



SAFER RECRUITMENT & ONGOING SUITABILITY POLICY

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1. Purpose

Koku-Ryu Martial Arts, referred to throughout this policy as “KRMA”, is committed to ensuring that everyone appointed to work, volunteer or carry responsibility within the organisation is suitable for their role.

Safer recruitment is not limited to obtaining a Disclosure and Barring Service check.

It is a continuing process involving:

- careful role design;
- clear safeguarding expectations;
- proportionate advertising;
- structured applications;
- identity verification;
- appropriate shortlisting;
- safeguarding-focused interviews;
- references;
- qualification checks;
- right-to-work checks;
- legally appropriate criminal-record checks;
- supervised practical assessment;
- induction;
- probation;
- ongoing supervision;
- conduct monitoring;
- annual suitability review; and
- prompt action where concerns arise.

The purposes of this policy are to:

- deter unsuitable applicants;

- identify safeguarding or suitability concerns before appointment;
- prevent barred or unsuitable individuals undertaking prohibited work;
- ensure recruitment decisions are fair and evidence-based;
- protect children and adults at risk;
- maintain appropriate employment and volunteering standards;
- support equality and reasonable adjustments;
- protect applicants' personal information;
- and establish ongoing expectations after appointment.

No single check can guarantee that a person is suitable.

KRMA will therefore consider the complete recruitment and suitability picture rather than relying solely upon:

- a DBS certificate;
- personal recommendation;
- martial arts rank;
- competitive achievement;
- reputation;
- friendship;
- previous involvement with KRMA;
- or length of service.

2. Scope

This policy applies to the recruitment, appointment, engagement and ongoing suitability of:

- employees;
- instructors;
- assistant instructors;
- trainee instructors;
- junior instructors;
- volunteers;
- reception and administration staff;
- coaches;
- team managers;
- safeguarding personnel;
- trip and residential staff;
- drivers acting on behalf of KRMA;
- freelance workers;
- self-employed instructors;
- contractors;
- visiting instructors;
- photographers;
- work-experience students;
- placement students;
- temporary workers;
- agency workers;
- and anyone else carrying duties on behalf of KRMA.

It applies whether the role is:

- paid or unpaid;
- permanent or temporary;
- full-time or part-time;
- regular or occasional;
- employed, self-employed or voluntary;
- delivered at KRMA premises;
- delivered at another venue;
- online;
- or connected with travel, residential activities or events.

The level of checking and recruitment activity will be proportionate to:

- the legal status of the role;
- contact with children or adults at risk;
- whether the work is regulated activity;
- frequency and nature of contact;
- access to confidential information;
- supervision;
- responsibility;
- lone working;
- transport;
- overnight duties;
- financial access;
- and the risks associated with the position.

3. Safer Recruitment Principles

KRMA will apply the following principles.

3.1 Safeguarding begins before appointment

Safeguarding expectations will be made clear from the earliest stage of recruitment.

Job and role information should explain that:

- KRMA is committed to safeguarding;
- suitability checks will be undertaken;
- safeguarding questions may form part of selection;
- concerns or relevant information must be disclosed lawfully;
- and appointments may remain conditional until checks are completed.

3.2 Recruitment will be role-based

KRMA will decide the checks required by examining what the person will actually do.

It will not assume that every:

- employee;
- volunteer;
- black belt;
- parent helper;
- administrator;
- contractor;
- or visiting instructor

is eligible for, or requires, the same level of DBS check.

KRMA will not knowingly request a higher level of criminal-record information than the law permits.

3.3 A DBS check is one part of the process

A DBS certificate provides criminal-record and, where legally permitted, barred-list information.

It does not confirm that a person:

- is competent;
- behaves safely;
- has supplied accurate qualifications;
- has appropriate boundaries;
- will follow KRMA procedures;
- or is suitable in every respect.

A certificate containing information does not automatically make a person unsuitable, unless the person is legally barred from the relevant activity or another legal restriction applies.

3.4 Personal relationships must not bypass recruitment

A person must not receive reduced checking merely because they are:

- personally known to an instructor;
- a long-standing student;
- a student's parent;
- related to a staff member;
- a senior martial artist;
- an established community figure;
- or recommended by someone trusted.

Previous familiarity may provide useful context, but it does not replace safer recruitment.

3.5 Children remain children

Junior instructors, assistants and volunteers under 18 remain children for safeguarding purposes.

Their leadership role or martial arts grade does not make them equivalent to adult staff.

They must receive:

- age-appropriate recruitment;
- parental involvement where required;
- suitable supervision;
- protected duties;
- and development opportunities that do not place adult safeguarding responsibility upon them.

3.6 Equality and fairness

Applicants will be treated fairly and with dignity.

Recruitment decisions must not be based upon unlawful discrimination.

KRMA will consider reasonable adjustments throughout:

- application;
- interview;
- practical assessment;
- induction;
- and employment or volunteering.

General pre-employment questions about health or disability will not normally be asked before a conditional offer, except where a lawful exception applies—for example, to arrange interview adjustments or determine whether an applicant can perform an intrinsic function of the role with appropriate adjustments.

3.7 Information will be handled securely

Recruitment information will only be collected where relevant and proportionate.

Access will be limited to authorised people.

Criminal-record, health, equality and safeguarding information will receive enhanced protection because of its sensitivity.

The Information Commissioner's Office states that data-protection obligations apply throughout recruitment, including candidate information, verification, vetting and retention of recruitment records.

3.8 Suitability continues after recruitment

Appointment does not end the safer recruitment process.

KRMA will continue to assess suitability through:

- induction;
- supervision;
- probation;
- training;
- appraisals;
- observations;
- annual declarations;
- DBS Update Service checks where agreed and appropriate;
- conduct monitoring;
- low-level concern reporting;
- safeguarding procedures;
- and investigation of relevant changes.

4. Legal and Guidance Framework

This policy has been developed with regard to legislation and guidance including:

- Children Act 1989;
- Children Act 2004;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Police Act 1997;
- Rehabilitation of Offenders Act 1974;
- Rehabilitation of Offenders Act 1974 Exceptions legislation;
- Equality Act 2010;
- Immigration, Asylum and Nationality Act 2006;
- Data Protection Act 2018;
- UK General Data Protection Regulation, as amended;
- Working Together to Safeguard Children 2026;
- Department for Education safeguarding guidance for out-of-school settings;
- Disclosure and Barring Service Code of Practice;
- current DBS eligibility and regulated-activity guidance;
- DBS guidance for sport;
- Home Office right-to-work guidance;
- and relevant local safeguarding-partnership procedures.

Working Together to Safeguard Children 2026 recognises that sports clubs and organisations form part of the wider safeguarding system and must understand their responsibility to help, support and protect children.

The Department for Education's out-of-school safeguarding guidance applies to activities such as community clubs, sports training and martial arts

provision. It advises providers to establish appropriate recruitment, vetting, supervision and safeguarding arrangements.

Where KRMA provides activities within a school, college or contracted setting, additional requirements imposed by that organisation may also apply.



5. Roles and Responsibilities

5.1 CEO and Chief Instructor

The CEO and Chief Instructor is responsible for:

- approving this policy;
- ensuring safer recruitment arrangements are resourced;
- authorising appointments;
- ensuring appropriate decision-making;
- reviewing high-risk or complex appointments;
- ensuring role restrictions are implemented;
- and supporting referrals to external authorities where required.

The CEO may delegate recruitment activity but retains overall organisational oversight.

5.2 Designated Safeguarding Lead

The Designated Safeguarding Lead will:

- advise on safeguarding aspects of role design;
- contribute to recruitment for significant child-facing roles;
- support safeguarding-focused interview questions;
- advise on concerns arising from references or checks;
- assess whether an appointment requires additional safeguards;
- support induction;
- review allegations and low-level concerns;
- and advise on external safeguarding referrals.

The DSL should not be solely responsible for every recruitment decision.

5.3 Recruitment lead

A named recruitment lead should be appointed for each process.

They are responsible for:

- confirming the vacancy or role;
- preparing role information;
- coordinating advertising;
- collecting applications;
- managing shortlisting;
- arranging interviews;
- recording decisions;
- obtaining checks;
- ensuring conditions are satisfied;
- and confirming whether the candidate may begin duties.

5.4 Interview and selection panel

Panel members must:

- understand the role requirements;
- declare conflicts of interest;
- use agreed criteria;
- treat candidates fairly;
- ask relevant safeguarding questions;
- make accurate notes;
- protect confidential information;
- and avoid making promises before authorisation.

Where reasonably practicable, significant adult child-facing appointments should involve more than one selector.

5.5 Managers and lead instructors

Managers and lead instructors must:

- ensure a new starter only undertakes authorised duties;
- understand any temporary restrictions;

- provide appropriate supervision;
- complete induction requirements;
- report concerns;
- and avoid allowing operational pressure to override recruitment safeguards.

5.6 Applicants and appointed individuals

Applicants must:

- provide accurate and complete information;
- disclose information lawfully requested;
- explain relevant gaps or discrepancies;
- cooperate with proportionate checks;
- provide evidence of identity and qualifications;
- notify KRMA of material changes;
- and avoid misleading claims about experience, rank or suitability.

Providing false, incomplete or misleading information may result in:

- withdrawal of an offer;
- disciplinary action;
- termination of the role;
- safeguarding referral;
- or police involvement where appropriate.

6. Types of KRMA Role

KRMA will identify which category a role falls into before recruitment.

6.1 Adult instructor or coach

This may involve:

- regular teaching;
- supervision;
- physical demonstrations;
- behaviour management;
- assessment;
- travel;
- access to children's information;
- or regulated activity.

These roles will normally require the most extensive safer recruitment process.

6.2 Assistant instructor or trainee instructor

An adult trainee may undertake supervised duties while developing competence.

The title "trainee" does not automatically remove DBS eligibility or safeguarding responsibility.

The required checks will depend upon their actual duties.

6.3 Junior instructor or young volunteer

A person under 18 may support delivery but must not be given sole adult responsibility.

A DBS check cannot be requested for anyone under 16. Government DBS guidance confirms that 16 is the minimum age for a DBS application.

Young people must instead be safeguarded through:

- appropriate selection;
- parental involvement;

- supervision;
- restricted duties;
- training;
- and clear adult accountability.

6.4 Parent helper or occasional volunteer

A parent helping at a single event is not automatically subject to the same checks as a regular instructor.

KRMA must assess:

- frequency;
- activity;
- supervision;
- access;
- responsibility;
- transport;
- overnight involvement;
- and whether the role falls within regulated activity or other DBS eligibility.

6.5 Administrative or reception role

An administrative role may involve little direct coaching but could still provide:

- access to children;
- access to contact and medical information;
- collection responsibilities;
- unsupervised presence;
- or safeguarding information.

Checks must therefore be based on the complete role rather than the job title alone.

6.6 Contractor or visiting instructor

Contractors and visitors may include:

- guest instructors;
- photographers;
- cleaners;
- maintenance workers;
- event staff;
- therapists;
- transport providers;
- and external programme leaders.

KRMA must determine:

- whether the person is working independently;
- who is responsible for vetting;
- what evidence is required;
- whether supervision is necessary;
- and whether access should be restricted.

6.7 Adults working with adults at risk

A role involving adult students does not automatically qualify for an adults' barred-list check.

Eligibility depends upon whether the person performs legally defined regulated activity with adults.

Current DBS guidance should be used for each role rather than assuming that vulnerability alone establishes eligibility.

7. Recruitment Planning and Role Assessment

Before advertising or appointing anyone, KRMA should create or review:

- the role title;
- job or role description;
- person specification;
- safeguarding responsibilities;
- essential qualifications;
- experience;
- working pattern;
- supervision;
- contact with children;
- access to adults at risk;
- physical-contact requirements;
- transport responsibilities;
- overnight duties;
- access to confidential information;
- DBS eligibility;
- right-to-work requirements;
- and any role-specific risks.

7.1 Role description

The role description should explain:

- key duties;
- accountability;
- limits of authority;
- safeguarding responsibility;

- supervision arrangements;
- required conduct;
- and whether duties may include regulated activity.

Vague descriptions such as “helping where needed” should not be used where the person may have meaningful responsibility for children.

7.2 Person specification

The person specification may include:

- technical competence;
- coaching or teaching ability;
- communication;
- reliability;
- safeguarding awareness;
- emotional maturity;
- ability to maintain boundaries;
- inclusion;
- teamwork;
- willingness to learn;
- and ability to respond safely in emergencies.

Martial arts grade alone must not be treated as proof of coaching or safeguarding competence.

7.3 Risk assessment of the role

The recruitment lead should consider:

- opportunities for unsupervised access;
- one-to-one work;
- authority over grading or selection;
- emotional influence;

- private communication;
- changing-room access;
- travel;
- residential contact;
- photography;
- access to money;
- and access to sensitive information.

Higher-risk roles require stronger recruitment and supervision controls.



8. DBS Eligibility and Regulated Activity

KRMA must assess each role against current DBS legislation and guidance.

8.1 Levels of DBS check

Depending upon legal eligibility, a role may qualify for:

- a Basic DBS check;
- a Standard DBS check;
- an Enhanced DBS check;
- or an Enhanced DBS check with a check of one or both barred lists.

KRMA must not request barred-list information unless the role is legally eligible.

DBS guidance published specifically for sport explains that eligibility depends upon the role's actual activities and applies to both paid workers and volunteers.

8.2 Regulated activity with children

Where a role constitutes regulated activity with children, KRMA will normally require:

- an Enhanced DBS check;
- children's barred-list information;
- and completion of all other safer recruitment checks.

Current DBS guidance defines regulated activity and confirms that organisations engaging people in such work become regulated-activity providers with associated safeguarding and referral responsibilities.

8.3 Volunteers and the September 2026 change

From **1 September 2026**, the supervised-volunteer exemption is removed for volunteers engaging in regulated activity with children. Affected volunteers will require an Enhanced DBS check with children's barred-list information before carrying out that regulated activity.

KRMA will review volunteer roles before that date and ensure:

- role descriptions are accurate;

- eligibility is confirmed;
- required applications are completed;
- and no affected volunteer undertakes regulated activity without the legally required check.

Until the change takes effect, KRMA will apply the law in force at the time and may use supervision or duty restrictions where appropriate.

8.4 Frequency and role changes

DBS eligibility may change where:

- duties change;
- frequency increases;
- supervision ends;
- transport is added;
- overnight work begins;
- access to children expands;
- or the person takes on a different position.

Roles must therefore be reassessed when responsibilities change.

8.5 DBS Update Service

Where a candidate subscribes to the DBS Update Service, KRMA may use a status check where:

- the individual gives permission;
- the existing certificate is at the legally required workforce and level;
- the role is eligible;
- KRMA sees the original certificate;
- identity is confirmed;
- and no new certificate is required.

Use of the Update Service must comply with the DBS Code of Practice, and KRMA must have appropriate policies on criminal-record information and recruitment of ex-offenders.



9. Advertising and Recruitment Information

Advertisements and recruitment information should be clear and accurate.

They should normally include:

- role title;
- main duties;
- location;
- hours or commitment;
- paid or voluntary status;
- essential qualifications;
- safeguarding statement;
- whether suitability checks will apply;
- the level of DBS check, where already confirmed;
- application method;
- closing date where relevant;
- and equal-opportunity information.

9.1 Safeguarding statement

Suitable wording may include:

Koku-Ryu Martial Arts is committed to safeguarding children and adults at risk. Appointments are subject to appropriate safer recruitment checks, which may include references, identity verification, right-to-work checks, qualification verification and a legally appropriate Disclosure and Barring Service check.

9.2 Accurate DBS wording

Advertisements must not automatically state “Enhanced DBS required” unless KRMA has assessed that the role is legally eligible.

Where eligibility depends upon final duties, the advertisement may state:

The successful candidate will be subject to the level of DBS check legally appropriate to the role.

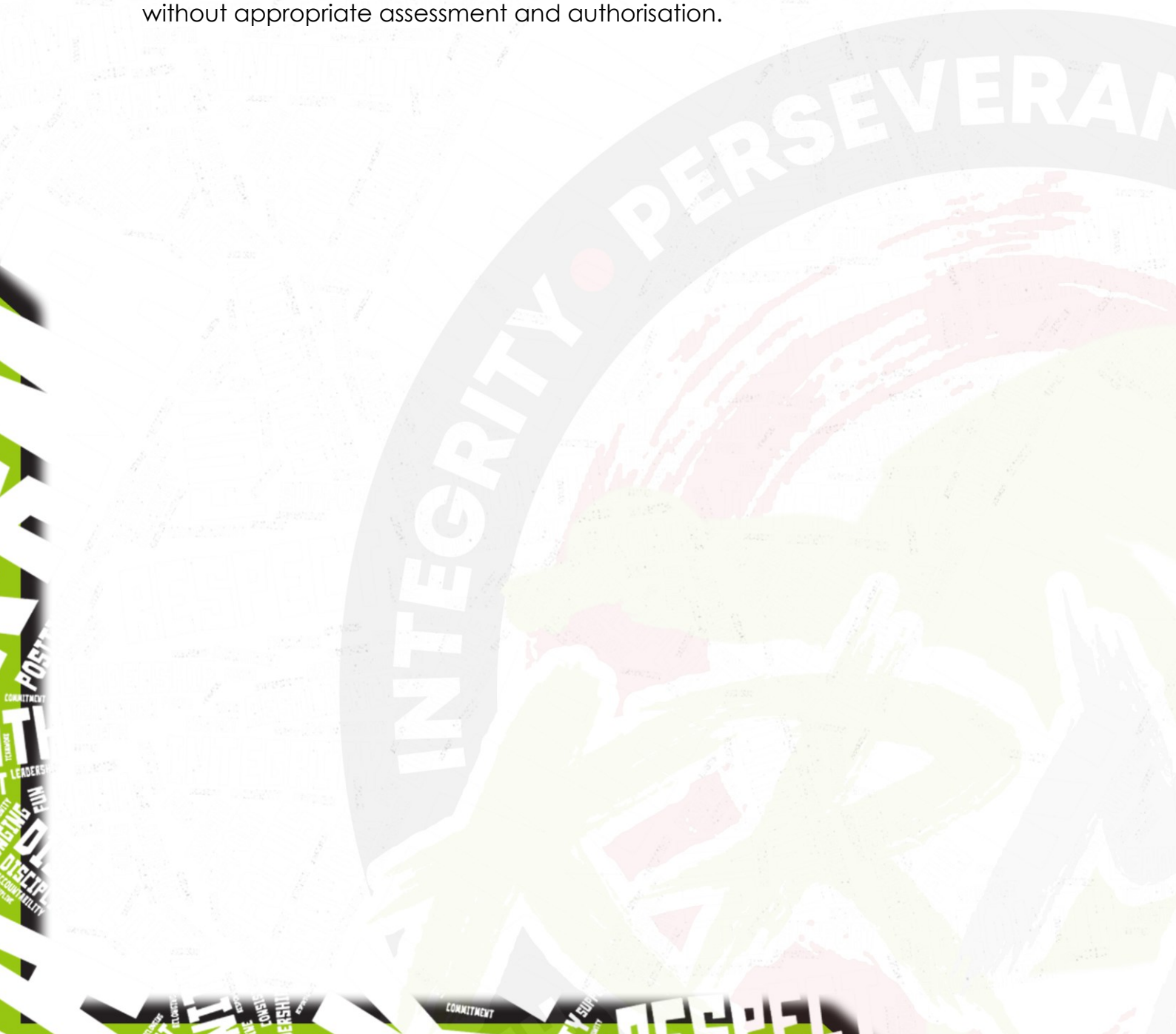
9.3 Recruitment through personal networks

KRMA may promote opportunities internally or through personal networks, but candidates must still complete the required process.

A role must not be awarded informally during:

- a conversation;
- a class;
- an event;
- a friendship;
- or a parent's offer to help

without appropriate assessment and authorisation.



10. Applications and Candidate Information

Candidates should normally complete an approved application process rather than submitting only a brief CV.

The information requested should be relevant and proportionate.

10.1 Application information

Applicants may be asked to provide:

- full name;
- previous names where legitimately required for checks;
- contact details;
- employment and volunteering history;
- education and qualifications;
- martial arts training and grades;
- relevant experience;
- references;
- explanations for material gaps;
- conflicts of interest;
- and a supporting statement.

10.2 Employment and activity history

Applicants for significant child-facing roles should provide a sufficiently complete history to allow KRMA to understand:

- previous work;
- volunteering;
- education;
- coaching;
- periods of unemployment;
- caring responsibilities;

- travel;
- and other material gaps.

A gap is not automatically concerning.

The purpose of discussing gaps is to:

- verify the timeline;
- identify unexplained inconsistencies;
- and understand experience relevant to the role.

10.3 Criminal-record declarations

Applicants will only be asked to disclose criminal-record information that KRMA is legally entitled to request.

The wording must reflect:

- the level of check;
- the Rehabilitation of Offenders Act;
- applicable Exceptions legislation;
- and current filtering rules.

Applicants must not be asked to disclose protected convictions or cautions that they are not legally required to reveal.

10.4 Information about safeguarding concerns

Applicants may be asked whether they have:

- previously been dismissed or removed from work with children or adults at risk;
- been subject to a relevant safeguarding investigation;
- been prohibited or restricted from a professional role;
- been referred to a safeguarding body;
- or have any reason they may be unsuitable for the duties.

Responses must be assessed fairly and must not automatically be treated as proof of wrongdoing.

10.5 Candidate privacy information

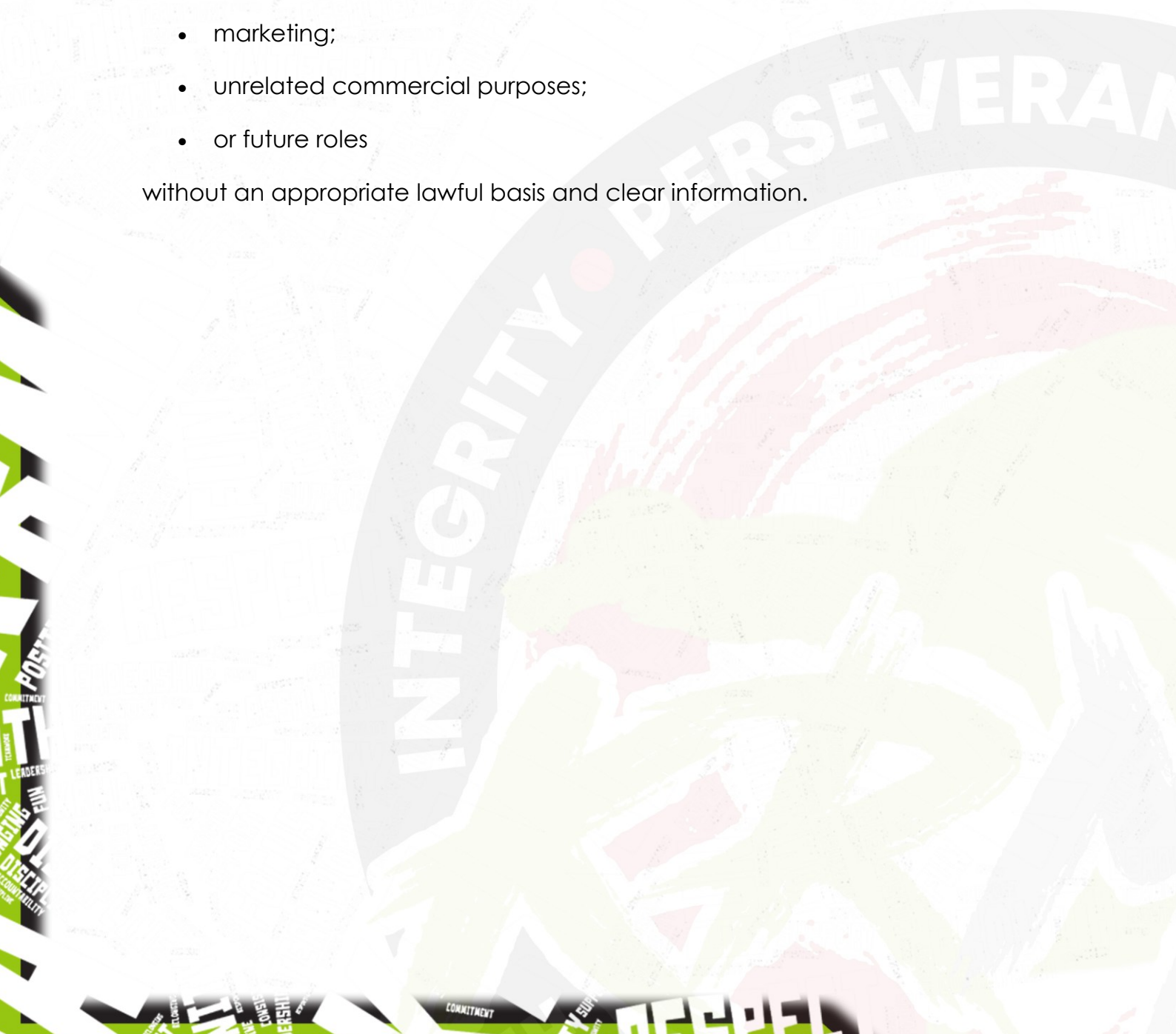
Applicants should be told:

- what information KRMA collects;
- why it is needed;
- the lawful basis;
- who may receive it;
- how long it will be retained;
- and how to exercise their data rights.

Recruitment information must not automatically be reused for:

- marketing;
- unrelated commercial purposes;
- or future roles

without an appropriate lawful basis and clear information.



11. Shortlisting

Shortlisting must be carried out against the agreed:

- role description;
- person specification;
- essential criteria;
- safeguarding responsibilities;
- and competence required for the position.

Candidates must not be shortlisted or rejected because of:

- friendship;
- family connection;
- marital status;
- personal popularity;
- assumptions about protected characteristics;
- pressure to fill the vacancy quickly;
- or factors unrelated to the role.

11.1 Shortlisting panel

For significant adult child-facing appointments, shortlisting should normally involve at least two appropriate people where reasonably practicable.

Panel members must:

- declare personal relationships or conflicts of interest;
- apply the same essential criteria to every candidate;
- record the reasons for their decisions;
- identify matters requiring clarification;
- protect candidate confidentiality;
- and avoid discussing applications with unauthorised people.

Where only one person can shortlist, the final appointment decision should receive additional independent review.

11.2 Application review

The panel should consider:

- relevant qualifications;
- coaching or work experience;
- safeguarding understanding;
- employment and volunteering history;
- unexplained gaps;
- inconsistencies;
- evidence of professional boundaries;
- reasons for leaving previous roles;
- and the candidate's supporting statement.

A gap or career change must not automatically be treated as suspicious.

However, significant:

- omissions;
- contradictions;
- unexplained changes;
- or differences between the application and CV

must be clarified before appointment.

11.3 Incomplete applications

KRMA may ask a candidate to provide missing information before deciding whether to shortlist them.

An application may be rejected where the candidate:

- refuses to provide essential information;
- knowingly gives false information;

- conceals material employment history;
- cannot demonstrate essential criteria;
- or fails to complete the required recruitment process.

11.4 Equality information

Equality-monitoring information, where collected, should normally be kept separate from the information used to shortlist.

It must not be used to make unlawful or unfair decisions.

Reasonable adjustments may be considered without allowing information about disability or health to prejudice shortlisting.

11.5 Publicly available online information

KRMA may undertake a proportionate search of publicly available online information for shortlisted candidates where this is relevant to safeguarding or professional suitability.

Candidates should be informed that such checks may occur.

Online checks must:

- be limited to information genuinely relevant to the role;
- use publicly available sources;
- be carried out consistently;
- avoid requesting passwords or access to private accounts;
- avoid searching merely out of curiosity;
- distinguish verified information from rumour;
- and allow the candidate to respond before an adverse decision is made.

The ICO advises that data-protection requirements apply throughout recruitment, including candidate verification and pre-employment vetting.

Information concerning lawful private activities must not automatically be treated as relevant misconduct.

12. Interviews

Interviews must assess both:

- ability to perform the role; and
- suitability to work within a safeguarding-focused organisation.

12.1 Interview panel

The panel should normally include people who collectively understand:

- the role;
- martial arts or operational requirements;
- safeguarding;
- professional boundaries;
- equality and inclusion;
- and KRMA's expectations.

At least one panel member for a significant child-facing role should have suitable safeguarding or safer-recruitment knowledge.

Panel members must declare:

- personal relationships;
- previous disputes;
- business interests;
- competition relationships;
- or another factor that may affect impartiality.

12.2 Interview format

Candidates applying for the same role should be assessed using consistent core questions and criteria.

Follow-up questions may differ where necessary to explore:

- the individual application;
- employment gaps;

- relevant experience;
- disclosed information;
- unclear answers;
- or role-specific circumstances.

Interview notes must record the substance of the answer rather than only a score.

12.3 Safeguarding questions

Candidates for child-facing or welfare-related roles should be asked questions exploring:

- why they wish to work with children;
- understanding of professional boundaries;
- response to a disclosure;
- handling bullying;
- use of physical contact;
- one-to-one working;
- digital communication;
- behaviour management;
- equality and inclusion;
- responding to a colleague's concerning conduct;
- and willingness to report someone senior.

Scenario questions may include:

- a child sending a private message;
- a parent requesting an informal lift;
- a student making a safeguarding disclosure;
- an instructor humiliating a child;
- a child leaving without permission;

- a concern about another staff member;
- or a participant refusing physical contact.

Answers should be assessed for:

- safety;
- judgement;
- openness;
- boundaries;
- willingness to seek help;
- and understanding that concerns must be reported rather than investigated personally.

12.4 Professional boundaries

Candidates should understand that martial arts coaching involves a position of influence.

The panel should explore how the candidate would manage:

- authority;
- rank;
- admiration from students;
- favouritism;
- gifts;
- personal relationships;
- private lessons;
- physical demonstrations;
- social media;
- and communication outside classes.

Concerning answers may include a belief that:

- seniority places someone beyond challenge;

- children should keep concerns inside the dojo;
- private communication is harmless if well-intended;
- humiliation is necessary for discipline;
- or safeguarding rules can be ignored for respected instructors.

12.5 Employment and activity history

The interview should clarify relevant:

- gaps;
- overlapping employment;
- short appointments;
- unexplained departures;
- changes of career;
- disciplinary matters lawfully disclosed;
- and inconsistencies between documents.

Questions must be factual and non-accusatory.

A candidate should be given a fair opportunity to explain.

12.6 Reasons for leaving previous roles

Where relevant, candidates may be asked:

- why they left;
- whether they were subject to a formal process;
- whether any safeguarding or conduct concern remained unresolved;
- and whether KRMA may discuss their suitability with an appropriate referee.

The panel must not assume that resignation, dismissal or an unresolved allegation proves misconduct.

12.7 Interview behaviour

The panel should consider whether the candidate demonstrates:

- respect;
- honesty;
- emotional control;
- appropriate communication;
- realistic understanding of the role;
- willingness to learn;
- and accountability.

A technically skilled martial artist may still be unsuitable if they demonstrate:

- unsafe attitudes;
- poor boundaries;
- discriminatory beliefs affecting the role;
- refusal to follow safeguarding requirements;
- or unwillingness to accept supervision.

12.8 Questions that must not be used improperly

Interviewers must not use questions intended to discriminate because of:

- age;
- disability;
- race;
- religion or belief;
- sex;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- marriage or civil partnership;
- or another legally protected characteristic.

Questions about family arrangements or childcare should only be asked where directly relevant to working availability and should be asked consistently.

Health and disability questions are restricted before a conditional offer, except for limited lawful purposes such as identifying interview adjustments or assessing an intrinsic function of the role.

12.9 Interview records

Interview records should include:

- panel members;
- questions asked;
- candidate responses;
- assessment against criteria;
- concerns identified;
- clarification required;
- and reasons for the decision.

Notes must be:

- factual;
- professional;
- securely stored;
- and free from inappropriate personal comments.

13. Practical Coaching Assessments

A practical assessment may form part of recruitment for:

- instructors;
- coaches;
- assistant instructors;
- trainee instructors;
- programme leaders;
- and other delivery roles.

It must not be treated as informal free labour or unsupervised access to children.

13.1 Planning

The practical assessment must have:

- a defined purpose;
- an agreed duration;
- appropriate supervision;
- a suitable group;
- safeguarding oversight;
- a risk assessment;
- clear boundaries;
- and an identified assessor.

Where children participate, the arrangement should form part of an appropriately supervised KRMA activity.

13.2 Candidate restrictions

Before full suitability checks are completed, the candidate must not:

- be left alone with children;
- take children into private areas;

- transport participants;
- access confidential records;
- administer medication;
- conduct intimate or personal care;
- photograph or film children;
- exchange personal contact details;
- arrange future private lessons;
- or communicate with children outside the assessment.

The supervising adult remains responsible for the group.

13.3 What should be assessed

The practical assessment may consider:

- technical competence;
- safe control;
- lesson structure;
- age-appropriate delivery;
- communication;
- observation;
- inclusion;
- partner selection;
- physical-contact boundaries;
- use of equipment;
- response to mistakes;
- behaviour management;
- safeguarding awareness;
- emotional regulation;

- and response to feedback.

13.4 Physical contact

Any physical contact must be:

- necessary for the activity;
- explained;
- appropriate;
- observable;
- proportionate;
- and consistent with KRMA's Safe Practice and Staff Code of Conduct.

The candidate must not use:

- excessive force;
- humiliation;
- pain as discipline;
- inappropriate touching;
- uncontrolled demonstrations;
- or unsafe partner work.

13.5 Safeguarding concern during assessment

Any concern arising during a practical assessment must be:

- acted upon immediately where safety is affected;
- recorded;
- reported to the DSL;
- and considered before the process continues.

The assessment may be stopped immediately.

14. Conditional Offers

An offer should normally be made in writing and clearly identified as conditional until the required checks have been completed satisfactorily.

14.1 Possible conditions

Depending upon the role, an offer may be conditional upon:

- satisfactory references;
- identity verification;
- right-to-work confirmation;
- appropriate DBS checks;
- barred-list checks where legally permitted and required;
- overseas criminal-record information;
- qualification verification;
- professional membership or licence checks;
- driving checks;
- insurance;
- health or fitness assessment after the conditional offer;
- signing the Staff Code of Conduct;
- completing safeguarding training;
- and any other relevant requirement.

14.2 No unconditional confirmation

A candidate must not be told that the role is fully confirmed while material conditions remain outstanding.

Wording such as:

“The role is yours regardless of what the checks show”
must not be used.

14.3 Unsatisfied conditions

Where a condition is not satisfied, KRMA may:

- seek clarification;
- extend the timescale;
- impose temporary restrictions;
- obtain specialist advice;
- undertake a suitability risk assessment;
- amend the role;
- or withdraw the offer.

The candidate should normally be given an opportunity to respond to adverse or disputed information before a final decision is made, unless a legal prohibition prevents appointment.

14.4 Starting date

The proposed start date must reflect the time required to complete checks.

Operational pressure, staff shortages or event deadlines must not be allowed to bypass safeguards.

15. Identity and Right-to-Work Checks

KRMA must verify the identity of every person appointed to a position of responsibility.

Identity checks and right-to-work checks serve different purposes and should not be treated as interchangeable.

15.1 Identity verification

Suitable identity evidence may include:

- passport;
- driving licence;
- birth certificate;
- immigration document;
- proof of address;
- name-change documentation;
- or another document accepted under the relevant checking process.

KRMA should confirm:

- the documents relate to the individual;
- names and dates are consistent;
- photographs resemble the person;
- changes of name are explained;
- and documents appear genuine.

Discrepancies must be resolved before completion of relevant checks.

15.2 Right to work

Right-to-work checks apply where legally required for employment.

They must be completed before employment begins through an authorised method, which may include:

- a manual document check;
- a digital verification service for eligible British or Irish citizens;

- or the Home Office online service.

A time-limited right to work requires appropriate follow-up checking.

Volunteer status must not be used artificially to avoid employment or immigration requirements where the arrangement is, in substance, employment.

15.3 Fair and consistent checks

Right-to-work checks must be carried out consistently.

KRMA must not make assumptions based upon:

- name;
- accent;
- appearance;
- ethnicity;
- nationality;
- or perceived immigration status.

15.4 Records

Evidence of a right-to-work check must be:

- dated;
- securely retained;
- accessible only to authorised people;
- and capable of being produced if required.

Current Home Office guidance requires evidence to be retained for the duration of employment and for two years afterwards, after which it should be securely destroyed.

16. References

References are a significant part of safer recruitment and must not be treated as a formality.

16.1 Number and type of references

For significant adult child-facing roles, KRMA will normally seek at least two appropriate references.

Where possible, these should include:

- the candidate's current or most recent employer;
- a previous employer or organisation relevant to work with children;
- or another professional person able to assess suitability.

For candidates with limited employment history, references may come from:

- a college or university tutor;
- placement provider;
- volunteering organisation;
- recognised martial arts instructor;
- or another credible professional source.

Personal friends or relatives should not normally provide the principal references.

16.2 Direct contact with referees

References should be obtained directly from the referee or organisation.

KRMA should not rely solely upon:

- an open testimonial;
- a reference carried by the candidate;
- a social-media recommendation;
- or an undated character statement.

The identity and authority of the referee should be verified where reasonably practicable.

16.3 Reference content

For child-facing roles, KRMA may ask the referee to comment on:

- dates and role;
- duties;
- reliability;
- performance;
- professional conduct;
- relationships with children and colleagues;
- boundaries;
- safeguarding concerns;
- disciplinary findings;
- reason for leaving;
- and whether they would re-employ or re-engage the person.

Questions must remain fair, relevant and lawful.

16.4 Safeguarding information

A referee should be asked whether there are substantiated safeguarding concerns relevant to the role.

Where the candidate left while a concern was unresolved, KRMA may seek factual information about:

- the nature of the process;
- its status;
- any findings;
- and whether the matter was referred externally.

An unresolved allegation must not automatically be treated as established fact.

16.5 Verbal references

Where information is obtained by telephone or video call, the person taking the reference must record:

- date and time;
- referee's identity;
- organisation;
- contact information;
- questions;
- responses;
- and any follow-up needed.

A written confirmation should be requested where practicable.

16.6 Discrepancies

Differences between:

- the application;
- interview;
- reference;
- employment dates;
- role description;
- or reason for leaving

must be discussed with the candidate.

Material discrepancies must be resolved before appointment.

16.7 Unsatisfactory or unavailable references

Where an appropriate reference cannot be obtained, KRMA must not simply ignore the requirement.

It should consider:

- alternative credible referees;
- additional verification;

- extended supervision;
- a delayed start;
- narrower duties;
- or withdrawal of the offer.

The decision and reasoning must be recorded.



17. Qualifications, Memberships and Experience

Relevant qualifications and experience must be verified rather than accepted solely on the candidate's assertion.

17.1 Qualification checks

Depending upon the role, KRMA may verify:

- martial arts grade;
- instructor qualification;
- coaching awards;
- first-aid certification;
- safeguarding training;
- teaching qualifications;
- professional registration;
- licences;
- insurance;
- driving entitlement;
- and specialist technical awards.

17.2 Verification

Verification may involve:

- viewing the original certificate;
- checking a secure digital record;
- contacting the awarding body;
- confirming membership with the relevant organisation;
- or obtaining another reliable verification.

Copies should only be retained where necessary and lawful.

17.3 Martial arts grades

A claimed martial arts grade must be considered in context.

KRMA may seek:

- awarding organisation;
- instructor;
- date awarded;
- discipline;
- technical scope;
- and evidence of current competence.

A high grade does not automatically establish:

- coaching competence;
- safeguarding awareness;
- first-aid knowledge;
- behaviour-management ability;
- or authority to grade within KRMA.

17.4 Expired or incomplete qualifications

Where a qualification has expired or required training is incomplete, KRMA may:

- delay appointment;
- restrict duties;
- require renewal;
- provide supervised development;
- or amend the role.

The person must not undertake duties for which a current qualification or authorisation is essential.

17.5 False qualification claims

Knowingly falsifying or materially exaggerating qualifications, experience or martial arts rank may result in:

- withdrawal of the offer;

- disciplinary action;
- termination;
- notification to an awarding body;
- or other appropriate action.



18. Criminal Record and DBS Checks

DBS checks will be requested only at the level legally appropriate to the actual role.

The DBS published updated sport-specific guidance in April 2026, confirming that eligibility depends upon activities and responsibilities rather than whether the position is paid or voluntary.

18.1 Application process

Where a DBS check is required, KRMA will ensure that:

- the correct workforce is selected;
- the correct check level is requested;
- barred-list information is requested only where legally permitted;
- identity is verified;
- the role description supports eligibility;
- and the candidate receives relevant information about the process.

18.2 Certificate terminology

KRMA should not describe a DBS certificate as “passed” or “failed”.

The certificate may:

- reveal no information;
- contain disclosed information;
- or require further consideration.

The final decision is a suitability decision made by KRMA, subject to any legal prohibition.

18.3 Viewing the certificate

The DBS normally issues the certificate to the applicant.

The candidate must present it as required so KRMA can verify:

- name;
- date of birth;

- certificate number;
- issue date;
- level;
- workforce;
- barred-list information where applicable;
- and disclosed information.

Where the Update Service is used, the employer must have seen the original paper certificate in person, checked identity, obtained consent and confirmed entitlement to the same check level and workforce.

18.4 Existing DBS certificates

An existing certificate should not automatically be accepted merely because it is described as “current”.

KRMA must consider:

- role;
- workforce;
- check level;
- barred lists;
- date;
- identity;
- Update Service status;
- and whether duties have changed.

Where these do not match, a new check may be required.

18.5 Update Service

Where appropriate, KRMA may carry out periodic Update Service checks with the person’s consent.

If the status indicates that the certificate is no longer current, KRMA should:

- discuss the result with the individual;

- obtain a new check where required;
- consider temporary restrictions;
- and assess immediate safeguarding risk.

KRMA must stop carrying out status checks when:

- the person leaves;
- consent is withdrawn;
- or KRMA is no longer legally entitled to the same information.

18.6 DBS certificate handling

DBS information must be:

- accessed only by authorised people;
- stored securely;
- used only for the purpose for which it was obtained;
- protected from unauthorised disclosure;
- and destroyed securely when no longer required.

KRMA will not routinely retain a photocopy or digital image of the full certificate.

It may retain a limited record including:

- candidate's name;
- certificate number;
- issue date;
- check level;
- workforce;
- position;
- barred-list status where applicable;
- person who checked it;
- and recruitment decision.

DBS guidance requires organisations using certificate information to have suitable handling, storage, retention and disposal arrangements.

18.7 Filtering and protected information

KRMA will only ask candidates to disclose criminal-record information it is legally entitled to request.

Candidates are not required to disclose protected cautions or convictions that are filtered from the relevant check.

Filtering determines which records are disclosed on Standard and Enhanced certificates, and employers must not ask for information that is legally protected.

18.8 Barred individuals

A person must not be appointed to regulated activity where they are legally barred from undertaking that activity.

Where barred-list information or another restriction is identified, KRMA must:

- stop the appointment or relevant duties;
- protect children or adults at risk;
- obtain safeguarding advice;
- preserve confidentiality;
- and consider whether external reporting is required.

19. Overseas Checks

A UK DBS check may not provide a complete picture of conduct that occurred overseas.

Government guidance states that DBS checks rely on UK-based data sources and are unlikely to include all overseas offending information.

19.1 When additional checks may be required

KRMA may request overseas criminal-record information where a candidate has lived, worked or undertaken significant relevant activity outside the United Kingdom.

The decision should consider:

- countries involved;
- length of residence;
- age at the time;
- recency;
- role risk;
- availability of records;
- local legal systems;
- and whether other evidence is available.

19.2 Possible evidence

Additional checks may include:

- overseas criminal-record certificate;
- certificate of good conduct;
- embassy or consular information;
- International Child Protection Certificate where relevant;
- verified overseas references;
- employer confirmation;
- professional registration;

- or another lawful source.

The process differs between countries.

19.3 Translation and verification

Where a document is not in English, KRMA may require:

- a certified translation;
- verification of the issuing body;
- confirmation of authenticity;
- and clarification of what the document covers.

19.4 Check unavailable

Some countries may not provide suitable certificates.

Where information cannot reasonably be obtained, KRMA should consider:

- additional references;
- further interview questions;
- increased supervision;
- delayed unsupervised duties;
- a longer probation period;
- restriction from higher-risk duties;
- and an individual written risk assessment.

Inability to obtain a certificate must not automatically be treated as evidence of wrongdoing.

19.5 UK checks still required

An overseas certificate does not normally replace an eligible UK DBS check.

The appropriate UK and overseas checks may both be required.

20. Health, Disability and Reasonable Adjustments

KRMA is committed to fair recruitment and must not treat disability, physical health or mental health as automatic evidence of unsuitability.

20.1 Before a conditional offer

Before making a conditional offer, health or disability questions should normally be limited to lawful purposes such as:

- arranging reasonable adjustments for the selection process;
- determining whether the candidate can perform an intrinsic function of the role with appropriate adjustments;
- equality monitoring kept separate from selection;
- or another specific legal exception.

General pre-employment health questionnaires must not be used to screen out disabled candidates.

20.2 After a conditional offer

After a conditional offer, KRMA may ask proportionate questions needed to:

- identify workplace adjustments;
- assess safe performance of essential duties;
- plan emergency support;
- understand relevant restrictions;
- obtain occupational-health advice;
- or comply with another lawful requirement.

Questions must relate to the role rather than seeking unnecessary medical history.

20.3 Reasonable adjustments

KRMA will consider reasonable adjustments for candidates and appointed workers with disabilities or health conditions.

Adjustments may include:

- accessible interview arrangements;

- additional preparation time;
- adapted communication;
- modified equipment;
- alternative demonstrations;
- changes to working methods;
- altered duties;
- accessible facilities;
- or supportive technology.

Employers must consider reasonable adjustments to prevent disabled workers or applicants being placed at a substantial disadvantage.

20.4 Fitness and safety

The relevant question is not whether a person has a diagnosis.

It is whether they can perform the essential duties:

- safely;
- competently;
- reliably;
- and with reasonable adjustments where appropriate.

A health condition may require:

- adjustment;
- advice;
- monitoring;
- or temporary restrictions

without preventing appointment.

20.5 Confidentiality

Health information must be:

- collected only where necessary;

- stored securely;
- shared only with authorised people;
- and limited in operational records to information needed for safety and adjustments.

Managers may need to know the adjustment required without receiving the person's full medical history.



21. Assessment of Criminal Record and Other Suitability Information

A criminal record or safeguarding-related information does not automatically prevent appointment unless a legal prohibition applies.

KRMA will assess information fairly, consistently and in accordance with its Recruitment of Ex-Offenders Policy.

21.1 Assessment panel

Complex or relevant information should normally be considered by an appropriate group, which may include:

- the CEO and Chief Instructor;
- Designated Safeguarding Lead;
- recruitment lead;
- HR or employment adviser;
- or another suitable independent person.

Anyone with a conflict of interest must not lead the decision.

21.2 Factors to consider

The assessment may consider:

- whether the person is legally barred;
- nature and seriousness of the information;
- relevance to the role;
- age at the time;
- time elapsed;
- pattern or repetition;
- circumstances;
- level of responsibility;
- access to children or adults at risk;
- supervision;
- candidate's explanation;

- accuracy of self-disclosure;
- evidence of rehabilitation;
- subsequent conduct;
- references;
- risk of recurrence;
- and potential impact upon participants.

21.3 Candidate explanation

The candidate should normally be given an opportunity to:

- confirm accuracy;
- explain circumstances;
- provide context;
- identify disputed information;
- describe rehabilitation;
- and supply relevant supporting evidence.

The candidate must not be pressured to disclose protected information that KRMA is not legally entitled to consider.

21.4 Safeguarding allegations without a finding

Information about an allegation that did not result in conviction or formal finding must be handled carefully.

KRMA should consider:

- source and reliability;
- whether the matter remains unresolved;
- whether statutory agencies were involved;
- available factual information;
- relevance;
- proportionality;

- and the candidate's response.

An allegation alone must not automatically be treated as proof.

However, lack of a conviction does not prevent KRMA from considering reliable safeguarding information where it is lawful and relevant.

21.5 Disclosed police information

Relevant police information appearing on an Enhanced DBS certificate must be assessed according to:

- its wording;
- relevance;
- age;
- reliability;
- role risk;
- and any explanation provided.

The decision must not be based on assumptions beyond the information available.

21.6 Possible outcomes

Following assessment, KRMA may:

- confirm appointment;
- confirm appointment with ordinary supervision;
- introduce additional safeguards;
- restrict particular duties;
- extend probation;
- require further information;
- defer the decision;
- offer an alternative role;
- or withdraw the offer.

Any additional safeguard should be:

- proportionate;
- documented;
- communicated to those who need to implement it;
- and reviewed.

21.7 Written risk assessment

Where relevant information is accepted and the person is appointed, KRMA should record:

- information considered;
- relevance to the role;
- candidate's explanation;
- decision-makers;
- identified risks;
- controls;
- review date;
- and reasons for the decision.

Sensitive details must not be distributed unnecessarily.

21.8 Challenging a decision

A candidate may ask for clarification or use an appropriate complaints or review process where they believe:

- information was inaccurate;
- the process was unfair;
- protected information was considered;
- discrimination occurred;
- or relevant evidence was ignored.

This does not require KRMA to disclose confidential third-party or police information beyond what it is lawfully permitted to share.

22. Starting Before Checks Are Complete

KRMA's normal position is that a person must not begin duties involving children, adults at risk or other positions of trust until all checks required for the role have been completed satisfactorily.

Operational pressure, staff shortages, event deadlines or familiarity with the individual must not be used to bypass safer recruitment requirements.

22.1 Regulated activity

Where the role involves regulated activity and requires children's or adults' barred-list information, the person must not undertake that regulated activity until KRMA has confirmed that they are not barred and the required recruitment checks have been completed.

It is an offence for a barred person to undertake regulated activity and for an organisation knowingly to permit a barred person to undertake it.

KRMA must not assume that it can access a standalone children's barred-list check. The Department for Education's direct checking service is restricted to specified education organisations.

22.2 Limited activity while checks are pending

In exceptional circumstances, a person may be permitted to begin limited induction, observation or non-regulated duties while a check is pending.

This may only occur where:

- the person's identity has been verified;
- any required right-to-work check has been completed;
- the application and interview process has been completed;
- references have been received or sufficiently progressed;
- relevant qualifications have been checked;
- the appropriate DBS application has been submitted;
- no known information indicates that the individual may be unsuitable;
- the DSL has been consulted where appropriate;

- the CEO or authorised senior manager has approved the arrangement;
- a written risk assessment has been completed;
- and the individual has received an initial safeguarding briefing.

22.3 Restrictions while checks are pending

Unless expressly authorised following a written risk assessment, the individual must not:

- supervise children alone;
- teach or lead a children's class independently;
- undertake one-to-one coaching with a child;
- transport children;
- enter children's changing or toilet areas;
- provide personal care;
- administer medication;
- undertake overnight or residential duties;
- have access to safeguarding records;
- access unnecessary medical or contact information;
- hold keys or unsupervised building access;
- take photographs or recordings of children;
- communicate privately with children;
- collect or release children;
- manage a missing-child incident;
- undertake physical intervention except in an immediate emergency;
- or make safeguarding decisions on behalf of KRMA.

22.4 Direct supervision

Where limited involvement is authorised, the person must remain under the direct and active supervision of a suitable adult whose own checks and suitability have been confirmed.

The supervising adult must:

- understand the restrictions;
- remain able to observe and intervene;
- not delegate supervision to a junior instructor;
- prevent unauthorised duties;
- report concerns immediately;
- and confirm whether the arrangement remains manageable.

“Supervised” must not mean that an approved adult is merely somewhere else in the building.

22.5 Written risk assessment

The risk assessment should record:

- the outstanding check;
- reason for permitting an early start;
- duties allowed;
- duties prohibited;
- named supervisor;
- locations;
- working times;
- contact with participants;
- access to information;
- review date;
- and authorising manager.

The assessment must be reviewed whenever:

- new information is received;

- duties change;
- supervision changes;
- delays become extended;
- a concern arises;
- or the pending check is completed.

22.6 Unsatisfactory or delayed checks

Where information received creates a concern, KRMA may:

- stop the individual's involvement immediately;
- extend restrictions;
- seek clarification;
- obtain professional advice;
- conduct a suitability assessment;
- withdraw the conditional offer;
- or make a safeguarding referral.

A delayed certificate does not automatically indicate concern, but lengthy delays must not lead to restrictions gradually being ignored.

23. Induction and Probation

Every new staff member, instructor, contractor or volunteer must complete induction appropriate to their role.

Induction is part of the safer recruitment process rather than an administrative formality.

23.1 Induction content

The induction programme should include, where relevant:

- KRMA's values and organisational structure;
- the Safeguarding and Child Protection Policy;
- Safeguarding Adults at Risk Policy;
- Staff, Instructor and Volunteer Code of Conduct;
- professional boundaries;
- allegations and low-level concerns;
- whistleblowing;
- responding to disclosures;
- confidentiality and record keeping;
- online communication and social media;
- photography and video;
- equality, diversity and inclusion;
- SENDI and reasonable adjustments;
- trauma-informed coaching;
- anti-bullying arrangements;
- behaviour management;
- safe physical contact;
- one-to-one working;
- changing-room arrangements;

- missing-child procedures;
- arrival and collection;
- first aid and emergency arrangements;
- risk assessment;
- health and safety;
- fire and evacuation;
- travel and transport;
- complaints;
- data protection;
- and role-specific technical standards.

23.2 Safeguarding contacts

Every new starter must know:

Designated Safeguarding Lead: Kayleigh Humphreys

Email: safeguarding@krma.co.uk

Telephone: 01652 653560

Deputy Designated Safeguarding Lead: Andrew Banks

They must understand that immediate danger requires a **999** call and does not require prior permission from management.

23.3 Policy acknowledgement

The individual should confirm that they have:

- received the relevant policies;
- understood the Code of Conduct;
- been given an opportunity to ask questions;
- understood reporting routes;
- and agreed to comply with KRMA's standards.

A signature confirms receipt and understanding. It does not remove KRMA's responsibility to provide suitable training and supervision.

23.4 Mentor or named supervisor

A new starter should be allocated a named mentor or supervisor where appropriate.

The mentor should:

- explain day-to-day procedures;
- observe practice;
- reinforce boundaries;
- answer questions;
- provide constructive feedback;
- identify training needs;
- and report concerns.

The mentor must not conceal concerns in an attempt to protect or informally manage the new starter.

23.5 Probationary or introductory period

New adult staff and volunteers should normally complete an appropriate probationary or introductory period.

This may vary according to:

- the role;
- frequency of attendance;
- employment status;
- level of responsibility;
- previous experience;
- and concerns or support needs.

During this period, KRMA should assess:

- reliability;
- punctuality;
- technical competence;

- safeguarding awareness;
- relationships with participants;
- professional boundaries;
- communication;
- response to feedback;
- equality and inclusion;
- judgement;
- emotional control;
- record keeping;
- and compliance with procedures.

23.6 Observations

Coaching and operational observations should be completed by an appropriate senior person.

Observations should consider:

- class safety;
- lesson structure;
- supervision;
- physical contact;
- partner selection;
- behaviour management;
- inclusion;
- boundaries;
- and participant engagement.

Feedback should be recorded proportionately.

23.7 Probation outcomes

At the end of the period, KRMA may:

- confirm the appointment;
- extend the probation period;
- continue enhanced supervision;
- amend duties;
- require additional training;
- offer a different role;
- or end the arrangement.

The decision and reasons should be recorded.

Serious safeguarding or conduct concerns do not need to wait until the end of probation.



24. Junior Instructors and Young Volunteers

Junior instructors and volunteers under 18 remain children for safeguarding purposes.

Their development should be positive, educational and appropriately supervised.

24.1 Selection

Selection should consider:

- age;
- maturity;
- behaviour;
- reliability;
- communication;
- willingness to learn;
- understanding of boundaries;
- and suitability for the proposed duties.

Martial arts grade alone must not determine appointment.

24.2 Parental involvement

Where appropriate, KRMA should obtain:

- parental or carer consent;
- emergency contact information;
- relevant medical information;
- agreement regarding duties and hours;
- and confirmation that the young person understands the role.

24.3 Role description

A junior instructor should receive a clear age-appropriate explanation of:

- duties;

- supervision;
- who they report to;
- what they may and may not do;
- how to raise a concern;
- and what support is available.

24.4 Permitted duties

Depending upon age, maturity and training, junior instructors may:

- demonstrate suitable techniques;
- assist with equipment;
- support warm-ups under direction;
- help organise lines or groups;
- encourage younger students;
- assist with simple drills;
- and participate in supervised leadership development.

24.5 Prohibited responsibilities

Junior instructors must not have sole responsibility for:

- a class;
- safeguarding decisions;
- confidential safeguarding information;
- formal discipline;
- one-to-one private lessons;
- transport;
- medication;
- intimate or personal care;
- changing-room supervision;

- residential night supervision;
- missing-child coordination;
- emergency decision-making;
- or physical intervention.

They must not be used to replace an appropriate adult staffing level.

24.6 DBS checks and age

The minimum age for a DBS application is 16. A junior instructor under 16 cannot be submitted for a DBS check.

Where a young person aged 16 or 17 undertakes duties that are legally eligible for a check, KRMA will determine the appropriate level based upon the actual role.

A DBS check does not alter the fact that the individual remains a child.

24.7 Safeguarding junior instructors

Adult staff must not:

- exploit junior instructors;
- give them unsafe responsibilities;
- use them as unpaid replacement staff;
- create private or dependent relationships;
- communicate secretly;
- expect unreasonable working hours;
- or expose them to confidential adult disputes.

Any concern involving a junior instructor must be managed as a concern involving a child.

24.8 Transition to an adult role

When a junior instructor reaches 18, KRMA must not automatically treat their existing junior position as an adult appointment.

Before adult responsibilities are introduced, KRMA should review:

- role description;
- recruitment checks;
- DBS eligibility;
- references where appropriate;
- training;
- competence;
- Code of Conduct;
- supervision;
- and readiness for increased responsibility.



25. Contractors, Agency Staff and Visiting Instructors

KRMA must apply appropriate safeguarding controls to people supplied or engaged by another organisation.

A person's reputation, professional title or relationship with an external organisation does not remove the need for checks.

25.1 Written assurance

Where another organisation is responsible for recruitment, KRMA should obtain suitable written confirmation that relevant checks have been completed.

This may include confirmation of:

- identity;
- employment status;
- DBS level and workforce;
- barred-list information where applicable;
- right to work;
- references;
- qualifications;
- safeguarding training;
- professional registration;
- insurance;
- and ongoing suitability.

KRMA should not request or retain more sensitive information than is necessary.

25.2 Identity on arrival

The responsible KRMA person should verify that the individual attending is the person whose information was supplied.

Unexpected substitutions must not be accepted without appropriate verification.

25.3 Visiting instructors

A visiting instructor must receive an appropriate briefing covering:

- safeguarding expectations;
- physical contact;
- professional boundaries;
- photography;
- communication;
- supervision;
- emergency procedures;
- and how to report concerns.

A visiting instructor must not automatically be left alone with children merely because they are:

- highly graded;
- well known;
- internationally recognised;
- personally known to staff;
- or employed by another martial arts organisation.

25.4 Regular contractors

A contractor who attends regularly or gains significant access to:

- children;
- training areas;
- changing areas;
- personal information;
- keys;
- or KRMA systems

may require an enhanced process similar to direct recruitment.

25.5 Maintenance and premises contractors

Contractors who do not require direct participant contact should normally:

- sign in;
- remain within the authorised work area;
- be supervised where necessary;
- avoid unnecessary access to children;
- follow site safety instructions;
- and report concerns.

Where work creates a safeguarding or physical hazard, the affected area should be restricted appropriately.

25.6 External photographers and media providers

Photographers and media contractors must:

- be formally authorised;
- follow KRMA's Photography, Recording and Media Consent Policy;
- receive a safeguarding briefing;
- comply with consent arrangements;
- avoid private or changing areas;
- use approved storage and transfer arrangements;
- and not retain or reuse material for unrelated purposes.

25.7 Agency responsibility does not replace KRMA responsibility

Even where an agency or contractor has completed recruitment checks, KRMA remains responsible for:

- local induction;
- supervision;
- safe deployment;
- reporting concerns;

- and preventing access beyond the agreed role.



26. Recruitment Records and Confidentiality

Recruitment records must be:

- accurate;
- relevant;
- secure;
- accessible only to authorised people;
- and retained according to KRMA's Data Protection and Retention arrangements.

26.1 Central recruitment record

KRMA should maintain a central record showing, where applicable:

- full name;
- role;
- start date;
- identity check;
- right-to-work check;
- references;
- qualifications;
- DBS check level;
- workforce;
- barred-list check where applicable;
- DBS certificate number;
- issue date;
- date viewed;
- person who viewed it;
- overseas checks;
- risk assessments;

- Code of Conduct acknowledgement;
- induction;
- safeguarding training;
- first-aid qualification;
- insurance;
- driving checks;
- probation outcome;
- and review dates.

The central record must not contain unnecessary detailed criminal-record or medical information.

26.2 DBS certificate information

Full DBS certificates and certificate information must be handled securely and only by people authorised to receive it.

DBS guidance requires organisations using its checking service to maintain appropriate written arrangements for secure handling, storage, use, retention and disposal.

KRMA will normally:

- view the original certificate;
- record limited checking information;
- return the certificate to the applicant;
- and avoid retaining a copy of the full certificate.

Where a copy or detailed information must exceptionally be retained, it must:

- be justified;
- be securely stored;
- have tightly controlled access;
- and be destroyed when no longer required.

DBS guidance states that certificate information should normally be destroyed after a suitable period, usually no longer than six months.

26.3 Health and equality information

Health, disability and equality-monitoring information must be separated from general selection records where appropriate.

It should only be shared with people who need it for:

- adjustments;
- safe working;
- legal compliance;
- or authorised decision-making.

26.4 Unsuccessful applicants

Information concerning unsuccessful applicants should be retained only for an appropriate period under KRMA's retention schedule.

It may be retained to:

- respond to recruitment queries;
- address complaints;
- demonstrate fair decision-making;
- or consider the person for a future opportunity where they have agreed to this.

Candidate information must not be retained indefinitely without justification.

26.5 Successful applicants

Relevant recruitment records for successful applicants should transfer to a secure personnel or volunteer file.

Only information necessary for:

- employment or volunteering;
- safeguarding;
- legal compliance;

- training;
- suitability;
- and organisational accountability

should be retained.

26.6 Access requests and corrections

Applicants and staff may have data-protection rights concerning recruitment information.

Requests should be handled under KRMA's Data Protection and GDPR Policy.

Where information is disputed, KRMA should:

- check accuracy;
- preserve the original record where necessary;
- record any correction;
- and avoid deleting material that must be retained for safeguarding or legal reasons.



27. Ongoing Suitability and Annual Declarations

Safer recruitment continues throughout a person's work or volunteering relationship with KRMA.

27.1 Duty to disclose relevant changes

Staff, instructors, volunteers and contractors must notify an appropriate senior person promptly where they:

- are arrested, charged or convicted of an offence relevant to their role;
- receive a caution relevant to their role;
- become subject to a safeguarding investigation;
- are removed or suspended from another child-facing position;
- become barred from regulated activity;
- receive a relevant professional restriction;
- lose a required qualification;
- lose relevant insurance;
- become disqualified from driving where driving forms part of the role;
- experience a health or capability change affecting safe performance;
- or become aware of another matter that may affect suitability.

Disclosure does not automatically result in suspension or dismissal.

KRMA will assess the information fairly and proportionately.

27.2 Annual suitability declaration

People undertaking positions of trust may be required to complete an annual declaration confirming:

- relevant personal details remain accurate;
- no undisclosed suitability change has occurred;
- required qualifications remain valid;
- insurance remains current where applicable;
- they have read current safeguarding updates;

- conflicts of interest have been declared;
- and they remain willing to comply with the Staff Code of Conduct.

Knowingly providing false information may be treated as serious misconduct.

27.3 DBS Update Service monitoring

Where a person is subscribed to the DBS Update Service, KRMA may conduct periodic status checks where:

- the person has provided consent;
- KRMA remains legally entitled to the check;
- the certificate is at the correct level and workforce;
- and the original certificate has been viewed.

The Update Service does not automatically notify an organisation of changes. Employers must undertake periodic checks with the individual's consent.

A status check must stop when:

- the person leaves;
- consent is withdrawn;
- the role is no longer eligible;
- or KRMA no longer has a legitimate reason to conduct it.

27.4 Periodic DBS review

A DBS certificate has no official expiry date; it records information available at the time it was issued.

KRMA will therefore review DBS status according to:

- role risk;
- Update Service membership;
- regulatory or contractual expectations;
- insurer requirements;
- changes in duties;

- gaps in service;
- and any concerns arising.

For regular child-facing roles not monitored through the Update Service, KRMA's normal internal standard will be to consider a new eligible DBS check at least every three years.

This is an organisational safeguarding standard rather than a universal statutory expiry period.

27.5 Changes in role

A new check or suitability review may be required where a person:

- moves from supervised to unsupervised duties;
- begins regulated activity;
- adds transport responsibilities;
- begins overnight work;
- gains access to adults at risk;
- changes workforce;
- becomes a manager of regulated activity;
- or takes on substantially different responsibilities.

An existing check must not automatically be assumed to cover every future role.

27.6 Supervision and appraisal

Ongoing suitability should be supported through:

- supervision;
- appraisals;
- coaching observations;
- training reviews;
- feedback;
- low-level concern reporting;

- complaints;
- attendance and reliability monitoring;
- and review of conduct.

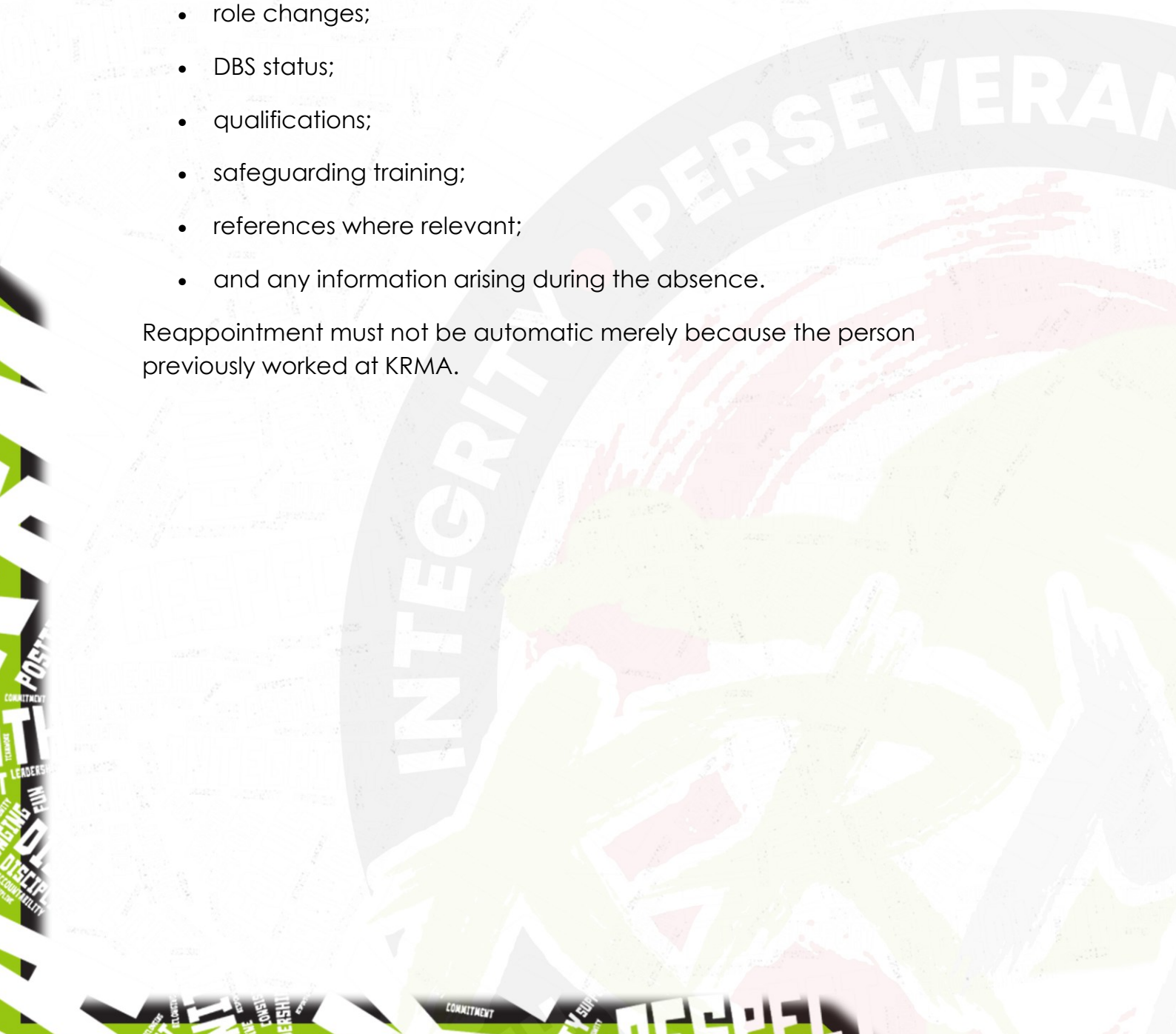
A person's technical ability must not prevent concerns about boundaries or safeguarding being addressed.

27.7 Breaks in service

Where a person returns after a significant break, KRMA should review:

- elapsed time;
- reason for leaving;
- role changes;
- DBS status;
- qualifications;
- safeguarding training;
- references where relevant;
- and any information arising during the absence.

Reappointment must not be automatic merely because the person previously worked at KRMA.



28. Allegations, Suspension and Role Restrictions

Concerns arising after appointment must be managed under KRMA's safeguarding and conduct procedures.

28.1 Immediate reporting

Concerns about an adult's conduct must be reported promptly to:

- the Designated Safeguarding Lead;
- the Deputy Designated Safeguarding Lead;
- or another appropriate safeguarding authority where either safeguarding lead is implicated.

Immediate danger requires a **999** call.

28.2 Immediate safeguards

KRMA may introduce precautionary arrangements including:

- increased supervision;
- removal of one-to-one contact;
- restricted communication;
- removal from transport;
- reassignment;
- exclusion from a specific venue;
- temporary removal from regulated activity;
- suspension;
- or ending access to systems and records.

The purpose is to protect participants and preserve the integrity of the process.

A precautionary restriction is not a finding of guilt.

28.3 Suspension

Suspension should not be automatic.

It may be considered where:

- children or adults at risk may remain in danger;
- the allegation is serious;
- evidence could be compromised;
- the person's presence may interfere with enquiries;
- suitable alternative duties cannot manage the risk;
- or external safeguarding advice supports suspension.

The decision and reasons must be recorded and reviewed.

28.4 Investigation

KRMA must not conduct actions that could compromise:

- police enquiries;
- children's social care enquiries;
- Local Authority Designated Officer processes;
- or another statutory investigation.

Internal enquiries should be coordinated appropriately.

The person who is the subject of the concern must not:

- contact the child privately;
- approach witnesses;
- pressure a reporter;
- delete information;
- or conduct their own investigation.

28.5 Resignation or withdrawal

An individual's:

- resignation;
- retirement;
- departure;

- withdrawal from volunteering;
- refusal to cooperate;
- or expiry of contract

must not prevent KRMA from:

- completing necessary safeguarding enquiries;
- recording findings;
- sharing information lawfully;
- considering a DBS referral;
- or cooperating with statutory agencies.

28.6 Support and fairness

KRMA should provide appropriate support to:

- the child or adult affected;
- the person reporting the concern;
- witnesses;
- other staff;
- and the person who is the subject of the allegation.

Support for an accused person must not involve:

- disclosing confidential information improperly;
- discrediting the reporter;
- contacting the child;
- or interfering with the investigation.

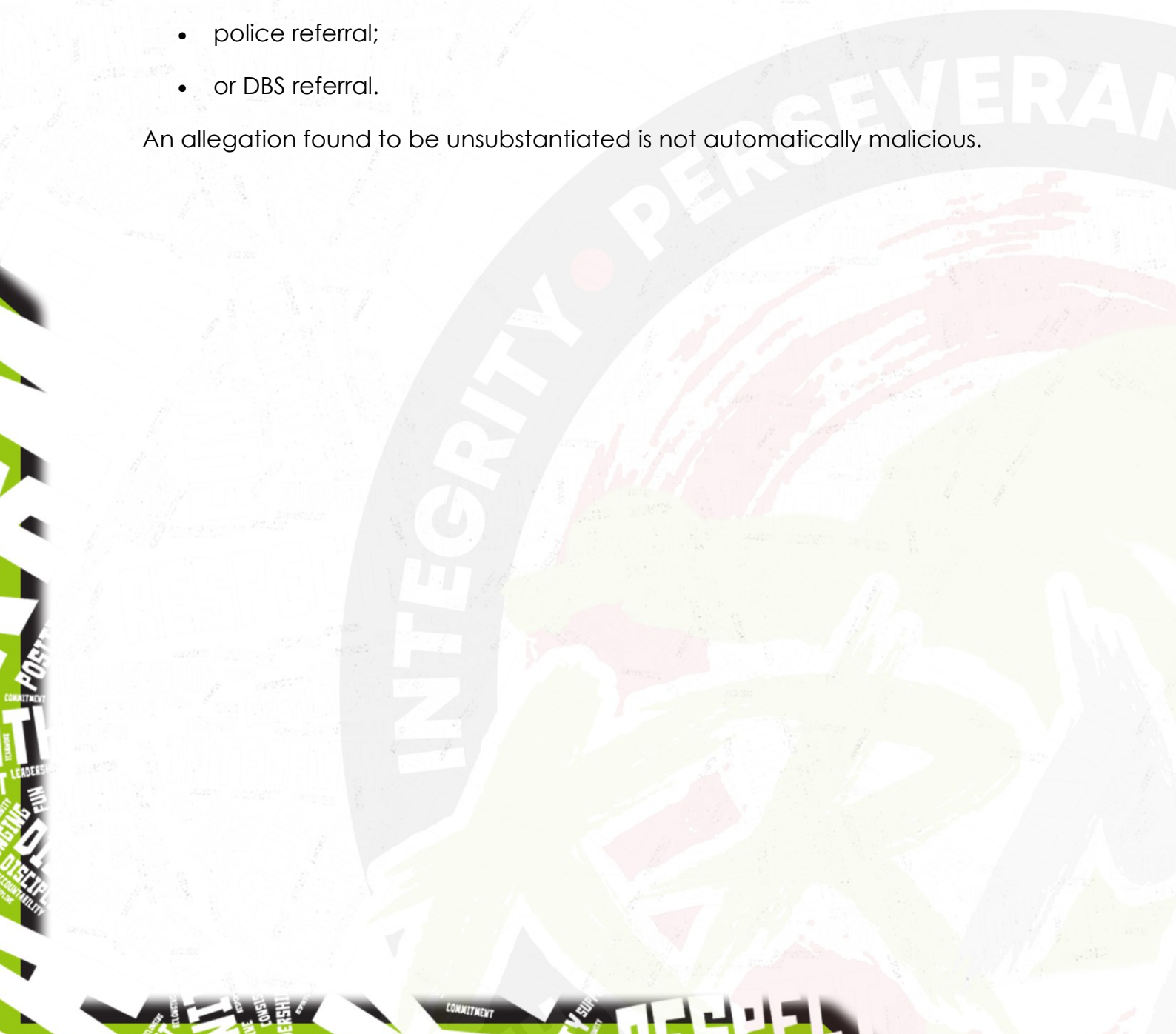
28.7 Outcome and future suitability

Possible outcomes may include:

- no further action;
- guidance;

- additional training;
- supervision;
- formal warning;
- role restrictions;
- redeployment;
- dismissal;
- termination of volunteering;
- referral to a professional body;
- safeguarding referral;
- police referral;
- or DBS referral.

An allegation found to be unsubstantiated is not automatically malicious.



29. Duty to Refer to the Disclosure and Barring Service

KRMA will comply with its legal duties as a regulated activity provider.

A DBS referral is separate from:

- a police report;
- referral to children's social care;
- Local Authority Designated Officer involvement;
- disciplinary proceedings;
- or referral to a professional body.

Making one type of referral does not automatically remove the need to consider another.

29.1 Legal referral conditions

A legal duty to refer will normally arise where both of the following conditions are met:

1. KRMA removes the person from regulated activity, or would have removed them had they not resigned, retired, been redeployed or otherwise left; and
2. KRMA considers that the person engaged in relevant conduct, satisfied the harm test or received a caution or conviction for a relevant offence.

Official DBS guidance confirms that regulated activity providers must refer where the legal conditions are met, including where the person left before they could be removed.

29.2 Relevant conduct and harm

Relevant conduct may include an action or failure to act that:

- harmed a child or adult at risk;
- placed them at risk of harm;
- involved sexual, physical, emotional or financial harm;
- involved neglect;

- or otherwise demonstrated relevant safeguarding risk.

The harm test may be satisfied where credible evidence indicates that the person may harm or place a child or adult at risk, even where the alleged conduct has not yet caused actual harm.

29.3 Timing of referral

A referral should normally be made once KRMA has:

- investigated appropriately;
- gathered sufficient evidence;
- concluded the relevant internal process;
- and established that the legal conditions are met.

Temporary suspension alone may not trigger the referral duty.

However, resignation or the passage of time does not remove the duty once the conditions are established.

29.4 Other agencies

The legal duty applies even where KRMA has also reported the matter to:

- police;
- the local authority;
- a safeguarding team;
- or a professional regulator.

KRMA must not assume that another agency will make the DBS referral on its behalf.

29.5 Power to refer

Where the strict legal duty is not met, KRMA may still have the power to supply relevant safeguarding information to DBS.

Before making a discretionary referral, KRMA should consider:

- credibility;
- relevance;

- proportionality;
- data protection;
- safeguarding advice;
- and legal advice where appropriate.

29.6 Referral responsibility

The CEO and Chief Instructor, supported by the DSL and appropriate advisers, will ensure that:

- the referral threshold is considered;
- evidence is preserved;
- required information is supplied;
- relevant agencies are consulted;
- and the decision is recorded.

A person who is the subject of a referral should normally be treated fairly and informed where appropriate, unless disclosure could create risk or conflict with statutory advice.

30. Training, Monitoring and Policy Review

30.1 Safer recruitment training

People leading recruitment for significant child-facing roles should receive suitable training or briefing covering:

- safeguarding;
- role assessment;
- DBS eligibility;
- regulated activity;
- fair shortlisting;
- lawful interview questions;
- references;
- criminal-record information;
- reasonable adjustments;
- professional boundaries;
- and referral responsibilities.

At least one suitably knowledgeable person should be involved in major child-facing appointments wherever reasonably practicable.

30.2 Recruitment checklist

KRMA should use a standard checklist to confirm, where applicable:

- role approval;
- role description;
- DBS eligibility;
- advertisement;
- application;
- shortlisting;
- interview;

- safeguarding questions;
- practical assessment;
- identity;
- right to work;
- references;
- qualifications;
- DBS;
- overseas checks;
- risk assessment;
- conditional offer;
- Code of Conduct;
- induction;
- training;
- probation;
- and final authorisation.

No person should be assumed to be cleared merely because one individual check has been completed.

30.3 Audit and monitoring

KRMA will periodically review:

- recruitment files;
- central records;
- DBS status;
- expired qualifications;
- safeguarding training;
- annual declarations;
- probation records;

- role restrictions;
- volunteer duties;
- contractor assurances;
- and outstanding actions.

30.4 Lessons from concerns

Recruitment processes should be reviewed after:

- a safeguarding allegation;
- serious low-level concern;
- disciplinary finding;
- DBS referral;
- false qualification claim;
- identity concern;
- recruitment complaint;
- data breach;
- or evidence that recruitment safeguards were bypassed.

The purpose is to identify:

- missed warning signs;
- weaknesses;
- training needs;
- unclear accountability;
- and improvements required.

30.5 Policy review

This policy will be reviewed:

- at least annually;
- following significant changes to DBS law or guidance;

- following changes to regulated activity;
- after a serious safeguarding incident;
- following changes to recruitment practice;
- before introducing substantially new staffing models;
- or whenever KRMA considers review necessary.

Safer Recruitment Appointment Summary

Before a person begins unrestricted child-facing duties, KRMA should be able to confirm:

1. The role and responsibilities are clear.
2. DBS eligibility has been assessed correctly.
3. A complete application and history have been reviewed.
4. Shortlisting and interview were recorded.
5. Safeguarding suitability was explored.
6. Any practical assessment was supervised.
7. Identity was verified.
8. Right to work was confirmed where required.
9. References were obtained and checked.
10. Qualifications were verified.
11. The appropriate DBS and barred-list checks were completed.
12. Overseas checks were considered.
13. Disclosed information was assessed fairly.
14. The Code of Conduct was signed.
15. Induction and supervision were arranged.
16. A suitable person authorised the appointment.

Policy Approval

Policy title: Safer Recruitment & Ongoing Suitability Policy

Organisation: Koku-Ryu Martial Arts

Version: 2.0

Policy owner: CEO and Chief Instructor

Safeguarding responsibility: Designated Safeguarding Lead

Designated Safeguarding Lead: Kayleigh Humphreys

Deputy Designated Safeguarding Lead: Andrew Banks

Approved by: Andrew Banks – CEO and Chief Instructor

Effective date: 14 July 2026

Next review date: 14 July 2027

Organisational Commitment

Koku-Ryu Martial Arts recognises that safe recruitment is one of the foundations of effective safeguarding.

No person will be considered suitable solely because of:

- reputation;
- friendship;
- rank;
- achievement;
- length of service;
- or a clear DBS certificate.

KRMA will use a combination of:

- careful recruitment;
- appropriate checks;
- clear expectations;
- training;
- supervision;
- reporting;
- and continuing suitability review

to reduce the risk of unsuitable people gaining or retaining positions of trust.

Every person appointed by KRMA is expected to understand that safeguarding responsibility continues throughout their role.

