



Cardinal Langley RC High School

POLICY STATEMENT IN RELATION TO SAFER RECRUITMENT, DISCLOSURE & BARRING SERVICE (DBS) & BACKGROUND CHECKS

It is the policy of Cardinal Langley RC High School to comply with the Local Authority's *Recruitment and Selection Policy* and *Disclosure and Barring Policy* to help ensure compliance with our obligations towards the safeguarding of our pupils.

The following exception applies in the case of Cardinal Langley RC High School:

- The Diocese of Salford requires Catholic schools to use the CES application forms in the recruitment process rather than the Rochdale Local Authority form.

The Local Authority's recruitment and selection process is in accordance with the DfE Keeping Children Safe in Education statutory guidance, and ensures that the necessary clearances and safeguards are in place for all staff, governors, volunteers, contractors, student teachers, supply staff, etc. before they are allowed to undertake their duties.

Compliance with policies and guidance is assured and monitored in the following ways:

1. Safer recruitment training for key members of staff involved in the recruitment process. At least one member of the shortlisting and interview panel will be trained in safer recruitment. Safer recruitment training is refreshed at least every 5 years.
2. A Single Central Record of recruitment and vetting checks is maintained (live updates) by the School Business Manager and monitored on at least a termly basis by the Senior Deputy Headteacher, who is also the Designated Safeguarding Lead.
3. There are regular safeguarding/safer recruitment link governor visits to ensure there are adequate systems in place, and to monitor compliance.
4. An audit of the Single Central Record of recruitment and vetting checks is carried out at least annually by either the School Improvement Partner or Judicium Education, or as part of:
 - Pre-Ofsted Inspection Audit by the Local Authority
 - Ofsted Inspection
 - Audit by the Governing Board (if concerns about compliance are raised)

Related documents:

- [DfE Keeping Children Safe in Education](#) (September 2026)
- RBC Recruitment and Selection Policy (revised September 2022)
- RBC Disclosure & Barring Policy (revised April 2015)
- Link Governor Report Form

Review/Approval: This document will be updated annually or following any change to related policy, procedure, guidance or legislation.

Updated September 2026		Signed	Date approved
Safeguarding/Safer Recruitment Link Governor	Mr B McAnenny		20.10.2026
Headteacher	Mr A Bridson		20.10.2026

Appendix A

From the DfE document: Keeping Children Safe in Education (September 2026)

Regulated activity

317. In summary, a person will be engaging in regulated activity with children if they work on a frequent 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. A person will also be in regulated activity if, as a result of their work or volunteering, they:

- will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity are below

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026.

Regulated activity includes:

- a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.⁸⁵ Some activities are always regulated activities, regardless of frequency. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

⁸⁵ [The Safeguarding Vulnerable Groups Act 2006](#) provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

Considering which type of check is required

318. Most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children's barred list information, will be required.

319. For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

320. Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.

Agency and third-party staff (supply staff)¹⁰²

364. Schools and colleges must¹⁰³ 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 or college (or who will be providing education on the school or college's behalf, including through online delivery).¹⁰⁴ In respect of the enhanced DBS check, schools and colleges must¹⁰⁵ ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

365. Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school or college, which has disclosed any matter or information, or any information was provided to the employment business, the school or college must¹⁰⁶ obtain a copy of the certificate from the agency.

366. Where the position requires a children's barred list check, this must¹⁰⁷ be obtained by the agency or third party by obtaining an enhanced DBS certificate with children's barred list information, prior to appointing the individual.

367. The school or college should also check that the person presenting themselves for work is the same person on whom the checks have been made.

¹⁰² Further advice on safer recruitment for schools and colleges using recruitment and supply agencies can be found within the [Better Hiring Institute's Education Supply Chains A better Hiring Toolkit](#) advice.

¹⁰³ 16-19 Academies, Special Post-16 institutions and Independent Training Providers should obtain written notification regarding checks when they use agency or third-party staff.

¹⁰⁴ Colleges must comply with regulations 11 to 19 of [The Further Education \(Providers of Education\) \(England\) Regulations 2006](#) in respect of agency workers; maintained schools must comply with regulations 18 and 30 of the [School Staffing \(England\) Regulations 2009](#); non-maintained special schools must comply with paragraphs 5 and 16 of the Schedule to [The Non-Maintained Special Schools \(England\) Regulations 2015](#); and independent schools (including academies and free schools) must comply with paragraph 19 of the Schedule to [The Education \(Independent School Standards\) Regulation 2014](#).

¹⁰⁵ 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

¹⁰⁶ 16-19 Academies, Special Post-16 institutions and Independent Training Providers should obtain a copy of the certificate in such circumstances.

¹⁰⁷ Where using a third party 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure a DBS with barred list information is obtained for those engaging in regulated activity.

Contractors

368. Where schools and colleges use contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school or college.

369. Schools and colleges should ensure 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. Contractors engaging

in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

370. 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.¹⁰⁸ In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children, schools and colleges should decide on whether a basic DBS check would be appropriate.

371. Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.

372. If an individual working at a school or college is self-employed, the school or college should either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

373. Schools and colleges should always check the identity of contractors on arrival at the school or college.

¹⁰⁸ It will only be possible to obtain an enhanced DBS certificate for contractors in colleges which are exclusively or mainly for the provision of full-time education to children.

Trainee/student teachers

374. Where applicants for initial teacher training are salaried by the school or college, the school or college must¹⁰⁹ ensure that all necessary checks are carried out including an enhanced DBS check (including children's barred list information).

375. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school or college would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

376. There is no requirement for the school or college to record details of fee-funded trainees on the single central record. However, schools and colleges may wish to record this information under non statutory information, see paragraphs 352-353 of KCSiE 2026.

¹⁰⁹ 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure all necessary checks are carried out.

Visitors

377. Schools and colleges receive a range of visitors. These include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days. For visitors provided through a third party, see paragraphs 364-367 of KCSiE 2026.

378. Schools and colleges 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.

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

380. 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 depending on the activity they are there to carry out (or that 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). Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

381. Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children’s education, careful consideration should be given to the suitability of any external organisations.

382. School and college safeguarding policies should set out the arrangements for individuals coming onto their premises, which may include an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

Volunteers

Regular or overnight volunteers

383. The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity (see paragraph 317 of KCSiE 2026 for more information on regulated activity). Where this applies, schools or colleges should obtain an enhanced DBS check with children’s barred list information.¹¹⁰

384. Where an individual meets the period condition (more than 3 days in a 30- day period) by volunteering at multiple settings, the school or college should work with the other settings to decide who should apply for the enhanced DBS check with barred list information, and that information should then be supplied by the individual to each setting. Volunteers may also choose to join the DBS Update Service at the point that a DBS check is applied for. This is free for volunteers and allows portability of a DBS check across different education settings (see paragraphs 328-331 of KCSiE 2026 for more information on the Update Service).

Existing volunteers in regulated activity

385. Where a school or college has an existing volunteer who will now be in regulated activity from 1 September 2026 because of the changes brought in by the Crime and Policing Act 2026, they must check their children’s barred list status. This should be done by obtaining an enhanced DBS check with children’s barred list information. Schools and colleges are able to obtain a standalone barred list check. They may do this where either:

- the school or college wishes to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
- the school or college has recently obtained an enhanced DBS check without children’s barred list information, and there has been no break in service since that certificate was issued.

386. Where schools are also subject to the EYFS framework, volunteers must not be permitted to begin working within the settings covered by the EYFS framework until the school or maintained nursery school has received the volunteer’s enhanced DBS certificate including barred list information

Volunteers not in regulated activity

387. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

388. 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 judgement and experience when deciding what checks, if any, are required.

389. The risk assessment should consider:

- the nature of any work with children,
- 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
- where the role is not regulated activity, whether another level of DBS check might be appropriate, such as:
 - an enhanced DBS check without barred list information, for volunteers who would be in regulated activity but do not volunteer frequently, or

- a basic DBS check for any other volunteer who may have access to children.

390. Details of the risk assessment should be recorded¹¹¹.

¹¹⁰ 16-19 Academies, Special Post-16 institutions and Independent Training Providers must ensure an enhanced DBS check with barred list information is obtained as per their funding agreement.

¹¹¹ Schools and colleges are free to determine where to store this information

Maintained school governors

391. Governors in maintained schools are required to have an enhanced DBS check.¹¹² It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.

392. 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.

393. Schools should also carry out a section 128 check for school governors, because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school. Using [GOV.UK](https://www.gov.uk) schools can check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction. There is no requirement for schools to record this information on the single central record, but they can if they choose to.

394. Associate members are appointed by the governing body to serve on one or more governing body committees. The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 which make enhanced DBS checks mandatory for maintained school governors do not apply to associate members, and so there is no requirement for them to be checked unless they also engage in regulated activity at their school.

¹¹² [The School Governance \(Constitution\) \(England\) Regulations 2012](#) were amended by the [School Governance \(Constitution and Federations\) \(England\) \(Amendment\) Regulations 2016](#) to include this requirement.

Alternative Provision

405. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, (further information provided in Part two). 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. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff.

Adults who supervise children on work experience

406. Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.¹²² Health and safety expectations for employers hosting young people on work experience can be found here: [Young people at work: Work experience - HSE](#).

407. If the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so frequently or for more than three days in a 30-day period, or overnight, this is a regulated activity. You must not allow someone on the barred list to take part in regulated activity.

408. Other individuals in the workplace who are not involved in teaching, training, instructing or caring for or supervising the child on a work experience placement or activity are not in regulated activity.¹²³

409. Schools and colleges are not able to request that a work experience provider obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience.¹²⁴

410. Activity undertaken by a person aged 16 plus on work experience which takes place in a 'specified place'¹²⁵, such as a school or sixth form college, and gives the opportunity for contact with children, may itself be considered to be regulated activity relating to children. In these cases, the work experience provider e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16.¹²⁶

¹²² [16-19 study programmes guidance: guide for providers.](#)

¹²³ Schools and work experience providers may seek other levels of DBS checks for individuals in contact with children but not in regulated activity, if they deem them necessary – [Find out which DBS check is right for your employee - GOV.UK.](#)

¹²⁴ The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 was amended by the Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (England and Wales) Order 2012 so that employers may no longer request checks in these circumstances.

¹²⁵ See page 8 of DBS guidance: Regulated activity with children England which can be found at: <https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-children>

¹²⁶ Under the [Police Act 1997](#), an individual must be 16 or over to be able to make an application for a DBS check.