DBS Policy

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1. Policy Statement

Mulberry Academy Hastings is committed to safeguarding and promoting the welfare of children and young people. As part of this commitment, the school ensures that appropriate Disclosure and Barring Service (DBS) checks are undertaken for staff, volunteers and other individuals working within the school environment.

This policy has been developed in accordance with the Department for Education statutory guidance Keeping Children Safe in Education (KCSIE) 2025, and sets out the responsibilities of schools in relation to safeguarding, pre-appointment vetting and ongoing suitability checks.

2. Purpose

The purpose of this policy is to ensure that DBS checks are obtained, assessed, recorded and managed consistently, fairly and in accordance with current legislation and statutory guidance.

3. Scope

This policy applies to all individuals who work for or on behalf of the school, including employees, volunteers, governors, trustees, agency staff, supply staff, contractors and trainees.

The policy applies to both paid and unpaid positions regardless of whether the role involves regulated activity with children.

4. Disclosure and Barring Service (DBS) Checks

The school will obtain the appropriate level of DBS check for all eligible roles in accordance with current legislation and Department for Education guidance.

Individuals undertaking regulated activity with children will be required to obtain an Enhanced DBS Certificate with a Children's Barred List Check before commencing unsupervised duties.

Where volunteers, contractors or visitors require DBS checks, the school will determine the appropriate level of check based on the nature of the role, the frequency of contact with children and the level of supervision provided.

5. Overseas Applicants

Where an applicant has lived or worked outside the United Kingdom, the school may require additional evidence of suitability.

This may include overseas criminal record checks, certificates of good conduct or other relevant documentation available from the country concerned. Any information obtained will be considered alongside all other safeguarding checks.

6. Positive DBS Disclosures

The school recognises that the disclosure of a criminal record does not automatically prevent an individual from working in a school environment.

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Where criminal record information is disclosed, an assessment will be undertaken to determine whether the information affects the individual's suitability for the role. Consideration will be given to:

- The nature and seriousness of the offence.
- The relevance of the offence to the role.
- The time that has elapsed since the offence occurred.
- Any pattern of offending behaviour.
- Evidence of rehabilitation.
- The potential safeguarding risk to children.

The assessment will be undertaken by the Headteacher and, where appropriate, the Designated Safeguarding Lead and Human Resources representative.

7. DBS Update Service

The school encourages employees to subscribe to the DBS Update Service where appropriate.

Where an employee has joined the Update Service and given consent, the school may undertake status checks to confirm that no new information has been added to the DBS record.

The school reserves the right to request a new DBS check where safeguarding concerns arise or where a role change significantly.

8. Ongoing Suitability

Employees have a continuing responsibility to maintain their suitability to work with children.

Staff must immediately inform the Headteacher if they:

- Are arrested or charged with an offence.
- Receive a caution, reprimand or conviction.
- Become subject to any investigation that may affect their suitability to work with children.

Failure to disclose relevant information may result in disciplinary action.

9. Referral to the Disclosure and Barring Service

The school will fulfil its legal duty to refer individuals to the Disclosure and Barring Service where appropriate.

A referral will be considered where an individual has harmed a child, poses a risk of harm to a child, or would have been removed from regulated activity had they not resigned or left employment before disciplinary procedures were completed.

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10. Single Central Record (SCR)

The school will maintain an accurate Single Central Record containing evidence that all required DBS and safeguarding checks have been completed.

The record will be reviewed regularly to ensure compliance with statutory requirements and safeguarding expectations.

11. Storage and Confidentiality

Information obtained through the DBS process will be handled confidentially and in accordance with the Data Protection Act 2018 and UK GDPR.

Records relating to DBS checks will be stored securely and access will be restricted to authorised personnel only. The school will not retain DBS certificate information for longer than is necessary and will dispose of information securely when retention periods expire.

12. Monitoring and Review

This policy will be reviewed annually, or sooner where changes to legislation, DBS guidance or Department for Education requirements make this necessary.

The school will ensure that its DBS procedures continue to support effective safeguarding practice and comply with current statutory guidance.

13. Appendices

- Appendix A – Positive DBS Disclosure Risk Assessment Form
- Appendix B – DBS Referral Decision Flowchart and Referral Record
- Appendix C – DBS Compliance and Monitoring Checklist

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Appendix A - Positive DBS Disclosure Risk Assessment Form

Name	
Job Title	
Manager	
Date of Assessment	
DBS Certificate Number	
DBS Certificate Date	
Disclosure Information	
Summary of information disclosed	
Nature of Offence(s)	
Consideration	Assessment Notes
Timing and Circumstances	
Consideration	Assessment Notes
Evidence of Rehabilitation	
Consideration	Assessment Notes
Role-Related Factors	
Consideration	Assessment Notes
Overall Risk Rating	
☐ Low	☐ Medium ☐ High
Rationale	
Recommendation	
☐Proceed with appointment/employment	☐ Proceed with additional safeguards
☐Refer for further review	☐ Do not proceed

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Appendix B - DBS Referral Decision Flowchart and Referral Record

Name		
Job Title		
Manager		
Date Concern Identified		
Date Investigation Began		
Nature of Concern		
Findings		
Question		
	Yes	No
Individual engaged in regulated activity?	☐	☐
Harm occurred?	☐	☐
Risk of harm identified?	☐	☐
Dismissed or removed?	☐	☐
Would have been removed if still employed?	☐	☐
Referral Decision		
☐ Referral not required	☐ Referral submitted to DBS	
Rationale		

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Appendix C - DBS Compliance and Monitoring Checklist – NOT SURE IF WE WANT/ NEED IT – IF YES, THEN I WILL FORMAT AS ABOVE

To be used for:

- Annual DBS Policy Review – to verify that the requirements of the DBS Policy are being implemented effectively.
- Termly Safeguarding Audit – as part of routine safeguarding and compliance monitoring.
- Preparation for Ofsted or External Review – to confirm DBS, SCR and referral processes are compliant and evidenced.
- MAT or Trust Compliance Visits – for central HR, safeguarding or governance teams undertaking assurance reviews.
- Following a Safeguarding Incident or Concern – to confirm DBS procedures and statutory duties have been followed appropriately.
- duties have been followed appropriately.

School	
Audit Completed By	
Date	
Period Reviewed	

- Section 1 – DBS Checks

Requirement	Yes	No	N/A	Comments
Appropriate DBS level determined for all applicable roles				
Enhanced DBS checks completed before commencement of unsupervised duties				
Children's Barred List checks completed where required				
Agency and supply staff assurances obtained and recorded				
Contractor safeguarding				

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checks considered and recorded				

- Section 2 – Overseas Checks

Requirement	Yes	No	N/A	Comments
Overseas employment history reviewed where applicable				
Overseas criminal record checks obtained where available				
Alternative evidence of good conduct obtained where appropriate				

- Section 3 – Positive DBS Disclosures

Requirement	Yes	No	N/A	Comments
Positive disclosures risk assessed using Appendix A				
Assessment completed by appropriate senior staff				
Decisions documented and retained securely				
Safeguards identified and implemented				

- Section 4 – DBS Update Service

Requirement	Yes	No	N/A	Comments
Participation recorded where applicable				

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Status checks undertaken with consent				
Appropriate follow-up action taken where required				

- Section 5 – Ongoing Suitability

Requirement	Yes	No	N/A	Comments
Staff reminded of disclosure responsibilities				
Self-disclosures reviewed appropriately				
Suitability concerns assessed and documented				

- Section 6 – DBS Referrals

Requirement	Yes	No	N/A	Comments
Potential referral cases reviewed against threshold				
Referral decisions documented using Appendix B				
Referrals submitted where required				
Records retained securely				

- Section 7 – Single Central Record

Requirement	Yes	No	N/A	Comments
DBS information recorded accurately on SCR				
SCR reviewed periodically				

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Discrepancies corrected promptly				

- Section 8 – Storage and Confidentiality

Requirement	Yes	No	N/A	Comments
DBS information stored securely				
Access restricted to authorised personnel				
Retention and disposal requirements followed				
GDPR requirements met				

- Audit Outcome
- ☐ Fully Compliant
  ☐ Substantially Compliant
  ☐ Partially Compliant
  ☐ Non-Compliant

Action Required	Owner	Target Date

- Sign-Off

Auditor	
Headteacher	

-

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