ORIGINAL
COLLECTION

POLICY

SAFEGUARDING, SAFER RECRUITMENT, DBS & PVG POLICY

1. PURPOSE

At Original Collection, we believe everyone has the right to feel safe, respected and treated with dignity.

We are committed to creating safe hotels and workplaces for our colleagues, guests, visitors and the communities in which we operate. We recognise that, as a hospitality business, we may come into contact with children, young people, vulnerable adults and people who may be at risk of abuse, exploitation or harm.

This policy explains how we safeguard people, recruit safely, use Disclosure and Barring Service (DBS) and Protecting Vulnerable Groups (PVG) checks where appropriate, and handle criminal record information responsibly.

Safeguarding is everyone's responsibility.

2. SCOPE

This policy applies to:

- all employees;
- workers and casual team members;
- apprentices;
- agency workers;
- volunteers;
- contractors;
- anyone recruiting on behalf of Original Collection.

3. OUR COMMITMENT

Original Collection is committed to:

- providing a safe environment for colleagues, guests and visitors;
- protecting children and vulnerable adults who come into contact with our business;
- protecting young workers and employees living in Company accommodation;
- recruiting fairly and safely;
- complying with safeguarding legislation and DBS/PVG requirements;
- treating criminal record information fairly and confidentially;
- encouraging colleagues to raise concerns without fear.

4. SAFEGUARDING

Safeguarding means protecting people from abuse, neglect, exploitation or harm.

This may include:

- children and young people;
- vulnerable adults;
- colleagues;
- guests;
- contractors;
- visitors.

Examples include:

- physical abuse;
- emotional abuse;
- sexual abuse or harassment;
- domestic abuse;
- financial abuse;
- neglect;
- coercive or controlling behaviour;
- modern slavery;
- human trafficking;
- criminal exploitation.

You are not expected to investigate concerns. If something doesn't feel right, report it.

5. EVERYONE'S RESPONSIBILITIES

Every colleague is expected to:

- help create a safe environment;
- treat everyone with dignity and respect;
- remain alert to safeguarding concerns;
- report concerns immediately;
- complete safeguarding training where required;
- cooperate with investigations where appropriate.

Managers have additional responsibility for ensuring concerns are acted upon promptly and escalated where necessary.

The Director of People & Growth is Original Collection's Group Designated Safeguarding Officer (Group DSO) and Designated Child Protection Lead (DCPL) and has overall responsibility for safeguarding arrangements across the Company.

Each hotel will appoint a Local Safeguarding Lead to act as a local point of contact and support the Group DSO.

Current names and contact details are provided in the Employee Handbook and displayed or otherwise made accessible within each hotel.

6. REPORTING CONCERNS

If you believe someone may be at risk, report the concern immediately:

- to your manager, the relevant Local Safeguarding Lead, the Group DSO or the People Team;
- if the concern involves one of those individuals, to another safeguarding lead, the Managing Director or another member of the Executive Team;
- you may also contact the police, local authority safeguarding services or another appropriate statutory agency directly. If someone is in immediate danger, contact the emergency services first.

You never need proof before raising a concern.

We would always rather investigate a genuine concern than miss an opportunity to protect someone.

No employee will suffer detriment for raising a safeguarding concern in good faith.

7. SAFER RECRUITMENT

Recruitment is one of the most important ways we safeguard our colleagues and guests.

Original Collection recruits fairly, consistently and on merit while taking reasonable steps to ensure people are suitable for the roles they undertake.

Our recruitment process may include:

- right to work checks;
- identity verification;
- employment references;
- qualification checks;
- driving licence checks where relevant;
- DBS or PVG checks where appropriate;
- health declarations where legally appropriate;
- paid trial shifts where suitable.

We encourage internal career progression and will always recruit without unlawful discrimination.

Where a role involves safeguarding responsibilities or working with vulnerable people, additional checks may be required.

8. DBS & PVG CHECKS AND RENEWALS

Some roles within Original Collection require a DBS check in England and Wales. In Scotland, individuals carrying out regulated roles must hold the appropriate PVG scheme membership.

The level of check will depend on the duties of the role and current legislation.

A DBS or PVG check will only be requested where it is lawful, proportionate and relevant.

Where a check is required, applicants will be informed during the recruitment process.

Having a criminal record does not automatically prevent someone from working for Original Collection.

Each case will be considered individually, taking into account:

- the nature of the offence;
- how long ago it occurred;
- its relevance to the role;
- evidence of rehabilitation;
- our duty to protect colleagues and guests.

DBS rechecks

DBS certificates do not have an official expiry date. As a Company safeguarding measure, colleagues in roles requiring a DBS check will normally undergo a new check, or an appropriate DBS Update Service status check, at least every three years.

An earlier role-eligibility review, Update Service status check or new DBS application may be required where:

- the employee's role or duties change and this affects DBS eligibility, workforce, level or barred-list requirements;
- the Company receives information giving rise to a safeguarding or suitability concern;
- an Update Service status check indicates that the certificate is no longer current;
- there is a relevant break in service; or
- legislation, regulation or a contractual requirement requires another check.

Update Service status checks will only be undertaken with the individual's consent and where Original Collection is legally entitled to obtain the same level and type of information. A new DBS application will be required where an existing certificate is no longer current or is not appropriate for the role.

PVG scheme membership

PVG scheme membership, disclosure applications and renewals will be managed in accordance with current Disclosure Scotland requirements, including applicable five-year membership renewal arrangements. The Company's three-year DBS rechecking cycle does not replace PVG scheme requirements.

9. HANDLING DBS CERTIFICATE INFORMATION

Original Collection complies with the DBS Code of Practice and all applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

DBS certificate information is treated as highly confidential.

We will:

- only use DBS information for the purpose for which it was obtained;
- restrict access to those who genuinely need it;
- store information securely;
- never share information without lawful authority;
- protect certificate information from unauthorised access.

Original Collection does not keep copies or images of DBS certificates once a recruitment decision has been made.

We may retain a record of:

- the individual's name;
- the type and level of check;
- certificate reference number;
- issue date;
- recruitment decision.

Where information needs to be retained, this will normally be for no longer than six months before being securely destroyed, unless legislation or a lawful reason requires otherwise.

10. CONFIDENTIALITY

Safeguarding concerns and DBS information will be handled sensitively and confidentially.

Information will only be shared where necessary:

- to protect someone from harm;
- to comply with the law;
- to support safeguarding investigations;
- to fulfil employment obligations.

11. TRAINING

Employees will receive safeguarding awareness appropriate to their role. Managers and those involved in recruitment will receive additional training on:

- safer recruitment;
- DBS/PVG requirements;
- recognising safeguarding concerns;
- reporting procedures.

12. MONITORING

The Director of People & Growth, as Group DSO and DCPL, is responsible for the Company's overall safeguarding arrangements, maintaining this policy and reviewing it at least annually to ensure compliance with legislation and best practice.

Managers are responsible for applying the policy consistently and seeking advice where needed.

13. RELATED DOCUMENTS

This policy should be read alongside:

- Employee Handbook
- Recruitment policy
- Equality, inclusion & respect policy
- Dignity at work, anti-harassment & sexual harassment policy
- Health & safety policy
- Speak up (whistleblowing) policy
- Data protection policy
- Employee guest room access policy
- Lone working policy
- Drugs, alcohol & fitness for work policy