Brontë Academy Trust
Great schools. Inspirational people. Strong foundations.

Bronte Academy Trust

DBS Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
Working Party	JB	4 March 19		4 March 21
DH	SC	14 Sep 21		14 Sep 22
DH	SC	8 Feb 22		8 Feb 23
DH	Trustees	13 July 24		13 July 25
DH	Trustees	15 July 25		15 July 26
DH	Trustees	28 Sep 26		28 Sep 27

CONTENTS:

Statement of intent

1. Legal framework
2. Definitions and DBS eligibility
3. Roles and responsibilities
4. Identity verification
5. Checks on staff and trainees
6. Governors / Trustees / Members
7. Volunteers
8. Visitors and contractors
9. Overseas checks and other settings
10. Certificate information and recruitment decisions
11. Referrals
12. Single Central Record
13. Data handling
14. Monitoring and review

Appendices

Recruitment of Ex-Offenders Statement

STATEMENT OF INTENT

Bronte Academy Trust (the Trust) safeguards pupils at Lees Primary, Haworth Primary, Oakworth Primary and Oldfield Primary through safer recruitment and appropriate ongoing checks. A DBS certificate is one part of a wider assessment; it does not establish suitability on its own.

This policy applies to employees, agency staff, trainees, governors, local committee members, trustees, members, volunteers, visitors and contractors as relevant to their duties. The Trust will request only the level of check for which the role is legally eligible. It will follow Keeping children safe in education 2026 (KCSIE), current DBS eligibility guidance and the DBS Code of Practice.

1 LEGAL FRAMEWORK

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Safeguarding Vulnerable Groups Act 2006
- Police Act 1997
- Rehabilitation of Offenders Act 1974 and Exceptions Order
- Education (Independent School Standards) Regulations 2014
- Childcare (Disqualification) Regulations 2018
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR

It should be read alongside current KCSIE, the Academy Trust Handbook, DBS guidance, and the Trust's Safer Recruitment, Child Protection and Safeguarding, Single Central Record, Data Protection, Records Management and Disciplinary policies.

Where guidance or law changes, the current requirement takes precedence over a description in this policy.

The responsible officer will update the policy promptly.

2 DEFINITIONS

A basic DBS check shows unspent convictions and conditional cautions. A standard check shows eligible convictions and cautions subject to filtering. An enhanced check adds relevant information held by police. An enhanced check with children's barred list information is available only for an eligible regulated activity role. The adults' barred list is requested only where the duties independently qualify as regulated activity with adults.

In schools, paid work with opportunity for contact with children is generally regulated activity where the statutory conditions are met. Teaching, training, instructing, caring for, supervising or advising children, or driving a vehicle solely for them, may be regulated activity when carried out frequently or overnight. Certain personal care and health care activities qualify regardless of frequency. The Trust will assess actual duties against current DBS guidance before applying.

Since 1 September 2026, supervision does not remove a volunteer who performs qualifying activity frequently or overnight from regulated activity. Work on more than three days in a 30-day period or overnight can meet the period condition; days volunteering across settings count. A volunteer on an overnight school trip is in regulated activity. Occasional supervised help on a day trip will ordinarily not meet this threshold. The Trust will document the role assessment.

3 ROLES AND RESPONSIBILITIES

The Trust Board is accountable for safeguarding arrangements and for ensuring the required checks are completed for trustees, members and those on local committees. It approves this policy and receives assurance on compliance.

The CEO oversees consistent application across the Trust. Headteachers ensure that duties and checks are assessed before people begin work at their school, certificates and identities are checked, and appropriate supervision and risk controls are in place.

The CFO coordinates checks and record keeping for Trust governance roles. The Governance Professional helps maintain governance records. The designated safeguarding lead is consulted on safeguarding concerns.

Access to disclosed information is restricted to those making the relevant decision.

4 IDENTITY VERIFICATION

Identity will be checked before a DBS application using the current DBS three route document process or an approved digital identity verification process. The checker will compare the applicant with photographic identity where available and verify names, addresses and other application details. A right to work check is a separate requirement for employees.

For manual document checks, the DBS guidance distinguishes the route used to select documents from the options used to view them. Physical documents are normally viewed in person. Where that is impracticable, the permitted alternative viewing options and the reasons for using them will be recorded. A video check is not “Route 3”. Physical originals must subsequently be checked where the DBS procedure requires this. eVisas and validated digital PASS cards may be viewed through their prescribed online services.

The Trust will retain a record of the identity documents checked for at least two years, including document type, issuing country, expiry and reference numbers, and any discrepancies, as required by DBS guidance.

Suspected false documents will be escalated and recruitment paused pending advice.

5 CHECKS ON STAFF AND TRAINEES

A conditional offer is subject to satisfactory pre appointment checks. Staff in regulated activity require an enhanced DBS certificate with children’s barred list information. Other roles will receive the check for which their duties are eligible; an enhanced or standard check must never be requested merely because it is preferred. The Trust also checks identity, right to work, qualifications where relevant, prohibition from teaching where relevant, references and other KCSIE requirements.

The original certificate must be seen and considered by the Trust. If a person is permitted to start regulated activity before the enhanced certificate arrives, a separate children’s barred list check must be completed first, all other checks completed, appropriate supervision put in place and a written risk assessment approved. A separate barred list check is a limited interim measure and does not replace the enhanced DBS certificate. The Trust will consider whether a fresh certificate is needed where KCSIE permits reliance on recent work in an English school or college.

A section 128 check is required for relevant management positions in an academy, including those specified in KCSIE. The Trust will determine applicability by role and record it. For staff within scope of the Childcare (Disqualification) Regulations 2018, the Trust will assess disqualification separately; a DBS check alone does not satisfy that requirement.

For agency and third party staff, the school will receive written confirmation that the supplying organisation has completed the checks the school would otherwise undertake and obtained the relevant certificates.

Where an enhanced certificate disclosed information, a copy will be obtained from the agency before the person starts. The school will verify that the person arriving is the person checked.

For salaried teacher trainees, the Trust completes the relevant checks. For fee funded trainees, it obtains written confirmation from the training provider that checks have been completed and the trainee judged suitable.

Changes of role, breaks in service and concerns about suitability will prompt a fresh assessment of required checks.

There is no general statutory expiry date for a DBS certificate or automatic requirement for routine repeat checks; the Trust may set a proportionate recheck practice.

6 GOVERNORS / TRUSTEES / MEMBERS

The Trust will obtain an enhanced DBS certificate without barred list information for academy trustees, members, governors and members of local committees, unless a separate role puts the individual in regulated activity.

It will check section 128 directions for all people whose governance or management role requires it, including members, trustees and local governors.

Governance appointments and records will be managed in line with KCSIE and the Academy Trust Handbook.

The chair of trustees will complete any additional DfE suitability process applicable to that role.

The Governance Professional and CFO will ensure checks and appointment details are recorded and follow up any outstanding result.

A person will not be assumed to have a children's barred list check solely because they hold a governance office

7 VOLUNTEERS

Before a volunteer starts, the headteacher will assess their actual activities, frequency, and work across other settings, and record the decision. A volunteer in regulated activity must have an enhanced DBS check with children's barred list information. This includes frequent supervised teaching or supervision and overnight school trips from 1 September 2026. If an existing enhanced check lacks barred list information, the headteacher will use the limited standalone route only where DBS and DfE guidance permits and will arrange the correct check.

For a volunteer outside regulated activity, an enhanced check without barred list information may be obtained only where the role is eligible. The headteacher will decide appropriate checks and supervision using a written risk assessment. An unchecked volunteer will not be left unsupervised with children or allowed to undertake regulated activity. The school will verify identity and consider references where appropriate. An existing certificate or Update Service result is accepted only after the Trust confirms the certificate, workforce, level and barred list status are appropriate to the new role.

8 VISITORS AND CONTRACTORS

Visitors attending in a professional capacity will have identity checked and the school will seek assurance of appropriate checks from their employer where applicable. The headteacher will decide whether they need escorting or supervision. The Trust will not demand a DBS certificate from parents or other occasional visitors merely because they enter the premises.

Contractors in regulated activity require an enhanced DBS check with children's barred list information. Other contractors with regular opportunity for contact with children may be eligible for an enhanced check without barred list information.

An unchecked contractor will not work unsupervised or engage in regulated activity. The school will confirm required checks, check the identity of those attending and set supervision appropriate to the work. A basic check may be considered where the role is not eligible for a higher level.

9 OVERSEAS CHECK AND OTHER SETTINGS

Applicants who have lived or worked outside the UK receive the same UK checks as other applicants and any further checks that the Trust considers appropriate. An enhanced DBS certificate may not reveal overseas conduct. Where available, the Trust will seek overseas criminal record evidence and, for teachers, professional standing information from the relevant authority. If evidence cannot be obtained, the headteacher will document alternative checks and a risk assessment.

For alternative provision placements, the school will obtain written confirmation that the provider has carried out appropriate safeguarding checks on staff. Work experience arrangements will be assessed against the specific activities and age of the pupil; the Trust will request only legally eligible checks and obtain assurances from the placement provider. These decisions will follow current KCSIE.

10 CERTIFICATE INFORMATION AND RECRUITMENT DECISIONS

The Trust will ask applicants only about criminal history it is legally entitled to consider. Protected convictions and cautions filtered under current rules must not be sought or relied on. Any information disclosed on a certificate will be discussed privately with the individual, including any claim that it is inaccurate, before a decision is made.

The headteacher, with appropriate HR and safeguarding advice, will make and document a proportionate role specific risk assessment. Relevant considerations include the nature and seriousness of the matter, relevance to duties, time elapsed, pattern, circumstances and the individual's explanation. A conviction or caution does not automatically bar employment unless the law prevents the individual undertaking the role. A person barred from regulated activity with children must not be permitted to perform it.

The Trust may defer a start, impose interim supervision or reassign duties while a concern is investigated. It will distinguish a safeguarding decision from any disciplinary process and give the individual an opportunity to respond. Decisions and reasons will be retained securely under the retention schedule.

11 REFERRALS

The Trust will refer to DBS when it has removed a person from regulated activity, or would have done so had the person not resigned or left, and the statutory harm or conduct criteria are met. A resignation does not end the duty. A referral will be made promptly with relevant evidence, separately from any local authority,

police or professional regulator referral. Where a teacher is dismissed or would have been dismissed for serious misconduct, the Trust will consider referral to the Teaching Regulation Agency under current guidance. Allegations about adults will also be handled under the safeguarding policy, including local authority designated officer involvement where required.

The school will consider the specific circumstances of the work experience placement when considering what level, if any, of DBS check is required on individuals supervising pupils, including those aged 16 and over, on the placement. Consideration will be given to whether the person providing supervision to the pupil will be unsupervised themselves and providing the supervision frequently, i.e. more than three days in a 30-day period, or overnight.

The headteacher will ask the employer providing the work experience to confirm that any member of staff who will be working with the child unsupervised and frequently is not a barred person.

12 SINGLE CENTRAL RECORD

Each academy will maintain an up-to-date single central record of the persons and checks required by KCSIE, with the date each check was completed or certificate obtained. A Trust wide system must be capable of showing each school's information separately without delay. It will include staff, relevant governance roles and agency confirmation as required.

The SCR will record identity, barred list, enhanced DBS, prohibition from teaching, section 128, overseas, qualifications and right to work checks where applicable. The record must distinguish "not applicable" from "not completed" and must not imply a barred list check was made where it was not eligible.

The Trust's SCR Policy controls detailed fields, access, quality assurance and removal of leavers.

13 DATA HANDLING

DBS information is confidential and will be accessed only by authorised people who need it for the relevant decision. Certificates will normally be inspected rather than copied. If a copy is retained for a justified reason it will be held securely and ordinarily destroyed within six months of the recruitment decision, unless a dispute or exceptional lawful reason requires longer.

The Trust will record the certificate issue date, type, reference number, relevant role, date seen and decision without reproducing offence details on the SCR.

Identity evidence and employment records will be retained in accordance with applicable DBS, right to work and Trust records rules. Paper and electronic information will be protected against unauthorised access and securely destroyed when no longer required.

The Trust will provide applicants with the DBS privacy and fair processing information and follow the DBS Code of Practice.

14 MONITORING AND REVIEW

The CFO will coordinate annual review with the CEO, safeguarding lead, Governance Professional and HR advice. The Trust Board will approve revisions.

An earlier review will take place if legislation or statutory guidance changes. Headteachers will check implementation and escalate gaps promptly.

Declaration of Responsibility
This DBS Policy was reviewed and formally adopted by Bronte Academy Trust on

.....28 Sep 2026.....Date



.....Signed Chair of Trustees



.....Signed Chief Executive Officer

Appendix 1

Recruitment of ex-offenders' statement

Bronte Academy Trust is required to send a copy of its policy on the recruitment of ex-offenders to all job applicants which outlines the following:

- The Trust fully complies with the DBS Code of Practice and will not discriminate unfairly against any subject of a disclosure on the basis of conviction or other information revealed
- All applicants are subject to a DBS check before the job appointment is confirmed; this includes details of convictions and cautions, as well as spent and unspent convictions. A positive disclosure will not necessarily prohibit a candidate from being offered a position
- The Trust is committed to the fair treatment of all applicants, regardless of race, gender, religion, sexual orientation, responsibilities for all dependants, age, physical or mental disability or offending background
- The Trust promotes equal opportunity and welcomes applicants from a wide range of backgrounds, including those with criminal records
- Candidates are selected for interviews based on their skills, qualifications and expertise
- All application forms and recruitment notices will contain a statement that a disclosure will be requested if a position is offered
- All applicants are encouraged to provide details of their criminal record at the earliest stage possible. This may be sent under a separate and confidential cover
- The Trust is committed to ensuring all disclosure information will only be seen by those who require access as part of their duties
- The Trust will discuss any matters revealed on a DBS certificate with the applicant before withdrawing a conditional offer of employment
- At the interview, or in a subsequent discussion, open and measured discussion will take place on the subject of the offences
- Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of any offer made
- Legal advice is available for all involved in the recruitment process to ensure they can identify and assess the relevance and circumstances of offences
- All recruitment personnel have received appropriate training and guidance in the relevant legislation relating to the employment of ex-offenders