



QAHE Limited Screening and Vetting Policy

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1. Introduction

This policy outlines QAHE Limited ('QA Higher Education') approach to screening and vetting, ensuring compliance with all legal and contractual obligations relating to background and vetting checks.

Background checking and security are a vital part of our processes, and it is everyone's responsibility to ensure that all workers have the relevant checks in place to enable them to fulfil their role. All background checks initiated through the screening providers are managed by the People Team. Managers are accountable for ensuring their team members have the correct checks in place and for identifying any additional requirements with the People Team.

2. Policy Ownership

This policy is owned by the People Team and will be reviewed periodically and updated as required. Please refer to the most up-to-date version, which can be found on the People Hub. This policy does not form part of your contractual terms and conditions.

3. Scope

This policy applies to all individuals engaged by QA Higher Education regardless of contractual status, including permanent employees, fixed-term and zero-hours staff, agency workers, contractors, freelancers and associates. It applies across all QA Higher Education campuses and operations.

4. Definitions

Screening - Verification of identity, employment history, qualifications, right to work or any other required background check.

Disclosure Check - A criminal records check undertaken via the Disclosure and Barring Service (DBS).

Regulated Activity - Work that involves close, unsupervised contact with children or vulnerable adults as defined in legislation.

5. Policy Statement

QA Higher Education is committed to robust, proportionate and fair screening and vetting practices. All checks will be relevant to role requirements, completed in line with legislation, and handled confidentially. QA Higher Education will not unfairly discriminate against individuals with criminal records and will assess disclosures on an individual, risk-based basis, with safeguarding as the primary consideration.



6. Screening Providers

QA Higher Education has engaged Giant Screening <https://www.giantscreening.com> to carry out background checks and any additional screening requirements.

As part of any screening check, the People Operations Team will initiate the checks for the candidates or employees via Giants online portal, providing:

- First name.
- Surname.
- Email address (personal email if a candidate/ work email if an employee).
- The role they have applied for/ or employees' current role.
- Cost Centre.

Candidates and employees are required to upload their personal details and supporting documentation directly to the screening provider's portal.

The screening provider retains records for seven years, with the exception of criminal record check results, which are deleted six months after the issue date. All information is securely stored on the provider's online system.

7. References

QA Higher Education uses its screening provider to obtain employment references. Two references are required to cover the previous three years of employment. Where a candidate is unable to provide this (for example, a school or university leaver), personal references may be accepted, including at least one from an educational setting. The screening provider will also seek to verify any gaps in activity of 28 days or more, wherever possible.

Where a candidate is unable to provide evidence covering the three-year period, (for example, due to limited work experience or gaps in employment), the People Team will review the available information and complete a risk assessment (as outlined in section 8).

If a reference is received that is unsatisfactory or raises concerns relating to performance, conduct, safeguarding, or capability, this will be escalated immediately to the line manager by the People Operations Manager.

QA Higher Education reserves the right to withdraw an offer of employment or terminate employment (where an individual has already commenced in role) where references contain factual information deemed to be unsatisfactory.

Requests for employment references relating to current or former employees must be directed to the People Team. References must not be completed by managers or employees within the business.

The People Operations team will provide references in a standard format, confirming employment dates and job title.

In line with UK safeguarding responsibilities, QA Higher Education is required to disclose any safeguarding concerns identified during an individual's employment. Any information shared will be factual and provided to the People Operations Team by either People Advisory or the Safeguarding Team.



8. Right to Work in the UK

It is the manager's responsibility to ensure that a Right to Work (RTW) check is completed **before** a new starter commences employment confirming they are legally allowed to work in the UK. RTW checks can be completed using one of the following methods:

- A manual face-to-face check (For all Individuals)
- An online IDVT (Identification Document Validation Technology) check via the screening provider (For British and Irish citizens with a valid passport)
- A Home Office online share code check (For non-British/Irish Citizens)

Where none of the above methods are possible, candidates may send their original documents to the People Operations Team by post. In these circumstances, the RTW check will be conducted via a live video call. A member of the People Operations Team must be in physical possession of the original documents to complete the check, and a secure process must be followed to ensure safe receipt and return of the documents.

Useful links: Government Right to Work and guidelines can be found here:

<https://www.gov.uk/government/publications/right-to-work-checklist>

Manual Face-to-Face Check

The manager should arrange a suitable time prior to the employees' first day to attend a campus and present their relevant documentation, as directed by List A and List B (government checklist) to either themselves or a delegated trained QA Higher Education employee, using the Right to Work Verification Checklist (see Appendix 1).

The manager or delegated employee should view and verify the original documentation, take a clear **COLOUR** photocopy, and write on the copy;

"This is a copy of the original document seen on <date> by <name>, <job title> and <signature>."

Simply signing the copy is not enough. The copy should be scanned and emailed to the People Team and copies then destroyed.

For freelance/associate workers, RTW checks and record keeping are the responsibility of the relevant manager of the team they will be working within.

IDVT Check

When an offer of employment is sent to the People Operations team from the Talent Acquisition team, confirmation will be provided as to whether the candidate holds a current British or Irish passport. The People Operations team will then initiate the IDVT check via the screening provider along with any other required checks.

The Screening provider will email the candidate a link to complete the check/s, the results of which are completed within a few days.

Once the People Operations team have received confirmation that the check is satisfactory, they will email the manager to advise.

If for any reason the IDVT check could not be completed, the manager will be informed and will need to revert to the face-to-face check.



Home Office Online Share Code Check

If the successful candidate is non-British/Irish, the Talent Acquisition team will obtain a Share Code and send to the People Operations team along with the offer.

The People Operations team will access the Home Office checking site <http://www.gov.uk/view-right-to-work> and enter the candidate's date of birth and right to work share code to complete the check. Once verified, a PDF copy must be downloaded and saved to file.

To ensure compliance with right to work checks, the People Operations team conducts weekly reviews of all upcoming onboarding and follows up with candidates and hiring managers as needed. Individuals must not commence work until their right to work has been verified.

9. Disclosure Checks

QA Higher Education is committed to ensuring that it complies with all legal obligations and completes the required disclosure checks as defined above, using the screening provider to complete these checks.

The checks are completed via the Disclosure and Barring Service (DBS) for England and Wales.

QA Higher Education will undertake disclosure checks in accordance with the following principles:

- The level of check will be appropriate for the post being applied for and only once an offer of employment has been made.
- QA Higher Education will not use information provided to unfairly discriminate against those people with a criminal record.
- Candidates will be provided with the opportunity to declare unspent/non-filtered convictions (in accordance with the guidelines set by relevant disclosure body) prior to completing their disclosure check.
- QA Higher Education will not use any information that was disclosed, but not required to be disclosed, as part of a selection decision.

QA Higher Education recognise that it is a UK criminal offence:

- For an applicant to apply for a role if they know that they are disqualified from it because of their criminal record or other unsuitability;
- For an employer to knowingly employ a person in a post for which they are disqualified by reason of their criminal record or other unsuitability; and
- To pass on information revealed from a criminal disclosure in certain circumstances.

UK guidance on the Rehabilitation of Offenders Act can be found here <https://www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974>

Please refer to the Nacro website for support and advice on criminal records <https://www.nacro.org.uk/criminal-record-support-service/>

Further information can also be found on the DBS code of practice, which can be found following this link; <https://www.gov.uk/government/publications/dbs-code-of-practice>



9.1. Disclosure Process

All disclosure checks are carried out via the screening provider, Giant Screening, who gain the appropriate level of consent from the applicant before a check commences.

A check will be initiated by the People Operations team, triggering an email to the individual to complete their application.

Once a result is returned, the People Operations team will be notified by Giant, the detail reviewed and the level of check, disclosure reference number and date completed will be recorded on the HR database.

The People Operations team will inform the line manager and employee so that the individual can commence all areas of their role and responsibilities without limitations. The employee/candidate will receive the disclosure certificate directly from the DBS. This is not received or retained by QA Higher Education.

QA Higher Education renew enhanced DBS checks every 3 years, and employees will be contacted directly to initiate these checks.

In addition to this, anyone within Academic Delivery is required to complete an Annual Disclosure Declaration via PeopleLink to ensure that we are informed if they have received any unspent convictions or conditional cautions which may impact their ability to fulfil their role within the last year.

9.2. Basic Disclosure Checks

A basic disclosure check will contain details of convictions and conditional cautions considered to be unspent under the terms of the Rehabilitation of Offenders Act 1974.

We will conduct a basic disclosure check for all employees, with the exception of the Pathway division.

Employees who hold key governance and leadership roles which fall within the Fit and Proper Persons scope, will be required to renew their basic DBS check every 3 years. This will be monitored and actioned by the People Team.

9.3. Enhanced Disclosure Checks

An enhanced Disclosure check provides details of both spent and unspent convictions, cautions, reprimands and warnings that are held on the Police National Computer, which are not subject to filtering. It can also search the children and vulnerable adults 'barred list' to identify if the applicant is prohibited from working with these groups.

Eligibility is determined by nature of the role.

Should any candidate, employee or self-employed worker work directly with children and do work that is classified as regulated activity then they will need to have an enhanced disclosure check before employment can commence.

Any exceptions to this needs to be approved by the Director of People. In these cases, the manager is responsible for ensuring that there is a Safeguarding Risk Assessment (See appendix 11.2) in place and that the employee is supervised when working with vulnerable groups.

Enhanced disclosures are only available for roles meeting the relevant criteria or pre-existing positions as listed in the Rehabilitation of Offenders Act amends/updates.



9.4. Enhanced DBS Check with Children's Barred List Information

Where individuals are working or seeking to work in regulated activity relating to children in the UK, this allows an additional check to be made, about whether the person appears on the children's barred list, along with a check of the Police National Computer records plus additional information held by the police as above. The position being applied for or activities being undertaken must be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

For all other employees who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced disclosure certificate, which does not include a barred list check, will be appropriate.

9.5. DBS Update Service

This is an online subscription that allows individuals to keep their enhanced DBS certificates up-to-date and allows employers to check a certificate online rather than applying for a new one. This allows it to become a portable check which is renewable on a yearly basis by the individual. It is not mandatory for QA Higher Education staff and is only portable if the check recorded is the same level and workforce as is required for the role.

If an individual is part of the Update Service, QA Higher Education is required to ensure that they obtain the original physical disclosure certificate to verify, alongside reviewing the update service.

9.6. Determining Commencement of Employment

In addition to other pre-employment checks, all offers of employment will be conditional on receipt of the disclosure and clearance.

Not all criminal convictions will be a bar to employment in line with the ROA. Where a 'positive result' (criminal conviction listed on the disclosure check) is received, the results of a disclosure check will be considered on an individual basis, and the organisation will act in a proportionate manner when deciding whether or not to proceed with the appointment to the role in question. However, the protection of children is the organisation's primary concern.

The individual will have the opportunity to provide an explanation, and the following will be reviewed;

- The seriousness of any offence and relevance to the post applied for.
- How long ago the offence occurred.
- Whether it was a one-off incident or a history of incidents.
- The circumstances around the incident, and,
- Whether the individual accepted responsibility for their actions.

9.7. Unclear Checks

If a check is returned as unclear, the process is:

1. People Operations Specialist notifies the line manager.
2. If the person has not commenced employment, the People Operations Specialist will contact the individual and ask them to send in their certificate.



3. If the person is already employed, the People Operations Specialist will request the employee provides the original disclosure certificate via the line manager.
4. Once the People Operations Specialist has the certificate, they will contact the individual to understand the context. A risk assessment (as described in section 12 below) is completed by the People Operations Manager or People Operations Specialist to determine if there is a low, medium or high risk for the individual and if high risk escalated to the People Advisory team so that the relevant process can be followed.
5. The risk assessment is saved on employee's file.
6. Copies of disclosure certificates are deleted.
7. The disclosure number and the check result are recorded on PeopleLink.

Useful links:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

10. Highest Level of Qualification

The highest level of qualification is obtained during the onboarding process via the screening provider. It verifies that the new starters possess the necessary academic credentials required for their roles. This process helps to confirm the authenticity of qualifications, maintain compliance with regulatory standards, and uphold the integrity of our hiring practices. By validating these credentials, we safeguard the organisation against potential risks and support a culture of professionalism and trust.

Copies of qualification certificates will be retained on the employee's file.

11. Clearance and Vetting Requirements

What	Why	Who
Pre-employment Screening	To verify identity, employment history and Right to Work	All employees
Basic Disclosure check (UK) Provides details of unspent convictions only	Baseline check, gaps in employment references, to comply with Fit and Proper Person Policy	All employees excluding Pathway Delivery Key governance and leadership roles inline with Fit and Proper Person Policy with 3 yearly renewals
Enhanced Disclosure with Children's barred list check (UK)	Required for roles engaging in regulated activity with children. Any role that is responsible, on a regular basis, for teaching, training, instructing or supervising children, or providing advice or guidance on physical, emotional or educational wellbeing, and where it is unsupervised.	All employees working within Pathway Delivery



What	Why	Who
Social Media Checks	To ensure online presence aligns with the company's values and culture and to mitigate reputational risk.	All employees within Academic Delivery
Highest level of Qualification	To ensure academic integrity, verify the legitimacy of candidates' claims, and meet legal and regulatory standards	All employees within Academic Delivery

12. Risk Assessments

All risk assessments are conducted by the People Team with input from the line manager where required and are based on the vetting results. An assessment is made based on the impact that any identifiable risks may have on the role being undertaken, and the outcome (accepted or declined) will be shared with the individual and line manager for further discussion as necessary. All assessments are held by the People Team for reference and in line with QA Higher Education data retention policy.

13. Additional Checks

Additional checks will be conducted when it is deemed necessary for a role within QA Higher Education. These can include but are not limited to credit checks, social media checks, media checks and sanction checks, all of which will be conducted through our screening provider. For the purposes of credit checks, neither the provider or QA Higher Education will store any credit related information, other than whether the individual has clearance.

As part of Safer Recruitment and due diligence checks, Social Media checks will be completed for all Academic Delivery roles.

This is to identify any incidents or issues that are publicly available online to mitigate risks associated with public conduct and to safeguard the students and the organisation's reputation. It also ensures online presence aligns with the company's values and culture.

Should information be discovered that we determine to be inappropriate or does not align with our values and culture, a conversation will take place with the candidate, line manager and either the Head of People or Senior People Partner to determine the suitability of progressing with the offer.

If an employee moves internally into a role that requires additional checks or clearance, it will be managed as part of the recruitment process and the required checks will be initiated via our screening provider.

14. Audit

The People Operations team complete audits on the following records:

1. Right to Work and Immigration completion/status.
2. Criminal disclosure check completion/status.
3. Employment references.



15. Responsibilities

15.1. Line Manager Responsibilities

Ensure no individual commences work before mandatory checks are completed and identify any role-specific additional checks.

15.2. Employees & Candidates Responsibilities

Cooperate fully with screening processes and provide accurate information.

15.3. People Operations Team Responsibilities

Initiate and manage all screening and vetting checks, maintain records and ensure compliance.

16. Related Policies and Procedures

This policy should be read in conjunction with other relevant QA Higher Education policies and procedures, including but not limited to:

- Safeguarding Policy
- Recruitment and Selection Policy
- Staff Privacy Notice

17. Monitoring and Compliance

The People Operations Team conducts regular audits of right to work checks, disclosure status and references. Non-compliance is escalated and managed in line with QA Higher Education procedures.

18. Data Protection

Any personal data collected as part of this policy will be processed in accordance with QA Higher Education's Data Protection & Privacy policy and applicable data protection legislation. Information will be handled confidentially and only shared where necessary for legitimate business purposes.

19. Further Information

If you have any questions about this policy or require further guidance, please contact the People Team at QAHEpeople.team@qa.com

20. Review

This policy will be reviewed every three years, or earlier where required to reflect changes in legislation, regulatory requirements, or business needs.



21. Appendix

21.1. UK RIGHT TO WORK VERIFICATION CHECKLIST

This form is to be used to document the information regarding UK Right to Work ID provided by a candidate/new starter.

Candidate Details			
Full name of the Candidate			
Job Title applied for			
Identity Checks – You MUST see original documents from either List A or List B of acceptable documents below			
	Yes	No	N/A
Photos - are they consistent with the appearance of the above person?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dates of Birth – is it consistent across all documents & does this look consistent with the above person’s appearance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Documents – are you satisfied they are genuine and haven’t been tampered with?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are expiry dates for time-limited permission to be in the UK in the future? i.e the expiry date has not passed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visa Type (if Applicable)			
Share Code (if Applicable)			

LIST A – *Please tick relevant Document/s from **either** List A or List B*

<input type="checkbox"/>	A passport or passport card (current or expired) showing the holder is a British citizen, Irish citizen or a citizen of the UK and Colonies having the right of abode in the UK.
<input type="checkbox"/>	A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man , which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted unlimited leave to enter or remain under Appendix EU to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.
<input type="checkbox"/>	A current passport endorsed to show that the holder is exempt from immigration control , is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
<input type="checkbox"/>	A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, together with an official document giving the person’s permanent National Insurance number and their name issued by a government agency or a previous employer.
<input type="checkbox"/>	A birth or adoption certificate issued in the UK, Channel Islands, Isle of Man or Ireland together with an official document giving the person’s permanent National Insurance number and their name issued by a government agency or a previous employer.
<input type="checkbox"/>	A certificate of registration or naturalisation as a British citizen, together with an official document giving the person’s permanent National Insurance number and their name issued by a government agency or a previous employer.



LIST B GROUP 1 Please tick relevant Document/s

<input type="checkbox"/>	A document issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules on or before 30 June 2021 together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A Certificate of Application (digital or non-digital) issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme), on or after 1 July 2021, together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man showing that the holder has made an application for leave to enter or remain under Appendix EU (J) to the Jersey Immigration Rules or Appendix EU to the immigration Rules (Bailiwick of Guernsey) Rules 2008, or Appendix EU to the Isle of Man Immigration Rules together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.

LIST B GROUP 2 - Please tick relevant Document/s

<input type="checkbox"/>	A document issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules on or before 30 June 2021 together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A Certificate of Application (digital or non-digital) issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme), on or after 1 July 2021, together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man showing that the holder has made an application for leave to enter or remain under Appendix EU (J) to the Jersey Immigration Rules or Appendix EU to the immigration Rules (Bailiwick of Guernsey) Rules 2008, or Appendix EU to the Isle of Man Immigration Rules together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.
<input type="checkbox"/>	A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.



Copy Documents and Sign off	
ID checked by; Name & Job Title	
Date original documents were seen & verified	
You must take a clear colour copy of each document with the wording "I certify this is a copy of the original document seen on DATE by NAME, JOB TITLE and SIGNATURE"	

Copy Requirements
<p>Passports – Copy pages with any information regarding the candidate</p> <p>All other documents - the document in full, including both sides of an Immigration Status Document and an Application Registration Card.</p>



21.2. SAFEGUARDING RISK ASSESSMENT FORM

First name:		Surname:	
Line manager:		Department:	

Section 1

Manager to populate and send to the **Dean of Faculty** for approval for the individual to start while DBS is in progress.

The individual is not allowed to start unless agreed by the Dean of Faculty who must sign this form below and return to the People Team.

Employment references received or in progress? <i>(Please check with the People Team).</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
DBS check in progress? <i>(Please check with the People Team).</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Has the individual declared that they have any unspent convictions, cautions or reprimands?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<p>Confirm all instructions below have been provided to the staff member</p> <ul style="list-style-type: none"> No unsupervised one to one contact with learners. (Manager to Identify appropriate team member/s to supervise until DBS is completed.) Avoid being alone with a learner at any time. When with students always leave the door open and be in a visible location. Local staff are informed of the new starter and asked to increase their contact with local learners to ensure any concerns can be escalated easily. No contact with students outside of working hours. Do not provide mobile or personal email addresses to students. <p>Failure to adhere to this plan could be managed as a gross misconduct and result in dismissal</p>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Confirm that an agreed risk management plan has been put in place, in addition to the basic guidance of the Safeguarding Policy	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Section 2

Please complete and return to the People Team on day 1 of employment

Have you confirmed that failure to strictly adhere to the above plan will lead to dismissal?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	---------------------------------	--------------------------------

Employee signature:		Date:	
Line manager signature:		Date:	
Dean of Faculty signature:		Date:	

