will be required to hold a current registration with the Health and Care Professions Council (HCPC). Where professional body membership is required or expected, this will also be verified. Verification will seek to confirm that the registration is valid, current, and appropriate to the role before commencement.

Physiologists

Where physiologist roles require statutory or voluntary professional registration, Young Epilepsy will verify registration with the relevant regulatory or professional body, such as the Registration Council for Clinical Physiologists (RCCP), where applicable. Verification will seek to confirm that the registration is valid, current, and appropriate to the role before commencement.

7.8 Health and Capability

Where applicable, health declarations or Occupational Health advice may be sought to confirm an applicant's fitness for the role and identify reasonable adjustments, if appropriate.

Should there be a need to investigate any aspect of an applicant's health in relation to the role applied for an assessment by our Occupational Health provider may be required. In these circumstances, the offer of employment will be based on an occupational assessment conducted by our Occupational Health provider.

8. Conditional Starts and Exceptional Arrangements

Young Epilepsy's expectation is that all required vetting checks are completed before an individual commences duties.

In exceptional circumstances, a conditional start may be authorised where:

- a written and approved risk assessment has been completed
- senior management including Executive and Heads of Service approval has been obtained
- appropriate supervision and safeguarding controls are in place
- the individual does not undertake regulated activity unless legally permitted
- outstanding checks are actively monitored by Line Managers and/or HR

Conditional arrangements will be time-limited and recorded.

9. Positive Disclosures and Suitability Decisions

Where vetting identifies information of concern:

- the information will be reviewed confidentially
- relevance to the role will be assessed
- safeguarding and Head of Service oversight will be sought

Young Epilepsy recognises that a criminal record does not automatically make an individual unsuitable. Decisions will balance safeguarding, risk, fairness, and legal requirements.

10. Agency and Third-Party Assurance

Where agencies or third parties are used, Young Epilepsy retains overall safeguarding accountability. Written assurance will be obtained from each agency, confirming completion of the required checks, and original evidence may be requested where necessary. See Appendix B.

11. Record Keeping and Data Protection

Accurate records of vetting checks for all applicants engaged by Young Epilepsy will be maintained, including on the Single Central Record, where applicable. Personal data will be processed in line with Young Epilepsy's retention schedule and retained only as long as necessary

12. Ongoing Responsibilities During Engagement

All individuals are required to:

- declare relevant changes in circumstances
- notify Young Epilepsy of any criminal investigations or convictions, ongoing or concluded
- maintain professional registrations
- comply with safeguarding expectations

Periodic re-checks may be required based on role and risk.

13. Monitoring, Review, and Governance

This procedure will be reviewed as outlined below:

- annually
- following changes to statutory, regulatory or other best practice guidance
- following inspection or audit findings

Compliance will be monitored through safeguarding governance and internal assurance processes.

APPENDICES – Vetting requirements

Appendix A – Employees (Permanent and Fixed-Term)

This applies to all permanent and fixed-term employees. It requires identity checks, right to work verification, a minimum of two references covering applicants for the prior three years, appropriate DBS checks (including barred list where necessary), overseas checks where applicable, online searches, health clearance, where appropriate, and inclusion on the Single Central Record.

Conditional starts may only occur under the controls specified in 'Section 8, above.

Appendix B – Agency and Temporary Workers

This applies to agency workers, temporary staff, contractors, and consultants. It requires written agency assurance of identity, right to work, appropriate DBS checks, references, qualifications, employment history, and overseas checks where applicable. Assurance should be given using an agency 'profile card'.

Young Epilepsy retains safeguarding accountability.

Note: self-employed contractors are responsible for obtaining their own professional indemnity insurance, and they must sign the applicable contract agreement.

Appendix C – Volunteers

This applies to all volunteers. Vetting will be proportionate to the role and supervision level. Where volunteers may be unsupervised or have regular contact with vulnerable children and young adults, appropriate DBS checks, identity verification, and safeguarding induction will be required.

Appendix D – Students, Placements, Work Experience, and Apprentices

This applies to students aged 16+, apprentices, interns, and placements. DBS eligibility will be assessed on a case-by-case basis. Supervision arrangements will be clearly defined where DBS checks are not appropriate or available.


For Nursing student placements and Therapy student placements, please read the process documents related to onboarding these individuals.

Appendix E – Honorary, Medical, Therapy and Other Professionals

This applies to honorary contractors, clinicians, therapists, rotational specialist registrars and other Honorary roles. It requires verification of professional registration, DBS checks, where applicable, and safeguarding assurance from the supplying organisations or obtained by Young Epilepsy, where relevant.

Appendix F – Trustees and Governors

This applies to all Trustees, Governors and any sub-committee members or Trust Board/Governing Body Advisors. It requires identity verification, appropriate DBS checks, suitability and conflict of interest declarations, and governance oversight.

This procedure is agreed by the Director of HR and will be implemented by all Departments.	
Signed: 	Date: 19/03/2026
Name: Sarah Stookes Title: HR Director	Date of review: 01/09/2026

Version table

Creation: Michael Turville – 24th March 2026

Approved by: Sarah Stookes – Director of HR

<u>Version No.</u>	<u>Date of changes</u>	<u>Reason for and nature of change</u>	<u>Changes made by</u>
v2	24/03/2026	<p>The procedure has been re-written to modernise and bring in line with current processes.</p> <p><i>Removal of historic legislation which no longer exists POCA, POVA, ISA.</i></p> <p><i>Procedure reviewed at the Policy Group on the 19th March 2026</i></p>	<p>Michael Turville Recruitment Manager</p>