Section 2:
Safer recruitment and training

Introduction

As churches, providing a wide variety of activities for children and vulnerable adults, we have a responsibility to make sure that we do this in a safe and accountable way. We need to be able to say to parents, carers and statutory authorities that we have done all we can to ensure that those who look after children, young people and vulnerable adults are safe and able to do their job.

The safer recruitment process in this section (see 2.1) is in line with current legislation and good practice guidance and has been the longstanding policy of the church and was also included in our previous guidance, "For the Sake of Our Children". By putting these policy and guidelines into practice we are taking important steps to safeguard children and vulnerable people in our midst.

We may assume that we know everyone within our church community or that we don't want to turn away any willing volunteers, but we have a legal and moral responsibility to take all reasonable steps to ensure that children and vulnerable people are safe. It can feel awkward to ask those we know to go through a recruitment process however, the steps noted in this section are acknowledged good practice to make sure that workers and volunteers have the appropriate skills, access to support and training and that the appropriate background checks have been carried out. If we apply the process to all, it is fair and transparent and quickly becomes the norm.

All leaders, workers and volunteers and those in positions of trust with access to or responsibility for vulnerable groups should undergo a thorough recruitment process **before** they begin their role. For employees, this should include an application form followed by an interview and references should always be taken up. Any inconsistencies or gaps in the employment history should be queried. For each volunteer, an information form and an informal discussion about the role should take place and references sought. All those working or volunteering with children or vulnerable adults should complete a self-declaration form (which will be stored confidentially) and a criminal records check (DBS) should be carried out for all eligible posts. The process should always be applied to new volunteers and employees, but all elements may not be relevant to existing volunteers.

The majority of posts involving contact with children and many posts working with vulnerable adults and adults at risk are eligible to do a Disclosure and Barring Service (DBS) check, but this can vary depending on the actual work, level of responsibility and frequency of the work. This section of the Handbook contains information to help you understand the process including flow charts and examples of eligible posts. All eligible workers /volunteers should complete a DBS check before they commence their role and then every four years.

As well as the information outlined in the following pages there are also forms and checklists available in Section 7 of this handbook and on the Panel website.

*Safer recruitment is a set of practices to help make sure your staff and volunteers are suitable to work with children and young people. It's a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.**

*https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment

2.1 The safer recruitment process

See also INDIVIDUAL APPLICANT CHECKLIST (Form 3)

1. APPLICATION /INFORMATION FORM (FORM 1)
This asks for information such as previous experience of working with children/adults and names of two independent referees who can testify to the applicant's employment history or his/ her volunteering work with children and or vulnerable adults.

2. SELF-DECLARATION FORM (FORM 2)
For those who will be working with vulnerable groups this form asks for details of any convictions or on-going criminal allegations, including convictions which are 'spent' under the Rehabilitation of Offenders Act 1974 in accordance with current legislation. The form will be kept securely by a named person within the church for three years.

3. INTERVIEW /INFORMAL MEETING
Applicants for an employed post should be interviewed formally and an informal meeting should take place with each potential volunteer to ensure that they understand their role and responsibilities.

4. **DISCLOSURE AND BARRING SERVICE CHECK** (DBS)
See the eligibility information and flow charts at 2.4
All workers / volunteers doing regulated activity must do an enhanced DBS check with a check of the relevant barred list. See 2.3
Most other volunteers working with children will be eligible for a DBS check without a barred list check and those working with adults may be eligible if the work meets the frequency requirement.

5. OBTAIN REFERENCES (FORM 4)
References should be sought from two independent people.
(See note iv)

6. ARRANGE APPROPRIATE TRAINING
Safeguarding training is essential for all leaders, workers and volunteers every three years[ix]. It should include clear guidelines on how to respond to concerns and best practice when working with children or vulnerable adults. Information about training opportunities is available from the Panel Office or website https://panel.cymru/en/training

Also note the following:

i. All forms noted above are available in Section 7 of the Handbook and on the Panel website.
ii. Ensure that a potential volunteer has at least six months' previous involvement with the church community
iii. Ensure the volunteer has read and understood the code of conduct for volunteers. (Appendix 2a)
iv. Draw up appropriate guidelines in relation to tasks and duties, including details of accountability and support (See Appendix 2: guidelines and safe working practices).
v. Obtain 2 references from people with experience of the applicant's paid or volunteer work. Where the applicant has no experience of such work, references should cover their character and relationships with others. Telephone references should be avoided. Written references should be followed up with a telephone conversation for clarification if needed.
vi. Never ignore doubts about an applicant's suitability; any erring should always be on the side of caution.
vii. The appointment of employed staff and volunteers should be subject to the successful completion of a probation period.
viii. Volunteers aged under 18 should always be supported and supervised. Consent of parents/ guardians is needed. 16 is the minimum age for a DBS check.
ix. Welsh Government Safeguarding Training Standards (introduced in 11/2022) recommend that all those working with children and vulnerable adults should attend training at least every 3 years.

What is a vulnerable adult?
The term 'vulnerable adult' has been amended as it was felt to be inappropriate to label an adult as vulnerable solely due to their circumstances, age or disability.
In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving one of the following services:
• Health care;
• Relevant personal care;
• Social care work;
• Assistance in relation to general household matters by reason of age, illness or disability;
• Relevant assistance in the conduct of their own affairs; or
• Conveying (due to age, illness or disability in prescribed circumstances).

dbs-referral-faq.pdf

2.2 What is a Disclosure and Barring Service Check (DBS)?

The Disclosure and Barring Service helps organisations make safer recruitment decisions by enabling organisations to check information about individuals that is held on national and local police records and confidential barring lists held by the Disclosure and Barring Service.
A DBS application should be the **final stage** of the recruitment procedure. This means that an organisation will have already gone through a safer recruitment procedure and decided to appoint the applicant or volunteer, providing the disclosure certificate does not contain any information of concern.

There are three types of DBS disclosure: BASIC, STANDARD AND ENHANCED. Standard and enhanced checks can only be done by a registered body whereas an individual can apply for their own basic check using the DBS website[1] (A basic check is not recommended for work with vulnerable groups and the Panel does not do these checks). Enhanced DBS checks are free for volunteers, and a fee is charged for an employed post.

The Interdenominational Safeguarding Panel is a DBS registered body and mainly carries out enhanced checks for those working with vulnerable groups in the three denominations following the DBS code of conduct. It is not possible to do a DBS check "just in case" someone may work with vulnerable groups in the future. The nature of a role and actual contact with vulnerable people must be looked at in each case to ensure that the role is eligible[2]. Eligibility criteria and information about roles within the church is on the following pages in this Handbook and more information is also available on the Panel website or DBS website.

The Panel counter-signatory must be able to confirm that each position is eligible under current legal provisions before submitting a form to the DBS. It is illegal for any organisation to seek information via a disclosure certificate which it is not entitled to know. To establish eligibility for a DBS check, it is essential to look at each role including the level of responsibility, frequency of the work and the level of contact with vulnerable groups. This information should be included on the verifier's form which needs to be completed alongside the DBS application form. This information also helps to ascertain if a role involves 'Regulated Activity' (see 2.3). Anyone undertaking regulated activities must have completed an Enhanced DBS check with a check of confidential lists of those barred from work with children and/or vulnerable adults before they begin working with vulnerable groups. As it is an offence to allow a barred person to carry out regulated activity, an employer must take relevant steps to ensure that they are not allowing a barred person[3] to take part in regulated activity.

Where someone is working closely with vulnerable groups but does not fit the regulated activity criteria, it is possible to do an enhanced check without a check of the barring list if the activity or position was eligible for a check before Sept 2012 changes. See Flow charts and information at 2.4 for more details.

The Panel recommends that DBS checks should be repeated every 4 years. DBS certificates are usually not transferable from one organisation to another. However, subscribing to the **DBS update service**[4] can allow a certificate to be reused (if additional roles require the same level of check as the original) and will also speed up the 4-year renewal process[5]. An applicant can only join this service within 30 days of the certificate issue date. There is an annual charge for employees, but the service is free for volunteers.

Since 2023 the Panel is also able to offer a digital DBS check through a third party. There is also an option for those who choose this option to verify their identity digitally for an additional fee.

[1] https://www.gov.uk/government/organisations/disclosure-and-barring-service
2 Eligibility must be confirmed before a check can be processed. For more information see 2.4 of this document or www.gov.uk/government/collections/dbs-eligibility-guidance
3 Safeguarding Vulnerable Groups Act 2006
[4] https://www.gov.uk/dbs-update-service
[5] https://panel.cymru/images/Information_sheet_update_service.docx.pdf

2.3 What is Regulated and Non-Regulated Activity?

Regulated activity is work that a barred person must not do. It is illegal for a barred person to carry out regulated activity. An enhanced DBS check with a check of the relevant barred list **MUST** be completed before any regulated activity takes place to ensure compliance with this.
This excludes activities conducted in the course of personal or family relationships.

A. With CHILDREN

Regulated activity will involve:

1. Regular Activities: such as teaching, supervising, training or advice/guidance on well-being.
2. Specified Establishments: including educational establishments, childcare premises and residential children's care homes.
3. Personal Care*: Washing and dressing, eating, prompting, drinking and toileting.
4. Health care* provided by any health care professional, or under their direction or supervision
5. Registered Childminding* and Foster-Carers*
6. Day to day management on a regular basis of a person providing a regulated activity.

With the exception of those marked * there is also a frequency condition to decide if an activity is regulated activity. The applicant needs to be involved in the activity:

- once a week or more
- More than 3 days in a 30-day period
- overnight between 2am - 6am with the opportunity for face-to-face contact
- assisting with personal care* only once would be classed as regulated activity.

B. With ADULTS

The definition of 'Regulated Activity' concentrates on specific activities whereby an adult is considered vulnerable at that particular time. This means that for DBS purposes adults are not labelled as 'vulnerable' because of their personal characteristics, circumstances or the location in which the activity is received. (This is different to a social services definition.)

There are six categories within the definition of regulated activity:

1. Health care: provided by a health care professional or under the supervision of one.
2. Providing Personal care: washing and dressing, eating, drinking and toileting for those who can't carry this out themselves because age, illness or disability. Also prompting or training.
3. Social work.
4. Assistance with Household Affairs: Anyone who provides day to day assistance to an adult because of their age, illness or disability, where it includes managing the person's cash, paying the person's bills, or shopping on their behalf.
5. Assistance with the Conduct of Affairs: Power of attorney/Deputies appointed under the Mental Capacity Act.
6. Transporting an adult for health, personal or social care due to age, illness or disability.

There is no specified establishment or frequency requirement for Regulated Activity work with adults as there is with children.

C. NON-REGULATED ACTIVITY

Where a worker or volunteer is in a role that involves substantial access to vulnerable groups but does not meet the 2012 definition of 'Regulated Activity' as noted above, there remains provision to request an enhanced disclosure excluding barring list status in many cases.

See flowcharts at 2.4 for details of eligibility and examples of roles at 2.5

2.4 Disclosure and Barring Service (DBS) eligibility

USE THESE 3 FLOWCHARTS AND INFORMATION TO HELP YOU TO DECIDE WHO IN YOUR CHURCH IS ELIGIBLE TO DO A DBS CHECK. If you are unsure contact the Panel Office.

Where a role is eligible, it is our policy as well as the expectation of the Charities Commission and many insurance companies that you apply for a DBS check.
Our policy states that a check should be repeated every 4 years.

CHART 1:
ARE OUR VOLUNTEERS / TRUSTEES ELIGIBLE TO DO A DBS CHECK?

Does this church have organised activities with children and / or vulnerable adults?
(See note 1 below)

YES

Those working directly with **CHILDREN** are likely to be eligible to do DBS checks. (See the list of examples & **Chart 2).**

Those involved in activities with **VULNERABLE ADULTS** are eligible if the activity meets the criteria and is carried out frequently enough
(See examples, notes & **Chart 3)**.

CHURCH TRUSTEES will be eligible if the activity with children or adults reaches the threshold for the church to be classed as a vulnerable groups charity

NO

There is **NO** eligibility to do DBS checks.

Even though vulnerable people and / or children may **attend** services and there may be occasional family services there is no eligibility to do a DBS unless the church has **specific children or vulnerable group activities.**

PLEASE REMEMBER
Even if no one in your church is eligible for a DBS check, the church still has safeguarding responsibilities.

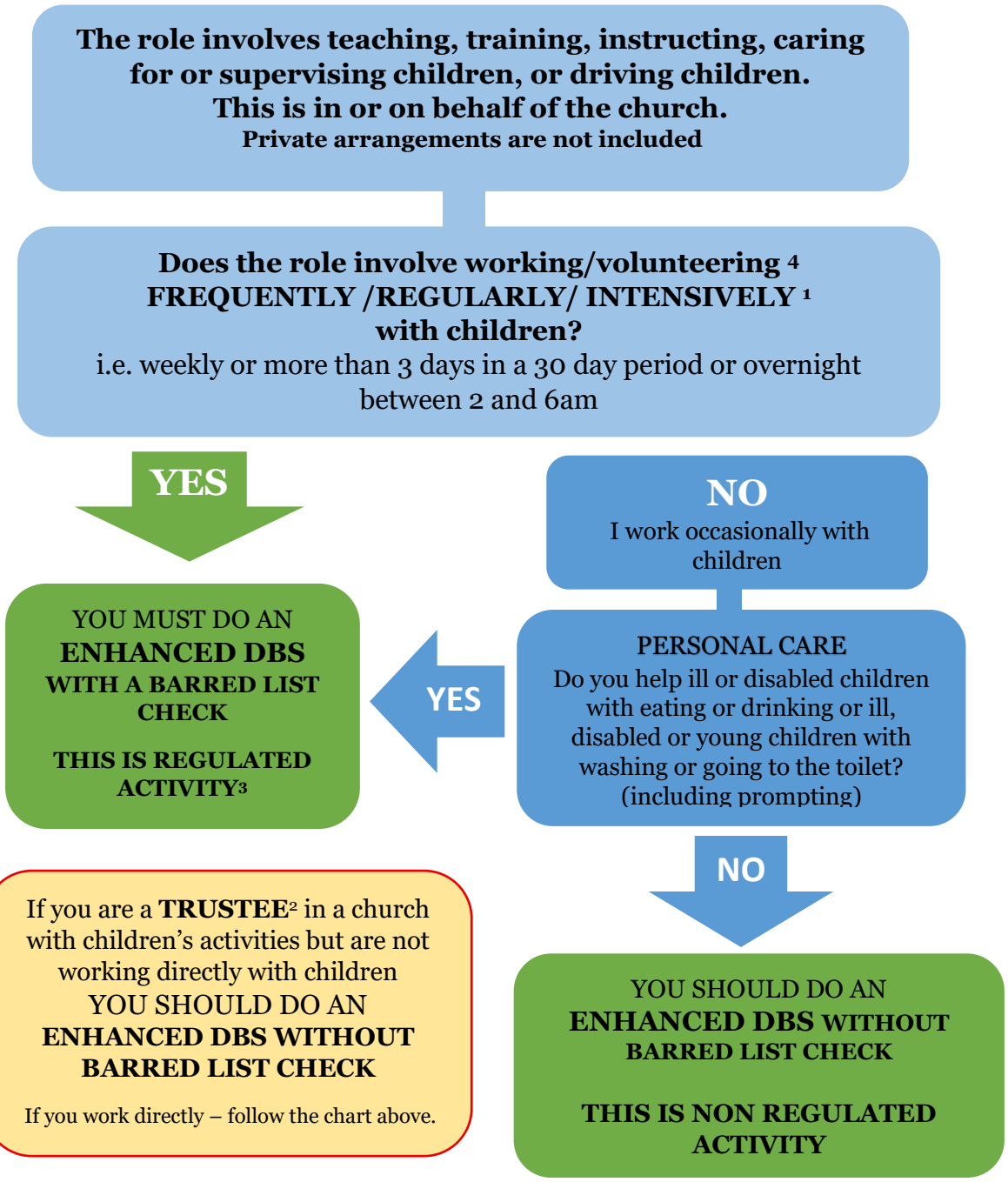
THE **SAFEGUARDING VULNERABLE GROUPS HANDBOOK** forms your Safeguarding Policy and Procedures.

You should still attend **TRAINING** to ensure you know how to respond if you have concerns about a situation or individual.

1. **ORGANISED ACTIVITIES** with children could include Sunday School or Youth club and for vulnerable adults this could be regular organised pastoral visiting of vulnerable adults in their homes or a transport rota or luncheon club for elderly or disabled people. See charts 2 & 3 for more details.
   These activities will usually be held regularly and consistently.
   Usual Church worship services do not count as organised activity for vulnerable groups even if there are children and / or vulnerable adults present.

CHART 2: WORK with CHILDREN

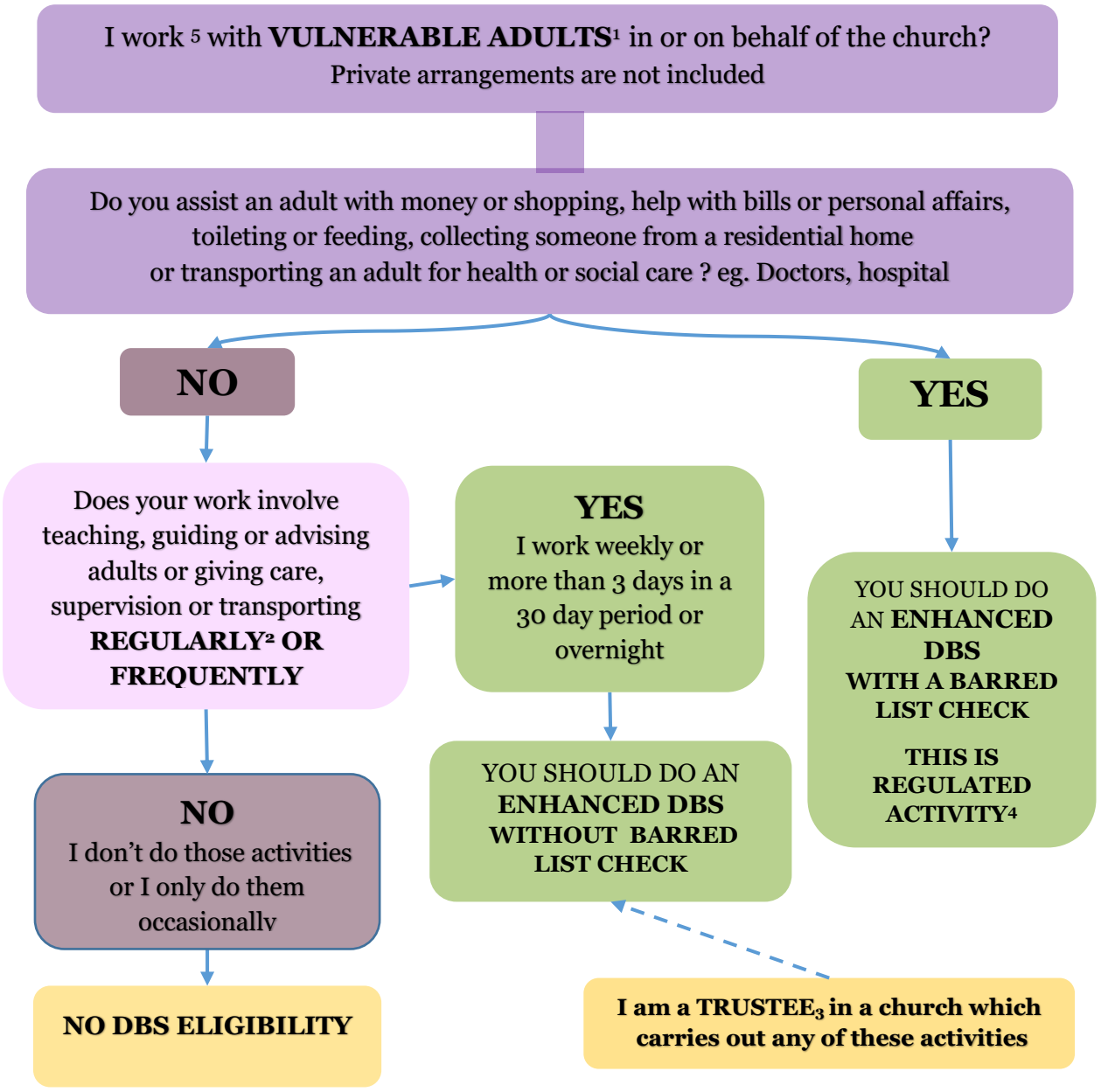
(including change in the definition of regulated activity from 01/09/2026)



NOTES and definitions for work with children

1) **REGULAR(LY) / FREQUENTLY/ INTENSIVELY** means at least weekly, or on more than 3 days in a 30-day period, or anytime overnight (between 2am - 6am). There are exceptions.
2) **CHURCH TRUSTEES** not engaged in direct work with children or vulnerable adults are only eligible to apply for a DBS check if there are activities with Vulnerable Groups within that Church which enable the church to be classed as a **VULNERABLE GROUPS CHARITY** (children and/or vulnerable adults). Such Trustees can do a DBS check without a check of the barred lists. This is in line with Charity Commission guidance. If the trustee is engaging in direct work with a vulnerable group, they will be entitled to a check based on that work not on the title trustee but should also note the role "trustee" on the Panel Verifier's form.
3) **REGULATED ACTIVITY** – See 2.3 in this Safeguarding Vulnerable Groups Handbook
4) **PAID WORK or VOLUNTEERING** is treated the same for the purpose of DBS eligibility
5) **SUPERVISION** from 1/9/2026 those working regularly / frequently with children are in regulated activity regardless of any supervision status. The supervision exemption has now been removed.

CHART 3: WORK with VULNERABLE ADULTS



NOTES and definitions for work with adults

1) A **'VULNERABLE ADULT OR ADULT AT RISK'** for DBS purposes is someone 18 and over who is receiving a health and social care service e.g., Residential accommodation or sheltered housing or health care or any care because of their age, health or disability (para 9 & 10 Police Act 1997 (Criminal Records) (Amendment) Regulations 2013).
2) **REGULAR(LY)/ FREQUENTLY** means at least weekly, or anytime on more than 3 days in a 30-day period, or overnight (any time 2am -6am). There are exceptions
3) **CHURCH TRUSTEES** not engaged in direct work with children or vulnerable adults are only eligible to apply for a DBS check if there are activities with Vulnerable Groups within that Church which enable the church to be classed as a **VULNERABLE GROUPS CHARITY** (children and/or vulnerable adults). Such Trustees can do a DBS check without a check of the barred lists. This is in line with Charity Commission guidance. If the trustee is engaging in direct work with a vulnerable group, they will be entitled to a check based on that work not on the title trustee but should also note the role" trustee" on the Panel Verifier's form.
4) **REGULATED ACTIVITY** – See 2.3 in the Safeguarding Vulnerable Groups Handbook
5) **WORK or VOLUNTEERING** is treated the same for the purpose of DBS eligibility

2.5 Examples of roles and their eligibility for DBS checks

It is not possible to produce a definitive list based in job title alone as eligibility is based on the actual work undertaken and its frequency, but the following examples are for general guidance. The terms "worker" and "working" also includes volunteers.

Roles working with CHILDREN: (see also CHART 2)
Note: From 1/9/2026 onwards all frequent or intensive work with children is classed as regulated activity regardless of whether it is supervised or not.

1) A **SUNDAY SCHOOL TEACHER/YOUTH WORKER** working **regularly** enough (see note 1 chart 2) is engaged in **regulated activity*** and must do an enhanced check (with a barring list check).
2) A **SUNDAY SCHOOL** teacher/youth worker working occasionally is engaged in non-regulated activity and should do an enhanced DBS check without the barring list check.
3) **PERSONAL CARE**: Any worker who helps ill or disabled children with eating or drinking or ill, disabled or young children with washing or going to the toilet, (including prompting) even if only once or occasionally is engaged in regulated activity and must do an enhanced DBS (barred list check).
4) A **CHURCH TRUSTEE** in a church that holds Sunday school and/or children's/youth activities is eligible for an enhanced check without a check of the barred list even if they personally do not take part. If a church holds services where children may attend or with occasional children's services, but have no other organised children's activities/work the trustees are NOT eligible for a DBS check.
5) The **OPEN THE BOOK** safeguarding policy requires volunteers to do a DBS check through their local church. Since the removal of the supervision exemption on 1/9/2026 this will be regulated activity if carried out weekly or more than 3 days in a 30-day period.
6) In a **CRÈCHE** or **TODDLER GROUP** OR **'MESSY CHURCH'** where children may be unaccompanied or a worker may be responsible for the children, the workers would be eligible for an enhanced check (with or without a barred list check depending on frequency.) If the parents/carers are always present and constantly in charge of their own children, helpers are not eligible for a DBS check. (See 3 above for toilet / nappy changing).

Roles working with VULNERABLE ADULTS (see definition in CHART 3)
The frequency of activity is key to DBS eligibility for those working with adults

7) A **PASTORAL VISITOR** who visits vulnerable elderly or disabled adults regularly (approx. weekly – see chart 3 note 2) and provides care, advice, teaching or support is **eligible** for an enhanced check. Those visiting less frequently are not eligible.
8) A **PASTORAL VISITOR** who helps a vulnerable adult with finances/bills/cash/shopping (regardless of frequency) must complete an enhanced check with a barred list check
9) A **LUNCH CLUB** or **FOOD BANK VOLUNTEER** who only distributes food and chats to the visitors is not eligible. However, if that role also involves **teaching, advising or guiding vulnerable adults** regularly or frequently, it is eligible.
10) A **LUNCH CLUB** worker or **PASTORAL VISITOR** who helps a vulnerable adult with their food, dressing or to go to the toilet must do an enhanced check with a barred list check.
11) A volunteer who **TRANSPORTS** elderly and vulnerable church members to church regularly/ frequently is eligible for an enhanced check without a barred list check. (This must be organised by or on behalf of the church not a private arrangement). Transporting adults infrequently is **not eligible** unless it is from a care home or to receive social care or health care.
12) A volunteer who **TRANSPORTS ADULTS** in order for them to receive medical care or conveys someone from a care home to church is engaged in regulated activity and must do an enhanced check, with barred list check. (This should be a church not private arrangement)
13) A **CHURCH TRUSTEE** in a church that organises activities for vulnerable adults such as weekly visiting of elderly and vulnerable members is eligible for an enhanced check (without a barred list check). If a church holds services where vulnerable adults attend but has no organised activities specifically for the vulnerable, the trustees are NOT eligible.

Other roles

14) **MINISTERS** should complete an Enhanced check with a check of the child and adult barring lists. This is because of the usual or expected duties. However, the accurate completion of the verifiers form is important to check if the role includes regulated activity.
15) **SECRETARY** or **TREASURER** or **CARETAKER** or **ORGANIST** roles are not eligible unless the role is also a **TRUSTEE** (see 4 &13 above) and/or meets the criteria as set out in Charts 2/3.

* See also notes and charts on previous pages (2.4)

2.6 Disclosure and Barring Service (DBS) application process

All volunteers and workers should be safely recruited including an application form and references (see Section 2.1)

The church should assess if the position needs a DBS check (using the charts in Section 2.4) or seek advice from the Panel Office.

Forms and information are available from the Panel

The volunteer completes the DBS paper form or online application and makes an appointment with a Panel Verifier *
or uses the online digital verifying process for a fee.
The Verifier checks at least 3 identity documents, completes the verifier's form and forwards the forms to the Panel Office.

The applicant receives the Disclosure Certificate directly from the DBS. Those following the paper route **must** send the original certificate to the Panel Office. **The check is not completed until this has been done.** Digital route applicants do not need to post their certificates to the Panel (unless specifically requested).
The Panel notes the certificate number and date, returns the certificate to the applicant, and informs the church safeguarding coordinator that the process is complete.

A volunteer can subscribe to the **Update Service** for free within 30 days of the date of the Certificate. THIS MAY ENABLE THE CERTIFICATE TO BE USED FOR OTHER POSTS AND RENEWALS (THERE ARE EXEMPTIONS). There is a fee for employees.

https://www.gov.uk/dbs-update-service

Any disclosure certificate showing **convictions or cautions** will be assessed following the process in Section 2.7.

More details on the DBS process on the Panel website **https://panel.cymru/en/dbs**

* The Interdenominational Safeguarding Panel has a team of verifiers across Wales who can check identity documents locally to facilitate the process and conform with the DBS code of conduct. This includes many ministers and church staff. They will need to seem at least 3 documents as approved by the DBS, and ask some simple questions about the role to confirm eligibility.

2.7 Blemished Disclosures

A blemished disclosure is a DBS certificate showing convictions, cautions, reprimands or final warnings, or information from the Police.

Having a criminal record will not necessarily prevent someone from working or volunteering

The Panel ensures that all individuals with a blemished record are treated fairly and confidentially

Many minor or old offences are **filtered** [7] and will not appear on a DBS certificate. The rules regarding the automatic disclosure of cautions and convictions on a DBS check are set out in legislation (updated in November 2020 and October 2023). See the links below or contact the office for more information.

- Adult* cautions for non-specified offences **will be filtered** after 6 years.
- Non-specified offences committed when an adult will be filtered and not appear after 11 years (5.5 years for an offence committed when under 18).
- Youth* cautions will not appear on the certificate.

The following **will never be filtered** from a standard or enhanced disclosure even if spent:

- Adult cautions for specified offences and offences leading to a custodial sentence and certain serious offences [8].
- All unspent conditional cautions and convictions (as defined by the Rehabilitation of Offenders Act) will be automatically disclosed on a Standard or Enhanced check.

On receipt of a blemished disclosure, the Panel Office will contact the applicant to confirm the details and information shown on the certificate and to provide additional information if necessary. A risk assessment will be completed and referred anonymously to a confidential panel to consider if the information shared has safeguarding implications. The Panel will write to the individual in each case, to explain the outcome

Some crimes or barring decisions make it unlawful or unsafe for a person to work with children and/or vulnerable adults, and the Panel will write to the individual. Where the decision is that the applicant should not proceed, the Panel will contact the church to offer advice. The General Secretary of the denomination will usually be notified.

In many cases the Panel assesses that there is no specific safeguarding risk related to the disclosure and the individual can proceed with the work. In some cases, the Panel may advise that the individual can work or volunteer but may make recommendations or conditions.

If the blemished DBS certificate is a renewal and the applicant's circumstances and role are unchanged and the certificate content has been previously risk assessed by the Panel, the previous decision regarding the applicant's suitability would normally remain in force.

An applicant has the right to appeal[9] a decision made by the Panel.

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* An 'adult' is any individual aged 18 or above at the time of the caution or conviction. A 'youth' is any individual aged under 18 at the time of the caution or conviction.

7 DBS filtering guide https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide

8 https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-checkhttps

9. See the policy page of the Panel website for more about the process and how to appeal