



Safer Recruitment Policy	
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1. INTRODUCTION

The safe recruitment and selection of staff is a fundamental part of safeguarding and promoting the welfare of children.

CM Sports UK Ltd is committed to safeguarding and promoting the welfare of all children and young people who participate in, attend or are otherwise connected with its activities.

As an organisation working with children, CM Sports expects all employees, workers, volunteers, contractors and agency staff to share this commitment.

Safer recruitment is not limited to completing pre-employment checks. It includes the entire recruitment process, from planning and advertising a vacancy through to selection, pre-employment checks, induction and ongoing suitability.

CM Sports will take reasonable and proportionate steps to deter, identify and prevent unsuitable individuals from working with children.

This policy is aligned with relevant safeguarding expectations in **Keeping Children Safe in Education 2026 (KCSIE 2026)** where applicable to CM Sports' work with schools and children, together with current Disclosure and Barring Service (DBS) requirements and relevant employment and safeguarding legislation.

2. AIMS AND OBJECTIVES

The aims of this policy are to:

- Safeguard and promote the welfare of children.
- Recruit the best person for each role based on skills, qualifications, experience, suitability and merit.
- Deter and prevent unsuitable individuals from obtaining positions involving work with children.
- Ensure recruitment decisions are fair, consistent and proportionate.
- Ensure equality of opportunity throughout recruitment.
- Identify safeguarding concerns, unexplained gaps or inconsistencies in an applicant's history.
- Complete all legally required pre-employment and safeguarding checks before an individual starts work where required.

- Ensure the level of DBS check is appropriate to the duties and eligibility of the role.
- Maintain appropriate records of recruitment and safeguarding checks.
- Ensure safer recruitment continues after appointment through induction, training, supervision and ongoing management.

Employees and managers involved in recruitment must familiarise themselves with this policy and follow the procedures within it.

3. EQUALITY, DIVERSITY AND FAIR RECRUITMENT

CM Sports is committed to equality, diversity and inclusion.

Applicants will be considered fairly and consistently and will not be unlawfully discriminated against on the basis of protected characteristics under the Equality Act 2010.

Recruitment decisions will be based on the requirements of the role, including the applicant's qualifications, experience, skills, suitability and ability to safeguard children.

Reasonable adjustments will be considered for disabled applicants where required.

Where a member of staff involved in recruitment has a close personal or family relationship with an applicant, this must be declared and the individual must not take part in the relevant recruitment decision-making process.

4. ROLES AND RESPONSIBILITIES

Directors

The Directors are responsible for ensuring that CM Sports has effective safer recruitment arrangements and that these are reviewed and monitored.

Managing Director and Regional Managers

The Directors delegate responsibility to the Managing Director and Regional Managers to oversee recruitment and appointments.

Managers involved in recruitment are responsible for:

- Following this policy.
- Ensuring appropriate checks are identified and completed.
- Ensuring safeguarding considerations are included throughout recruitment.
- Ensuring unsuitable individuals are not permitted to undertake duties before required checks have been completed.
- Ensuring contractors and agencies provide appropriate assurance.
- Maintaining accurate recruitment records.
- Escalating safeguarding concerns or discrepancies appropriately.

Recruiting Managers

Recruiting managers must ensure that:

- Job descriptions and person specifications are appropriate.
 - Recruitment documentation is accurate.
 - Shortlisting is undertaken fairly.
 - References are appropriately obtained and verified.
 - Interviews explore suitability and safeguarding.
 - Appropriate DBS and other checks are completed.
 - Recruitment decisions are properly recorded.
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5. SAFER RECRUITMENT PROCESS

CM Sports will use a structured recruitment process which may include:

1. Role planning.
 2. Job description and person specification.
 3. Safeguarding-focused advertising.
 4. Application form.
 5. Shortlisting.
 6. References.
 7. Interview.
 8. Identity verification.
 9. Right to work checks.
 10. Qualification and professional status checks where required.
 11. DBS and barred list checks where eligible and required.
 12. Overseas checks where appropriate.
 13. Risk assessment where information requires further consideration.
 14. Conditional offer.
 15. Completion of required pre-employment checks.
 16. Contract and appointment.
 17. Safeguarding-focused induction.
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6. ADVERTISING

Job advertisements will make clear CM Sports' commitment to safeguarding and promoting the welfare of children.

Where appropriate, advertisements will state that:

- The role involves working with children.
- Relevant safeguarding checks will be required.
- The appointment will be subject to satisfactory pre-employment checks.
- The applicant will be expected to demonstrate suitability to work with children.

Recruitment documentation will be handled securely and in accordance with applicable data protection requirements.

7. APPLICATION FORMS

CM Sports will use an appropriate application form for roles where safer recruitment checks are required.

Applicants will be required to provide sufficient information to allow CM Sports to assess:

- Employment history.
- Relevant experience.
- Qualifications.
- Skills and suitability.
- Experience of working with children where applicable.
- Any gaps or discrepancies in employment history.

Applicants may be asked to explain gaps in employment or other relevant inconsistencies.

CVs may be used as supporting information but will not replace the Company's application and safer recruitment process where an application form is required.

Applicants must provide accurate information.

Providing deliberately false or misleading information may result in an application being rejected or, if discovered after appointment, appropriate disciplinary action and/or termination of employment.

Where appropriate, relevant information may also be referred to the DBS, police or another competent authority.

8. JOB DESCRIPTIONS AND PERSON SPECIFICATIONS

A job description and person specification will be prepared before recruitment begins.

The job description will accurately describe:

- Duties.

- Responsibilities.
- Level of responsibility.
- Contact with children.
- Safeguarding responsibilities.
- Any supervision requirements.
- Any qualifications or experience required.

The person specification will identify the skills, experience, qualifications, attributes and behaviours required for the role.

For roles involving children, suitability to work safely and appropriately with children will be an essential consideration.

9. SHORTLISTING

Shortlisting will be undertaken against the job description and person specification.

Recruiting managers will consider:

- Qualifications.
- Experience.
- Relevant skills.
- Employment history.
- Gaps or inconsistencies.
- Information provided in the application.
- Suitability to work with children.

Any concerns identified during shortlisting should be explored further during the recruitment process.

10. REFERENCES

References will be obtained for successful or shortlisted applicants in accordance with CM Sports' recruitment procedures.

Where practicable, references should be obtained before appointment and any concerns should be explored before a final decision is made.

References should, where possible, be obtained directly from an appropriate referee rather than from the applicant.

Where the applicant has worked with children previously, CM Sports may seek information from a relevant previous employer to help assess suitability to work with children.

References will not normally be accepted from relatives or individuals who are unable to provide an appropriate employment or professional reference.

Any discrepancies, anomalies or concerns identified in references will be followed up.

References are an important part of safer recruitment but do not replace other required checks.

KCSIE does not prescribe a fixed number of references for every setting; CM Sports will determine an appropriate approach according to the role and circumstances.

11. INTERVIEWS

Where practicable, interviews will be conducted face-to-face. Remote interviews may be used where appropriate.

At least two people should normally be involved in the selection process for roles involving significant responsibility for children.

Interview questions will assess the applicant against the job description and person specification.

Where relevant, interviews will explore:

- Motivation for working with children.
- Safeguarding awareness.
- Professional boundaries.
- Appropriate behaviour towards children.
- Experience of managing challenging situations.
- Understanding of equality and inclusion.
- Ability to recognise and report concerns.
- Any gaps, discrepancies or concerns identified during recruitment.

At least one person involved in recruitment for roles requiring safer recruitment expertise should have appropriate safer recruitment training.

12. PRE-EMPLOYMENT CHECKS

An appointment will remain conditional until all checks appropriate to the role have been satisfactorily completed.

Depending on the role, checks may include:

- Identity.
- Right to work in the UK.
- References.
- DBS check.

- Children's Barred List check where legally eligible and required.
- Qualifications.
- Professional registration or status where relevant.
- Overseas criminal record or other suitability checks where appropriate.
- Prohibition or restriction checks where legally applicable to the role.
- Other checks required by law or current safeguarding guidance.

The level of DBS check will be determined by the legal eligibility of the specific role.

CM Sports will not request a higher-level DBS check unless the role is legally eligible for that level of check.

13. DBS AND REGULATED ACTIVITY

CM Sports will determine whether a role constitutes regulated activity with children by considering the actual duties and frequency of the work.

From **1 September 2026**, the supervision exemption for regulated activity with children has been removed.

This means that a person who teaches, trains, instructs, cares for or supervises children may be undertaking regulated activity even where they are supervised by another person.

The frequency condition includes work undertaken on more than three days in any 30-day period, and overnight activity between 2.00am and 6.00am is also relevant.

This change is particularly relevant to sports and activity settings because regularly involved assistant coaches, instructors and volunteers may now fall within regulated activity where the legal conditions are met.

Where a role is regulated activity with children, CM Sports will obtain an **Enhanced DBS check with Children's Barred List information** as legally required.

CM Sports will review DBS eligibility whenever:

- A new person is recruited.
- An employee changes role.
- Duties change.
- Frequency of work changes.
- A volunteer's role changes.
- Legislation or DBS guidance changes.

14. CHILDREN'S BARRED LIST

CM Sports will only request a Children's Barred List check where the role is legally eligible.

It is unlawful for a barred person to engage in regulated activity with children, and CM Sports will not knowingly permit a barred individual to undertake regulated activity.

Where a role does not qualify for a Children's Barred List check, CM Sports will not request one simply as a matter of preference.

15. DBS CHECKS BEFORE COMMENCEMENT

CM Sports' standard expectation is that required DBS checks will be completed before an individual begins duties involving children.

Where exceptional circumstances arise and applicable guidance permits an individual to begin work before all information is available, a documented risk assessment and appropriate safeguards must be in place.

Any such arrangement must be authorised by an appropriate manager and must comply with current legal and safeguarding requirements.

No person will be permitted to undertake duties where doing so would breach DBS or safeguarding requirements.

16. DBS UPDATE SERVICE

Where an applicant or employee is registered with the DBS Update Service, CM Sports may use the service where legally permitted and appropriate.

Before relying on a previous certificate through the Update Service, CM Sports will:

- Obtain the individual's consent.
- Verify the individual's identity.
- Check that the existing certificate is at the appropriate level and workforce.
- Confirm that the certificate is relevant to the role.
- Carry out a status check where appropriate.
- Consider whether a new DBS check is required.

The Update Service does not remove the need for CM Sports to make its own suitability decision.

17. DBS CERTIFICATES

DBS certificates are issued to the applicant.

Where required, the applicant will provide the original certificate or appropriate evidence of the result so that CM Sports can complete its recruitment process.

CM Sports will record the required recruitment information without unnecessarily retaining DBS certificate information.

DBS information will be handled securely and confidentially.

18. CONVICTIONS AND OTHER INFORMATION

A criminal record or other disclosed information will not automatically prevent an individual from being employed.

Where relevant information is identified, CM Sports will consider:

- The nature and seriousness of the matter.
- Relevance to the role.
- How long ago it occurred.
- Whether it was an isolated incident or part of a pattern.
- The individual's circumstances.
- Any evidence of rehabilitation.
- Any safeguarding implications.
- The requirements of relevant legislation.

Decisions will be fair, proportionate and documented.

Where an applicant disputes information contained within a DBS disclosure, CM Sports may allow reasonable opportunity for the information to be challenged before making a final decision where practicable.

19. IDENTITY AND RIGHT TO WORK

CM Sports will verify the identity of applicants in accordance with current DBS and right-to-work requirements.

Right-to-work checks will be completed using the appropriate current Home Office process.

The Company will not discriminate unlawfully on the basis of nationality, race or other protected characteristic.

Where a person's identity documents indicate a change of name, appropriate evidence may be requested.

20. QUALIFICATIONS AND PROFESSIONAL STATUS

Where qualifications or professional registration are required for a role, CM Sports will verify them before appointment.

Where a role requires a particular professional status, registration, prohibition or restriction check, this will be completed before the person undertakes the relevant duties.

Any discrepancy between qualifications claimed and qualifications obtained will be investigated.

21. MEDICAL FITNESS AND REASONABLE ADJUSTMENTS

CM Sports will comply with applicable employment and equality legislation regarding health information and medical fitness.

Health information will only be requested or processed where there is a lawful and appropriate reason to do so.

Where a disability or health condition is disclosed, CM Sports will consider reasonable adjustments in accordance with the Equality Act 2010.

A person's health condition or disability will not, in itself, be treated as evidence that they are unsuitable to work with children.

22. OVERSEAS CHECKS

Where an applicant has lived or worked outside the UK, CM Sports will consider whether additional overseas checks are appropriate.

The nature of any overseas check will depend on the country concerned, the individual's circumstances and the availability of relevant records.

An overseas check does not replace a UK DBS check where a DBS check is required.

Where appropriate checks cannot be obtained, CM Sports will undertake a documented risk assessment and consider additional evidence of suitability before appointment.

23. TEACHING AND PROFESSIONAL PROHIBITION CHECKS

Where a role falls within the scope of a professional prohibition, restriction or sanction check, CM Sports will complete the appropriate check.

This may include checks relating to teaching or other regulated professional activity where applicable.

CM Sports will not knowingly appoint an individual where a legal prohibition prevents them from undertaking the relevant duties.

24. INDUCTION

All new staff and volunteers will receive an appropriate induction.

Safeguarding induction will include, as relevant:

- CM Sports' Safeguarding & Child Protection Policy.
- Reporting safeguarding concerns.
- The role of the DSL and Deputy DSL.

- Professional boundaries.
- Code of Conduct.
- Behaviour expectations.
- Online safety and appropriate digital conduct.
- Whistleblowing.
- Equality, diversity and inclusion.
- Prevent-related safeguarding responsibilities where applicable.
- Confidentiality and information sharing.
- Relevant emergency procedures.

Staff working in schools or other settings will also follow the safeguarding requirements of the setting in which they are working.

25. SINGLE CENTRAL RECORD AND RECRUITMENT RECORDS

Where CM Sports is required by the relevant setting or contractual arrangements to maintain or contribute to a Single Central Record (SCR), it will ensure required recruitment and safeguarding checks are accurately recorded.

Where CM Sports operates independently, it will maintain an appropriate central safer recruitment record for its workforce.

Records should demonstrate completion of appropriate checks, including where applicable:

- Identity.
- Right to work.
- References.
- DBS.
- Children's Barred List.
- Qualifications.
- Professional checks.
- Overseas checks.
- Other relevant suitability checks.

Records will be regularly reviewed and audited.

26. CONTRACTORS AND AGENCY STAFF

CM Sports will take appropriate steps to ensure that contractors and agencies supplying staff who work with children have completed the required safer recruitment checks.

Before an individual starts work, CM Sports will obtain appropriate confirmation from the contractor or agency that required checks have been completed.

Depending on the contractual arrangement and legal requirements, CM Sports may independently verify identity and/or other information.

Agency and contractor staff must comply with CM Sports safeguarding procedures while working on CM Sports activities.

Any concern about the suitability or conduct of an agency worker or contractor must be reported to the appropriate CM Sports manager and, where relevant, the safeguarding lead.

27. VOLUNTEERS

Volunteers will be subject to safer recruitment procedures proportionate to their role.

From 1 September 2026, the removal of the supervision exemption means that volunteers undertaking regulated activity with children may require an Enhanced DBS check with Children's Barred List information even where they are supervised.

Occasional volunteers who do not meet the relevant frequency or other regulated activity conditions will be assessed according to the DBS eligibility rules applicable to their role.

CM Sports will determine the appropriate checks based on the actual duties and frequency of volunteering.

Where an unchecked volunteer is permitted to participate in an activity, appropriate supervision and safeguarding arrangements will be maintained in accordance with current requirements.

28. ONGOING SUITABILITY AND SAFER EMPLOYMENT

Safer recruitment does not end when an individual starts employment.

CM Sports will promote ongoing safeguarding through:

- Induction.
- Safeguarding training.
- Regular supervision.
- Management oversight.
- Performance management.
- Professional development.
- Staff declarations and reporting requirements.
- Appropriate review of concerns.
- Action where conduct raises questions about suitability.

Staff must inform CM Sports promptly where they become aware of information that may affect their suitability to work with children, in accordance with Company procedures and applicable law.

29. CONCERNS ABOUT STAFF AND VOLUNTEERS

Any allegation or concern that an employee, volunteer, contractor or other adult has harmed a child, may pose a risk of harm to a child, or has behaved inappropriately towards a child must be reported immediately through CM Sports safeguarding procedures.

Concerns must be taken seriously regardless of the person's role or seniority.

The matter must not be investigated informally by staff who are not responsible for managing the allegation.

Where appropriate, the concern will be referred to the DSL, Local Authority Designated Officer (LADO), Children's Social Care, police, DBS or another relevant authority.

30. DBS REFERRALS

CM Sports will make a referral to the DBS where legally required.

This may include circumstances where an individual has:

- Been engaged in regulated activity with children.
- Been removed from regulated activity because they harmed a child or posed a risk of harm.
- Resigned or otherwise left before they could be removed from regulated activity for relevant safeguarding reasons.

CM Sports will not prevent or discourage a required DBS referral.

31. LEAVING EMPLOYMENT

Where safeguarding concerns arise when an employee, volunteer or contractor leaves CM Sports, the Company will consider whether further action is required.

This may include:

- Completing an ongoing safeguarding investigation.
- Making a DBS referral.
- Making a referral to the police.
- Making a LADO referral.
- Providing appropriate factual information in response to future employment references.
- Taking any other action required by law or safeguarding guidance.

Resignation will not prevent CM Sports from completing appropriate safeguarding procedures.

32. PREVENT AND SAFEGUARDING

CM Sports recognises that safeguarding includes protecting children from a range of risks, including radicalisation and extremism.

Staff will receive appropriate safeguarding information and training regarding the Prevent duty where relevant to their role.

CM Sports will not discriminate against applicants or staff on the basis of protected characteristics, religion or belief.

Any safeguarding concern relating to radicalisation, extremism or terrorism will be managed through the Company's safeguarding procedures and appropriate referral routes.

33. DATA PROTECTION AND RECORD RETENTION

Recruitment and safeguarding information will be processed in accordance with UK data protection law and CM Sports' data protection procedures.

CM Sports will:

- Keep information secure.
- Limit access to authorised individuals.
- Only retain information for as long as necessary and lawful.
- Dispose of information securely.
- Avoid retaining unnecessary copies of sensitive documents.

Recruitment records relating to unsuccessful applicants will normally be retained only for the period necessary for legitimate recruitment, legal and equality purposes, after which they will be securely destroyed in accordance with CM Sports' retention arrangements.

Where a longer retention period is required by law, safeguarding requirements, contractual arrangements or a legitimate legal purpose, the appropriate period will apply.

34. SAFER RECRUITMENT TRAINING

Staff responsible for recruitment will receive appropriate safer recruitment training.

Training will be refreshed where necessary, including when:

- Legislation changes.
- KCSIE or safeguarding guidance changes.
- DBS requirements change.
- Recruitment procedures are updated.
- An audit identifies a training need.

Recruiting managers should understand how to identify and respond to concerns arising during recruitment.

35. MONITORING AND AUDIT

CM Sports Management will monitor compliance with this policy.

Safer recruitment audits will consider:

- Recruitment records.
- DBS eligibility.
- DBS completion.
- Barred list checks where applicable.
- References.
- Identity and right-to-work checks.
- Qualification checks.
- Overseas checks.
- Contractor and agency compliance.
- Staff induction.
- Safeguarding training.
- Ongoing suitability.

Any weaknesses identified through audit will result in appropriate corrective action.

36. KCSIE 2026 SAFEGUARDING ALIGNMENT

This policy supports relevant KCSIE 2026 safeguarding expectations by ensuring that CM Sports:

- Treats safeguarding as everyone's responsibility.
- Uses safer recruitment to reduce the risk of unsuitable adults working with children.
- Considers concerns about adults working with children.
- Maintains appropriate safeguarding records.
- Ensures staff understand how and where to report concerns.
- Promotes professional boundaries.
- Supports appropriate information sharing.
- Ensures safeguarding training forms part of induction and ongoing employment.
- Responds appropriately to allegations against staff and volunteers.

- Maintains appropriate whistleblowing arrangements.

Where CM Sports staff work within a school or college, they must also comply with the relevant safeguarding arrangements and policies of that setting.

37. RELEVANT LEGISLATION AND GUIDANCE

This policy will be interpreted in accordance with current applicable legislation and guidance, including:

- Keeping Children Safe in Education 2026.
 - Safeguarding Vulnerable Groups Act 2006, as amended.
 - Crime and Policing Act 2026, including changes affecting regulated activity with children.
 - Disclosure and Barring Service guidance.
 - Equality Act 2010.
 - UK GDPR and Data Protection Act 2018.
 - Immigration, Asylum and Nationality Act 2006 and current right-to-work requirements.
 - Relevant employment legislation.
 - Working Together to Safeguard Children 2026, where applicable.
 - Current Department for Education safeguarding guidance.
 - Current DBS eligibility guidance.
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