



THAMES LEARNING TRUST

Name of Policy	Disclosure and Barring Checks (DBS) Policy
Scope of Policy	This policy relates to all academies across TLT.
Approved by	CEO
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Review period	Annually
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GROWING STRONGER TOGETHER



THAMES LEARNING TRUST

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1. Introduction

1.1 Thames Learning Trust (TLT) is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment and effective vetting help deter unsuitable applicants and support safe practice.

1.2 This policy sets Trust-wide expectations for DBS checks and associated safeguarding suitability checks for employees, trustees, members, governors/committee members, volunteers, contractors and agency workers.

1.3 DBS checks form one part of a wider safer recruitment process. They do not guarantee an individual is suitable to work with children; ongoing supervision, induction, training, culture and professional curiosity remain essential.

2. Key legislation and statutory guidance

This policy operates within the framework of:

- Keeping Children Safe in Education (KCSIE) (from 1 September 2025, and subsequent updates).
- Academy Trust Handbook 2025 (effective from 1 September 2025) – including requirements for section 128 directions for trust members.
- Police Act 1997 and the Safeguarding Vulnerable Groups Act 2006 (as amended).
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended).
- UK GDPR and Data Protection Act 2018 (including handling of criminal offence data).
- DBS Code of Practice and DBS guidance (including Update Service rules).

3. TLT policy statement and principles

3.1 TLT will:

- Obtain the appropriate level of DBS check for roles that are eligible and where required by law and statutory guidance.
- Where former members of staff have had a break in service in more than three months; a new enhanced DBS check with CBL must be completed.
- Carry out barred list information checks where roles involve regulated activity and where the law/statutory guidance requires this.
- Apply additional checks proportionate to the role and context (e.g., overseas checks, professional regulation checks, section 128 directions).
- Ensure decisions are consistent, fair, and defensible, based on safeguarding risk and statutory guidance.
- Handle DBS information securely and lawfully, limiting access and retention.

3.2 TLT will not request DBS checks at a higher level than the role is legally eligible for.

3.3 Trust renewal position: TLT will renew DBS checks every five years as an additional safeguarding assurance measure. This does not replace the need for earlier action where concerns arise or where a role change triggers a different level of check or barred list information requirement.

4. Determining the correct level of check

4.1 The level of DBS check must match the role's legal eligibility and duties. In schools, eligibility typically falls into:

- Enhanced DBS check (with children's barred list information) – where the role involves regulated activity with children.
- Standard or Basic DBS checks – only where the role is eligible and does not involve work with children in a school setting (rare in academy environments).

4.2 Regulated activity is defined in law and explained in KCSIE (including the annex on supervision of regulated activity). Head of Safeguarding will determine eligibility and record the rationale where needed.

5. Pre-employment checks and identity verification

5.1 All appointments are conditional upon completion of safer recruitment checks, which may include (as applicable):

- Identity verification (including right to work).
- DBS check at the appropriate level.
- Barred list information check where required.
- Two satisfactory references, including the most recent employer, with scrutiny for safeguarding concerns.
- Professional regulation checks (e.g., teacher prohibition checks and any relevant sanctions) where applicable.
- Overseas checks where an applicant has lived/worked abroad (see section 14).
- Pre Employment Medical
- Social Media Check
- Verification of Qualifications (where required)
- Proof of past conduct by professional regulation authority of the country (overseas teachers)

5.2 Identity and DBS: the Trust will verify identity in line with DBS requirements and ensure the DBS certificate name and date of birth match the individual presenting for work.

6. Legal Position

6.1 Safeguarding Vulnerable Groups Act 2006

This provided the legislative framework for a Vetting and Barring scheme, it also brought in the requirement for two separate but aligned barred lists, the provision for ISA (now DBS) to make decisions around individuals that should be barred from working with vulnerable groups, outlined monitoring arrangements and proposed two types of activities where CRB (now DBS) checks would be required which were for controlled and regulated activity.

Protection of Freedoms Act 2012

This act includes the restriction of the scope of the 'vetting and barring' scheme for protecting vulnerable groups and makes changes to the system of criminal records checks. As a result the Safeguarding Vulnerable Groups Act 2006 will be amended by this act and the major changes were:

- A new definition of regulated activity
- The repeal of controlled activity
- The repeal of registration and continuous monitoring
- The introduction of a minimum age of 16 at which someone can apply for a DBS check
- Only posts which meet the definition of regulated activity can have an enhanced DBS check with barred list check
- Establishing the Disclosure and Barring Service (DBS) as a merger of the functions of the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) as a non-department public body sponsored by the Home Office

6.2. Legal requirements of the DBS

All staff on the Trust's payroll, whether supervised or not remain in regulated activity and checks on these individuals should continue in the same way. This includes cleaners and caretakers working in schools.

Enhanced DBS checks can be obtained where a post or situation meets the criteria outlined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006. Where reference is made to this check throughout this policy this criteria will need to be met.

It is still an offence for an employer to engage in regulated activity someone whom they know has been barred by the DBS

A person who is barred by the DBS from working in regulated activity will be breaking the law if they work or volunteer, or try to work or volunteer in regulated activity.

If the school provides regulated activity and dismisses a member of staff or a volunteer because they have harmed, or posed a risk of harm to a child or vulnerable adult, or the school would have dismissed if they had not left, the school must refer this information to the DBS.

Police may use common law powers to provide information directly to employers in cases where this is necessary, for example to prevent harm to others. Where information is disclosed from the police using their common powers this must not be fed back to the candidate(s). Discussions must take place and an agreement reached with the police in terms of the information that will be provided to the candidate to ensure current police investigations are not compromised

7. Use of the DBS Update Service and status checks

7.1 The DBS Update Service enables registered individuals to keep a DBS certificate up to date and allows employers to carry out online status checks.

7.2 Subscription is optional; where used, the individual must subscribe within the DBS timescale (currently within 30 days of the certificate being issued). The current annual subscription fee is set by DBS (currently £16 per year for paid applicants; free for eligible volunteers).

7.3 Where an individual is subscribed and gives consent, TLT may conduct an Update Service status check. A status check can be used to support portability of a certificate only where:

- The certificate level matches the role (including barred list where needed).
- The workforce is correct (children's workforce for school roles).
- The status check confirms no change to the information.

7.4 When an individual is on the update service, the original DBS certificate needs to be viewed to ensure it includes the CBL (Child Barred List) check; as this is not confirmed on the update service check outcome.

7.5 The individual's original DBS certificate must also be checked to ensure that the name on the certificate matches the identity of the individual and ensure that it is the same level of check.

7.5 If the individual is not subscribed, or the status check indicates a change, a new DBS application will be required.

8. Recording checks and the Single Central Record (SCR) (Trust-wide)

8.1 Each academy must maintain an accurate SCR in line with KCSIE. For TLT, the SCR must be maintained in a way that enables academy-specific information to be produced separately and without delay.

8.2 The SCR will record, as applicable:

- Identity check date, right to work, qualification checks (where required).
- DBS certificate number and date, and the check level (and barred list where applicable).
- Barred list information check (if carried out separately).
- Prohibition check (teachers) and section 128 direction checks for relevant roles.
- Overseas checks where applicable (and dates).
- For agency staff: written confirmation received from the agency and identity verification on arrival.
- Proof of past conduct for overseas teachers where applicable (including dates)

8.3 The CEO will conduct SCR audits across the Trust with either HR or SCR holders in each school. These take place each term within an academic year.

9. Deployment and supervision

9.1 Deployment decisions must consider safeguarding risk, competence and supervision requirements, not only vetting status.

9.2 Individuals who have not completed the full suite of required checks must not be deployed into unsupervised regulated activity with children.

10. Supply staff and agency workers

10.1 Agency supply staff

11.1.1 Where staff are supplied by an agency, the agency is responsible for completing the required recruitment checks, including the appropriate DBS check and (where relevant) barred list information.

11.1.2 The Trust must obtain written notification from the agency that the required checks have been completed and are satisfactory. The academy must verify the person's identity on arrival.

11.1.3 The Trust does not routinely require a copy of the DBS certificate. A copy is only required where the DBS certificate contains disclosed information, and the agency has confirmed it has seen and assessed the content.

11. Volunteers

12.1 Volunteers can enrich learning and wider provision. Volunteer roles must be defined and supervised appropriately.

12.3 All volunteers must have the enhanced DBS check including barred list information.

12.4 Volunteers must be briefed on safeguarding expectations, professional boundaries, reporting routes, confidentiality and the staff code of conduct.

12. Contractors

12.1 TLT expects contractors and their staff to operate to appropriate safeguarding standards. The Trust will set safeguarding requirements through procurement/contracting arrangements.

12.2 Contractors who work regularly or unsupervised in school settings, or who may have contact with children, must have the appropriate DBS checks for their roles. Evidence requirements must include written confirmation of checks, a vetting statement.

12.3 Site controls must include sign-in/out, visible identification/badging, site rules, and supervision arrangements appropriate to the work location and presence of pupils.

13. Overseas applicants

13.1 TLT may recruit individuals who have lived or worked outside the UK. The Trust must still obtain the appropriate DBS check for the role in England, even where the individual has not previously lived in the UK.

13.2 In addition, the Trust will take additional steps as appropriate, which includes:

- Overseas criminal record checks / certificate of good conduct from relevant countries.
- Checks with professional regulating authorities (where applicable).

- Additional references and verification of employment history.
- A documented risk assessment where checks cannot be obtained (with Principal/Chair of Trustees approval).

13.3 All decisions must be documented with rationale and retained in line with data protection requirements.

14. Early Career Teachers (ECTs) and ITT/placement students

14.1 ECTs are subject to the same safer recruitment requirements as other staff, including DBS and prohibition checks as applicable.

14.2 For trainees/placement students, TLT will follow statutory guidance and partner provider agreements. The Trust must obtain written confirmation of vetting checks from the provider and verify identity on arrival.

15. Invigilators

15.1 By the very nature of examinations, there will necessarily be a gap in excess of three months between them. Provided that an enhanced DBS check with barred list check was obtained when the Invigilator was first employed, together with all the other pre-employment checks listed above, we can reasonably advise that where an Invigilator is used regularly by the schools, it will not be necessary to seek further DBS disclosures each time the Invigilator is subsequently used.

15.2 However, a check of the DBS children's barred list must be undertaken on each occasion the Invigilator is used. Schools are to use the DBS Update Service to check the invigilator's certificate is still current. The invigilator must be subscribed to the DBS Update Service and have given the school permission to undertake the check and the level of check required must be the same as the original check (the original DBS certificate must also be viewed).

15.3 Where an invigilator has failed to subscribe to the DBS update service or renew their DBS subscription on an annual basis; they must complete a DBS declaration form confirming there are no changes in their circumstances.

16. Trustees, members and committee members (including section 128)

16.1 TLT will ensure that safeguarding checks for governance roles comply with KCSIE and the Academy Trust Handbook 2025.

16.2 DBS: TLT will obtain enhanced DBS checks for:

- Academy trust members.
- Charity trustees (trustees).
- The chair of trustees.
- Strategic Ambassadors

16.3 Section 128 directions:

- TLT must ensure that its members are not subject to a section 128 direction (prohibiting participation in academy trust management).
- TLT will obtain and record section 128 checks for relevant governance roles and for staff in management positions where required by statutory guidance.

16.4 All governance checks must be recorded appropriately (including on the SCR where required) and reviewed during governance onboarding and annual compliance checks.

17. Educational visits and transport arrangements

17.1 DBS checks alone are not sufficient to determine suitability for visits. Visit planning must follow the Trust Educational Visits policy and safeguarding procedures.

17.2 Where adults are engaged to transport pupils (including regular volunteer drivers), the academy must determine whether the role is eligible for DBS and ensure appropriate safeguards and supervision.

18. Storage, retention, access and disposal of DBS information

18.1 TLT will handle DBS information in line with the DBS Code of Practice and UK GDPR/DPA 2018. DBS certificates are the property of the individual and must not be photocopied or retained routinely.

18.2 Where it is necessary to retain a copy (e.g., to evidence a decision based on disclosed information), retention must be strictly limited and normally must not exceed 6 months, with access restricted to authorised personnel.

18.3 The Trust will keep only the minimum record required to evidence that a check was completed (e.g., certificate number/date and decision record) once any temporary copy is securely disposed of.

18.4 Criminal offence data is sensitive. Access is restricted to those with a clear business need (normally HR and designated senior leaders as required).

19. DBS referrals and safeguarding allegations

19.1 TLT has a legal duty to make a DBS referral in relevant circumstances, including where an individual is removed from regulated activity (or would have been removed had they not left) because they harmed a child or posed a risk of harm.

19.2 Allegations or concerns about staff, volunteers, contractors and supply staff must be managed in line with the Trust policy on allegations against staff and KCSIE Part 4. HR and the Designated Safeguarding Lead (DSL) must be involved as appropriate.

19.3 Decisions and referrals must be documented and retained securely.

20. Monitoring, audit and review

20.1 The Trust will monitor compliance through:

- SCR sampling and internal audits (Trust-wide).
- Safeguarding Audits.
- Review of any incidents, near misses or learning from allegations.

20.2 This policy will be reviewed annually and sooner if statutory guidance, DBS requirements or Trust arrangements change.

Appendix A – Quick reference: who needs what check (summary table)

Role/Group	Typical check (subject to eligibility)	Barred list?	Notes
Teachers and all support staff	Enhanced DBS	Yes	Determine regulated activity and supervision; prohibition check for teachers where applicable.
Support staff with supervised contact only	Enhanced DBS (if eligible)	Yes	Role must be assessed; do not request barred list unless role is regulated activity.
Agency supply staff	Agency obtains Enhanced DBS	Yes	Trust gets written confirmation; verify identity; copy only if disclosure content.
Volunteers	Enhanced DBS	Yes	All volunteers are required to have a DBS regardless of role or supervision.
Contractors	Depends on role and access	Only if regulated activity	Set safeguarding clauses in contract; site controls and supervision.
Trust members / trustees / chair	Enhanced DBS	Yes	Plus section 128 direction checks; record appropriately.