

# **GRAND AVENUE PRIMARY AND NURSERY SCHOOL VETTING POLICY FOR ANYONE WISHING TO WORK OR VOLUNTEER**

This policy was agreed in February 2016 by the Grand Avenue Primary and Nursery School Board of Governors

## **Introduction**

The Governing Body and staff of Grand Avenue Primary and Nursery School take safeguarding of our children extremely seriously and consider it one of our top priorities. Indeed, the school was rated outstanding by OFSTED for its safeguarding in its latest inspection report. As part of this safeguarding process, we must ensure that anyone working in the school, in whatever capacity, be they paid staff, student or volunteer, is suitable. Government regulations leave it largely down to each school to decide how they will determine an individual's suitability to work with children.

At Grand Avenue we require all staff as part of the recruitment process to complete a full check with the DBS (Disclosure and Barring Service). We also ask all volunteers and students to complete a DBS check as a minimum, prior to helping at school with any activity, e.g. swimming, reading, helping on school trips, etc. The DBS check must be renewed every three years for volunteers and will be co-ordinated through the school office. We may also request an interview and references before allowing volunteers unsupervised access to children.

The law regarding the processing of DBS checks changed in May 2013. The new regulations now allow the DBS to filter out certain convictions and cautions which the government feel are not relevant by virtue of their severity, time elapsed or the age of the person and the time of the conviction or caution. The regulations also lay down a list of offences which, because of their nature, must always be disclosed regardless of any of the factors listed above. It follows that any disclosure on a DBS certificate may be an offence which is either serious, recent, or one of several. The Governing Body has therefore decided that when any disclosure appears, this will be risk assessed by the DBS check panel to determine whether or not the individual concerned should be permitted to serve as a volunteer in school, taking into account the nature of the offence, the role to be undertaken and outcomes of further enquiries. Support and advice will be obtained from the LADO (Local Authority Designated Officer) and LSCB (Local Safeguarding Children's Board) if determined to be appropriate, before reaching a decision on any individual case.

## **DBS Check Procedures**

All volunteers who wish to assist in school must complete the DBS process. Once the DBS process has been completed online then the following procedures should be followed:

### ***If the DBS check is complete stating 'no content', meaning that it is clear:***

The school will not receive communication from the Local Authority but can access the website to see the status of the check to ensure that it is clear.

Before they can assist in school, the volunteer will be asked to present their certificate, so that staff can double check that it is clear. This information is then logged on the single central register.

The recruiting manager can then arrange an induction meeting and start date.

***If the DBS check is complete stating ‘with content’, meaning that the check is not clear:***

The school will receive communication from the Local Authority Human Resource Department informing us that the DBS check has ‘content’ and that it is not clear.

The correspondence will state, ‘Please note that a positive Criminal Record Disclosure was completed on XXXXX (see below) for XXXX. As we no longer receive a copy at Guildhall 2, you will need to ask the applicant to show you the disclosure certificate when it arrives in the post (these normally take 7 – 10 days to arrive at the applicant’s home address).

When you or the relevant person has viewed the certificate and held a discussion with the applicant, you should carry out a ‘risk assessment’ in line with the school safeguarding policy.

If you need any guidance on the risk assessment, please contact me and I will direct you to the relevant HR Business Partner for advice.

When you have seen the applicant’s copy of the disclosure please amend the record on e-Bulk to indicate ‘*Certificate seen – Yes*’ otherwise please let me know and I will amend the record myself in HR. Please confirm receipt of the notification for our records.’

The school will then contact the applicant and ask to see the certificate. The applicant will be informed that due to content on the check that this means they are not automatically eligible to volunteer in school and that it will be reviewed by the DBS check panel (see section entitled DBS Check Panel). Volunteers can decide at this stage to withdraw their interest to volunteer in school.

The school will then submit the certificate to the DBS check panel for consideration and a risk assessment will be carried out (see section entitled Dealing with Positive Disclosures). In all cases the Head teacher must see an original copy of the DBS check certificate. Schools are advised not to print copies of the certificate. Any copy must be destroyed or deleted immediately after it has been considered. It should NOT be left in a waste bin or shredding sack before shredding or kept on the school’s electronic files.

A copy of the risk assessment should be kept permanently on file in a sealed envelope, along with the copy of the email sent from Human Resources.

**Dealing with Positive Disclosures:**

A positive disclosure is a certificate that shows cautions, warnings or convictions. They may show spent convictions and also unspent convictions, and for Enhanced checks, they will also show information that a police force deems relevant to disclose based on the nature of the role.

*A summary of the action to be taken following receipt of notification of a DBS disclosure is set out below:*

With ‘no content’	Disclosure with ‘content’	Applicant is barred from with children and/or vulnerable adults
Applicant required to bring certificate on first day of employment.	Applicant asked to bring certificate in to show the Head teacher as soon as possible. No start date is arranged.	Offer of volunteering is void.

The Head teacher will organise a DBS check panel meeting with relevant parties.

A member of the panel should contact HR to seek advice on the implications of the information revealed.

The panel completes a risk assessment

### **DBS Check Panel**

The DBS check panel is a group comprising of the head teacher, Safeguarding lead, the Chair of Governors, and Vice Chair. At least one member of this group will be a parent.

All members of the panel understand their responsibilities in regards to the nature of the meeting and that any information discussed is of a confidential nature and will not be discussed outside of the panel.

### **Risk Assessment**

Before a decision is reached on whether to allow an individual to volunteer, the individual will be offered the opportunity to discuss the content of the disclosure with the DBS check panel and the DBS check Risk Assessment form will be completed.

The panel will make a balanced decision on whether they are satisfied to allow the person to volunteer, based on:

- ☐ Whether they are barred from appointment under the DBS lists;
- ☐ Whether the conviction is relevant to the position;
- ☐ The circumstances surrounding the offence, and any explanations provided by the applicant;
- ☐ The seriousness of the offence;
- ☐ The length of time since the offence occurred;
- ☐ Whether there is a pattern to the offending behaviour, or whether it was a one-off;
- ☐ Whether the applicant's circumstances have changed.

Further discussion should take place regarding:

- ☐ Whether the applicant disclosed the conviction(s)/cautions, warnings or reprimands at application or at interview stage;
- ☐ What level of supervision will the person receive;
- ☐ Does the post involve responsibility for finance or items of value;
- ☐ Will the nature of the role allow the applicant to potentially re-offend.

The applicant will also asked to provide two references and the panel will request references and use this information to inform their decision.

The panel, in consultation with Human Resources and the LADO (local Authority Designated Officer for Safeguarding), will make the overall decision about whether to allow the person to volunteer or not. The decision to allow the applicant to work or volunteer in school should be unanimous. The decision and the reasons for it will be recorded on the risk assessment, signed by the Head teacher on behalf of the panel, and be stored confidentially on file.

### **DBS Check Risk Assessment Form**

This form can be used to assist in assessing and recording the risks of allowing someone to start work or volunteering where a DBS certificate shows relevant convictions or other relevant information.

The completion of this risk assessment form is the responsibility of the appointing manager or line manager as appropriate. It must be authorised by the Head Teacher before the person can start working with children or vulnerable adults or their records. This completed risk assessment form must be placed on the individual's personnel file or other appropriate file and made available to HR, Audit, Safeguarding and Ofsted inspections.

The form was created based on the form provided by Oxfordshire County Council, recommended for use by AfC.

## **DBS Check Risk Assessment Form**

### **PART 1 – FOR THE APPLICANT TO COMPLETE**

Your DBS certificate has been returned with information contained on the certificate which may be relevant to your employment. This will not necessarily bar you from working with the school. It will depend on the nature of the position that you are applying for and your circumstances at the time of the incidents or offences. We would therefore like to give you the opportunity to provide an explanation for these incidents or offences, as well as the circumstances around you at the time. We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed.

Please complete the following information. Please be aware that to withhold information or to give false information will be regarded as an attempt to falsify records which constitutes gross misconduct and will, if proved, lead to any volunteer work or request for time in school to be refused..

<b>Name:</b>	<b>Date of Birth:</b>
<b>Job/ Position Applied for:</b>	

<b>Offence or Incident 1:</b>
<b>Date of Offence or Incident:</b>
<b>We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed. It is also necessary to explain how you, the applicant, now feel about the incident or offence.</b>
<b>Offence or Incident 2:</b>
<b>Date of offence or incident:</b>
<b>We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed. It is also necessary to explain how you, the applicant, now feel about the incident or offence</b>
<b>Offence or Incident 3:</b>
<b>Date of offence or incident:</b>
<b>We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed. It is also necessary to explain how you, the applicant, now feel about the incident or offence</b>

**Declaration by Applicant**

I certify that the information I have provided on this document is true and complete. I understand that to knowingly make a false statement or omit information will result in my volunteering application being unsuccessful .

<b>Signature:</b>	<b>Print:</b>
-------------------	---------------

**DBS Check Risk Assessment Form continued.****PART 2 – FOR THE APPOINTING LINE MANAGER or TEACHER TO COMPLETE**

<b>Name of Candidate:</b>	<b>Date of Birth and/or Payroll Number:</b>
<b>Job Title:</b>	<b>Manager Conducting Assessment:</b>
<b>Proposed Start Date:</b>	

**A. BACKGROUND INFORMATION CHECK**

<b>Information required.</b>	<b>Notes/Confirmation.</b>
Has the Recruitment Checklist been completed, including all of the following? <ul style="list-style-type: none"><li>• Application Form - check gaps, discrepancies or anomalies</li></ul>	
<ul style="list-style-type: none"><li>• Appropriate and satisfactory references</li></ul>	
<ul style="list-style-type: none"><li>• Give details where you have obtained clarification or missing information on the applicant or verification of the referees position in the organisation.</li></ul>	
<ul style="list-style-type: none"><li>• Qualifications – Have you checked and verified that the candidates qualifications fulfil the requirements in the selection criteria?</li></ul>	
<ul style="list-style-type: none"><li>• Has the candidate completed the Convictions Policy Statement on the Application form regarding the Rehabilitation of Offenders Act 1974? Please state the information</li></ul>	

<p>they supplied.</p> <ul style="list-style-type: none"> <li>Confirm that you have actively asked the person if they have any convictions, cautions, reprimands, warnings, bind-overs, pending prosecutions or disqualifications.</li> </ul>	
<ul style="list-style-type: none"> <li>Have you seen and verified asylum and immigration checks?</li> </ul>	
<ul style="list-style-type: none"> <li>Have satisfactory health checks been received.</li> </ul>	
<p><b>List 99 check or Section 142 of the Education Act 2002.</b></p> <p><b>For anyone working in a school a List 99 check must be carried out before they start work.</b></p>	

<b>Criminal Records Bureau Disclosure Checks</b>	<b>Comments</b>
<p>1. Does the candidate already hold a DBS certificate?</p> <p>If not, please go to Q6.</p>	
<p>2. Was the DBS certificate obtained by Kingston County Council?</p> <p>If not, who is the Registered Body?</p>	
<p>3. Was the DBS certificate issued within the last 12 months?</p>	
<p>4. Is the DBS certificate “Enhanced level”?</p>	
<p>5a. If the candidate is going to work with children the DBS certificate must indicate “None Recorded” against the ISA Children’s Barred list information.</p> <p><u>OR</u></p> <p>5b If the candidate is going to work with vulnerable adults the DBS certificate must indicate “None Recorded” against the ISA Vulnerable Adults’ Barred list information</p>	

<p>6. Has the candidate completed a new DBS certificate Application form?</p> <p>Confirm date that the application form has been forwarded to the DBS team for processing.</p>	<p>Date completed DBS application:</p>
<p>7. Has the candidate been a resident outside of the United Kingdom?</p> <ul style="list-style-type: none"> <li>• If yes, is the candidate able to produce the Police Check or DBS equivalent from other countries lived in?</li> <li>• If no, is a Police Check or DBS equivalent from that country being sought?</li> </ul>	

## B. ASSESSING THE RISKS

Question	Applicable (Please delete as appropriate)	Comments
Did the applicant declare the matters on the DBS Application form and/or the this Application form?	<p>Yes / No</p> <p>If 'No' state reason</p>	
Does the individual agree that the information detailed on the DBS Certificate is correct?	<p>Yes/ No</p> <p>If 'No' what do they think is incorrect and why?</p>	
Were any offences work-related or committed within the context of a work setting?	<p>Yes/No</p> <p>If 'Yes' give details</p>	



Question	Applicable (Please delete as appropriate)	Comments
Were any offences committed within the last 2 years?	<p>Yes / No</p> <p>If 'Yes' explain context in which each offence occurred e.g. where, how, why and details of any victims. (Continue overleaf if necessary)</p>	
What is the individual's attitude to the offence/s now?	<p>e.g. regret/remorse/ justified/denial</p>	
Would they do anything differently now?	<p>Yes / No</p> <p>If 'Yes' specify what</p>	
Has the individual's circumstances changed since the conviction/s e.g. location/friends/partner/education?	<p>Yes / No</p> <p>If 'Yes' specify what</p>	
Are there any mitigating circumstances? e.g. immaturity, traumatic life event	<p>Yes / No</p> <p>If 'Yes' specify what</p>	
Do the matters disclosed form any pattern e.g. repeat offences or repeat motivation (anger/financial/drugs/alcohol	<p>Yes / No</p> <p>If 'Yes' specify</p>	

Question	Applicable (Please delete as appropriate)	Comments
Can the applicant demonstrate any efforts not to re-offend? e.g. Rehabilitation course, Anger Management course, help for alcohol/drug abuse.	Yes / No  If 'Yes' specify  (NB – completing Community Service is a punishment not a rehabilitation programme)	
Does the post have any direct contact with the public and if so how vulnerable are they?	Yes / No  If 'Yes' give details	
Can safeguards be implemented to reduce/remove any risk e.g. no unsupervised contact?	Yes / No  If 'Yes' specify what	
What supervision is available and how readily?	Give details	

<b>Any further information</b>
Is there any other information relevant to this Risk Assessment regarding the candidate, the work itself or the location/environment where the activities will take place?

<b>Level of Risk:</b> Please complete the level of risk posed by appointing/employing the individual in this job. Give reasons.	
High Risk	
Medium Risk	

Low Risk	
Can protective measures be put in place to render the risk low? Yes / No	
Outline of the protective measures <b>Risk Management Plan</b> e.g. curtailment of access to children/information; additional supervision; temporary changes of work location; temporary diversion of low risk tasks or training.	

Risk Assessment completed by:

Signed (Manager)

Date:

Print Name (Manager)

<b>Authorised by Head Teacher on behalf of the Governors</b>
Is this person suitable to work under the conditions proposed above?    Yes/No
<b>Comments: (Reasons for decision)</b>

Risk Assessment Authorised by:

Signed (Head Teacher)

Date

Print Name (Head Teacher)

If authorised by a Head Teacher please retain this locally in a locked secure cabinet.