

DBS Policy

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1. Definitions

- 1.1 **DEMAT** means the Diocese of Ely Multi-Academy Trust.
- 1.2 **Trust** means the Diocese of Ely Multi-Academy Trust.
- 1.3 **Academy** means a constituent academy of DEMAT.
- 1.4 **Central Team** means staff who are not employed within an academy.
- 1.5 **Central Leadership Team** means any Director or Head of a Function in the Central Team including the Director of Education and the CEO.
- 1.6 **CEO** means the Chief Executive Officer of DEMAT, or any officer or other person exercising relevant authority delegated by the Chief Executive Officer to them.
- 1.7 **Managers** refers to those with line management responsibilities including but not limited to Hub Directors, Head of Department and Headteachers.
- 1.8 **Senior Leader** means a Senior manager within the academy or a Hub Director or Senior Manager within the Central Team.
- 1.9 **Staff** means any person employed by DEMAT, temporarily or permanently.
- 1.10 **Employee** means any person employed by DEMAT, temporarily or permanently.
- 1.11 **Applicant** means any person offered employment by DEMAT, temporarily or permanently.
- 1.12 **Headteacher** also refers to any other title used to identify the Headteacher, where appropriate.

2. Application of this Policy

The policy is applicable to all employees (permanent and temporary) of DEMAT. Where applicable, it is also applicable to all Volunteers supporting DEMAT.

The above definitions are included for reference purposes for both School and Central Team staff to enable clarity and transparency when applying this policy.

3. Relationship with DEMAT Values

The application of this policy must be applied at all times in a way that reflects the values of DEMAT and our Christian Ethos:

Love – We engender love and tolerance between and for our staff, pupils and others to foster an inspiring atmosphere of mutual support.

Community – We are committed to ensuring our schools are a living part of the community and contribute positively to its needs.

Respect – We do everything to provide a caring, safe and secure place for our staff and pupils to be happy and respected in our schools so they may achieve their potential.

Trust – We acknowledge accountability and responsibility for our actions and ensure that we encourage each other to make brave decisions and then learn from any mistakes.

Ambition – We are determined that our schools offer a place for the joy of learning, enabling those of all abilities to thrive and go on to lead rewarding lives.

4. Associated Policies and Documents

This Policy/Procedure should be read in conjunction with Keeping Children Safe in Education, the Education Act 2011 and Schools Staff (England)(Amendment)(No2) Regulations 2026 along with the following DEMAT Policies/Procedures:

- Recruitment Policy
- Colleague Code of Conduct
- Managing Allegations Against Staff
- Safeguarding and Child Protection Policy
- Volunteer Policy
- Disciplinary Policy

DEMAT People policies can be accessed via our website at: www.demat.org.uk/policies

The DBS Risk Assessments referred to in this Policy can be obtained from the People Services Team.

5. Version control

Policy type	DEMAT Trust Policy
Author	Laura Barton, People Services Lead
Reviewed by	Helen Rothwell, Director of People
Approved by	Adrian Ball, CEO Date: 3 June 2026
Release date	4 June 2026
Review	ANNUAL Policies will be reviewed in line with DEMAT's internal policy schedule and/or updated when new legislation comes into force.
Description of changes	The policy has been reviewed in line with legislation and best practice to provide clarity, greater consistency and support for staff. For further information regarding the specific changes please contact the HR Team at hrteam@demat.org.uk

6. Purpose and Scope

6.1 This policy aims to ensure a robust approach to safeguarding during the appointment process and during employment. It applies to all staff, including academy trust leaders, Trustees, RSB members and volunteers.

6.2 The principles of the policy will also be applied to agency staff, self-employed individuals engaged by our trust, individuals employed by any contractors / sub-contractors (where the contract agreement specifies the requirement for a DBS check). In such cases, organisations are required to either adopt this policy or produce their own, which aligns with the general principles of this policy.

7. Policy Statement

7.1 Our trust is committed to the ongoing protection of children by ensuring the highest integrity of those appointed. It does this partly through a series of vetting checks on appointment to a role with our trust and via an annual declaration check.

7.2 Our recruitment processes ensure that we do not employ anyone who is barred from working with children. The Application Form includes a declaration requiring applicants to disclose any criminal convictions and explicitly states that the position is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

7.3 Throughout all DBS-related processes, DEMAT is committed to ensuring that every applicant and member of staff is treated with dignity and respect, in a manner that reflects our core values and Christian distinctiveness.

8. Roles and Responsibilities

8.1 Our Chief Executive Officer has overall responsibility for the effective management of this policy and for ensuring compliance with legislation

8.2 Our Trust Board is accountable for ensuring we have effective policies and procedures in place in keeping with this guidance.

8.3 Academy SLT members are responsible for monitoring the academies / teams they are responsible for to ensure compliance. In addition to this, they must efficiently and accurately administer all pre-employment checks. They are responsible for ensuring that new starters do not attend for work in our trust without the appropriate level of vetting having been undertaken.

8.4 The People Services Team are responsible for providing timely advice regarding DBS checks and monitoring compliance via SCR audit checking alongside colleagues in Safeguarding. Any risks associated with DBS checks are reportable to SLT and the People & Culture Committee.

8.5 All those to whom this policy applies must:

- be personally responsible for ensuring that they adhere to the policy;
- report any changes to your Line Manager immediately
- treat colleagues and third parties with dignity, trust and respect.

9 The Legal Framework

9.1 Adherence is in line with mandatory compliance under Keeping Children Safe in Education Part 3, Safer Recruitment. Duties imposed by section 175 of the Education Act 2002 make explicit the responsibility of our trust for safeguarding and promoting the welfare of children as part of fulfilling the duty of care towards our pupils.

9.2 The Safeguarding Vulnerable Groups Act 2006 imposes a legal duty for employers to check an individual's suitability (Enhanced DBS check) before employing them in a role that is covered by regulated activity.

9.3. The requirements, under the School Staffing (England) (Amendment) (No 2) Regulations 2006, are that for each academy in our trust, we must:

- have a 'single central record' detailing a range of pre-employment checks.

- ensure that overseas applicants, or applicants who have spent a significant period of time overseas prior to appointment, are subject to sufficient checks in the countries they were residing in to establish suitability to work with children and young people.
- satisfy ourselves that supply staff and third-party contractors have undergone the necessary checks to assess their suitability for the post.
- ensure that academies carry out the appropriate checks to confirm the individuals are not disqualified under the Childcare (Disqualification) Regulations 2018.

10. DBS Process for New Starters

10.1 The Disclosure and Barring Service (DBS)

DBS checks are a criminal record check carried out by the Disclosure and Barring Service (DBS). The check will also include information held on the DBS children's barred lists, together with any information held by police forces, that is reasonably considered to be relevant.

These checks assist employers in making safer recruitment decisions. However, a check is just one part of a robust recruitment practice. Upon completion of the check by the Disclosure and Barring Service (DBS), the applicant will receive a DBS certificate.

The DBS can't access criminal records held overseas. A DBS check may not provide a complete view of an applicant's criminal record if they have lived outside the UK. A 'Certificate of Good Character' will be applicable if the applicant has lived or worked abroad. Please complete a [criminal record check for overseas applicants](#).

10.2 How to undertake a DBS check for a New Starter

10.2.1 ID validation for DBS checks

The applicant's identity must be verified via the DBS 3-route identity checking process to validate the name, date of birth and address provided by the applicant in sections A and B of the application form.

[ID checking guidelines for Standard/Enhanced DBS check applications from 22 April 2025 - GOV.UK](#)

10.2.2 Types of check

There are 3 types of check:

- A standard check shows spent and unspent convictions, cautions, reprimands, and final warnings
- An enhanced check shows the same as a standard check, plus any information held by local police that's considered relevant to the role

- An enhanced check with a check of the barred lists shows the same as an enhanced check plus whether the applicant is on the list of people barred from carrying out the role.*

*All those in regulated activity must have an enhanced check with a barred list check.

10.2.3 Guidance: ID-checking guidelines for DBS check applications

Introduction

The applicant must provide a range of ID documents as part of the DBS check application process:

- follow the 3-route ID checking process as outlined
- check and validate the information provided by the applicant on the application form
- establish the true identity of the applicant through the examination of a range of documents as set out in this guidance
- make sure the applicant provides details of all names by which they have been known
- check that the application form is fully completed and the information it contains is accurate

Failing to do this can result in delays. If there are any discrepancies in the information provided by the applicant and/or the identity documents supplied, and fraud is not suspected, please ask the applicant to clarify. If you don't do this, it may compromise the integrity of the DBS service and introduce risk to your recruitment arrangements.

As an employer you must not attempt to amend the application form without the applicant's knowledge and agreement. Doing this will invalidate the declaration by the applicant and may breach data protection legislation.

What you must do as part of the ID checking process

- you must only accept valid, current, and original documentation
- you must not accept photocopies
- you must not accept documentation printed from the internet, e.g. internet bank statements
- seek photographic identity documents (e.g. passport, driving licence, etc) in the first instance. This can be used to compare the applicant's likeness
- Make sure that any details of the current passport, UK driving licence and national insurance number are included on the electronic application form.
- Follow the route ID checking guidance set out below
- all documents must be in the applicant's current name as recorded in section A
- one document must confirm the applicant's date of birth as recorded in section A

- you must ensure that the applicant declares all previous name changes and provides documentary proof to support the change of name. If the applicant is unable to provide proof to support the change of name, you should hold a probing discussion with the applicant about the reasons why, before considering validating their identity
- you must see at least one document to confirm the applicant's current address as recorded in section B, in accordance with the guidance.
- Use a document type only once in the document count, e.g. don't accept two bank statements as two of the required documents if they are from the same bank
- you should not accept the foreign equivalent of an identity document if that document is listed as '(UK)' on the list of valid identity documents
- Keep a record of the documents used to validate each identity for a minimum of 2 years. This is to aid fraud investigation work carried out by DBS.

The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

It's important to note that a DBS check does not provide evidence of a person's right to work in the UK. You must do a separate check to make sure an applicant is allowed to work in the UK, which also includes roles for voluntary work.

All applicants are hereby made aware of the [transgender application route](#).

10.2.4 ID checking – 3 Routes

Route 1

The applicant must be able to show:

- one document from Group 1 below
- 2 further documents from either Group 1, or Group 2a or 2b below

The combination of documents presented must confirm the applicant's name and date of birth.

Route 2

Route 2 can only be used if it's impossible to process the application through Route 1.

If the applicant doesn't have any of the documents in Group 1, then they must be able to show:

- one document from Group 2a
- 2 further documents from either Group 2a or 2b

The combination of documents presented must confirm the applicant's name and date of birth.

The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

Route 3

Route 3 can only be used if it is impossible to process the application through Routes 1 or 2 and for this the applicant must be able to show:

- a birth certificate issued more than 12 months after the time of birth (UK, Isle of Man and Channel Islands) and
- one document from Group 2a and
- 3 further documents from Group 2a or 2b

The combination of documents presented must confirm the applicant's name and date of birth.

If the applicant cannot provide these documents, they may need to be fingerprinted.

Group 1: Primary identity documents.

- Passport: any current and valid passport. A UK passport can be expired up to a maximum of 6 months.
- e-Visa: Accessed via the 'View and Prove' service
- Biometric residence permit UK
- Application Registration Card (ARC)
- Current and valid driving licence photocard (full or provisional – front and back): UK, Isle of Man, Channel Islands.
- Birth certificate, issued within 12 months of birth: UK, Isle of Man and Channel Islands, including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces.
- Adoption certificate: UK and Channel Islands

Group 2a: Trusted government documents.

- Current and valid driving licence photocard (full or provisional): all countries outside the UK (excluding Isle of Man and Channel Islands)
- Current and valid driving licence (full or provisional) - paper version (if issued before March 2000): UK, Isle of Man, Channel Islands. All information, including name and address, must be up to date
- Birth certificate, issued more than 12 months after time of birth: UK, Isle of Man and Channel Islands
- Marriage/civil partnership certificate: UK and Channel Islands

- Immigration document, visa, or work permit: issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/ permit must relate to the non-UK country in which the role is based
- HM Forces ID card UK
- Firearms licence: UK.

Group 2b: Financial and social history documents.

- Mortgage statement, UK, issued in last 12 months
- Bank or building society statement, UK and Channel Islands issued in last 3 months
- Bank or building society statement, countries outside the UK issued in last 3 months. Branch must be in the country where the applicant lives and works
- Bank or building society account opening, UK: issued in last 3 months
- Credit card statement, UK: issued in last 3 months
- Financial statement, e.g., pension or endowment, UK: issued in last 12 months
- P45 or P60 statement, UK and Channel Islands: issued in last 12 months
- Council Tax statement, UK and Channel Islands: issued in last 12 months
- Letter of sponsorship from future employment provider valid only for applicants residing outside of the UK at time of application: must still be valid
- Utility bill, UK (not mobile telephone bill – cannot be printed from an online account): issued in last 3 months
- Benefit statement, e.g., Child Benefit, State Pension, UK: issued in last 3 months
- Central or local government, government agency, or local council document giving entitlement, e.g., from the Department for Work and Pensions, the Employment Service, Local Authority, UK: issued in last 12 months
- HMRC self-assessment letters or tax demand letters, UK: issued in last 12 months
- European Health Insurance Card (EHIC) or Global Health Insurance Card (GHIC), UK: must still be valid
- EEA National ID card: must still be valid
- Irish Passport Card (cannot be used with an Irish passport): must still be valid
- Cards carrying the PASS accreditation logo, UK, Isle of Man and Channel Islands: must still be valid
- Letter from head teacher or college principal or apprenticeship provider UK (for 16- to 19-year-olds in full-time education or on an apprenticeship), only used in exceptional circumstances if other documents cannot be provided: issued in the last month

Once the checks are completed, the DBS will send a certificate to the applicant. The applicant must show the original DBS certificate to their potential employer before they commence work.

If an **agency worker/contractor** is being deployed to undertake a 'regulated' activity, the manager must ensure they have received written confirmation from the agency, that the worker has been subject to a DBS check, which includes the appropriate barred list check. The same level of risk assessment should be undertaken for agency workers with a DBS disclosure as outlined in section 12.1 Original DBS Certificates of Agency Workers must be seen by school administrators on arrival at the academy.

11. Handling DBS Certificates

11.1 The Trust/the Academies within the Trust will comply fully with our Records Management Policy regarding the correct handling, use, storage, retention and disposal of certificates and certificate information and should be aware of the data protection principles.

11.2 They will undertake to treat all applicants fairly and not to discriminate against anybody on the basis of a conviction or other information being disclosed. Having a criminal record will not necessarily prevent an individual from being employed by the Trust/the Academies within the Trust (or as a volunteer). This will depend on the nature of the role and the circumstances and nature of the offence(s).

11.3 Confidentiality is an important part of the procedures provided under this policy and must be always adhered to.

12. Handling Delays

12.1 Where there is a delay associated with receiving a DBS, staff will only be able to undertake work with children where they have a DBS from their former employment; a DBS risk assessment has been carried out and they work under supervision.

13. Positive Disclosures/DBS Results during Recruitment

13.1 **Convictions and Cautions** - If a person is subject to any disqualification under the 2006 Act and the 2018 regulations, it would be included within the DBS check, and if relevant, it would also be contained within the barred list check.

13.2 **Relevant offences and orders** - Under the legislation, a person is disqualified if they are found to have committed an offence which is included in the 2018 regulations (a 'relevant offence'). This includes:

- being convicted of a relevant offence
- on or after 6 April 2007, being given a caution for a relevant offence
- on or after 8 April 2013, being given a youth caution for a relevant offence

A list of **relevant offences** (commonly referred to as ‘autobar’ offences) can be found at [Disqualification under the Childcare Act 2006 - statutory guidance Appendices \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/Disqualification-under-the-Childcare-Act-2006-statutory-guidance-Appendices.pdf).

13.3 All applicants are asked if they have anything to disclose in the Application Form and during any interview. Where a positive disclosure is made during the recruitment process, the appointing Manager will raise this to the People Services Team. This could lead to a Risk Assessment being necessary. In some circumstances, this could lead to the applicant not being selected for the position or the offer of employment being withdrawn.

13.4 Where a DBS check contains information on the disclosure certificate, the applicant must inform the appointing Manager, if they are not already aware who will raise this to the People Services Team. A Positive Risk Assessment will be completed and must be co-signed by the Trust Safeguarding Lead. In some circumstances, this could lead to the conditional offer of employment being withdrawn.

14. DBS Re-checks

14.1 A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. We encourage all staff to sign up to the DBS update service, which enables checks to be carried out online.

14.2 Where staff are promoted or there is a significant change in role or work location a further DBS check will be carried out.

14.3 Employees who leave our employment or take a break in employment of greater than 12 weeks will be required to have an appropriate level of DBS check upon their return. These provisions apply to career breaks, sabbaticals and unpaid leave, but they do not apply to sickness absences, maternity/paternity or adoption leave.

15. Staff Declarations

15.1 All staff must declare the following immediately if the scenario arises during employment:

- You are arrested, or summonsed for an offence
- You receive a conviction, a bind over order or a warning given by police force

Failure to disclose such information may result in disciplinary action which could lead to the termination of your employment.

16. Annual DBS Questionnaire

- 16.1 Each year, staff are assigned a short questionnaire via Google Forms to declare any changes that may have taken place either since joining the Trust or their last annual declaration.
- 16.2 All staff should complete the questionnaire and discuss any concerns they have with either their Line Manager or the People Services Team.
- 16.3 If an individual's questionnaire contains information in relation to a previous conviction or caution, please contact the People Services team.
- 16.4 Where the staff member indicates a positive disclosure during the annual declaration process, the Line Manager will undertake a full risk assessment. Where appropriate, the staff member may be asked to attend a meeting to discuss the disclosure, and a new DBS application will be made.
- 16.5 If the risk assessment determines that it is not appropriate to remain in role, the Line Manager in conjunction with the People Advisory Team, may lead to a disciplinary investigation for failure to disclose a criminal offence that affects suitability to work in line with our Disciplinary Policy.

17. Referrals to DBS

17.1 The Trust/the Academies within the Trust have a legal responsibility as an employer to refer any person to the DBS where consideration needs to be given, as to whether they should be placed on the Barred List for working with children and/or adults. This can occur under the following circumstances:

- As a result of a member of staff being dismissed or removed from working with children or vulnerable adults following a management investigation undertaken because of safeguarding concerns.
- The Academy has evidence that any employee has been cautioned, convicted of a relevant offence.
- Or, that any employee has satisfied the 'harm test' in relation to children and/or vulnerable adults. Harm is defined in its widest context and includes physical, sexual, financial harm, neglect, emotional or verbal psychological.

The above and further information on DBS referrals because of breach of Contract and/or our policies can be found in section 9.10 of our Managing Allegations Against Staff.