

Disclosure and Barring Service (DBS) and Safer Recruitment Policy

Organisation: GLAS Business Solutions

Policy Owner: Designated Safeguarding Lead (DSL)

Applies to: All staff, associates, contractors

Version: 1.0

1. Policy Statement

GLAS Business Solutions is committed to safeguarding learners and maintaining safe and professional learning environments.

This policy sets out the organisation's approach to **DBS checks and safer recruitment**, ensuring that safeguarding arrangements are **proportionate, lawful, and appropriate** to the nature of its provision.

2. Scope and Learner Context

GLAS Business Solutions delivers training, assessment, mentoring and quality assurance to:

- **Adult learners aged 19 and over**
- Learners in **workplace, professional, or remote learning environments**

The organisation:

- Does **not deliver provision to learners aged under 18**
- Does not deliver provision to learners who meet the legal definition of vulnerable adults requiring regulated activity.
- Does **not carry out regulated activity** as defined by DBS legislation

This context underpins the organisation's approach to DBS requirements.

3. Legal and Regulatory Context

DBS checks are required where individuals engage in **regulated activity** with children or vulnerable adults. For staff working exclusively with **non-vulnerable adult learners**, DBS checks are **not a statutory requirement**.

GLAS Business Solutions adopts a **risk-based approach** to safeguarding and safer recruitment, consistent with:

- Safeguarding legislation and guidance
- Ofsted expectations regarding proportionate safeguarding arrangements
- Good practice in adult education and training

4. DBS Position and Requirements

In line with the organisation's delivery model and learner profile:

- **DBS checks are not routinely required** for staff, associates or contractors
- This applies to roles including trainers, assessors, internal quality assurers and administrative staff
- No staff undertake regulated activity as part of their role

This position is **intentional, reviewed, and risk-assessed**, and does not reduce the organisation's safeguarding responsibilities.

This position is informed by a documented safeguarding and safer recruitment risk assessment.

5. Safer Recruitment and Risk Mitigation Measures

In the absence of routine DBS checks, GLAS Business Solutions mitigates safeguarding risk through the following controls:

5.1 Recruitment and Appointment

- Identity verification and right-to-work checks
- Review of relevant qualifications, experience and professional background
- Professional references where appropriate

5.2 Professional Boundaries

- Staff are required to maintain **clear professional boundaries** at all times
- No unsupervised or inappropriate one-to-one activity in private or domestic settings
- Delivery takes place in **workplace, public, or remote environments**

5.3 Training and Awareness

- Mandatory Safeguarding and Prevent training for all staff
- Refresher training completed at least every two years, or earlier if required
- Clear understanding of safeguarding responsibilities and escalation routes

5.4 Reporting and Oversight

- A designated Safeguarding Lead (DSL) oversees safeguarding arrangements
- Clear procedures for raising, recording and escalating concerns
- Safeguarding concerns are handled promptly and proportionately

6. Safer Recruitment Process (Operational Steps)

GLAS Business Solutions applies the following safer recruitment steps for all staff, associates and contractors, proportionate to the role and delivery context:

1. Application / CV Review

Review of professional background, qualifications and relevant experience.

2. Interview and Selection

Structured discussion to assess role suitability, professional conduct and values.

3. Employment History Review

Any unexplained gaps in employment history are explored and clarified.

4. References

Professional references are requested and reviewed where appropriate.

Any concerns are followed up prior to appointment.

5. Identity and Right to Work Checks

Identity and right-to-work documentation is verified prior to engagement.

6. Appointment Decision and Sign-off

Appointment decisions are approved by senior management or the Designated Safeguarding Lead.

7. Induction and Mandatory Training

All staff complete induction and mandatory safeguarding and Prevent training prior to, or immediately upon, commencing delivery.

8. Associate and Contractor Due Diligence

Associates and contractors are subject to the same safeguarding, training and conduct requirements as employed staff.

9. Review and Triggers for Enhanced Checks

Safeguarding arrangements are reviewed if delivery context changes, including:

- Changes to learner profile
- Introduction of under-18 learners
- Increased vulnerability
- Changes in delivery environment
- Identification of safeguarding concerns

Where risk increases, additional safeguards — including DBS checks — will be considered.

7. Exceptional and Changed Circumstances

If the organisation's delivery context changes, including but not limited to:

- Delivery to learners aged **16–18**
- Delivery to learners identified as **vulnerable**
- Engagement in activity that may constitute **regulated activity**

then:

- DBS requirements for relevant roles will be **reviewed immediately**
- Appropriate DBS checks will be implemented in line with statutory guidance
- This policy will be updated accordingly

8. Responsibilities

Designated Safeguarding Lead (DSL)

- Maintains oversight of safeguarding and safer recruitment
- Ensures this policy remains current and appropriate
- Leads reviews following any change in delivery context

Staff, Associates and Contractors

- Comply with safeguarding procedures and professional standards
- Complete required safeguarding and Prevent training
- Raise any safeguarding concerns without delay

9. Monitoring and Review

This policy is reviewed:

- **Annually**, or
- Earlier if technology, guidance or organisational activity changes

Formal approval, version control and review dates are managed through the organisation's policy register.