

# Ginger Nut Training.



## Document Title

**Ginger Nut Training – Safer Recruitment & Pre-Employment Checks**

### Originator

**Dan Williams**

### Responsible Person

**Sarah Osborne**

### Date of Approval

**April 2026**

### Policy Due for Renewal

**April 2027**

Version

**1.1**

# Ginger Nut Training – Safer Recruitment & Pre-Employment Checks Policy

## Pre-Employment Checks

### 1. Introduction

Before confirming employment for any tutors or other staff with access to learners and/or vulnerable young people, Ginger Nut Training will run a series of checks to confirm that the potential member of staff holds all appropriate qualifications in addition to a clean DBS check.

### 2. Pre-Appointment Vetting Checks

In accordance with Keeping Children Safe in Education (KCSIE) 2025, Ginger Nut Training will complete the following mandatory pre-appointment checks before any individual begins work in regulated activity:

- **Identity verification**, including photographic ID and proof of address.
- **Enhanced DBS check**, including the **children's barred list** where the role meets the regulated activity threshold.
- **Prohibition from teaching (TRA) check** for anyone undertaking teaching work.
- **Section 128 direction check** for individuals in management roles, including senior leaders and governors/trustees.
- **Right to Work in the UK** verification.
- **Verification of professional qualifications** where required for the role.
- **Overseas criminal/character checks** where the applicant has lived or worked abroad.
- **Two employment references and a character reference**, including one from the most recent employer, with any anomalies or gaps explored and recorded.
- **Scrutiny of employment history**, including explanations for any gaps.
- **Written confirmation from agencies** that all legally required vetting checks have been completed for agency workers.

All checks listed above will be **recorded without delay on the Single Central Record (SCR)**

### 3. DBS Check

Ginger Nut Training is committed to ensuring that staff have satisfactory Disclosure & Barring Service (DBS) enhanced checks undertaken by us before allowing them to work with learners. To ensure that we comply with new DBS-ID checking guidelines, which came into effect on 1<sup>st</sup> November 2025, staff will be required to complete an online ID verification process. Should this online ID verification fail for any reason, staff will be required to complete this check either in person, or via a participating Post Office branch. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands, and final warnings) relevant to the post. Should convictions be returned by the process, a member of the Senior Management Team with appropriate DSP (Designated Senior Person safeguarding) training will assess the level of risk associated with the appointment and determine if the applicant is suitable for appointment. All staff or apprenticeship support tutors employed to look after children must report any subsequent criminal convictions to a company Director. Failure to do so will result in disciplinary action being taken. Where we are operating in partnerships, perhaps offsite, and partner employees come into contact with Ginger Nut Training learners, we will seek assurance that their employees will have been through the same pre-employment checks expected of Ginger Nut Training staff.

### 4. Right to Work Checks

Ginger Nut Training conducts Right to Work checks in line with the **Home Office Employer's Guide to Right to Work Checks**. Accepted methods include:

1. **Home Office Online Right to Work Check** (using a share code generated by the applicant).
2. **Digital Identity Verification (IDSP/DVS)** for eligible British and Irish passport holders, using a certified Identity Service Provider.
3. **Manual document-based check** using original acceptable documents as defined by the Home Office.

Evidence of the completed check—online confirmation, verified digital report, or certified manual copies—will be **securely retained** in accordance with the Home Office statutory excuse requirements and our Data Retention Policy.

### 5. Employer References

Before employment, Ginger Nut Training requires three references: one from the current or most recent employer, one from a previous employer, and one separate character reference. These are kept on file against the employee's record.

### 6. Previous Qualifications / CPD

Before employment, all tutors must provide original copies of all certificates to confirm previous qualifications. Scans of these will be taken and saved against the employee's CPD record, which should be updated as and when new qualifications are achieved.



## 7. TRA Prohibition and Section 128 Checks

Where a role involves **teaching work**, Ginger Nut Training will conduct a **Teaching Regulation Agency (TRA) prohibition check** using the DfE “**Check a teacher’s record**” service. This confirms whether an individual is prohibited, sanctioned, or restricted from teaching.

For all individuals undertaking **management responsibilities**, a **Section 128 direction check** will also be completed to confirm that the person is not barred from management of an educational institution.

The outcomes of both checks must be **recorded on the SCR**.

## Recruitment Process

### 1. Initial Steps

- Clear job description in place.
- Clear person specification in place.
- Outline of advert expectations.
- Only Ginger Nut application forms or set platform Indeed customised questions to be accepted, not CVs alone.
- Information packs to be sent to candidates or signpost to electronic information on the company via the website.

### 2. Volunteers

**Ginger Nut Training applies a risk-based approach to determining the level of vetting required for all volunteers.**

#### Volunteers

- Where volunteers are engaged in regulated activity, an Enhanced DBS with Barred List check is required.
- For supervised volunteers not in regulated activity, a documented risk assessment will determine the appropriate level of checking.
- All volunteers’ identity, role, supervision arrangements, and vetting outcomes will be recorded on the Single Central Record (SCR).



**Ginger Nut Training does not use contractors or agency workers. Accordingly, all references to contractor or agency vetting do not apply within this policy. Should organisational practice change in future, this section will be expanded to outline the necessary requirements in line with safer recruitment legislation and KCSIE.**

### Shortlisting

- Shortlisting and interviewing candidates must be undertaken by a minimum of two people employed by Ginger Nut.
- A copy of the job description is sent to candidates when sending out interview invitation confirmation.
- The same selection panel both shortlists and interviews the candidate.
- Applications are reviewed against essential and desirable criteria.
- Information is checked for consistency and discrepancies.
- Gaps in employment/training or a history of repeated changes of employment are to be identified and taken up as part of the consideration of whether to shortlist the applicant or to ask the applicant for further explanation at the interview.
- Incomplete applications are not accepted.

### Interview

- All interview questions must be competency-based, and all questions must be completed.
- Interviews should be face-to-face where possible.
- All interviews must be undertaken by a minimum of two people employed by Ginger Nut.
- At least one member of the panel must have undertaken safer recruitment training.
- All members of the interview panel must take notes.

Candidates must be asked at the interview about:

- Any anomalies or discrepancies identified on their application form or CV; this must be noted and questioned.
- Any gaps in their employment history; this must be noted on the application.
- Criminal convictions and/or concerns/allegations/investigations to be shared at the interview.
- Their motivation for working with apprentices, including those aged under 18/children.

- Their understanding of the role's safeguarding responsibilities.
- Any issues arising from their references.
- Clear notes are recorded by all panel members of the candidates' responses at the interview and stored securely.
- The interview stresses that the identity of the successful candidate will be checked thoroughly and that a DBS will be obtained.
- All candidates bring with them documentary evidence of their right to work in the UK and their identity (this must be signed by the candidate to give permission for copies to be kept in files).
- Evidence should be obtained in line with UK Visas and Immigration and the Disclosure and Barring Service.
- Photographic ID must be seen.
- Candidates bring documents confirming any educational and professional qualifications.
- A copy of the documents used to verify the successful candidate's identity and qualifications are kept for the personnel file.
- Candidates are informed that any offers of employment are conditional and dependent on checks.

### Post-Interview

- Referencing.
- DBS checks.
- Right to Work in the UK.

### Enhanced Background Checks

Social media profiles and online presence may be checked to highlight any potential red flags for questioning.

### Ongoing Monitoring

Staff will be continually monitored to ensure continued compliance with safeguarding standards.

### Training and Development

Mandatory training on safeguarding and child protection for all new hires, with regular refresher courses to be in place.



## Digital Security

Ensure that all digital records and personal information are stored securely and access is restricted to authorised personnel only. Contracts will include agreements to protect sensitive information.

## Feedback Mechanism

Establish a feedback mechanism for candidates to provide insights on the recruitment process, helping to improve future practices.

## Compliance with Ofsted and Department for Education Requirements

Ginger Nut Training will comply with all Ofsted and DfE requirements, including:

- Ensuring compliance with regulations 32 and 33 and schedule 2 of the Children's Homes (England) Regulations 2015, including proof of identity, DBS certificate, two written references, verification of previous employment, and documentary evidence of qualifications.
- Aligning recruitment processes with statutory requirements, including the Prevent Duty and Disclosure and Barring Service (DBS) checks.
- Including a statement about Ginger Nut Training's commitment to safeguarding in all job advertisements.

## Disability Confident Committed Employer

As a Disability Confident Committed Employer we have committed to:

- Ensure our recruitment process is inclusive and accessible.
- Offering an interview to disabled people who meet the minimum criteria for the job.

Candidates can request Reasonable Adjustments for the interview process, and can do this by:

- Indicating needs in the application email or form.  
Contacting our recruitment team directly at 0207 495 5110 / [info@gingernuttraining.co.uk](mailto:info@gingernuttraining.co.uk)

Provide us with details of the adjustments required, such as accessible interview locations, additional time for assessments, or alternative formats for interview materials.

- Support any existing employee who acquires a disability or long-term health condition, enabling them to stay in work

## Care Leaver Friendly Employer Charter

As a care leaver friendly employer, we commit to work towards the 'RTD' principles below.

### Recruitment (R)

- Work with the Covenant team to promote appropriate opportunities to the care leaver community through targeted means (including but not limited to the Covenant app, website, social accounts).



- Create a Special Point of Contact at our organisation who care leavers can contact – for guidance - before, during and after their application process (when applying for a job).
- Offer a guaranteed interview (and constructive feedback) to applicants who identify as care-experienced and meet the minimum criteria for the role.

#### Tracking (T)

- Create a 'tick box', or similar mechanic, within application forms or ATS in order to track progress of care leaver applicants or
- Manually record applicants from the care leaver community (when they declare) to track the progress of care leaver applicants.
- Encourage recruitment vendors/partners to also adopt these tracking principles and share care leaver applicant progress with us.

#### Development (D)

- Assign a workplace buddy for our care leaver employees to provide informal support and guidance and help in navigating the organisation.
- Create and communicate clear boundaries and high expectations for our care leaver employees to ensure their time with us is a growing and challenging one.
- Approach our care leaver employees' professional challenges with compassion and empathy, recognising that there may be a high level of disruption in their personal lives.

## Data Handling/Information Governance

### Data Protection and Recruitment Data

All recruitment-related personal data is processed in accordance with the **UK GDPR, Data Protection Act 2018**, and ICO's **Employment Practices: Recruitment & Selection** guidance. This includes:

- Using only **lawful bases** (e.g., legal obligation, legitimate interests) for processing recruitment data.
- Ensuring **data minimisation** by collecting only information that is necessary for safer recruitment purposes.
- Applying strict **retention limits**, including not retaining DBS certificates for more than **six months** unless legally justified.
- Maintaining robust **security measures** to protect candidate information, with access restricted to authorised personnel only.
- Directing all applicants to the organisation's **Privacy Notice**, outlining how their data is collected, used, stored, and their rights under data protection law.

## Policy Review

- The policy is to be reviewed annually.

*Sarah Osborne*

Sarah Osborne (Mar 12, 2026 16:20:31 GMT)

*Dan Williams*

Dan Williams (Mar 12, 2026 16:58:17 GMT)

Version	Date	Author	Changes Made
1.1	03/03/2026	SO	Addition of: Disability Confident Committed employer status / Care Leaver Friendly Employer Charter status / Updates to DBS IDV checking guidelines / Sending job descriptions with interview invites / Pre-Appointment Vetting Checks / Right to Work Checks / TRA Prohibition and Section 128 Checks / Volunteers / Data Protection and Recruitment Data

# Ginger Nut Training – Safer Recruitment & Pre-Employment Checks

Final Audit Report

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