



Believing and Achieving Together

Sign:

Date: March 2023

Review: March 2025 or sooner if required

1 Scope

This code of practice is available for adoption by all maintained schools and academies. An alternative version is available for schools that wish to undertake additional discretionary criminal records checks for current staff.

The code applies to the school's responsibilities for obtaining criminal record certificates for all employees and some volunteers appointed by the school. It also sets out the steps it should take to ensure third parties such as external agencies and contractors follow the same arrangements.

2 Purpose

The purpose of this code of practice is to set out how schools should handle criminal record checks from the Disclosure and Barring Service (DBS), either as one of the pre-appointment checks required under the Recruitment and Selection Code of Practice for Schools or in other limited circumstances, and their powers to check in some circumstances whether individuals are barred from working with children by their inclusion on the Children's Barred List held by the DBS.

This will ensure schools follow appropriate and proportionate vetting procedures as part of their commitment to safeguarding and promoting the welfare of children and young people.

3 Roles and Responsibilities

Governing Body: The governing body should ensure that the school operates safe recruitment practices and that all appropriate checks are carried out on staff and volunteers who work with children.

Headteacher: The headteacher will:

- ensure, on behalf of the person(s) with the delegated responsibility for making appointments, that all new employees apply for an enhanced criminal records certificate from the DBS, unless they have an acceptable existing certificate and are registered with the DBS Update Service, and undertake any necessary additional checks if the person has previously lived overseas;
- decide whether a new unpaid volunteer needs to apply for an enhanced criminal records certificate and/or Children's Barred List check and undertake any necessary additional checks if the person has previously lived overseas;
- ensure that the necessary identity documents are checked and copied and that the validation process for identity checks is properly administered;
- decide whether a new employee or unpaid volunteer can start work before a newly applied for enhanced criminal records certificate is received under the respite measures set out in this Code of Practice;

- consult with the person(s) delegated to make appointment or dismissal decisions about whether a criminal conviction and/or additional disclosed information makes a selected candidate or current employee or volunteer unsuitable for the work they do;
- seek assurance from supply agencies and external contractors that their staff have a satisfactory criminal records and, where relevant, are not included on the Children's Barred List and the third party provider is following the full range of safer recruitment practices;
- ensure that the criminal records check and other pre-appointment checks are recorded on the school's single central record of recruitment and vetting checks; and
- ensure that criminal convictions information is treated confidentially and only disclosed and retained as allowed for in this Code of Practice.

Local authority: Employee Services will process DBS applications for staff/volunteers as the registered body for schools. The County Council has a number of counter signatories who will countersign the application and receive the disclosure from the DBS. Each counter signatory is registered with the DBS and has been subject to a criminal records check themselves.

4 Legal Considerations

The entitlement to request a check of the Children's Barred List only applies to individuals carrying out "regulated activity". This includes:

Activity of a specified nature

- Teaching, training, instructing, care for or supervision of children (except if the person undertaking the activities is under regular supervision) if carried out by the same person frequently or overnight;
- Advice or guidance provided wholly or mainly for children which relates to their physical, emotional or educational well-being if carried out by the same person frequently or overnight;

Driving a vehicle used for conveying children

- Driving a vehicle being only used for conveying children and their carers or supervisors under a contract or similar arrangement when carried out by the same person frequently;

Activity within a specified establishment including schools

- Any activity that is for or on behalf of the school with the opportunity for contact with children if carried out frequently, excluding work by volunteers under regular supervision or occasional or temporary contract work that is not an activity of a specified nature (as listed above).

"Frequently" means an activity carried out by the same person either once a week or more often, or on four or more days, in a 30-day period. The individual does not need to work with the same children on each occasion nor do they need to work in the same establishment if they are sent to work by an organisation who authorises that work (such as a supply agency or external contractor).

"Overnight" means once or more between 2am and 6am with the opportunity for face-to-face contact with children.

"Regular supervision" means as defined in the DfE statutory guidance on supervision in the context of volunteers working with children, as described in 8.2 below.

It is a legal requirement that an enhanced criminal records certificate is available for all newly appointed school staff carrying out regulated activity. This includes staff in schools that do not work directly with children, for example administrative staff,

caretakers and other ancillary staff. Schools have discretion in relation to requiring an enhanced criminal records certificate for supervised volunteers based on a risk assessment of the individual circumstances of the situation.

Candidates are not required to disclose all criminal convictions as minor and historic convictions are disregarded. Some types of convictions are never disregarded for jobs working with children and young people. Schools are not entitled to ask about those convictions that the law has deemed should be “filtered out” of an individual’s criminal records history; they will also not appear on a DBS certificate.

All schools are required to keep and maintain a single central record of recruitment and vetting checks including criminal records checks.

5 Information contained in an enhanced criminal records certificate

An enhanced criminal records certificate includes:

- spent and unspent convictions, cautions, reprimands and final warnings held in England and Wales on the Police National Computer (most of the relevant convictions in Scotland and Northern Ireland may also be included), except for those that are “filtered out” and are not disclosed; and
- where local police records hold data that the police reasonably believes to be relevant to the post, additional information released by the Chief Police Officer. Exceptionally, and in a very small number of circumstances (typically to protect the integrity of current police investigations), additional information may be sent under separate cover to the registered body’s counter signatory and must not be revealed to the applicant.

The filtering rules are as follows:

- **For those 18 or over at the time of the offence:**
An adult conviction will be removed from a DBS certificate if:
 - 11 years have elapsed since the date of conviction; and
 - it is the person’s only offence, and
 - it did not result in a custodial sentenceEven then, it will only be removed if it does not appear on the list of offences which will never be removed from a certificate. If a person has more than one offence, then details of all their convictions will always be included.
An adult caution will be removed after 6 years have elapsed since the date of the caution – and if it does not appear on the list of offences relevant to safeguarding.
- **For those under 18 at the time of the offence:**
The same rules apply as for adult convictions, except that the elapsed time period is 5.5 years. The same rules apply as for adult cautions, except that the elapsed time period is 2 years

Where it is appropriate to request this information as the individual will be engaged in “regulated activity”, the certificate will also confirm that a check of the Children’s Barred List has been undertaken.

6 Additional checks to accompany the criminal records disclosure for overseas staff

Criminal records certificates will not generally show offences committed by

individuals whilst living or working abroad (except in the case of service personnel and their families). Therefore, in addition to an enhanced criminal records certificate, additional checks such as obtaining overseas criminal records checks or certificates of good conduct from relevant embassies or police forces are necessary. This does not apply to Foreign Language Assistants where the British Council ensures that criminal records checks are provided by their home country.

The DBS provides detailed guidance on how to undertake additional checks in specific countries. Where an applicant is from or has lived in a country where criminal record checks cannot be made for child protection purposes, or is a refugee with leave to remain in the UK, and has no means of obtaining relevant information, the school must take extra care in taking up references and carrying out other background checks. For example, additional references should be sought, and references followed up by phone as well as letter.

7 Cost of an enhanced criminal records disclosure and additional checks for overseas staff

The DBS charges an application fee for each enhanced criminal records certificate. There is discretion about whether the individual or the school pays the DBS application fee, although the practice in Northumberland is for schools to meet these costs by a recharge from Employee Services. It is expected that applicants meet the costs of any additional overseas checks including any translation costs, although the school may decide to pay for these.

The DBS application fee does not apply to checks for volunteers which are free. The DBS defines a volunteer as “a person who performs any activity which involves spending time, unpaid (except for travel and other approved out of pocket expenses), doing something which aims to benefit some third party other than or in addition to close relatives”. However Employee Services charge an administration fee to cover the costs of processing checks for volunteers which is recharged to schools.

8 Individuals for whom the school has a mandatory duty to undertake a check of the Children’s Barred List/obtain an enhanced criminal records certificate and portability of previous certificates

8.1 New appointments – paid employees

A Children’s Barred List check and an enhanced criminal records check are mandatory for all staff newly appointed by the school including those who do not work directly with children. This applies to staff employed on permanent, fixed-term or supply/casual contracts.

The school must ensure the individual applies for a DBS enhanced criminal records certificate if they:

- have never had a DBS certificate;
- have a DBS certificate issued before 17 June 2013;
- have a DBS certificate that is not at the enhanced level, is not for the children’s workforce and/or does not include a check of the Children’s Barred List; or
- have a DBS certificate issued on or after 17 June 2013 but they are not registered with the DBS Update Service.

Further guidance on treating previous criminal records certificates as portable is set out in the Portability section below.

8.2 New appointments – unpaid volunteers

A Children's Barred List check can only be requested if a volunteer is undertaking "regulated activity". An enhanced criminal records check is also required for volunteers undertaking "regulated activity"; the school has discretion whether to request an enhanced criminal records check for volunteers not undertaking "regulated activity" i.e. volunteers working on an irregular basis or as supervised volunteers. The definition of "regulated activity" is explained in the Legal considerations section above.

Schools will need to identify in each case whether the level of supervision of a volunteer is sufficient to decide they are not undertaking "regulated activity". The law requires that supervision must be reasonable in all the circumstances for the purpose of protecting any children concerned, which gives each school the flexibility to determine what is reasonable in each individual case. The duty that supervision must take place "on a regular basis" means that supervision must not, for example, be concentrated during the first few weeks of an activity and then tail off, becoming the exception not the rule. It must take place on an ongoing basis, whether the worker has just started or has been doing the activity for some time. The level of supervision may differ, depending on all the circumstances of a case. Headteachers should consider the following factors in deciding the specific level of supervision they will require in an individual case:

- the age of the children concerned;
- the number of children that the individual is working with;
- whether or not there are other carers/ adults around;
- the nature of the individual's work or contact with the children;
- the vulnerability of the children;
- the experience of, and checks carried out on, the person being supervised;
- the number of people being supervised.

The decision regarding whether the individual is undertaking regulated activity must be kept under review.

Having decided that an individual is classed as an irregular or supervised volunteer and therefore not undertaking "regulated activity", headteachers should consider the following factors when considering whether to exercise discretion to seek an enhanced criminal records check:

- the duration, frequency and nature of contact with children;
- what the school knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer is well known to others in the community who are likely to be aware of behaviour that could give cause for concern;
- whether the volunteer has other employment, or undertakes voluntary activities where referees would advise on suitability; and
- any other relevant information about the volunteer or the work they are likely to do.

If the headteacher decides that an enhanced criminal records disclosure is required, the school must ensure the individual applies for a DBS enhanced criminal records certificate if they:

- have never had a DBS certificate;

- have a DBS certificate issued before 17 June 2013;
- have a DBS certificate that is not at the enhanced level, is not for the children's workforce and/or, where this is necessary, does not include a check of the Children's Barred List; or
- have a DBS certificate issued on or after 17 June 2013 but they are not registered with the DBS Update Service.

Further guidance on treating previous criminal records certificates as portable is set out in the Portability section below.

8.3 Portability of previous criminal records certificates

Individuals who receive a DBS certificate can choose, for an annual subscription fee (no charge for volunteers), to have their DBS certificate kept up-to-date and use it when they move from role to role, as long as this is within the same workforce and where the same type and level of check is required. Where applicants have registered with the DBS Update Service, appointing officers will be able to carry out an online check to confirm if the certificate the individual has presented for inspection remains current. This check is referred to as a status check. This is intended to allow DBS certificates to be portable between employers and should reduce the need for repeat DBS certificates to be obtained for the same individual.

The ability of the school to accept an existing DBS certificate is based on the following principles:

- the applicant produces the original certificate for inspection;
- the person's identity has been checked to verify the certificate belongs to them;
- the certificate is at the enhanced, not standard, level;
- the certificate is for the "child workforce" or the "child and adult workforce"; and
- the certificate contains a check of the Children's Barred List (if the school is entitled to request this i.e. only if "regulated activity" will be undertaken).

If the answer to **all** of the above questions is "yes", the appointing officer should check that the applicant has given permission for a status check to be carried out on their DBS certificate. If the answer to **any** of the above questions is "no", the individual must apply for a new DBS certificate.

Applicants are asked to confirm whether they are registered with the Update Service when they complete the Criminal Records Declaration Form as they apply for the role. They are also asked on the form to give written permission for a status check to be carried out if they are offered the post.

The appointing officer should check the Criminal Records Declaration Form to ensure that the applicant has given permission for the status check to be carried out. If the answer is "yes", the appointing officer should carry out the status check. If the answer is "no", the individual must apply for a new DBS certificate.

A status check is a free, instant online check that the employing organisation carries out to see if any new information has come to light since a DBS certificate was issued. Appointing officers need to follow the steps set out by the DBS to carry out an online status check. Further detailed guidance is provided in the [Guidance Notes for Appointing Officers on Checking DBS Certificates](#). Depending on the outcome of the status check, the individual may need to apply for a new DBS enhanced criminal records certificate following the guidance in the Procedure for obtaining a new enhanced criminal records certificate section below.

9 Individuals for whom a third party has a mandatory duty to obtain an enhanced criminal records disclosure

Third party providers, rather than the school, are responsible for ensuring that their staff have obtained an enhanced criminal records certificate that is judged to be satisfactory and, if the work falls within the definition of regulated activity, checked the Children's Barred List. It is not appropriate for schools to see the criminal records certificate but they should seek written confirmation from each third party that they have followed safer recruitment practices and undertaken the appropriate vetting checks including an enhanced criminal records certificate.

This includes:

- supply staff engaged by a third party whether from the County Council's Supply Register or an external agency – further guidance is included in the Procedure for ensuring third party supply staff have enhanced criminal records certificates section below;
- contracted staff for facilities services such as catering, cleaning and caretaking whether from the local authority or an external contractor;
- third party providers of extended services;
- other public sector staff such as Ofsted inspectors, psychologists, nurses, dentists and centrally employed teachers and support staff who work in schools; and
- trainee teachers undertaking school-based elements of their training.

The school should carry out an identity check of supply staff engaged by a third party to confirm that the individual who arrives to work is the individual that the local authority or agency told them to expect.

10 Individuals for whom the school does not require a criminal records certificate

10.1 Current employees and volunteers

There is no requirement to recheck staff or volunteers on an ongoing basis once an enhanced criminal records certificate has been obtained.

It is not necessary to ask current staff or volunteers in the school who have not previously had an enhanced criminal records disclosure to apply for one unless:

- there are concerns about their suitability to work with children; or
- they move to work that involves greater contact with children.

10.2 Visitors

It is not necessary to obtain an enhanced criminal records certificate for visitors who will only have contact with children on an ad hoc or irregular basis for short periods of time, or secondary pupils undertaking voluntary work or work experience in other schools. Examples of people who do not require a criminal records disclosure include:

- visitors who have business with the headteacher or other staff or who only have brief contact with children with a member of staff present;
- people who visit a school only once but their work takes them into numerous schools as a one-off visit. This would be likely to apply to visiting authors, drama companies, poets and other people who visit an individual school to deliver a one-off session for children, but will repeat

such sessions in other schools on a regular basis and will not therefore have contact with the same children;

- visitors or contractors who come on site only to carry out emergency repairs or service equipment and who would not be expected to be left unsupervised on school premises;
- secondary pupils on Key Stage 4 work experience in other schools or nursery classes, secondary pupils undertaking work in another school as part of voluntary service, citizenship or vocational studies; or Key Stage 5 or sixth form pupils in connection with a short careers or subject placement. In these cases the school placing the pupil should ensure that they are suitable for the placement in question; and
- people who are on site before or after school hours when children are not present: e.g. local groups who hire premises for community or leisure activities.

10.3 Building contractors

Building contractors should not require an enhanced criminal records certificate as children should not be allowed in areas where builders are working, for health and safety reasons, so these workers should have no contact with children. If the arrangements are such that contractors will come into contact with children then the provisions for third parties to obtain an enhanced criminal records certificate will apply.

The school should carry out an identity check to confirm that the individual who arrives to work is the individual that the contractor informed them to expect.

11 Procedure for obtaining a new enhanced criminal records certificate

11.1 Criminal Records Disclosure Form

All applicants for posts in schools are required to complete a Criminal Records Disclosure Form. The school is not entitled to ask about convictions etc that will be “filtered out” of the DBS certificate, as described in Information contained on an enhanced criminal records certificate section above. The Recruitment and Selection Code of Practice for Schools explains the actions that the person(s) with the delegated responsibility for appointments need to take at the short-listing and interview stages.

11.2 Application to DBS

Only the applicant who has been conditionally offered the post is required to complete a DBS application form (unless they have an existing certificate that is portable).

The school is responsible for ensuring that the individual requiring the enhanced certificate completes the DBS application form and provides the required identity documents. The required identity documents are set out in the [DBS Guidance on ID Checks for DBS Application Form](#). There are three possible routes for confirming the identity of the applicant and schools need to ensure that the appropriate route is followed. Further information is provided in the [Guidance Notes for Appointing Officers on Completing DBS Application Forms](#). The original application form and copies of the identity documents

(signed by the school to confirm originals were seen) are returned to Employee Services for checking and authorisation by a counter signatory. The [DBS Documentary Evidence Checklist](#) is also completed and returned. Neither the school nor the applicant should complete sections X, Y and Z of the DBS application form.

It is the responsibility of the appropriate counter signatory to ensure that the DBS application form indicates the type of certificate required (i.e. enhanced level), the relevant workforce, whether or not a check of the Children's Barred List is required and whether or not the check is for a volunteer. A separate check of the Children's Barred List is not required, unless the criminal records certificate remains outstanding at the time the individual begins work in "regulated activity". The type of proof of identity supplied should also be noted on the DBS application form by the counter signatory.

The counter signatory will send the application to the DBS. The headteacher has discretion to allow an employee to start work pending receipt of a criminal records certificate. They should consider carefully the circumstances of the situation before doing so, as set out in the Starting work pending a criminal records disclosure section below.

11.3 Inspection of new DBS certificate issued to the individual

The DBS only produces one copy of the certificate of disclosure, which is sent to the individual. The individual must be asked to present the original certificate to the school for inspection. This should be compared with the Criminal Records Disclosure Form, the information gathered at interview and the information provided by referees.

Where conviction information is disclosed, it should be considered in accordance with the Procedure for dealing with criminal convictions and additional information section below.

The [DBS Certificate Confirmation Form](#) must be completed by the school and returned to Employee Services. This includes the certificate number and date of issue and can also be used to enter this information onto the school's single central record of recruitment and vetting checks. The school must not retain the original certificate which is the property of the applicant and the DBS's own Code of Practice specifically excludes any paper or electronic copy of the certificate being taken.

12 Procedure for ensuring staff from external agencies have enhanced criminal records certificates

Before taking on a member of supply staff provided by an external agency, the school must obtain written confirmation that the provider has carried out all of the relevant recruitment and vetting checks including an enhanced criminal records certificate and, if the work falls within the definition of regulated activity, the Children's Barred List.

In relation to criminal records certificates the written notification from the provider must confirm that an enhanced criminal records certificate has been requested, whether or not it has been received and, if received, whether it included any disclosed information. Where there is disclosed information, the school must inspect the criminal records certificate before the individual starts work and confirm whether

or not it is satisfactory.

Any convictions or additional information disclosed should be considered by the headteacher in accordance with the Procedure for dealing with criminal convictions and additional information section below.

13 Procedure for ensuring staff from the local authority's supply register have enhanced criminal records disclosures

All staff on the Northumberland School Teacher Supply Register have had all of the relevant recruitment and vetting checks including an enhanced criminal records check. Staff are only included on the register if they do not have any criminal convictions at the time that the criminal record check was undertaken. These checks are repeated cyclically every three years.

It is recommended that schools follow the guidance on Individuals for whom the school has a mandatory duty to undertake a check of the Children's Barred List/obtain an enhanced criminal records certificate and portability of previous certificates above in relation to new appointments and portability of DBS certificates. Supply staff are strongly encouraged to register for the DBS Update Service to prevent the need for different schools to undertake repeat criminal records checks of the same individual.

14 Procedure for dealing with criminal convictions and additional information

14.1 Assessing the relevance of criminal convictions and/or additional information

Criminal convictions, cautions, reprimands, warnings and/or additional information from the police do not automatically make a person unsuitable for work in a school. A person's suitability should be judged in light of all the relevant information available about them including other recruitment and vetting checks if the disclosure has been obtained as part of a recruitment and selection process.

The headteacher, in consultation with the persons with delegated responsibility for the appointment and the registered body, must make a judgement about suitability, taking into account only those offences that may be relevant to the particular job or situation in question. A number of points should be considered in deciding the relevance of convictions:

- **the nature of the offence:** in general, convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children;
- **the nature of the appointment:** for example, serious sexual, violent, drug or drink offences would be of particular concern where the individual would be providing care and driving or drink offences would be relevant in situations involving transport of children;
- **the age of the offence:** offences which took place many years in the past may often have less relevance than recent ones. However, convictions for serious violent or sexual offences or serious offences involving substance abuse are more likely to give cause for continuing concern than, for instance, an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children; and

- **the frequency of the offence:** a series of offences over time is more likely to give cause for concern than an isolated minor conviction.

The headteacher may also take into account whether or not an individual disclosed these convictions or other information on their Criminal Records Declaration Form and should discuss failure to do so with them. If an individual admits to a previously undisclosed conviction but claims the failure to disclose was an oversight it will be for the headteacher, or where appropriate governing body, to decide whether the explanation is credible.

If an applicant disputes the information provided on the disclosure then either the applicant or the registered body can contact the DBS within 3 months of the date of issue of the disclosure. An applicant registered with the DBS Update Service can also dispute the outcome of the status check. In all cases the applicant should notify the registered body of the dispute in order to prevent a recruitment decision being made before the dispute is resolved.

The school's decision about whether the individual is suitable to be appointed to or continue in their role is final.

14.2 Action required if the individual is judged to be unsuitable

The school may decide that an individual's criminal convictions and/or additional information provided by the DBS make them unsuitable to work with children. The relevant actions, depending on the individual's position with the school, are:

- an applicant considered unsuitable following a recruitment interview based on the Criminal Records Declaration Form completed by the applicant, the discussion at interview and other pre-appointment checks should not be offered the post;
- an applicant considered unsuitable following a conditional offer of appointment based on an enhanced criminal records certificate and/or additional information obtained from the DBS should have their conditional offer withdrawn;
- a current employee (including those who have started work under respite measures before the criminal records certificate was received) considered unsuitable must be withdrawn by the school immediately pending further enquiries and disciplinary or dismissal procedures may follow; or
- a current volunteer considered unsuitable must be withdrawn by the school immediately pending further enquiries and the school may decide not to use their services again; or
- supply staff provided by a third party considered unsuitable must be withdrawn from the school immediately by the agency pending further enquiries and the school may decide not to use their services again.

15 Starting work before an enhanced criminal records certificate is obtained

Ideally a criminal records certificate should be obtained before an employee or volunteer begins work. It must in any case be obtained as soon as practicable after the individual's appointment and the application for a criminal records certificate should be submitted before the individual starts work.

Headteachers have discretion to allow employees, volunteers, third party supply staff or third party contractors to begin work pending receipt of the disclosure under

respite measures. In the case of Council staff contracted to the school via a Service Level Agreement the local authority will seek written permission from the headteacher prior to the individual starting work.

The headteacher must complete the Criminal Records Respite Measures Form for any individual who is allowed to start work before an enhanced criminal records certificate is received and return it to Employee Services.

In all cases the headteacher must ensure that all other recruitment and vetting checks, including the Children's Barred List where relevant, have been carried out and the individual is appropriately supervised.

Appropriate supervision for staff who start work prior to the criminal records certificate being received should reflect what is known about the person concerned, their experience, the nature of their duties and the level of responsibility they will carry. For those with limited experience and where references have provided limited information the level of supervision required may be high. For those with more experience and where the references are detailed and provide strong evidence of good conduct in previous relevant work a lower level of supervision should be applied. It should be made clear to all staff without completed criminal records checks that they are subject to this additional supervision. The nature of the supervision should be specified and the roles of staff in undertaking the supervision spelt out. The arrangements should be reviewed regularly, at least every two weeks until the criminal records certificate is received and judged to be satisfactory.

16 Policy on secure storage, handling, use, retention and disposal of disclosure information

Anyone who receives disclosure information must abide by the DBS's own Code of Practice and obligations under the Data Protection Act 1998 and other relevant legislation. Failure to abide by that Code can be a criminal offence and the individual subject to a fine or imprisonment. The key points are

- **Storage and access**
Disclosure information will be kept securely in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see it.
- **Handling**
Disclosure information is only passed to those who are authorised to receive it in the course of their specific duties relevant to recruitment and vetting processes. No photocopy or other image of disclosure documentation may be taken.
- **Usage**
Disclosure information is only used for the specific purpose for which it was requested for which the applicant's full consent has been given.
- **Retention**
Disclosure information is not kept for any longer than is necessary once a recruitment (or other) decision is made. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, the school will seek permission from the DBS and will give consideration to the data protection and human rights of the individual before doing so. Throughout this time the usual conditions regarding secure storage and controlled access will apply.
- **Disposal**

Once the retention period has elapsed any disclosure information will be immediately destroyed by secure means (shredding, pulping or burning). While awaiting destruction the documentation will not be kept in any insecure receptacle (for example, waste bin or confidential waste sack).

- **Record keeping**

Schools will keep a record of the DBS certificate detailing the date of issue, the name of the subject, the type of disclosure requested, the outcome of any check of the Children's Barred List where relevant, the position for which the disclosure was requested, the unique certificate number and the decision taken. This will enable the single central record of recruitment and vetting checks to be accurately maintained.

- **Breaches of security**

Breaches of this policy may be subject to action under the County Council's or school's disciplinary procedure, as appropriate.