

REACHING ALL PEOPLE TRUST CIC

Company No. 10349786

**SAFER RECRUITMENT, VETTING, DBS
& SUITABILITY POLICY**

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Policy status: This controlled v1.0 policy establishes RAP Trust's safer-recruitment framework for defining roles, screening candidates, verifying identity and eligibility, obtaining lawful DBS information, assessing criminal history and lived experience, making defensible suitability decisions and monitoring continuing suitability.

1. Statement of Commitment

RAP Trust will recruit and engage people through processes designed to protect participants, uphold equality and make proportionate, evidence-based decisions about suitability for positions of trust.

2. Central Principle

Safer recruitment is not about finding people with perfect histories. It is about making defensible decisions about whether a person is suitable for a particular position of trust, responsibility and access.

3. Framework

DEFINE -> ATTRACT -> SCREEN -> VERIFY -> ASSESS -> CHECK -> DECIDE -> INDUCT -> MONITOR -> REVIEW -> ASSURE.

4. Rehabilitation and Safeguarding

RAP Trust rejects both blanket exclusion based on criminal history and the assumption that lived experience makes risk irrelevant. Rehabilitation and safeguarding must be considered together.

5. Individualised Assessment

Where lawful criminal-record information is relevant, assessment should consider **HISTORY -> RELEVANCE -> RECENCY -> SERIOUSNESS -> PATTERN -> ROLE -> ACCESS -> EVIDENCE OF CHANGE -> CURRENT RISK -> SAFEGUARDS.**

6. Scope

This policy applies proportionately to directors, employees, practitioners, sessional workers, volunteers, mentors, peer workers, contractors, associates and others recruited or supplied to undertake RAP Trust activity.

7. Role Risk Assessment

Before recruitment, RAP Trust should identify whether a role involves children or adults at risk, one-to-one work, custody, unsupervised access, home visits, personal data, money, transport, digital contact, overnight activity, authority or management responsibility.

8. Proportionate Vetting

The level of recruitment scrutiny and vetting should follow the role's duties, legal eligibility and risk exposure rather than applying identical checks to every role.

9. Job Descriptions

Relevant roles should identify purpose, responsibilities, safeguarding duties, professional boundaries, accountability, required competence and applicable vetting requirements.

10. Person Specification

Selection criteria should distinguish essential from desirable requirements and should be relevant, proportionate and capable of fair assessment.

11. Recruitment Advertising

Where appropriate, advertisements should explain that appointment is subject to relevant safer-recruitment checks and should communicate RAP Trust's commitments to safeguarding, equality, rehabilitation and fair assessment.

12. Application Information

Candidates should provide sufficient information to assess relevant employment history, qualifications, skills, experience, suitability, references and lawful declarations.

13. CV-Only Recruitment

For safeguarding-sensitive roles, a CV alone may be insufficient where a structured application is needed to obtain consistent information and explore employment history.

14. Identity Verification

Identity should be appropriately verified before appointment and before DBS processing where applicable.

15. Right to Work

RAP Trust must complete legally compliant right-to-work checks before employment begins and maintain appropriate evidence of the check.

16. Qualification Verification

Qualifications, registrations or licences material to the role should be verified where reasonably necessary.

17. Regulated Professional Claims

Particular care should be taken where a candidate presents themselves as a psychologist, therapist, social worker, counsellor, teacher or other regulated or specialist professional.

18. Employment History

Relevant employment and activity history should be reviewed, with significant unexplained gaps explored proportionately.

19. Employment Gaps

A gap is not inherently suspicious. It may reflect custody, illness, caring, homelessness, recovery, education, unemployment or family responsibility. The purpose of enquiry is understanding and risk assessment, not humiliation.

20. References

Relevant appointments should normally be supported by satisfactory references, including a recent employer or suitable professional source where practicable.

21. Reference Quality

References should be assessed rather than merely collected. Material inconsistencies, omissions or safeguarding concerns should be explored.

22. Safeguarding References

For safeguarding-sensitive roles, RAP Trust should seek appropriate information about suitability to work with the relevant participant group, subject to lawful recruitment practice and data-protection requirements.

23. Candidate Consent and Transparency

Candidates should receive appropriate information about the checks RAP Trust intends to undertake and how recruitment information will be used.

24. Interview

Interviews should assess technical competence alongside judgement, safeguarding, boundaries, accountability, values, professional curiosity and response to challenge.

25. Scenario Assessment

For participant-facing roles, realistic scenarios may be used to test safeguarding judgement, boundary management, de-escalation, confidentiality and escalation.

26. More Than One Assessor

For significant safeguarding roles, selection should wherever practicable involve more than one assessor to reduce unchecked bias, patronage and single-person decision risk.

27. Familiar Candidates

Community familiarity, prior collaboration or personal knowledge can provide context but must not replace safer-recruitment requirements. **Familiarity is information. It is not vetting.**

28. Family and Close Associates

Recruitment involving relatives, partners or close associates of directors or staff should be declared and managed through sufficiently independent decision-making.

29. Conflicts of Interest

Recruiters must declare actual, potential or perceived conflicts and withdraw from decisions where independence could reasonably be questioned.

30. DBS Eligibility

RAP Trust will request only the level and type of Disclosure and Barring Service check for which the role is legally eligible.

31. No Blanket Enhanced Checks

Enhanced DBS checks must not be treated as a universal recruitment requirement where the role is not legally eligible for that level of disclosure.

32. Barred-List Information

A barred-list check should only be requested where the role and activity are legally eligible, including where applicable regulated activity requirements.

33. Working While Barred

RAP Trust must not knowingly permit a person barred from relevant regulated activity to undertake activity from which they are legally barred.

34. DBS Is One Source of Information

A clear DBS certificate does not prove that somebody is safe. A disclosed conviction does not automatically prove that somebody is unsafe.

35. Rehabilitation of Offenders

RAP Trust will have regard to the Rehabilitation of Offenders Act 1974 and applicable exceptions. Candidates should not be required to disclose criminal-record information RAP Trust is not legally entitled to require.

36. Criminal-Record Assessment

Where information can lawfully be considered, assessment should examine nature, seriousness, relevance, age at the time, time elapsed, pattern, circumstances, evidence of change, role exposure and current risk.

37. Lived Experience

A history of justice-system involvement must not be treated as synonymous with present safeguarding risk.

Lived experience may be a legitimate strength for some RAP Trust roles.

38. Lived Experience and Competence

Lived experience should be considered alongside competence, professional boundaries, rehabilitation, current behaviour, references and role-specific safeguarding requirements.

39. No Automatic Exclusion

A criminal record should not create automatic exclusion unless law, barring status, role requirements or the specific risk assessment make appointment impermissible or unsuitable.

40. Candidate Explanation

Where lawful information raises concern, the candidate should ordinarily have an appropriate opportunity to provide context before a final suitability decision.

41. Risk-Managed Appointment

Where appointment remains lawful and appropriate despite identifiable risks, RAP Trust may consider **RISK -> CONTROL -> SUPERVISION -> RESTRICTION -> REVIEW**.

42. Possible Controls

Controls may include enhanced supervision, restricted lone working, limited transport, restricted financial access, additional boundary supervision or structured probationary review.

43. Legal Prohibitions

Risk controls must never be used to circumvent a statutory prohibition or barred-status restriction.

44. Overseas History

Where a candidate has lived or worked overseas, RAP Trust should consider whether additional criminal-record, professional or safeguarding checks are reasonably required and available.

45. Limits of UK Checks

A UK DBS certificate may not provide a complete account of conduct or criminal history occurring outside the United Kingdom.

46. Volunteers

Volunteer status does not remove safeguarding risk. Checks should reflect activity, access and legal eligibility rather than whether the role is paid.

47. Contractors and Associates

RAP Trust should obtain appropriate assurance about individuals supplied by contractors or partner organisations where they will have relevant participant access.

48. Agency Workers

Where an agency supplies personnel, RAP Trust should clarify responsibility for identity, right-to-work, references, DBS, barred-list status and qualifications where applicable.

49. Verification of Third-Party Assurance

RAP Trust should not rely on vague statements that a worker is 'fully checked' where the nature, date and relevance of required checks need to be known.

50. Peer Workers

Peer roles should have clear role descriptions, boundaries, supervision and safeguarding arrangements.

51. Young Peer Mentors

Where young people or former participants undertake peer roles, RAP Trust should recognise that a person may simultaneously hold a contributor role and require support or safeguarding consideration.

52. Conditional Offers

Offers for relevant roles should remain conditional until required pre-employment checks have been satisfactorily completed.

53. Starting Before Checks

Where law permits work to begin before a particular check is complete, this should be exceptional, documented and supported by a role-specific risk assessment and appropriate safeguards.

54. No Risk Assessment Above the Law

Where legislation prohibits an activity, **no organisational risk assessment can override that prohibition.**

55. Probation and Initial Review

Initial employment or engagement should include a meaningful probationary or review period where appropriate, allowing suitability to be assessed through actual conduct and performance.

56. Induction Before Unsupervised Work

Before unsupervised participant work, relevant personnel should receive induction covering safeguarding, professional boundaries, the Staff Code of Conduct, confidentiality, reporting, health and safety, complaints and whistleblowing.

57. Continuing Suitability

Safer recruitment does not end on the first working day. RAP Trust should maintain **RECRUITMENT -> INDUCTION -> SUPERVISION -> OBSERVATION -> DISCLOSURE -> REVIEW.**

58. New Information

Personnel should disclose relevant new criminal, safeguarding, regulatory or professional information where legally and contractually appropriate.

59. Fair Assessment of New Information

New allegations, arrests or investigations should trigger proportionate risk assessment rather than an automatic assumption of guilt.

60. DBS Update Service

Where appropriate, lawful and with the required consent or authority, RAP Trust may use the DBS Update Service to assist continuing-status checks.

61. Repeat DBS Checking

RAP Trust does not assume a universal statutory requirement to renew every DBS check on a fixed three-year cycle. Review arrangements should reflect role, contract, commissioner requirements, Update Service status, risk and changes in information.

62. Commissioner Requirements

Where a lawful commissioning or host-setting requirement specifies additional vetting or renewal standards, RAP Trust should incorporate them into the relevant role arrangements.

63. Allegations After Appointment

Safeguarding allegations arising after appointment should be managed through **PROTECT -> REPORT -> ASSESS -> MANAGE -> CORRECT PROCESS -> REVIEW SUITABILITY.**

64. Allegations Management

Recruitment records may inform allegations management but do not replace fair safeguarding, disciplinary, police or statutory processes.

65. Suspension or Restrictions

Interim restrictions may be considered where risk requires them, but they should be proportionate and should not automatically be treated as a finding of misconduct.

66. DBS Referrals

Where statutory referral conditions are met, RAP Trust must consider and make any required referral to the Disclosure and Barring Service.

67. Resignation During Investigation

Resignation does not automatically end RAP Trust's safeguarding responsibilities. Relevant safeguarding action, fact-finding or DBS referral consideration may need to continue.

68. Settlement or Departure

RAP Trust must not use resignation, settlement, contract termination or non-renewal to avoid a safeguarding referral or other legal reporting duty.

69. Recruitment Records

Records should demonstrate **WHAT WAS CHECKED -> BY WHOM -> WHEN -> OUTCOME -> DECISION -> RISK CONTROLS.**

70. Data Minimisation

Recruitment and vetting information should be limited to what is relevant and necessary for lawful decision-making, safeguarding and audit.

71. DBS Certificate Handling

DBS certificate information should be handled securely and in accordance with applicable DBS and data-protection requirements. Certificates should not be copied or retained unnecessarily.

72. Sensitive Criminal-Record Data

Access to criminal-record information should be restricted to people with a legitimate recruitment, safeguarding, legal or governance need.

73. Retention

Recruitment records should be retained in accordance with RAP Trust's retention schedule, legal obligations, commissioner requirements and safeguarding needs.

74. Equality

Safer recruitment must be conducted consistently with equality law and must not become a mechanism for unlawful discrimination.

75. Reasonable Adjustments

Candidates should be offered reasonable adjustments throughout recruitment where required.

76. Rehabilitation and Opportunity

RAP Trust may seek to broaden employment and volunteering opportunities for people with lived experience or from under-represented communities while maintaining the safeguarding threshold required by each role.

77. Positive Action

Any lawful positive-action measures should be transparent and should not involve ignoring essential competence, safeguarding or legal requirements.

78. Recruitment Fraud

False qualifications, identity deception, material dishonesty or deliberate concealment of information RAP Trust was lawfully entitled to require should be investigated appropriately.

79. Decision Recording

Where suitability is finely balanced, the decision and rationale should be recorded sufficiently to demonstrate a defensible process.

80. Decision Test

The central question is not simply 'Do we like this candidate?' but 'Can we defend why this person is suitable for this particular role?'

81. Unsuccessful Candidates

Recruitment decisions should be communicated professionally and records should avoid unnecessary or discriminatory commentary.

82. Recruitment Complaints

Candidates should have an appropriate route to raise concerns about recruitment fairness, discrimination, data handling or safer-recruitment processes.

83. Leadership Appointments

Directors and senior managers should not be exempt from proportionate safer-recruitment and suitability arrangements merely because they are founders, personally known or already influential.

84. Director Conflicts

Where a director is involved in the appointment of a relative, close associate or person with whom they have a material relationship, independent governance oversight should be used.

85. Designated Safeguarding Roles

Appointments to designated safeguarding responsibilities should include assessment of safeguarding knowledge, judgement, authority, availability and ability to challenge senior personnel where necessary.

86. Recruitment Panels

Panel members should understand safer-recruitment principles, equality obligations, lawful criminal-record enquiries and the role-specific safeguarding risks they are assessing.

87. Training

Managers involved in recruitment should receive proportionate training in safer recruitment, DBS eligibility, criminal-record assessment, safeguarding and equality.

88. Supervision and Suitability

Supervision should remain alert to conduct or performance information that may alter a person's continuing suitability for their role.

89. Changes in Role

A move into a role with materially different participant access or regulated activity should trigger review of whether additional vetting is legally eligible and required.

90. Temporary Cover

Urgency or staffing pressure should not become a routine reason to bypass essential recruitment and safeguarding controls.

91. Emergency Deployment

Where exceptional temporary deployment is lawful, risk controls, supervision and authorisation should be documented.

92. Partnership Settings

RAP Trust should clarify with host organisations which party is responsible for each recruitment and vetting control and retain sufficient assurance that required checks have occurred.

93. No Assumption from Access Passes

A prison, school, local-authority or other host pass should not automatically be treated as evidence that every RAP Trust recruitment requirement has been satisfied.

94. Audit

Periodic audit should test role risk assessments, identity and right-to-work evidence, references, qualification checks, lawful DBS eligibility, risk assessments, exceptions and continuing-suitability arrangements.

95. Governance Assurance

Directors should receive proportionate assurance concerning **RECRUITMENT -> DBS ELIGIBILITY -> REFERENCES -> RIGHT TO WORK -> QUALIFICATIONS -> SUITABILITY DECISIONS -> EXCEPTIONS -> ALLEGATIONS -> DBS REFERRALS -> AUDIT.**

96. Serious Recruitment Failure

Evidence of falsified checks, knowingly unlawful deployment, concealed safeguarding information or systemic bypassing of safer-recruitment controls should be escalated promptly to appropriate leadership and external bodies where required.

97. Organisational Learning

Where a recruitment or suitability failure occurs, RAP Trust should examine the system, supervision and governance conditions that allowed it, not only the actions of one individual.

98. Closing Principle

The purpose of safer recruitment is neither exclusion nor blind trust. It is to place the right people in positions of trust through evidence, proportionality and defensible judgement - protecting participants while preserving the possibility of rehabilitation.

99. Policy Review

This policy will be reviewed at least annually and earlier following a serious safeguarding incident, recruitment failure, DBS or legal change, commissioner requirement, audit finding or evidence that vetting controls are ineffective or disproportionate. The planned annual review date is September 2027.

Document Control

Policy	Safer Recruitment, Vetting, DBS & Suitability Policy
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Designated Safeguarding Lead	Dr David Williams
General contact	info@rapacademy.org

Related governance: Safeguarding and Child Protection; Staff Code of Conduct, Ethical Practice & Professional Standards; Professional Boundaries; Equality and Anti-Discrimination; GDPR & Data Protection; Whistleblowing; Complaints; Disciplinary and Capability arrangements; Volunteer Management; and Organisational Governance.

Implementation note: RAP Trust should create role-specific safer-recruitment checklists; maintain a central recruitment assurance record; document DBS eligibility rather than assuming it; introduce structured criminal-record suitability assessments; ensure independent oversight of related-party appointments; and align ongoing suitability reviews with supervision, safeguarding and commissioner requirements.