

Safer Recruitment Policy

Pocket Money Adventures CIC | Version 2.1

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.

Current operating requirements

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.

Eligibility, consent and retention

Adult barred-list eligibility depends on the adult regulated-activity definition, not one-to-one contact alone. Check role eligibility with the registered body. Unsuccessful applicant records are normally retained for six months unless a documented reason requires longer; successful worker records use the category-specific retention schedule. No required check is waived by supervision.

Detailed policy and procedures

Safer Recruitment Policy

This Safer Recruitment Policy sets out how Pocket Money Adventures CIC recruits and manages staff, contractors and volunteers, so that children and adults at risk are protected from harm. It reflects practice aligned to UK safeguarding expectations, including Keeping Children Safe in Education as updated from time to time, and is used alongside our Children and Adult Safeguarding Policy v1.7. Our commitment We take all reasonable steps to deter, identify and reject people who may pose a risk, and we require appropriate vetting, checks and safeguarding understanding of anyone who works with or around children or adults at risk through Pocket Money Adventures.

1. Purpose and scope

This policy applies to the recruitment and engagement of employees, sessional workers, contractors, directors and volunteers who represent Pocket Money Adventures or deliver or assist with activities in schools and in community settings. It covers:

- roles involving direct contact with children and young people;
- roles involving direct contact with adults, including adults at risk, in family and community sessions;
- roles with indirect contact, for example administrative or logistics staff visiting a school or a community venue; and
- any third party we engage who may interact with children or adults at risk as part of our delivery. It operates alongside our Children and Adult Safeguarding Policy v1.7, our Code of Conduct, our Lone Working Policy v2.1, and any site-specific safeguarding requirements set by a host school, trust, local authority or community organisation.

2. Principles and legal framework

We recruit in a way that puts safety, fairness and compliance first. We will:

- promote safeguarding in all recruitment materials and throughout selection;
- assess suitability through a structured process, including scrutiny of employment history and motivation;
- obtain appropriate pre-appointment checks before any unsupervised access to children or adults at risk;
- keep clear records of decisions and checks; and
- apply safer recruitment consistently and without unlawful discrimination. This policy is informed by UK guidance and law, as updated from time to time, including Keeping Children Safe in Education; Working Together to Safeguard Children; the Care Act

2014 in relation to adults at risk; UK GDPR and the Data Protection Act 2018; the Safeguarding

Vulnerable Groups Act 2006; the Rehabilitation of Offenders Act 1974 and associated Exceptions Orders; the Equality Act 2010; and the Immigration, Asylum and Nationality Act

2006 for right to work checks.

3. Roles and responsibilities

3.1 The Board

Pocket Money Adventures CIC is a community interest company. It has directors, not directors. The Board approves this policy, ensures there are resources to implement it, and oversees safeguarding governance.

Director and Designated Safeguarding Lead Nathan Waldron

Director and Deputy Designated Safeguarding Lead Bernadette Houlton, appointed 22 April 2026

3.2 The Designated Safeguarding Lead

The Designated Safeguarding Lead advises on recruitment risk, ensures safeguarding training is completed and recorded, and supports decisions where a concern arises. Where a recruitment concern involves the Designated Safeguarding Lead personally, it is handled by the Deputy Designated Safeguarding Lead, so that nobody assesses a matter concerning themselves.

3.3 Recruiting managers

- ensure job descriptions and adverts carry a safeguarding statement;
- ensure pre-appointment checks are completed before a start date; and
- ensure supervision is arranged where a check is still pending, and only where that is lawful.

3.4 Everyone engaged by us

- uphold our safeguarding standards and report any concern immediately; and
- complete the required training and comply with the Code of Conduct.

4. The recruitment process

4.1 Role design

We write a role profile with a job description and person specification that includes safeguarding responsibilities. We decide whether the role is eligible for an Enhanced Disclosure and Barring Service check and whether a barred list check is permitted or required, taking account of whether the role involves children, adults at risk, or both. We identify the level of supervision and any site access requirements.

4.2 Advertising

Every advert and recruitment pack carries a safeguarding statement. For example: "Pocket Money Adventures is committed to safeguarding and promoting the welfare of children and adults at risk. The successful applicant will undergo appropriate vetting, including Disclosure and Barring Service checks where applicable, and will complete safeguarding training."

4.3 Applications and shortlisting

- we use a structured application form and do not accept a curriculum vitae alone for any role involving work with children or adults at risk;
- we ask for full employment history, an explanation of any gap, and details of relevant training and qualifications; and
- we document shortlisting against the person specification.

4.4 Interview and assessment

At least one interviewer is trained in safer recruitment. The interview explores motivation, attitude to safeguarding and professional boundaries, ability to follow a policy and respond to a concern, behaviour-based examples, and any anomaly or gap in the application. We may add a practical task, a scenario question or an observed delivery session.

4.5 Conditional offer

Every offer is conditional on satisfactory pre-appointment checks. Nobody has unsupervised contact with a child or an adult at risk until all required checks are complete and recorded.

5. Pre-appointment checks

Checks are proportionate to the role, the setting and the level of access.

5.1 Identity, right to work and qualifications

- verify identity from original documents and keep an appropriate record;
- complete right to work checks in line with Home Office guidance; and
- verify qualifications or professional status where the role requires them.

5.2 References

- obtain at least two references, including the most recent employer where possible;

- ask specifically about suitability to work with children or adults at risk and about any disciplinary history relating to them; and
- verify references by direct contact, and follow up anything vague or concerning rather than letting it pass.

5.3 Disclosure and Barring Service checks

Where a role is eligible we obtain an Enhanced check. Where the role is regulated activity with children and the law permits, we also obtain a children's barred list check. Where the role is regulated activity with adults, we obtain an adults' barred list check. A check without the relevant barred list does not satisfy this policy for regulated activity, and where an existing certificate does not carry the barred list required for a role, a further check is obtained before that person undertakes that regulated activity.

Disclosure and Barring Service information is handled securely and in line with data protection requirements. Certificate numbers are never published.

5.4 Overseas checks

Where an applicant has lived or worked abroad we consider additional checks, for example a certificate of good conduct, and apply a documented risk assessment where an equivalent check is not available.

5.5 Disqualification and prohibition checks

Where a role involves teaching or childcare-related regulated activity, or the equivalent, we consider further checks such as prohibition from teaching. In a school we also comply with any check required by the host school or trust, and in a local authority or community setting with any check required by the host organisation.

5.6 Fitness to undertake the role

Where relevant, for example where there are physical delivery demands, we may ask for confirmation that a person is fit to undertake the role. We do not seek health data beyond what that requires.

6. Volunteers, contractors and partners

6.1 Volunteers

Volunteers are recruited and vetted proportionately. Where a volunteer role is eligible for an Enhanced check, that check is obtained before they work unsupervised with children or adults at risk.

6.2 Contractors and partners

Where delivery is supported by a contractor or a partner organisation, the contract requires compliance with safeguarding and safer recruitment standards. We may ask for evidence of checks and training, and we may decline the engagement where safeguarding assurance is insufficient.

6.3 Working in a school

Our people comply with site rules, including signing in and out, wearing identification, and following the school's safeguarding procedures. The school retains day-to-day responsibility for its pupils. Our people follow school instructions and report any concern immediately.

6.4 Working in a community setting

In a family hub, library, holiday programme or community venue, the host organisation retains responsibility for its own premises, its staff and its registration and collection arrangements. Children remain the responsibility of the adult who brought them. Before delivery we confirm in writing who the host's named safeguarding contact is, what their reporting route is, and what their lockdown and emergency procedure is. We are a visiting provider and we are never alone with a child. Where an activity could involve one to one contact with an adult at risk, that is arranged under the Lone Working Policy v2.1 and the Money Guidance Boundary and Escalation Policy v1.1, and only where the person undertaking it has the checks legally eligible and required for the actual activity, plus agreed safeguarding controls.

7. Induction, training and ongoing suitability

- every new starter receives a safeguarding induction before delivery begins, covering how to recognise and report a concern;
- everyone completes safeguarding training appropriate to their role, and is added to the central training register before their first visit;
- we operate a Code of Conduct setting out professional boundaries; and
- ongoing suitability is supported through supervision, performance management and refresher training.

8. Records and retention

8.1 Recruitment records

We keep records sufficient to evidence safer recruitment decisions, including shortlisting notes and interview records. Unsuccessful applicant records are normally retained for six months; successful-worker records use the documented category-specific schedule and are then disposed of securely, in line with the Data Protection and Privacy Policy v1.4.

8.2 Central register of checks

We maintain a central register of everyone engaged in a role involving work with or around children or adults at risk, recording the checks undertaken, the dates and the outcomes, without storing unnecessary certificate data. It is reviewed at least annually.

8.3 Data protection

Personal data is processed in line with our Data Protection and Privacy Policy v1.4 and UK GDPR. Access to recruitment and vetting information is restricted to those who need it.

9. Concerns, allegations and referrals

Where a concern or an allegation arises about someone's conduct towards a child or an adult at risk, we follow the Children and Adult Safeguarding Policy v1.7, including:

- immediate action to protect the child or adult;
- escalation to the Designated Safeguarding Lead and to the Board, and to the Deputy Designated Safeguarding Lead instead where the concern involves the Designated Safeguarding Lead;
- liaison with the host school, trust or organisation and with the relevant authorities, including the Local Authority Designated Officer where required;
- suspension or removal from duties pending the outcome where necessary; and
- referral to the Disclosure and Barring Service or another body where the legal threshold is met.

10. Review and approval

This policy is reviewed annually, or sooner where guidance, law or our operations change materially. Substantive changes are approved by the Board.

Appendix A: pre-appointment checks

Check	Timing and requirement
Structured application; full history and explained gaps	Before shortlisting / interview; CV alone is insufficient.
Original identity and right to work where required	Before appointment / start.
Two directly verified references, including most recent employer	Before start; resolve concerns.
Appropriate Enhanced DBS and applicable barred-list information	Assess eligibility, duties and frequency with the registered body. Complete required checks before qualifying activity begins. Teacher supervision does not exempt an otherwise qualifying child role.
Overseas checks, prohibition / disqualification and qualifications	Where relevant and lawful; resolve before the applicable role starts.
Safeguarding induction, training and Code of Conduct	Before delivery; record verified evidence and acknowledgement.

Appendix B: regulated activity and supervision

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.

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.