



St. Lawrence Church of England

Primary School

DBS & SAFER RECRUITMENT POLICY

SEPTEMBER 2026

Approved by: David Oludotun Fasanya (Chair of Governors)

Last reviewed on: September 2026

Next review on: September 2027

1. PURPOSE & ETHOS

St. Lawrence Church of England Primary School is committed to safeguarding and promoting the welfare of every child. In keeping with our Christian vision, “Learning together, rooted in God”, we seek to ensure that adults appointed to work or volunteer in school are suitable, safe and equipped to uphold the dignity and wellbeing of all pupils.

This policy sets out the school’s arrangements for safer recruitment, Disclosure and Barring Service (DBS) checks, other pre-appointment vetting, the Single Central Record (SCR), ongoing suitability and statutory referrals. It should be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Managing Allegations and Low-Level Concerns procedures, Whistleblowing Policy, Data Protection Policy and relevant Lancashire County Council guidance.

2. LEGAL & STATUTORY FRAMEWORK

The school will have regard to current legislation and statutory guidance, including:

- Keeping Children Safe in Education (KCSIE) 2026, particularly Part Three: Safer Recruitment
- Education Act 2002 and School Staffing (England) Regulations 2009, as applicable to maintained schools
- Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026
- Rehabilitation of Offenders Act 1974 and Exceptions Order, as amended
- Childcare Act 2006 and Childcare (Disqualification) Regulations 2018
- Immigration, Asylum and Nationality Act 2006 and current right-to-work requirements
- UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025
- DBS Code of Practice and current DBS guidance
- Lancashire Safeguarding Children Partnership procedures and Lancashire County Council safer recruitment advice.

3. SCOPE

This policy applies to all recruitment and engagement of adults working in or on behalf of the school, including employees, supply and agency workers, volunteers, governors, contractors and self-employed workers, trainee/student teachers, placement students and other adults where safeguarding checks are required. Different legal requirements apply according to the role, frequency, supervision and whether the activity is regulated activity.

4. RESPONSIBILITIES

- The Governing Body is responsible for ensuring robust safer recruitment arrangements are in place and monitored.
- The Headteacher is responsible for implementing this policy, ensuring required checks are completed and that the SCR is accurate and reviewed.
- At least one person conducting an interview for a maintained school appointment will have completed appropriate safer recruitment training.
- All recruitment panel members must apply safer recruitment principles consistently and declare any conflicts of interest.

5. SAFER RECRUITMENT PROCESS

5.1 Planning, adverts and application information

- Job descriptions and person specifications will clearly identify safeguarding responsibilities and whether the post involves regulated activity with children.
- Adverts will state the school's commitment to safeguarding, that safeguarding checks will be undertaken, and whether the post is exempt from the Rehabilitation of Offenders Act 1974.
- Where a role involves regulated activity, applicant information will state that it is an offence for a barred person to apply for the role.
- Applicants will be given access to the school's Child Protection and Safeguarding Policy and policy/statement on the recruitment of ex-offenders.
- The school will use a full application form. A CV may accompany an application but will not be accepted on its own.

5.2 Shortlisting and online searches

- At least two people will shortlist wherever practicable, considering inconsistencies, employment gaps and potential safeguarding concerns.
- Only shortlisted candidates will be asked to complete an appropriate self-declaration relating to criminal history and other information relevant to suitability, in accordance with current filtering rules and KCSIE.
- As part of the school's due diligence, the school will consider carrying out an online search on shortlisted candidates. Candidates will be informed that such searches may be undertaken. The purpose of the search is to identify matters that may need to be explored with the candidate at interview; it is not intended to undertake intrusive investigation unrelated to suitability for the role.

5.3 References

- References will be sought before interview where possible and will be obtained directly from referees rather than accepted through the applicant.
- Open references will not be accepted. Current or most recent relevant employers will be approached, together with the last employer where the applicant worked with children where appropriate.
- References will be verified, discrepancies followed up, and vague or insufficient information clarified.
- Safeguarding information in references will be handled in line with KCSIE, including the proper treatment of substantiated allegations and low-level concerns.

5.4 Interview and selection

- Interviews will use structured questions and explore motivation for working with children, safeguarding understanding, professional boundaries, relevant experience, employment gaps and any areas of concern.
- Where appropriate, candidates may take part in a supervised activity involving pupils as part of the selection process.
- All safeguarding and suitability information considered in decision-making will be recorded appropriately.

6. PRE-APPOINTMENT CHECKS

All offers of employment are conditional on the satisfactory completion of all checks applicable to the role. The school will determine the correct level of check for each appointment and will not request information to which it is not legally entitled.

- identity, including current and previous names where relevant
- enhanced DBS check, with children's barred list information where the person will engage in regulated activity
- a separate children's barred list check only where legally permitted and required, for example where an eligible regulated-activity starter is awaiting the enhanced DBS certificate
- right to work in the UK
- mental and physical fitness to carry out the responsibilities of the role, in accordance with the law
- professional qualifications where required
- teacher prohibition and relevant historic restrictions for those carrying out teaching work
- appropriate checks for childcare disqualification where the role falls within the Childcare (Disqualification) Regulations 2018
- such further checks as the school considers appropriate where a person has lived or worked outside the UK.

The original physical DBS certificate will be checked against the individual's identity before the person takes up post, or as soon as practicable afterwards where KCSIE permits. Where the school uses the DBS Update Service, it will still inspect the original certificate and ensure the certificate is for the correct workforce and level of check.

7. REGULATED ACTIVITY & DBS LEVEL

The school will apply the statutory definition of regulated activity and the frequency/period conditions in force at the time. In broad terms, regulated activity includes relevant teaching, training, instructing, caring for or supervising children, providing certain advice or guidance, driving a vehicle solely for children, certain work in specified places such as schools, and specified personal care or health care. Relevant activity may constitute regulated activity where it is carried out frequently or where the applicable period condition is met, including activity on more than three days in a 30-day period or overnight.

8. STARTING WORK BEFORE A DBS CERTIFICATE IS RECEIVED

The normal expectation is that required vetting is complete before the person begins work. Exceptionally, where KCSIE permits a person to start regulated activity before the enhanced DBS certificate is available, the Headteacher may authorise this only after all other required pre-appointment checks have been completed, including an eligible separate children's barred list check, and a written risk assessment and appropriate supervision arrangements are in place. The decision and rationale will be recorded.

This exception does not apply to work within school provision covered by the EYFS requirements. Individuals and volunteers must not begin work within EYFS provision until the required enhanced DBS certificate including barred list information has been received.

9. DBS UPDATE SERVICE & REPEAT CHECKS

There is no general statutory requirement to renew DBS certificates at fixed intervals. The school will keep safeguarding suitability under review and may obtain a new DBS check where there is a legal or safeguarding reason to do so. The school may encourage or require eligible new staff or volunteers to subscribe to the DBS Update Service, subject to contractual arrangements and current DBS rules.

Before using the Update Service, the school will obtain the individual's consent, confirm identity, examine the original certificate, and ensure that its workforce and level are appropriate to the role.

10. VOLUNTEERS

Volunteer checks will be determined by the nature and frequency of the role and whether it constitutes regulated activity. The school will apply the changes to regulated activity reflected in KCSIE 2026.

From 1 September 2026, the previous supervision exemption for volunteers has been removed. Supervision by a member of staff does not, by itself, prevent a volunteer's activity from being regulated activity.

- A volunteer teaching, training, instructing or supervising children frequently, on more than three days in a 30-day period, or overnight will be treated as engaging in regulated activity and an enhanced DBS check with children's barred list information will be obtained.
- Existing volunteers who became regulated activity from 1 September 2026 because of legislative changes will have their children's barred list status checked in accordance with KCSIE 2026.
- A volunteer on whom no checks have been obtained will never be left unsupervised or permitted to undertake regulated activity.

- For volunteers who are not undertaking regulated activity, the school will undertake a written risk assessment and determine whether the role is eligible for an enhanced DBS check without children's barred list information. Any DBS check will only be requested where the school is legally entitled to obtain it.

11. GOVERNORS

As a maintained school, all governors will have an enhanced DBS check. Governance itself is not regulated activity, so a barred list check will only be undertaken where the governor separately engages in regulated activity. A section 128 check will also be undertaken for prospective governors because a person subject to such a direction is disqualified from being a governor of a maintained school.

12. AGENCY, SUPPLY & THIRD-PARTY STAFF

- Before a person works at the school, written confirmation will be obtained from the agency or third-party organisation that it has completed the checks the school would otherwise be required to undertake and has obtained the appropriate DBS certificate.
- Where required, the agency must have obtained children's barred list information before appointment.
- Where the agency DBS certificate disclosed information, the school will obtain a copy of that certificate as required by KCSIE.
- The school will verify the identity of the person who arrives for work against the person on whom the checks were completed.
- Relevant information and confirmation dates will be recorded on the SCR.

13. CONTRACTORS & SELF-EMPLOYED PERSONS

- Contracts will specify the school's safeguarding requirements.
- Contractors in regulated activity require an enhanced DBS check with children's barred list information.
- Contractors not in regulated activity but with opportunity for regular contact with children require an enhanced DBS check without barred list information, where eligible. The school will consider whether a basic DBS check is appropriate where there is no opportunity for regular contact.
- No unchecked contractor will work unsupervised or carry out regulated activity.
- The school will verify contractor identity on arrival.
- For a self-employed person, the school will obtain the appropriate DBS check or inspect an appropriate certificate where the individual is legally able to obtain one.

14. TRAINEE & STUDENT TEACHERS

- For salaried trainee teachers, the school will ensure that all necessary checks, including the appropriate enhanced DBS check with barred list information, are completed.
- For fee-funded trainee teachers, the training provider is responsible for the checks. The school will obtain written confirmation that the necessary pre-appointment checks have been completed and the trainee has been judged suitable to work with children.

15. VISITORS & VISITING PROFESSIONALS

- The school will not request DBS or barred list checks for ordinary visitors such as family members attending a school event.
- For professional visitors, the school will check identity and obtain appropriate assurance that relevant vetting has been completed. It will not routinely request to see a DBS certificate where the professional's employer has provided the necessary assurance.
- The Headteacher will use professional judgement to determine escort and supervision arrangements.

16. PEOPLE WHO HAVE LIVED OR WORKED OUTSIDE THE UK

An overseas history does not replace the checks required in England. The same core pre-appointment checks will be completed, including an enhanced DBS certificate where required. In addition, the school will make any further checks it considers appropriate so that relevant overseas events can be considered. This may include overseas criminal record information and, for teaching posts, information from the relevant professional regulating authority. Where such information is unavailable, the school will consider alternative checks and complete a documented risk assessment to support the appointment decision.

17. CHILDCARE DISQUALIFICATION

The school will apply the Childcare (Disqualification) Regulations 2018 and associated statutory guidance to staff who work in relevant early years provision, including reception, and relevant wraparound care for children up to the age of eight, and to those directly concerned in the management of that childcare. Appropriate declarations/checks will be obtained and recorded. Where a disqualification issue arises, the school will seek appropriate HR and regulatory advice and will not permit unlawful deployment.

18. SINGLE CENTRAL RECORD

The school will maintain an accurate Single Central Record in accordance with KCSIE 2026. It will cover all staff, including salaried trainee teachers, and agency and third-party supply staff, even where they work for only one day. The SCR will record whether the required checks have been carried out or certificates obtained, and the relevant dates.

- identity check
- standalone barred list check, where one has lawfully been undertaken
- enhanced DBS check and, where applicable, children's barred list information
- teacher prohibition check
- further checks for people who have lived or worked outside the UK
- professional qualifications where required
- right to work in the UK
- required agency/third-party assurances and dates.

The school may also record non-statutory information such as volunteer and governor checks, childcare disqualification information, safeguarding/safer recruitment training dates and the name of the person who completed each check. Details will be removed from the SCR when the individual no longer works at the school, in line with KCSIE.

19. HANDLING DBS CERTIFICATES & CRIMINAL RECORD INFORMATION

DBS information is sensitive personal data and will be handled securely, confidentially and in accordance with data protection law and the DBS Code of Practice. The school does not need to retain copies of DBS certificates in order to maintain the SCR. If a copy is retained, there must be a valid reason and it will not normally be kept for longer than six months. The school may retain a record that vetting was undertaken, the result and the recruitment decision, where lawful.

A criminal record or other information on a DBS certificate will not automatically prevent appointment. Relevant disclosures will be assessed fairly and individually, taking account of the seriousness and relevance of the matter, the passage of time, pattern or one-off nature, circumstances, the applicant's explanation and acceptance of responsibility, and, for teaching posts, relevant professional standards. Decisions and rationale will be recorded.

20. ONGOING SUITABILITY & REPORTING CONCERNS

Safer recruitment is not a one-off process. The school will maintain an open safeguarding culture in which concerns about the conduct or suitability of adults are reported promptly under the Child Protection and Safeguarding Policy, Staff Code of Conduct, Managing Allegations/Low-Level Concerns procedure and Whistleblowing Policy. Changes in circumstances relevant to suitability will be considered promptly and advice sought from Lancashire County Council HR, the Local Authority Designated Officer or other appropriate agencies where required.

21. REFERRALS TO THE DBS & TEACHING REGULATION AGENCY

The school recognises its legal duty to refer to the DBS where the statutory referral conditions are met, including where a person is removed from regulated activity, or would have been removed had they not left, because they harmed or posed a risk of harm to a child. Where relevant, the school will also consider referral to the Teaching Regulation Agency and will work with the LADO, police, children's social care and other agencies in accordance with statutory and local procedures.

22. ALTERNATIVE PROVISION & OTHER COMMISSIONED EDUCATION

Where the school places a pupil with an alternative provision provider, the school remains responsible for safeguarding that pupil. The school will obtain written information confirming that appropriate safeguarding checks have been carried out on people working at the provision and that the provider will notify the school of staffing or other changes that could place the child at risk. The school will carry out proportionate due diligence and review the placement in line with KCSIE and its safeguarding policy.

23. MONITORING, AUDIT & REVIEW

- The Headteacher and Governing Body will keep the effectiveness of safer recruitment arrangements under review.
- The SCR will be reviewed regularly, with any omissions or discrepancies addressed promptly.
- Recruitment documentation and risk assessments will be retained securely in accordance with the school's retention schedule and data protection requirements.
- This policy will be reviewed at least annually, and sooner following relevant legislative, KCSIE, DBS or Lancashire guidance changes, a safeguarding incident, or lessons from audit/review.

Appendix 1: Pre-appointment safer recruitment checklist

Check	Evidence / action
Application & selection	Completed application form; employment history/gaps explored; self-declaration at shortlisting; online search considered; interview safeguarding questions; references obtained and verified.
Identity	Identity verified, including name history where relevant.
DBS	Correct level determined; original certificate checked; barred list information obtained only where legally eligible.
Right to work	Current right-to-work check completed.
Qualifications/status	Qualifications verified; teacher prohibition and QTS/induction checks where applicable.
Overseas	Additional overseas checks/risk assessment where relevant.
Childcare	Childcare disqualification check/declaration where role is within scope.
Fitness	Role-related mental/physical fitness requirement addressed lawfully.
Agency/third party	Written assurance obtained and identity verified on arrival.
SCR	All required check outcomes/dates recorded before or as required on commencement.

Appendix 2: Key policy principle

A DBS certificate is one part of safer recruitment. Appointment decisions will always be based on the complete safeguarding picture, including robust application and selection procedures, verified references, identity and statutory checks, professional judgement, appropriate risk assessment and a continuing culture of vigilance after appointment.