

DBS and Safer Recruitment Procedure

Pocket Money Adventures CIC | Version 1.4

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Purpose and roles

Apply eligibility-led vetting to directors, staff, volunteers, contractors and delivery partners. Nathan owns the private suitability register; an uninvolved director handles concerns about him. Use the current Safer Recruitment Policy, Safeguarding Policy and host requirements.

Determine eligibility before engagement

From 1 September 2026 in England and Wales, supervision does not exempt otherwise qualifying teaching, training, instruction, care or supervision of children from regulated activity. Assess the actual duties, frequency across settings and any overnight activity with the registered DBS body. More than three days in any 30-day period is a relevant period condition; two sessions on one day count as one day. Where the role is regulated activity, PMA requires the appropriate Enhanced DBS with Children's Barred List information before that activity begins, even where a teacher is present. A missing required check means the person does not undertake that role. Do not request barred-list information for an ineligible role. Adult regulated activity has a different test and is not created merely by an adult being vulnerable or attending a money session.

Pre-appointment steps

Write the role description and assessment; obtain the structured application, full history and explanations of gaps; check identity, right to work where required, relevant qualifications and at least two references. Record the interview, safeguarding scenarios, suitability decision and any conditions. Confirm references directly. Apply overseas, prohibition or disqualification checks where relevant and lawful.

Completion before access

Complete the checks required for the actual role, induction, Code of Conduct and safeguarding briefing before deployment. Do not use teacher supervision to bypass a required barred-list check. Office-only and other ineligible roles must not be subjected to unlawfully high-level DBS requests. Adult checks depend on the legal activity test, not a general description of vulnerability.

Volunteers and partners

Apply the same role assessment to volunteers. Obtain written evidence of contractor and partner checks, training and controls. The host may impose additional lawful requirements. Refuse engagement where essential assurance is missing.

Ongoing review and Update Service

Review suitability annually, on role or frequency changes, adverse information and host requirements. PMA's former three-year review benchmark was an internal practice, not a legal certificate expiry. Obtain a fresh check when necessary. Record Update Service membership only after verification; check with consent, eligibility and matching workforce/level. The current joining deadline is 30 days from certificate issue.

Disclosures and records

Assess disclosed information fairly and confidentially: relevance, seriousness, recency, pattern, context and role. Obtain specialist advice where needed. Keep a minimal record of certificate date, level, workforce, barred-list check where eligible, outcome, checker and date. Do not publish certificate numbers or copies. Normally destroy certificate copies within six months unless a documented lawful need requires longer retention; keep verification records under the retention schedule.

Concerns and referrals

Report suitability concerns immediately through safeguarding or the independent route. Refer allegations to the relevant LADO where the child-workforce threshold applies; use adult safeguarding and positions-of-trust arrangements for adults. Make DBS referrals where the statutory conditions are met. Do not substitute an internal process for required external action.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.