



SAFEGUARDING

Creative Education Trust

Creative Education Trust

Single Central Record

Guidance Handbook and Self-evaluation Tool
March 2023

Louis Donald, Director of Safeguarding

Introduction

Introduced in 2007, in The Education (Independent School Standards) (England) placed a statutory responsibility on schools, and academies to maintain a register of the checks which they have made in respect of their own staff and members of bodies of persons named as proprietors, and, in the case of supply staff, of the information about checks provided by the supply agency and carried out by the proprietor.

Whilst the guidance is clear there are many myths surrounding the Single Central Register (SCR), how its constructed, maintained and monitored. I have spent a lot of time researching the legislation associated with the Single Central Record, spending time with colleagues at the Department for Education, Ofsted, and legal firms, to understand what 'under the bonnet' really looks like.

What did I learn? Well, it's straightforward actually. Whilst Lord Bichard noted, in his report following the inquiry into the Soham Murders of August 2002, 'the harsh reality is that if a sufficiently devious person is determined to seek out opportunities to work their evil, no one can guarantee that they will be stopped.' The SCR, when maintained effectively, supports us in our task 'to make it as difficult as possible for them to succeed' (The Bichard Inquiry, HM Government, June 2004).

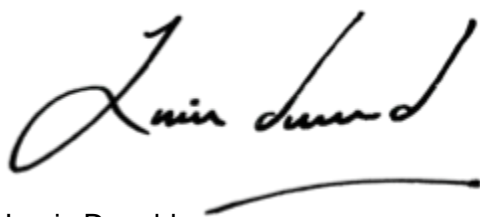
This guidance and self-evaluation handbook is designed to support school leaders, Single Central Record (SCR) administrators and HR officers who support them.

Carolyn Eyre, a member of the Safer Recruitment Consortium, and a trusted voice to both me personally, and the sector more widely, once said words to the effect of:

"The SCR is a storyboard that tells an inspector that you understand your obligations around Safer Recruitment; and assures you, as a leader, that the adults in your academy are safe to be there."

She is right.

I hope that this handbook serves as a quick reference guide in moments of panic, and ultimately puts you at ease when thinking about the SCR.

A handwritten signature in black ink, appearing to read 'Louis Donald', with a long horizontal flourish underneath.

Louis Donald

Director of Safeguarding, Creative Education Trust.

March 2023.

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1. History

Our journey into understanding the history of the Single Central Record takes us back to 1955; as we march up to 2023, we are going to interweave a little bit with broader Safer Recruitment themes – but the history is important to know.

In **1955**, the list that came to be called List 99 was started by the Home Office Consultancy Service. The list, maintained by the Department for Children, Schools and Families (DCSF), previously the Department for Education and Employment (DFEE) was a confidential list of people whom the Secretary of State for Education had directed may not be employed by local education authorities (LEAs), schools (including independent schools) or further-education (FE) institutions as a teacher, or in work involving regular contact with children under 18 years of age. List 99 also included details of people the Secretary of State had directed could only be employed subject to specific conditions (Erooga, Marcus (30 April 2012). [Creating Safer Organisations](#)).

Section 142 of the Education Act **2002** formalised this list in legislation, as a confidential register of people barred from working with children by the Department for Education and Skills (DfES) In the United Kingdom. The list contained the names, dates of birth, aliases, and national insurance numbers of those people deemed not suitable to work with children in schools, social work and voluntary settings.

Following the Soham murders in 2002, the Bichard report was published on 22 June 2004 and made 31 recommendations, of which recommendation 19 called for a new registration scheme and stated:

"New arrangements should be introduced requiring those who wish to work with children, or vulnerable adults, to be registered. This register – perhaps supported by a card or licence – would confirm that there is no known reason why an individual should not work with these client groups. The new register would be administered by a central body, which would take the decision, subject to published criteria, to approve or refuse registration on the basis of all the information made available to them by the police and other agencies. The responsibility for judging the relevance of police intelligence in deciding a person's suitability would lie with the central body"

Of note in this recommendation is the use of the double-negative, "no known reason why an individual should not work with these client groups". This to say the ISA from its inception was not designed to clear individuals as "suitable" for work with vulnerable groups but to remove those who pose a known risk.

Proposals to implement the recommendations were put to public consultation on 5 April 2005. The results of this exercise were announced by the Rt Hon Ruth Kelly, the Secretary of State of the Department for Education and Skills, on 19 January 2006 and were translated into primary legislation, the Safeguarding Vulnerable Groups Act 2006, which received royal assent on 8 November 2006.

The Safeguarding Vulnerable Groups Act of **2006** (SVGA) introduced a new vetting and barring scheme, the VBS. This was designed to prevent those deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

The introduction of the Vetting and Barring Scheme (the VBS) meant that those convicted of one of a number of sexual offences against a child under 16 years of age were automatically deemed unsuitable to work with children and included on List 99. Those subject to a

disqualification order and those permanently included on the Protection of Children Act (PoCA) List were also included on List 99 automatically (NSPCC, 2006).

The SVGA was due to be implemented in full, in 2010, when individuals would be required to begin to register with the scheme. Although, this scheme was scrapped prior to implementation; with the introduction of the Independent Safeguarding Authority, *but we will come to that soon...*

In Summer **2006**, the then Department for Children, schools and families, released a one-of-a-kind document, 'Safeguarding children and safer recruitment in education'. This set out the responsibilities of all local authorities, schools and further education (FE) institutions in England to safeguard and promote the welfare of children. It contained recruitment best practice, some of which was underpinned by legislation, and some of which was not.

This 143 page document was broken down into 5 chapters, similar to how Keeping Children Safe in Education (KCSIE) is structured today. Chapter 3 provided guidance on safer recruitment and selection in education settings. This included recruitment and selection best practice, other human resources processes that help to recruit candidates who have the skills, knowledge and aptitudes to work, whether paid or unpaid, in the education services and to deter, reject or identify people who are unsuitable.

This document gives the simplest explanation of what should be recorded on the register:

Single central record of recruitment and vetting checks

4.84 In addition to the various staff records which are kept as part of normal business, educational establishments must⁴⁶ also keep and maintain a single central record or 'register' of recruitment and vetting checks. Details of what needs to be included in the 'register' can be found for maintained schools in Schedule 2 of The School Staffing (England) Regulations 2009 and for independent schools in paragraph 4C of the Schedule to SI 2003/1910 as amended by The Education (Independent School Standards) (England) (Amendment) Regulations 2007. This record is intended to be a live document and should only contain the record of those staff currently employed at the establishment. Information on past employees will be kept within their individual personnel files and should be retained in line with the establishment's normal HR practices. Establishments are not required to keep copies of identity documents either for inspections by Ofsted (or their agents) or to reinforce the information on the central record. They should simply record on the central record the date upon which checks were carried out, who carried out the checks and a description of any documents seen as part of the checking process.

Interestingly – at least for me - this document also gave birth to the first ever model of the record. It's worth noting that this document was released back in 2010, so long before the General Data Protection Regulations (GDPR) was introduced back in 2016. This change meant, amongst other things, that recording information about a person's address, or date of birth on the record, was simply no longer appropriate.

Identity				Information about position		Check ISA registration or the ISA barred lists		Required Qualifications	CRB checks		Right to work in UK	Additional Overseas Check	Details of person who carried out checks
Name	Address	Date of Birth	Description of evidence and date (must include some form of current photographic identification)	Date Appointed	Role	Unique reference number	Description of evidence seen and date	Description of evidence seen and date	Unique reference number	Description of evidence seen and date	Description of evidence seen and date	Description of evidence of good conduct/ overseas criminal record check and date	Name, position held and date

It's this document too, that first mentioned the need for 'two references'. The origin of many safer recruitment related myths and mysteries lay within this document.

Ofsted first started considering the SCR as part of its routine inspection activity, in **2008**.

From **October 2009** List 99 and the PoCA list and the Northern Ireland equivalent were replaced by the Children's Barred List, established under the Safeguarding Vulnerable Groups Act 2006 (SVGA); the names of those listed were transferred incrementally to this new list, held by the Independent Safeguarding Authority (ISA).

The ISA existed until **1 December 2012**, when it merged with the Criminal Records Bureau (CRB) to form the Disclosure and Barring Service. In its final report, it stated that 46,557 adults were on its Children's Barred list as of 31st March 2012.

Later that year, on **22 October 2010**, the government announced that it would remodel the Vetting and Barring Scheme (VBS) back to common-sense levels and the then Home Secretary commissioned an Independent Review of the criminal records regime.

The review considered the fundamental principles and objectives behind the vetting and barring regime. On **11 February 2011** the Government published the outcome of this review, and legislation to make key changes, including:

- merging the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) to form a streamlined new body providing a proportionate barring and criminal records checking service
- a large reduction of the number of positions requiring checks to just those working most closely and regularly with children and vulnerable adults
- portability of checks between jobs to cut down on needless bureaucracy
- an end to a requirement for those working with vulnerable groups to register with the Vetting and Barring Service and then be continuously monitored by the ISA
- stopping employers who knowingly request criminal records checks on individuals who are not entitled to them

In **September 2011**, Ofsted released a guidance note titled: 'Safeguarding in schools: best practice'. This was the first time that Ofsted had given a view on the Single Central Record, it recognised that Information is increasingly held on electronic systems, usually in the form of a SCR, which allows for ease of access and updating, is held centrally, and includes all the necessary information listed in current DCSF/DfE guidance.

The guidance note commented on how one school included additional information, such as the person's start date and job role, so that the register was helpful to them as a more complete record.

It also recognised that Senior administrators were being given the role of maintaining the Single Central Record, and seemingly ratified this approach. (Ofsted, Safeguarding in schools: best practice, September 2011).

On **1 December 2012** the Disclosure and Barring Service (DBS), a merger between the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) was created.

In **Spring 2013**, the update service was launched, an online subscription service that let people keep their standard and enhanced DBS certificates up-to-date and allows for employers to check a certificate online, with the subject's consent.

In late **2013** the DBS started issuing the disclosure certificate only to the applicant. This move was made to give the applicant the ability to challenge or clarify any information on the disclosure, before it is shared with the employer.

On **28 March 2013** the Government launched a consultation on revised statutory guidance to keep children safe in education. The consultation closed on **20 June 2013**. They said that they felt that the current statutory guidance, Safeguarding Children and Safer Recruitment in Education, has too much unnecessary material that detracts from its core purpose: the specification and clarification of statutory responsibilities (HM Government, Consultation on keeping children safe in education, 2014.)

The consultation found that the current statutory guidance for safeguarding in schools and colleges, Safeguarding Children and Safer Recruitment in Education, was issued in 2006 and was seen to be out of date in a number of respects.

This consultation document was bold; one of the things it consulted on, was the removal of the regulation that requires Secretary of State approved safer recruitment training for at least one member of a recruitment panel. That change passed.

In making that change, the Department said:

“We continue to hold the view that training on safer recruitment is necessary, but we do not believe it needs to be approved by the Secretary of State. School and college leaders are better placed than central government to decide what training is appropriate for their staff and the circumstances of the school or college”.

The updated guidance required (and continues to require) school and college leaders to ensure at least one member of a recruitment panel has had proper training on safer recruitment but leaves it to school and college leaders to judge what training their recruitment panel members will complete.

‘Safeguarding children and safer recruitment in education’ remained in place, until replaced by ‘Keeping Children Safe in Education’, first published by the Department for Education on in **April 2014**.

On **12th May 2016** Keeping Children Safe in Education was updated, to include a new appendix document titled: 'Regulated activity in relation to children: scope'.

On **18th January 2021**, Keeping Children Safe in Education was updated to reflect legal changes following Britain's withdrawal from the European Union, including guidance on checking the past conduct of individuals who have lived or worked overseas.

The Single Central Record continues to feature in statutory guidance.

2. Ofsted

Ofsted calls schools the day before an inspection, and when speaking to the headteacher the lead inspector will ask for a number of documents to be made available in the inspection team room by 8.00am on the first day of inspection. One of these is the SCR.

The Ofsted Inspection Handbook (2022) says that:

‘Inspectors should check the single central record early in inspections of schools and colleges. It should be complete and meet statutory requirements. During early years inspections, inspectors will check that the provider is able to produce evidence of suitability of relevant staff and adults.’

First published in September 2018, the Ofsted guidance ‘Inspecting safeguarding in early years, education and skills settings’ offers a bit more clarity around exactly how inspectors will review the SCR. Annex 3 of that document, talks in detail about the Single Central Record.

Annex 3 has been slimmed down in the most recent iteration of the document, but the principles remain the same.

Ofsted say that sometimes, minor administrative errors can come up on a SCR; such as a missing date. They define minor administrative errors in the single central record as:

- failure to record one or two dates
- individual entries that are illegible
- One or two omissions where it is clear that the information is already held by the school or college, but the school or college has failed to transfer over the information in full to the single central record

Ofsted makes clear, however, that inspectors will not make any allowance for failures such as breaches of the requirements for Disclosure and Barring Scheme (DBS) checks (Ofsted, Inspecting safeguarding in early years, education and skills settings, Para 31-32, 2022.)

It's important to remember that every inspection is different, and each inspector will have a different way of coming to a judgment in respect of your SCR; however most inspectors will start by asking you to produce the record.

Inspectors will normally ask a number of almost ‘general knowledge’ questions around the upkeep of the SCR.

How often is it quality assured and by who?

Remember, there is no requirement to review the SCR, or record that you have; but you do need to maintain it, so it's reasonable to say that someone other than the person who maintains it on a day-to-day basis should check it once per term or so. circa. This is usually the Principal/Headteacher with the DSL. Governors should never check the SCR themselves (Amanda Spielman, Chief His Majesties Inspector for Ofsted at a speech to the National Governance Association in June 2019).

Each inspection is different, and often – presumably unintentionally - inspectors can ask some red-herring questions.

Some other questions that have come up on inspection before:

- What do you do on a day-to-day basis for supply staff?
- Are governors on your SCR and are trustees on there?
- Who does ID checks for employees?
- What training have you had for overseeing the SCR?
- How often is the SCR audited and by who?
- Why have you recorded not required for prohibition checks for site staff?
- Do you have any employees from overseas. Talk me through the overseas check process.
- How do you maintain the SCR, how often?
- When do you add new starters and remove leavers?
- Do governors check the SCR?
- Asked how long we retain leavers on there for?
- Who is checked against the Section 128 direction list?

Historic missing data

Sometimes, when reviewing the SCR, you will indeed find that historic checks haven't been completed; usually the issue is references. Ofsted once said, in a now-withdrawn document that they do not expect you to retrospectively apply for references for staff appointed prior to and continuously employed since the introduction of the vetting and barring requirements (Ofsted, Ofsted inspection – clarification for Schools, September 2018).

If a check is missing that was a statutory requirement at the time, you should carefully consider this and complete such checks necessary to assure yourself around the colleague's ongoing suitability. If concerns arise about their suitability, this may then allow you to seek a new DBS certificate in line with statutory guidance.

Ofsted also said that:

'There is no expectation or statutory requirement for the routine checking of personnel files by inspectors. Inspectors may look at a small sample of personnel records. Ofsted does not have expectations about the format in which staff records are maintained.'

Again, now withdrawn, but useful to know.

Over-checking - “it’s better to be safe than sorry”

When the inspector looks at your staff list, in addition to checking that your checks really were made pre-employment, he or she will want to make sure that you are completing only the checks required for that person’s role in the school.

Over-checking is just as bad as under-checking.

It is not better to be ‘safe then sorry’ – the record, is a storyboard that demonstrates you have undertaken only the checks required and understand your safer recruitment obligations. Plus, sometimes, checking someone against a list that you are not entitled to can be unlawful.

Trainee teachers

I recently found myself in one of those awkward positions on Inspection, where you have to challenge an HMI line of questioning. The inspector was asking why the school had not recorded their trainee teachers on the SCR.

It went a little bit like this:

HMI: *Do you have any trainee teachers on placement here?*

DSL: *Yes, we have 4. They all come from X university and are with us until Christmas, they aren’t on a salaried route, and we have a letter of assurance from the provider.*

HMI: *But they are in your building, aren’t they?*

Me: **oooo. here we go...*

DSL: *Well, yes, but as per paragraph 297 of Keeping Children Safe in Education, the trainee teachers are fee-funded, so it is their provider’s responsibility to carry out the necessary checks.*

We have obtained the written confirmation from the provider that it has carried out all pre-appointment checks we would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

For that reason, there is no requirement for us to record their details on the SCR, and we would only record their details if we did the checks, because they were on a salaried route.

‘There is no requirement for the school or college to record details of fee-funded trainees on the single central record.’

– Keeping Children Safe in Education (2022)(Para 298).

2. All Staff Tab

The Education (Independent School Standards) (England) give a definition of 'staff' as

'any person working at the school whether under a contract of employment, under a contract for services or otherwise than under a contract but does not include supply staff or a volunteer.'

In my view, that is a very long, boring way of saying: 'If they are on your payroll, they are staff'. This is not legal advice, obviously.

When looking at the tabs across the top of the record, Inspectors are looking to see that you are recording the following checks:

Column	√
Identity check	
Enhanced DBS check/certificate	
Section 128 direction (for management positions in independent schools including academies and free schools)	
Check of professional qualifications	
Barred list check	
Prohibition from teaching work check	
Further checks on people living or working outside the UK	
Right to work in the UK.	

Non-Statutory information

Keeping Children Safe in Education states that schools (including academies) are free to include other non-statutory information on the single central record; such as the date references were obtained, or information relating to (fee funded) trainee teachers.

At Creative Education Trust, in principle, we do not record non-statutory information on the Single Central Record.

That being said, there are three pieces of non-statutory information that we do record:

1. Checks made against volunteers.

There is a strange clash in statutory guidance here that it is worth drawing to your attention.

Keeping Children Safe in Education says in paragraph 273 of its current guidance that: schools are free to record non-statutory information that they deem relevant such as checks made on volunteers. Whereas Ofsted takes the view that:

'Where checks are carried out on volunteers, schools should record this on the single central record.' (Inspecting safeguarding in early years, education and skills, Ofsted, 2022)

Section 3 refers to volunteers.

2. The DBS certificate number contained on the paper certificate.

3. Checks made against governors.

3.1 Identity check

The regulations require that we carry out appropriate checks to confirm ‘the person’s identity’ in respect of each such person who intends to work at the school.’

The requirements are:

You must	You should not
<ul style="list-style-type: none">Record the date you saw (in person) the person’s identity documentation.	<ul style="list-style-type: none">Record on the SCR, who completed the checkRecord on the SCR what documentation was seen

Audit tasks:

Check	√
Does the Single Central Record capture the date that the person’s identification documentation was checked?	

2.2 Enhanced DBS check/certificate

The regulations require that we must **obtain** an Enhanced DBS certificate in respect of each such person who intends to work at the school.

Keeping Children Safe in Education defines (in paragraph 243) the word ‘obtain’ as when the *‘applicant shows the original paper DBS certificate to their potential employer before they take up post, or as soon as practicable afterwards.’*

Some academies use umbrella bodies to complete DBS checks; this is fine, however, you must never rely on the e-receipt provided by the umbrella body; seeing this emailed receipt, does not conform with the requirements of both the Regulations and Keeping Children Safe in Education, to see the original paper certificate.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you saw (in person) the person’s original paper DBS certificate. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record on the SCR what date the certificate was processed or applied for.
There is no requirement to record the DBS number on the Single Central Register; however, at Creative Education Trust, we do.	

Keeping Children Safe in Education (2022) says that schools (including academies) do not need to retain the DBS certificate in order to satisfy the requirements of maintaining the Single Central Record.

If the adult subscribes to the DBS update service, you must still see the original paper certificate, used with the update service.

Audit tasks:

Check	√
Does the Single Central Record capture the date that the person’s DBS certificate was obtained by the school?	
Does the Single Central Record capture the DBS number contained on the original paper certificate, and is it complete (00XXXXXXXX)	
Personnel files do not contain copies of the DBS certificate	

2.3 Section 128 direction

Inspectors will often ask to look at who you have identified as ‘management’ and therefore have checked ¹against the list of adults subject to a Section 128. ‘Prohibition on Participation in Management direction notice’.

There is no exhaustive list of roles that might be regarded as ‘management’ for the purpose of determining what constitutes management in an independent school.

The Department’s view is that: ‘roles involving, or very likely to involve, management of a school include (but are not limited to) headteachers, principals, deputy/assistant headteachers, governors and trustees’.

It is important to note that the individual’s job title is not the determining factor, and whether other individuals such as teachers with additional responsibilities could be considered to be ‘taking part in management’ depends on the facts of the case.

If an adult in your school is a headteacher, principal, deputy/assistant headteacher, governor, trustee or line managing someone, or managing a budget, it is reasonable to assume that they are involved in management (DFE, Single Central Record FAQ, March 2023).

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you completed a check of the Section 128 direction list on the SCR 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check

There are no requirements to retain evidence that this check has been completed, as the check is completed via Employee Access, which is an auditable tool.

Audit tasks:

Check	√
Have leaders established what adults working in the Academy are line managing someone, or managing a budget and are therefore considered to be involved in the management of the Academy?	
Does the Single Central Record capture the date that you completed a check of the Section 128 direction list on the SCR?	
Personal files, do not contain any evidence of this check	

¹ Checks of the Section 128 Direction list, are completed via Employee Access, on the DFE Single Sign-In portal.

2.4 Check of professional qualifications

The regulations require that we carry out appropriate checks of professional qualifications in respect of each such person who intends to work at the school, in such a role where those qualifications are essential to their work.

The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

Checking qualifications extends beyond just teachers. If for example you have hired a caretaker and said that an essential qualification for their role is a 'BoilerSafe certificate' for example; or a finance manager, where you have specified that they must be a 'chartered accountant' then you need to verify those qualifications too.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you completed a check of the qualifications of the personal (which includes verifying any award of qualified teacher status (QTS), and the completion of teacher induction or probation where appropriate). ▪ Retain a copy of the professional qualification on the person's personal file. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record on the SCR what qualification was checked ▪ Record on the SCR any form of professional body number (such as TRA number). ▪ Record what university the adult went to, or what qualification they were awarded.

Keeping Children Safe in Education (2022) states that schools (including academies) must retain a copy of the document used to evidence professional qualifications.

Audit tasks:

Check	√
Does the Single Central Record capture the date that professional qualifications were verified?	√
A copy of the qualification used to perform such a check, has been retained in the personal file	√

2.5 Barred List checks

The regulations require that we carry out a check of the 'Children's Barred List' in respect of each such person who intends to work at the school, in regulated activity.

In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- will be working on a regular basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children, or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

It is reasonable to assume that if an adult is working in your school, as a member of your staff body, they are in regulated activity and therefore require a check against the Children's Barred List.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you completed a check of the children's barred list in respect of any adult who is engaged in regulated activity. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check

Keeping Children Safe in Education (2022) states that schools (including academies) must retain a copy of the document used to evidence professional qualifications.

Audit tasks:

Check	√
Does the Single Central Record capture the date that the children's barred list was obtained?	
Does the date on which the barred list was checked fall before the date that the adult commenced work in regulated activity (at the academy)	

An auditor's tip: When looking across the record, look to see if all checks were completed before the person started work. There are a couple of cases where it might not be, such as the DBS certificate (seen) date; but, and especially regarding the Children's Barred List, the date should always precede the start date.

When thinking about how an inspector might look at a member of staff, they are going to want to see that the dates precede the start date for example:

Compliant:

Staff information			Identity check		Disclosure and Barring Service (DBS)		Role specific			Overseas checks
Name	Position	Start date	ID seen date	Right to work seen date	Enhanced DBS certificate seen date	Children's Barred List seen date	GTCE/Prohibition from teaching work check date	Date qualifications seen (where applicable)	Section 128 Management check date (where applicable)	Any other overseas checks completion date
Louis Donald	Teacher of Art	01/09/2022	01/07/2022	01/07/2022	15/08/2022	15/08/2022	01/07/2022	01/07/2022	N/A	N/A

Not compliant:

Staff information			Identity check		Disclosure and Barring Service (DBS)		Role specific			Overseas checks
Name	Position	Start date	ID seen date	Right to work seen date	Enhanced DBS certificate seen date	Children's Barred List seen date	GTCE/Prohibition from teaching work check date	Date qualifications seen (where applicable)	Section 128 Management check date (where applicable)	Any other overseas checks completion date
Louis Donald	Teacher of Art	01/09/2022	01/07/2022	01/07/2022	15/09/2022	15/09/2022	15/09/2022	01/07/2022	N/A	N/A

As you can see in this example, the start date comes after the date that the Children's barred list was checked.

There will always be examples where certain dates will fall after the start date; it could be for example that a school has completed a new DBS check for an adult, having developed concerns about their suitability, or that there has been a break in service of more than 12 weeks, maybe in the case of an exam invigilator, for example.

2.5.1 Standalone Barred List checks

Back in 2012, when the DBS launched, there was a significant backlog in terms of the production of DBS certificates, and as a result, the Department for Education gave schools an exemption to the normal rules of play when it comes to checking DBS certificates.

Keeping Children Safe in Education 2014 first mentioned 'standalone barred list checks' where it stated in Paragraph 52 that where a school or college allows an individual to start work in regulated activity before the DBS certificate is available, then they should ensure that the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed.

This exemption remains in place; however it was only in April 2021 that the Department for Education (DfE) took over the responsibility for hosting the Barred List Checking Service. The replacement system is administered by the Teaching Regulation Agency (TRA).

Where a school or college allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check.

Separate barred list checks must only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 232 have been carried out),

or

- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 232 have been carried out).

When the inspector looks at your staff list, in addition to checking that your checks really were pre-employment, they are going to want to make sure that you are completing only the checks required for that person's role in the school.

Over-checking is just as bad as under-checking.

It is not better to be 'safe then sorry' – the record, is a storyboard that demonstrates you have undertaken only the checks required and understand your safer recruitment obligations. Plus, sometimes, checking someone against a list that you are not entitled to can be unlawful.

For example: Barred list information **must not** be requested on any person who is not engaging in or seeking to engage in regulated activity (Keeping Children Safe in Education, 2022, DfE).

2.6 Prohibition from Teaching Work check

Teacher prohibition and interim prohibition orders prevent a person from carrying out teaching work in schools, academies, sixth form colleges, 16-19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited must not be appointed to a role that involves teaching work.

It is now the responsibility of the TRA to maintain this list. However, there are a number of individuals who are still subject to disciplinary sanctions which were imposed by the GTCE (prior to its abolition in 2012).

Checks are carried out via Employee Access, on the DFE Single Sign-In portal.

In my personal experience, inspectors will often ask to look at a member of staff who is a teaching assistant.

Some teaching assistants for example, are in 'Teaching work' but some are not.

'Teaching work' has a clear definition in law:

The Teachers' Disciplinary (England) Regulations 2012 define teaching work as: *planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils.*

"Delivering" includes delivering lessons through distance learning or computer aided techniques.

For that reason, you might employ some staff who you wouldn't traditionally imagine to be teaching, such as the teaching assistant who covers PPA every week, or the caretaker who puts on a woodwork session, or even the teaching assistant who plans a scheme of work to deliver to a small group of pupils once a week. However, all the above are actually in teaching work, and therefore the requirement for you to assure yourself that they aren't prohibited from teaching work is there.

That is why it's fine on your SCR for some non-teaching staff (that happen to be engaging in teaching work) to have the date you completed a check against the General Teaching Council for England (GTCE) and Prohibition from teaching work list.

It might not always be the case that when they start working with you, they are at that point engaged in teaching work. You should complete the check as soon as you become aware that they are engaging in teaching work.

The requirements are:

You must	You should not
<ul style="list-style-type: none">Record the date you checked that any adult who is engaged in 'teaching work' has not been issued either a Teacher prohibition or interim prohibition order, by the TRA or GTCE.	<ul style="list-style-type: none">Record on the SCR, who completed the check

There are no requirements to retain evidence that this check has been completed, as the check is completed via Employee Access, which is an auditable tool.

Audit tasks:

Check	√
Does the Single Central Record capture the date that the TRA/GTCE Sanction list was checked via (DFE) Employee Access?	
Have leaders identified all non-qualified teachers, who are in 'teaching work' and completed this check them too?	
Personal files, do not contain any evidence of this check	

2.7 Further checks on people living or working outside the UK

The regulations require that in the case of any person for whom, by reason of that person living or having lived outside the United Kingdom, obtaining a DBS certificate is not sufficient to establish the person's suitability to work in a school, such further checks are made as the proprietor considers appropriate, having regard to any guidance issued by the Secretary of State.

'Keeping Children Safe in Education' is the guidance issued by the Secretary of State, of which we must have regard.

That document, states that these checks could include, where available:

- criminal records checks **for overseas applicants**

The key word here is 'applicants'.

The Home Office Guidance, 'Criminal records checks for overseas applicants' (May 2013) makes it clear that **the requirement to check an overseas police certificate (of good conduct) only applies to overseas applications.**

and for teaching positions

- obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you carried out any overseas checks. This doesn't have to be individual dates, for individual checks, it is the date you completed your checks, reviewed those checks and decided on the adult's suitability. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record on the SCR what documentation was seen, or certificate obtained.

There is no clear guidance on retention; however, for overseas applicants, we should retain a copy of the documents used to verify their suitability in a sealed envelope for the entirety of employment (plus a further two years). This is because it relates to their application to work in the country.

Audit tasks:

Check	√
Does the Single Central Record capture the date you carried out any overseas checks.	

2.8 Right to Work checks

The regulations require that we carry out appropriate checks to confirm ‘the person’s right to work in the United Kingdom’ in respect of each such person who intends to work at the school.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date you saw (in person) the person’s right to work documentation. ▪ Make a clear copy of each document in a format which cannot manually be altered and retain the copy securely: electronically or in hardcopy. ▪ Retain copies of documents taken should be kept securely for the duration of the worker’s employment and for two years afterwards. The copy must then be securely destroyed. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record on the SCR what documentation was seen ▪ Record any document reference number (for example passport numbers)

You must copy and retain copies of:

1. **Passports:** any page with the document expiry date, the holder’s nationality, date of birth, signature, immigration permission, expiry date, biometric details, photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK (visa or entry stamp) and undertake the work in question (the front cover no longer has to be copied).
2. **All other documents:** the document in full, including both sides of an Immigration Status Document and an Application Registration Card.

You must also make a note of the date on which you conducted the check. This can be by making a dated declaration on the copy.

This dated declaration should be written on the document copy as follows: *‘the date on which this right to work check was made: [insert date]’*

Audit tasks:

Check	√
Does the Single Central Record capture the date that the person’s right to work in the United Kingdom documentation was checked?	
Does the personal file contain a clear copy of each document in a format that cannot manually be altered?	
Is there a clear process in place for ensuring that copies of documents taken are kept securely for the duration of the worker’s employment and then to securely destroy them, two years afterwards?	
Does the copy contain a dated declaration on the document copy?	

3. Volunteers Tab

Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so schools and colleges should undertake a written risk assessment and use their professional judgment and experience when deciding what checks, if any, are required.

The risk assessment should consider:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and
- whether the role is eligible for a DBS check, and if it is, the level of the check, for volunteer roles that are not in regulated activity.

An example risk assessment can be found at Appendix 2.

The risk assessment must be recorded in the personal file.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Record the date on which any checks carried on against volunteers, on the volunteer tab of the Single Central Record. ▪ Complete a risk assessment against each volunteer, using Appendix 2. ▪ Keep a copy of the risk assessment in the personal file. 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check

Audit tasks:

Check	√
Does the Single Central Record capture the date on which any checks were carried out upon volunteers, on the volunteer tab of the Single Central Record.	✓
Have on file a risk assessment for each volunteer	

4. Supply Staff Tab

Inspectors will always want to talk about supply staff, and rightly so; it's a statutory recording area.

When we think about what inspectors will be looking for, it's worthwhile remembering exactly what is meant by the term 'supply staff'.

"supply staff" means any person working at the school supplied by an employment business.

- ***The Education (Independent School Standards) Regulations 2014***

The Education (Independent School Standards) Regulations 2014 gives us some clear guidance about how we assess the suitability of a member of supply staff and record them on the record.

Part 4 of The Education (Independent School Standards) Regulations 2014 talks about the suitability of staff, supply staff, and proprietors. It tells us that we need to do two things:

1. Seek a comfort document from the employment business - the supply agency
2. See a copy of the adult's Enhanced DBS certificate.

In Summary:

	Maintained schools	Independent schools (including academies and free schools)
Obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school	In all cases	In all cases
See a copy of the enhanced DBS certificate that was obtained prior to the individual starting work	Only where it disclosed any matter or information or any information'	In all cases

When it comes to recording this information on the SCR, it's important to break down the statutory requirements in this area.

You must	You should not
<ul style="list-style-type: none"> ▪ Record who the adult is (their name). ▪ Record their start and end date² ▪ Record the date we have obtained written confirmation from the agency ▪ The date the DBS certificate was obtained by the agency³ ▪ The date you saw the certificate 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record the DBS number ▪ Retain a copy of the DBS certificate

The tab should read like this:

Forename	Surname	Date ID seen	Start date	End date	Written Confirmation obtained	Date DBS certificate obtained	Date DBS Certificate seen

Case study:

It is Monday 1st March 2023. The headteacher has asked Jermaine the senior administrator who is responsible for booking supply staff, to source a maths teacher who can cover for Mrs Jackson who is off sick today. She called in this morning saying she was off sick, and would be back in work on Friday 5th March.

Jermaine has called the agency and secured the services of a supply-maths teacher: Liam Samson.

The agency has provided the school with written confirmation that they have completed all the checks you would have otherwise completed; as this is a maths teacher; they confirm they have seen his Identification documentation, including his right to work; they have checked that he isn't prohibited from teaching work and obtained an enhanced DBS certificate (with barred list information). They confirm on the written document that they haven't completed any overseas checks (Liam has never worked/lived overseas) and they haven't completed a check of the Section 128 direction list (he isn't in a management role, or provided cover in one.).

Jermaine has received the written confirmation, and stores it securely. She starts to complete the SCR....

² Keeping Children Safe in Education, in a convoluted way, tells us that a member of supply staff needs to be entered onto the SCR even if they only work for one day (Keeping Children Safe in Education 2022, Para 269) and come off, when they are no longer working at the school (272).

³ Remember it must be before they start work at your school, the exemption we discussed earlier does not apply to supply agencies)

Now that the school have received the written confirmation, and has confirmed that it contains the date that all checks necessary were completed, they can start to populate Liam's row on the SCR.

Forename	Surname	Date ID seen	Start date	End date	Written Confirmation obtained	Date DBS certificate obtained	Date DBS Certificate seen
Liam	Samson		1/03/2023	05/03/2023	01/03/2023	14/01/2023	

It's worth noting that the column marked 'date DBS certificate obtained' contains the date that the agency obtained a copy of the certificate, that date is taken from the written confirmation. This does not replace the need for independent schools to see the certificate, or for maintained schools to see it where it contains information.

It is now 9am on Monday 1st March 2023; and Liam arrives at the school.

Upon arrival, his identification is checked by Jermaine. It is cross-checked with the written confirmation document.

Liam also produces his DBS certificate to Jermaine, who confirm it contains no information, and checks the issue date to make sure it is the same date that was contained on the written assurance document.

Jermaine now completes the rest of the row...

Forename	Surname	Date ID seen	Start date	End date	Written Confirmation obtained	Date DBS certificate obtained	Date DBS Certificate seen
Liam	Samson	1/03/2023	1/03/2023	05/03/2023	01/03/2023	14/01/2023	1/03/2023

It is now the end of the school day on 5th March 2023, Liam has completed his time with the school, Mrs Jackson is back on Monday so Liam's services are no longer required by the school.

Jermaine now removes Liam from the SCR but retains the written confirmation document.

Your retention period for the written confirmation should be reasonable; I would suggest no longer than 12 months. Most schools set up service level agreements with supply agencies; when establishing a service level agreement, you should include a paragraph within it that sets out your safeguarding expectations and captures this retention period.

You must never retain a copy of the DBS certificate, which is not reasonable, nor required to meet the requirements of the SCR.

Audit tasks:

Check	√
Does the Single Central Record capture who the adult is (their name).	
Does the Single Central Record capture their start and end date	
Does the Single Central Record capture the date we have obtained written confirmation from the agency	
Does the Single Central Record capture the date the DBS certificate was obtained by the agency	
Does the Single Central Record capture the date you saw the certificate	

5. Governors and Proprietary bodies

At Creative Education Trust, 'Governors' means external members of an Academy Council.

'Proprietary body' means the Academy Trust board, and its members.

'Governance is not a regulated activity relating to children, so governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity.'

– Keeping Children Safe in Education (2022)(Para 314).

5.1 Governors

There is no statutory requirement to record (maintained school) Governors on your SCR. We know that, because Keeping Children Safe in Education, identifies it within its 'non-statutory information' section.

That being said. It's always advisable to record checks completed against governors on your single central record, where else are you going to do it?

Myth buster: Governors are volunteers, so you do need to check their right to work.

Visitors to the UK, can volunteer for a registered charity for 30 days. You are probably going to establish that someone doesn't have a substantive UK address as part of your basic application process, because as you know, governors need a full process too... conducting 'right to work' checks is an absolute legal necessity.

Governors in maintained schools are required to have an enhanced DBS check.

It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.

The legal requirement is that DBS applications are made within 21 days after his or her appointment or election."

The law⁴ was updated in 2016, to state that where a governor has been elected or appointed before 1st April 2016 and does not hold an enhanced criminal record certificate, the governing body must apply for such a certificate in respect of that governor by 1st September 2016.

⁴ The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016

5.2 Academy trust boards

Some academy trusts have bodies like academy councils; they have delegated powers, as issued by the Trust Board. For that reason, in my view, academies should manage these volunteers in the same way that a maintained school would apply for certain checks for their governing body.

So, let's think about 'the Trust board' – they are your proprietary body.

There is a requirement, under Section 21(6) of the regulations, to record the details of Trustees and the Chair of the Trust Board, on your SCR.

Section 20 (4) Sub-paragraphs (5) to (8) of the 'regulations' contain information about what is required with regards to establishing suitability.

The regulations state that the chair of the trust board must have their DBS certificate countersigned by the secretary of state.

In practice, the Education and Skills Funding Agency (ESFA) carries out statutory suitability checks on newly appointed chairs of trustees on behalf of the Secretary of State for Education.⁵

The suitability check includes:

- verification of identity
- confirmation of the right to work in the United Kingdom
- an enhanced Disclosure and Barring Service (DBS) check

In relation to the wider board, the 'trustees' (sometimes referred to as Non-Executive Directors) also require enhanced DBS checks. The regulations state that you must seek an Enhanced DBS certificate (without barred list information), check their right to work, and, if necessary, because they have lived outside the United Kingdom, carry out further checks (deemed appropriate) to establish their suitability.

The regulations conclude this section with a prudent reminder - that you must always see the DBS certificate yourself!

In terms of recording the details of Governors and proprietary board members I would record them like this:

Forename	Surname	Role	Start of term date	Date ID seen	Date 'Right to work' documentation verified	Date DBS certificate obtained	Date DBS Certificate seen	Date that DBS certificate countersigned by the Secretary of State

⁵ <https://www.gov.uk/government/publications/academy-trust-chair-suitability-checks/academy-trust-chair-suitability-checks-guidance-for-applicants>

You can then make it role specific, like this:

Forename	Surname	Role	Start of term date	Date ID seen	Date 'Right to work' documentation verified	Date DBS Certificate seen	Date that DBS certificate countersigned by the Secretary of State
Sandra	Smith	Trustee	01/09/2022	11/08/2022	11/08/2022	22/08/2022	NA
Alisha	Singh	Chair of Trustees	01/09/2022	14/07/2022	14/07/2022	22/08/2022	18/08/2022

As you can see clearly, the date that the DBS was counter-signed, is the issue date and the date we obtained (saw) the certificate is the date the certificate was produced.

You should maintain personal files for proprietors and governors, in the same way you do for staff.

You must	You should not
<ul style="list-style-type: none"> ▪ Record who the adult is (their name). ▪ Record the date of their start of term in office ▪ Record the date we have checked their 'Right to Work' documentation. ▪ Record the date you saw the DBS certificate ▪ Record the date that the Children's Barred List was checked (if the adult is in regulated activity in addition to their Governance duties). 	<ul style="list-style-type: none"> ▪ Record on the SCR, who completed the check ▪ Record the DBS number ▪ Retain a copy of the DBS certificate

Audit tasks:

Check	✓
Does the Single Central Record capture who the adult is (their name).	
Does the Single Central Record capture the date of their start of term in office	
Does the Single Central Record capture the date we have checked their 'Right to Work'?	
Does the Single Central Record capture the date that the Children's Barred List was checked (if the adult is in regulated activity in addition to their governance duties)?	
Does the Single Central Record capture the date you saw the certificate	
Has the DBS certificate for the chair of the Trust Board been countersigned by the Secretary of State?	

6. Third Party Staff Tab

When talking about who must be recorded on the Single Central Record, the Regulations refer to all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for only one day.

Ofsted mirror this in their handbook where they say: all staff (including third-party supply staff and trainee teachers on salaried routes, and any tutors or other staff, working either in person or virtually) who work in the school. Ofsted recently updated the handbook to include online tutors.

UK General Data Protection Regulations (UK GDPR) apply to recording and retaining information on the Single Central Record of third-party staff. For that reason, you must seek consent from the visitor, including those working with children, to record their individual details on the SCR. In most cases, recording their company details is sufficient.

You should lay out clearly in the service level agreement, how you will record the adult's information on the Single Central Record (where appropriate).

6.1 Contractors

Myth buster: There is no requirement to record contractors on the Single Central Record.

When referring to contractors, we mean adults who provide a temporary service (usually maintenance-related) to the academy; they come into the school on an infrequent basis and are not usually in regulated activity.

Where schools use contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the academy.

In addition to checking the identity of contractors on arrival at the academy, we must ensure that any contractor, or any employee of the contractor, who is to work at the academy, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.

As part of your service level agreement, you will request that the company provides you with assurance in relation to the checks they have carried out; this does not have to include a list of the adults who work for them, and what checks have been completed against them.

Where you receive a letter of assurance, you should retain it for the period of the contract, or 12 months, whatever comes sooner. When that period passes, it would be reasonable to seek a new letter.

There is no requirement to record this information on the Single Central Record, however, it would be good practice to include a list of the companies that have supplied you with assurances, on your third-party tab. This shouldn't include personal information though.

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Set out your safeguarding requirements in the contract between the organisation and the academy ▪ Check the identity of contractors on arrival at the academy ▪ Ensure that the that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check ▪ Record these adults in your visitor book. 	<ul style="list-style-type: none"> ▪ Record details of contractors on the Single Central Record

6.2 Adults contracted to work with children.

When we talk about ‘adults contacted to work with children’ – we are referring to sports coaches, therapists, external counsellors (not provided by the Local Authority) for example. We are not referring to supply staff, or alternative provisions.

Sometimes, schools (including academies) approach third-party organisations to do a specific piece of work with children, normally over a set period of time.

Schools (including academies) must obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school.

Once that written confirmation has been received, the visitor’s employers have confirmed that their staff have appropriate checks. Schools and colleges should not ask to see the certificate in these circumstances.

For adults who are self-employed, ‘Keeping Children Safe in Education’ says that:

‘If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.’

You should record on your Single Central Record the name of the adult being provided to undertake this third-party work at your school, and the date you received written confirmation that appropriate checks were in place, if the company has provided you consent to do so.

In most cases, you will record the name of the company, and the date you received written confirmation that appropriate checks had been completed.

If the company is providing a tutor, you must record the details of any tutors or other staff, working either in person or virtually with pupils. You must record the date that you were assured that the organisation providing an adult for work at the school has carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school. If they are self-employed, you will need to obtain the DBS check, as

self-employed people are not able to make an application directly to the DBS on their own account.

Some self-employed people seek their checks through a registered body, in which case it is OK, for the school (including academies) to see the original paper certificate of the adult and then complete a check via the DBS update service.

Details of registered DBS umbrella bodies can be found here: <https://dbs-ub-directory.homeoffice.gov.uk/>

The requirements are:

You must	You should not
<ul style="list-style-type: none"> ▪ Set out your safeguarding requirements in the contract between the organisation and the academy ▪ Check the identity of these adults on arrival at the academy ▪ Ensure that the organisation providing an adult for work at the school has carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school ▪ Record on the Single Central Record, the name of the company, and the date you received written confirmation that appropriate checks had been completed ▪ Record on the Single Central Record the of any tutors or other staff, working either in person or virtually with pupils. 	<ul style="list-style-type: none"> ▪ Record individuals' details on the Single Central Record without consent. ▪ See the physical DBS Certificate.

6.3 Alternative Provision

Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff.

You must	You should not
<ul style="list-style-type: none"> ▪ Set out your safeguarding requirements in the contract between the Alternative Provision and the academy ▪ Ensure that the organisation has carried out the same checks on their own staff, that the school would otherwise perform on any individual who will be working at the school ▪ Record on the Single Central Record, the name of the Alternative Provision, and the date you received written confirmation that appropriate checks had been completed 	<ul style="list-style-type: none"> ▪ Record individuals' details on the Single Central Record without consent. ▪ See the physical DBS Certificate.

6.4 Visitors who are there in a professional capacity

For visitors who are there in a professional capacity schools and colleges should check ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks. Schools and colleges should not ask to see the certificate in these circumstances).

There is no requirement to see the DBS certificate for a Children's Social Care representative, Ofsted, or the Police. You must still check their identification though upon arrival.

Interesting fact: Inspecting on behalf of Ofsted, is not a regulated activity; therefore Inspectors do not require a children's barred list check.

Usually, local authorities will issue schools with an assurance letter that confirms that they have completed all the required checks on their representatives; this letter will also cover other professionals such as those from educational psychology services, counselling services, and children's mental health support workers for example.

If an adult presents on behalf of the local authority, you will normally be expecting them, but you should check their Identity to confirm they are who you are expecting and are operating on behalf of the local authority of whom you have been offered assurances.

The requirements are:

You must	You should not
<ul style="list-style-type: none">▪ Check the identity of these adults on arrival at the academy▪ Record these adults in your visitor book.	<ul style="list-style-type: none">▪ Record details of Police Officers, Ofsted inspectors or social workers (including those working on behalf of the local authority for whom have already offered you assurance) on the Single Central Record

6.5 Visitors

Schools (including academies) should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

Headteachers and principals should use their professional judgement about the need to escort or supervise such visitors.

The requirements are:

You must	You should not
<ul style="list-style-type: none">▪ Check the identity of these adults on arrival at the academy▪ Record these adults in your visitor book.	<ul style="list-style-type: none">▪ Record details of Police Officers, Ofsted inspectors, or social workers (including those working on behalf of the local authority for whom have already offered you assurance) on the Single Central Record

7. Monitoring and oversight

The multi-academy trust maintains the Single Central Record; and quality assurance takes place half-termly between the Trust HR Manager and the Director of Safeguarding, as laid out in the Safeguarding Quality Assurance Framework (2023).

There are no set standards around the oversight of the Single Central Record; however, the Creative Education Trust expectation is that the principal meets with the person who oversees the SCR at least once per half term, to quality assure the document.

When looking at the record, principals and headteachers should use the audit tool found in Appendix 2, to assure themselves about the upkeep the document.

There is no requirement for Governors to audit the Single Central Record.

“As governors and trustees, you are responsible for making sure that safeguarding procedures are properly followed in schools. But that doesn’t mean you have to go through your school’s central record yourself. You need to make sure the overarching culture is right.”

- Amanda Spielman, His Majesty’s Chief Inspector, Ofsted, Amanda Spielman at National Governance Association, June 2019

If Governors are discussing the Single Central Record, they should ask questions like:

They could ask questions like:

- What is your process for quality assuring the record
- What did your most recent quality assurance of the record show
- how do you ensure that all staff are recorded
- what is the process for ensuring that supply teachers are added to the SCR (even if they only work for one day)
- How is the record stored and kept secure
- Who has access to the record and what training to they receive about GDPR (to recognise it as sensitive information)
- Who has had safer recruitment training in the school?
- Have we had any new starters process last spoke; talk me through that recruitment process.
- How do you ensure we are GDPR compliant (does the record contain address/date of birth?)

8. Myth Busting!

- **You do not need to record the adults date of birth, or address on the SCR.** This information is already contained within personal files, and on MIS systems.
- **You do not need an archive/leavers tab.** KCSIE is clear in paragraph 272, that you should remove the details of adults from the SCR, once they no longer work at the school.
- **There is no set timeframe from someone living or working overseas, before you need to complete checks.** See Section 2.7.
- **There is no requirement to re-check a person's DBS certificate.** The conditions where you may need to recheck existing staff, is laid out in Para 345 of KCSIE.
- **There is no requirement to record references of health checks on the Single Central Record;** you can (and must) retain this information in personal files, though.

In February 2023, I presented a webinar on behalf of the Department for Education, around the Single Central Record. Following that webinar, the Department released an FAQ document, which addressed the most common questions that came in the live chat. That document can be found in Appendix 3.



Appendix 1: Self-evaluation checklist

All Staff Tab	√
Column check	
Identity check	
Enhanced DBS check/certificate	
Section 128 direction (for management positions in independent schools including academies and free schools)	
Check of professional qualifications	
Barred list check	
Prohibition from teaching work check	
Further checks on people living or working outside the UK	
Right to work in the UK.	
Identification check	
Does the Single Central Record capture the date that the person's identification documentation was checked?	
Enhanced DBS certificate	
Does the Single Central Record capture the date that the person's DBS certificate was obtained by the school?	
Does the Single Central Record capture the DBS number contained on the original paper certificate, and is it complete (00XXXXXXXX)	
Personal files, do not contain copies of the DBS certificate	
Children's Barred List	
Does the Single Central Record capture the date that the children's barred list was obtained?	
Does the date on which the barred list was checked, fall before the date that the adult commenced work in regulated activity (at the academy)	
Where the school has completed a standalone barred list check, before the certificate has been obtained by the school, they have ensured all other checks are in place	
Where the school has completed a standalone barred list check, before the certificate has been obtained by the school, they have put in place a written risk assessment	
Prohibition from teaching work check	
Does the Single Central Record capture the date that the TRA/GTCE Sanction list was checked via (DFE) Employee Access?	
Have leaders identified all non-qualified teachers, who are in 'teaching work' and completed this check them too?	
Personal files, do not contain any evidence of this check	
Right to Work in the United Kingdom	
Does the Single Central Record capture the date that the person's right to work in the United Kingdom documentation was checked?	
Does the personal file contain a clear copy of each document in a format that cannot manually be altered?	

Is there a clear process in place for ensuring that copies of documents taken are kept securely for the duration of the worker's employment and then to securely destroy them, two years afterwards.	
Does the copy contain a dated declaration on the document copy?	
Overseas Checks	
Does the Single Central Record capture the date you carried out any overseas checks.	
Qualifications check	
Does the Single Central Record capture the date that professional qualifications were verified?	
A copy of the qualification used to perform such a check, has been retained in the personal file	
Section 128 check	
Have leaders established which adults working in the academy are line managing someone, or managing a budget and are therefore considered to be involved in the management of the academy?	
Does the Single Central Record capture the date that you completed a check of the Section 128 direction list on the SCR?	
Personal files do not contain any evidence of this check	
Volunteers tab	√
Column check	
Identity check	
Enhanced DBS check/certificate	
Barred list check	
Prohibition from teaching work check	
Further checks on people living or working outside the UK	
Right to work in the UK	
Volunteers	
Does the Single Central Record capture the date on which any checks carried out upon volunteers on the volunteer tab of the Single Central Record	
Have on file a risk assessment for each volunteer	
Supply Staff tab	√
Column Check	
Person's name	
Date of Identity check	
Start date	
End date	
Written confirmation received on	
Date DBS certificate obtained (by agency)	
Date DBS Certificate received.	
Supply Staff checks	
Does the Single Central Record capture who the adult is (their name).	
Does the Single Central Record capture their start and end date	
Does the Single Central Record show that an adult goes on the record when they start work (even for only one day) and comes off it when they are no longer working at the Academy?	
Does the Single Central Record capture the date we have obtained written confirmation from the agency	
Does the Single Central Record capture the date the DBS certificate was obtained by the agency	
Does the Single Central Record capture the date you saw the certificate	

Governance tab		√
Column Check		
Person's name		
Date of Identity check		
Start of term of office date		
Right to Work check		
Barred List (where appropriate)		
Date DBS Certificate received.		
Governance Checks		
Does the Single Central Record capture who the adult is (their name).		
Does the Single Central Record capture the date of their start of term in office		
Does the Single Central Record capture the date we have checked their 'Right to Work'?		
Does the Single Central Record capture the date that the Children's Barred List was checked (if the adult is in regulated activity in addition to their governance duties?)		
Does the Single Central Record capture the date you saw the certificate		
Has the DBS certificate for the chair of the Trust Board been countersigned by the Secretary of State?		
Third-Party Tab		√
Column Check		
Person's name		
Role		
Company/Organisation name		
Date Letter of assurance received/or DBS obtained (for self-employed)		
Third-party staff related checks		
The school seeks letters of assurance from Alternative Providers and they are recorded on the Single Central Record		
The school checks the identity of visitors (including contractors, those contracted to work with children and professional visitors) on arrival at the Academy.		
Where the school engages adults who are self-employed, they seek DBS checks for them.		
The school sets out their safeguarding requirements in the contract between the organisation and the academy.		



Appendix 2: Volunteer risk assessment

Persons name			
Academy			
Role in the Academy			
Is the volunteer in 'Regulated' Activity?	YES		NO

*The new definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

- i. unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on well-being, or drive a vehicle only for children;
- ii. work for a limited range of establishments ('specified places'), with opportunity for contact: e.g., schools, children's homes, childcare premises. Not work by supervised volunteers;

If 'yes', an enhanced DBS with Barred list check is required.

If 'no', an enhanced DBS without a Barred list check *may* be obtained

Areas to consider

	What is known by the Academy?
How frequently will the volunteer be in school?	
What is the connection of the volunteer to the school?	
What motivates the volunteer to want to work in the school?	
Is the volunteer in paid employment or do they work in a voluntary capacity elsewhere with children?	

Can the volunteer provide at least one reference from someone other than a family member, including a senior person at the employment or voluntary service named above?	
What information does the school already know about the person?	
Has the person's identity been verified?	
Is the person signed up to the DBS Update Service?	
Has a check been completed on the DBS Update Service?	
Is the person aware of any reason why they should not volunteer to work with children?	
Is the school aware of any reason that the person should not work with children?	
Is this volunteer with children between the hours of 2am and 6am <i>This is a regulated activity.</i>	

Any other comments

Decision

√	Risk level	Condition
	High Risk	<p>the person has no previous connection with the school AND cannot provide references from elsewhere.</p> <p><i>There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school should consider whether the person's uncorroborated background would raise an unacceptable risk.</i></p>
	Medium Risk	<p>The person can provide suitable references for other work with children (either paid or unpaid), they have a connection to the school, and no issues have come to light that would mean they would be unsuitable.</p> <p><i>There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school may wish to do so, as no enhanced DBS has been seen.</i></p>
	Low Risk	<p>The person is signed up to the DBS Update Service and the checks reveal no negative information OR The person is employed or volunteers elsewhere and has a recent enhanced DBS and can provide references OR the school knows the person well (eg. may be a former employee)</p> <p><i>There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, unless the person uses the DBS Update service, the school may decide to obtain a new enhanced DBS.</i></p>

Rationale

Decision

- Application for enhanced DBS check is not needed. State reason(s) below:

- Application for an enhanced DBS check is needed. State reason(s) below:

- Application for an enhanced DBS check and a Barred List check is needed because the person is in Regulated Activity
-

Sign off

Principal/Headteacher (Print Name)	Principal/Headteacher (Signature)
Date	

If in doubt, do not sign this document and contact the Trust HR Manager, or Director of Safeguarding.

Appendix 3: DfE, SCR FAQ document, March 2023

Q: Can the DfE share a Single Central Record (SCR) template, which can be used as good practice?

A: *Part three of Keeping children safe in education clearly sets out the statutory and non-statutory requirements for schools and colleges in relation to completion of the SCR. This includes what ‘must’ be included (legal requirements) and what ‘could’ be included (non statutory information). Schools and colleges are best placed to decide on the format of their own template, as this will enable them to meet their own local requirements.*

Q: What date should be recorded on the SCR, the date the evidence was seen (e.g. DBS certificate) or the date of issue, and does the name of the person who has made the checks need to be included?

A: *The statutory requirement is to record the date the certificate was obtained by the school or college, i.e. the day the certificate was presented to them by the individual and the information on it considered. However, as set out at paragraph 273 of KCSIE, schools can, if they wish, also record any other information they deem relevant. This could include the date that the certificate was issued by DBS and details of the individual who undertook the check.*

Q: Should any gaps on the SCR, for staff who have worked at a school for many years, be undertaken retrospectively?

A: *A requirement in maintaining the SCR is that it should be up to date at all times. This means that the details of **all** staff who are working at the school or college should be included. The SCR should include evidence that all checks required at the time the individual was appointed were completed.*

Q: When should the details of those who leave a school be removed from the SCR, and is a ‘leavers’ tab required?

A: *The requirement that the SCR is up to date at all times means that the details of staff who no longer work at the school should be removed when they leave. Any personal information retained will need to comply with the Data Protection Act (DPA) and GDPR requirements.*

Q: Is there a requirement to include the date online checks were conducted on the SCR?

A: *Paragraph 221 of KCSIE sets out that schools and colleges should*

*consider carrying out an online search as part of due diligence on shortlisted candidates. However, **there is no statutory requirement to include the date the check was made on the SCR but schools and colleges can do so if they wish.***

DBS Checks

Q: How often are DBS checks required?

A: There is no requirement for schools to re-check the DBS status of staff unless they have moved from a position that means they will now be working in regulated activity, or where the school/college has concerns about an individual's ongoing suitability to work with children, or where there has been a break in service of 12 weeks or more.

Q: Should a copy of the DBS certificate be retained?

A: Schools and colleges do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the SCR (KCSIE paragraph 276). When a school or college chooses to retain a copy, there should be a valid reason for doing so, and it should not be kept for longer than six months. Further information on handling DBS information can be found on [Handling of DBS certificate information - GOV.UK \(www.gov.uk\)](#)

Q: Can a recent DBS check from another school be accepted?

A: KCSIE paragraphs 233-234 set out that there is no requirement to undertake a further DBS check where an individual has worked in a school or college within three months prior of their new appointment. However, schools and colleges should carefully consider if it would be appropriate to request a further DBS check to ensure they have up to date information (KCSIE paragraph 235).

Overseas Checks

Q: How far should we go back when considering undertaking an overseas check?

A: KCSIE does not specify any minimum period of time that a person must have lived or worked abroad before an overseas criminal record check is required, this will be a decision for the school/college/recruitment body. Further guidance on criminal records checks for overseas applicants can be found at: <https://www.gov.uk/government/publications/criminal-recordschecks-for-overseas-applicants>.

Q: Are overseas checks required for governors/volunteers who have worked or lived overseas?

A: [The Governance Handbook 2019 \(publishing.service.gov.uk\)](#) sets out

the checks which are required for school governors; academy members; trustees and individuals on any Multi Academy Trust Local Governing Body. If schools and trusts are uncertain, they should seek their own legal advice.

Paragraphs 305-312 of KCSIE outline the checks that are, or may be, required for volunteers. The nature of voluntary roles can vary, so schools and colleges are required to use their professional judgement when deciding what checks, if any, are required, whilst considering the various aspects of the volunteering role, including whether the role will be supervised. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Section 128 Checks

Q: Do governors (school type not specified) require a Section 128 check?

A: Schools and colleges are required to carry out checks for Section 128 directions for management roles in independent schools, academies and free schools as set out in paragraphs 256-257 of KCSIE. This includes, but is not limited to, those on your senior leadership team (regardless of teaching status), middle leaders and anyone else who is line managing a person, or managing a budget, as they are likely to be considered in management too.

Section 4.1.2 of the [Governance Handbook 2019](#) ([publishing.service.gov.uk](#)) sets out the 'requirements' for Section 128 checks for independent schools, academies and free schools. Maintained schools should also check if a person proposed to be a governor is disqualified under Section 128.

Maintained schools are not legally required to conduct Section 128 checks on individuals in management positions unless they hold office as a governor.

A section 128 direction does not prohibit a person working or being a governor of a non-maintained special school.

Q: How is a Section 128 check obtained?

A: Schools and colleges with a Department for Education Sign-in account can use the free Teaching Regulation Agency 'Employer Access' service which is available via the TRA's web page [Teaching Regulation Agency](#) ([education.gov.uk](#)).

Q: Are Section 128 checks included on the SCR?

A: Yes. With regards to independent schools, including academies and

free schools it is a statutory requirement (i.e. mandatory) that the Section 128 check is included on the SCR, see KCSIE paragraph 271 for further information.

In the case of maintained schools, the Section 128 check, if required, can be recorded under the non-statutory information. This is because recording checks completed against Governors is not a requirement. Where a staff member also sits on the Governing body, recording the Section 128 check date is required.

Prohibition Checks/Right to Work Checks

Q: Who requires a 'prohibition from teaching' work check?

A: These checks must be made to ensure that any applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State, see KCSIE paragraph 253 for further information. A person who is prohibited must not be appointed to a role that involves teaching work.

Q: Who requires a Right to Work check?

A: All employers in the UK have a responsibility to prevent illegal working. You do this by conducting simple right to work checks before you employ someone, to make sure the individual is not disqualified from carrying out the work in question by reason of their immigration status. Further details: [Employer's guide to right to work checks \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk). Schools and colleges must verify a person's right to work in the UK, see KCSIE paragraph 232.

Contractors/Third Parties/Agencies

Q: What checks should be undertaken for contractors, and are they included on the SCR?

A: Part three of KCSIE describes in detail those checks that are, or may be required. Information about checks for 'Contractors' can be found at paragraphs 290-295 of KCSIE. Under no circumstances should a contractor, in respect of whom no checks have been obtained, be allowed to work unsupervised or engage in regulated activity. There is no requirement for contractors to be included in the SCR. Schools and colleges should have their own policy and procedures for ensuring that contracting staff to work at the school are suitable, checked and monitored.

Q: When a school hires their premises to another organisation (e.g. after school clubs), do employees need to be added to the SCR?

A: Instructors and coaches who run after school activities, supplied by

third parties/agencies, who are not school staff, do not need to be included in the SCR. There is separate statutory guidance for after school provisions: Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK (www.gov.uk).



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