



**Harrison College Ltd**

**DBS Policy Statement inc DBS Update and Renewals Service**

Review date: Mar 2026  
Next Review: Mar 2027

## **General Principles**

As a Post 16 Specialist Provision, Harrison College adheres to the Disclosure and Barring Service (DBS) Code of Practice and uses its checking service to help assess the suitability of applicants for positions of trust when recruiting individuals to engage in regulated activity working with young people and vulnerable adults. Access to this service and the DBS protocols at Harrison College are strictly limited to those involved in recruitment decisions and safeguarding roles.

The designated Data Protection Officer ensures compliance with the regulations. For further information on pre appointment and vetting of Harrison College staff, volunteers and business partners, please refer to our Child Protection and Safeguarding Policy which contains more detail on our safe management processes.

In addition, Harrison College follows the latest KCSiE (safer recruitment statutory regulations) and ensures we have procedures in place to make referrals to the Disclosure and Barring service to ensure safeguarding management. This is a legal duty on the college. Harrison College also follows The Education and Training (Welfare of Children) Act 2021 for specialist Post-16 provision.

Handling of this DBS data complies fully with its obligations under the (UK GDPR) – 2020 General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information. The use of this information is used only for the purpose which it was obtained and confidentiality and the lawful basis for sharing this is carefully managed within our legal obligations, safeguarding and safety responsibilities and for Harrison College's legitimate interests. Schedule 1 of the DPA 2018 conditions will be met when considering Special Category Data or Criminal convictions detail.

For the purposes of transparency and accountability Harrison College has clear, written policies on these matters, which are available, on request, to those who wish to see it, or on our website.

Please note that we will always endeavour to obtain an enhanced DBS Check with Barred lists, for any staff working with our students and vulnerable young people before their employment commences. This includes checks on spent and unspent convictions, cautions, reprimands and warnings as well as additional information held by the Police that is considered relevant for this role. The Barred lists check the individual is not barred from working with children, young people or vulnerable adults.

Harrison College will always take all steps to remain safe and reduce risk by putting a thorough risk assessment in place prior to the DBS certificate arriving and will have carried out all pre-employment vetting checks as described in latest version of KCSiE (Part Three: Safer Recruitment) including robust safeguarding practices beyond the recruitment phase to ensure the safety and welfare of children in all educational settings through adherence to the Legal Reporting Duties placed on us as an employer (Paragraph 350-355 KCSiE).

## **Initial Checks**

All new staff and volunteers must obtain an enhanced DBS check (including barred list check where required) before commencing regulated activity and employment with Harrison College.

Where a DBS certificate is required, it must be obtained from the applicant before, or as soon as practicable after, the person's appointment, including when using the DBS update service (see paragraph 254 – 257 KCSiE)

DBS will send a DBS certificate to the applicant/staff member. They must show the original paper DBS certificate to Harrison College before they take up post, or as soon as practicable afterwards. Harrison College will be able to compare any information disclosed on the certificate with any information shared by the applicant/staff member during the recruitment process (paragraph 248 KCSiE).

The original DBS certificate should be verified by a designated safeguarding / HR officer, to confirm that the certificate number, issue date and individuals name match. This must be recorded in the College's Single Central Record (SCR) as per Regulations 12(7) and 24(7) and Schedule 2 to the School Staffing (England) Regulations 2009 and the School Staffing (England) (Amendment) Regulations 2013 . This is held securely in the confidential CPOM's Staff Safe system.

Where relevant, identity, right to work, professional qualifications and any required reference checks will also be completed prior to confirmation of appointment.

A self declaration form is given to each new perspective employee to complete prior to appointment.

Harrison College complies fully with the code of practice regarding the correct handling, access, use, storage, retention and disposal of certificates and certificate information.

### **Storage and access**

Certificate 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 as part of their duties. Digital and electronic records are securely protected, backed up and include encryption and password control measures

The single central record (SCR) will officially record the relevant information for all staff at Harrison College working in regulated roles whether they are teaching, or non teaching staff, paid or unpaid volunteers, agency staff, those with service level agreements, or relevant mentors and business partners who may work unsupervised with our children or vulnerable adults. This will record that the identity, barred list, prohibition and right to work vetting checks have been carried out appropriately. A Data Sharing Agreement may be considered when outlining which external parties can have access to, or relevant information shared with them.

The SCR is a statutory safeguarding requirement under KCSiE guidance and is a live document which is updated with real-time Information and will only be accessed, viewed or shared with the nominated safeguarding leads or for a legal basis identified as a legitimate need. This could include DBS referrals, Teacher Regulation Agency (TRA) referrals and Local Authority Designated Officer (LADO) involvement.

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR and DPA 2018 Article 10. We do not need to keep a physical copy of the DBS certificate and will not keep copies of DBS information for longer than is needed for our legitimate uses. According to the DPA if the 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. Where the Update Service is used, a copy of the original DBS certificate will be retained or details logged (certificate number, issue date, date seen, name of verifier) (see paragraph 237 & 254-257) and we will examine that certificate to ensure validity (para 256 KCSiE). When the information is destroyed college may keep an audit record of the fact that vetting was carried out, the result and the decision taken.

### **Handling**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We will maintain a record of all those to whom certificates, or certificate information has been revealed. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **Usage**

Before we carry out an online DBS check, consent must be gained granting permission to share the DBS and your data with Harrison College, otherwise a paper copy must be applied for. Under UK law, consent is a legal requirement for processing a DBS application and this is gained through the application form consent section and within the job offer letter as well as through the DBS declaration form process.

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## **Retention**

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary, unless a longer retention period is justified for safeguarding or legal reasons. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will be adhered to and if a paper copy of the DBS certificate is retained, it will not be kept for longer than 6 months.

In addition, organisations that require retention of certificates in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate. This practice will need to be compliant with the Data Protection Act 2018, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.

## **Disposal**

The disposal of DBS records will comply with the DBS Code of Practice, the DPA 2018 and UK GDPR regulations. Once the relevant retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, eg, by shredding. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). However, Harrison College may securely retain a written record of the checks made recording the date, type of level, certificate number, outcome and any recruitment decisions made.

We will not store the actual DBS certificate, or photocopy or other image of the certificate or any copy or representation of the contents of a certificate once the recruitment decision has been made and up to 6 months. The exception to this is if a recruitment decision is delayed or we need to retain it for a legitimate legal or safeguarding decision as outlined within the body of this policy.

However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken within our SCR or personnel files.

The above policy approach ensures compliance with Data Protection Laws and upholds the privacy rights of individuals whilst upholding our educational responsibilities to safeguard children, young people and vulnerable adults.

## **DBS Renewals & Ongoing Suitability — Policy Statement**

### **1. Purpose**

This DBS renewals policy sets out the approach of Harrison College to managing enhanced DBS checks and ongoing suitability for staff and volunteers working with children, young people, and/or vulnerable adults. Its aim is to ensure that safeguarding standards remain robust, and that any changes in an individual's circumstances are identified in a timely manner.

### **2. Scope**

This policy applies to all staff, volunteers, contractors and agency staff who engage in regulated activity with students or service users at the College — including teaching staff, learning support assistants, therapists, support workers, supply staff, work-experience supervisors, those on service level agreements and any other role requiring unsupervised or regular contact.

### **3. Update Service and Status Checks**

The College strongly encourages all staff and volunteers to subscribe to the DBS Update Service. This allows future status checks to be carried out by Harrison College to confirm no new information has been added to the check since its issue.

Individuals can join the DBS update service at the point that an application for a new check is made.

For individuals registered with the Update Service, the College will carry out a status-check at least once every 12 months (or more frequently depending on role risk level). If the status check reveals a change (e.g. new conviction, caution, warning or barred-list record), the College will review the information and may suspend or cease regulated activity pending further enquiries.

### **4. Periodic Re-check for Non-Subscribed Individuals**

For staff or volunteers not registered with the Update Service, the College may conduct a full enhanced DBS re-check at a minimum of every three years. This interval is considered good practice in medium-to-high risk settings.

The three-year re-check applies especially to those working one-to-one, unsupervised, or with high safeguarding responsibilities (e.g. learners with complex needs, behavioural support, personal care).

### **5. Additional Circumstances Requiring a New Check**

A fresh or updated DBS check (or status-check) will be required when any of the following apply:

- The individual moves to a different role with increased safeguarding risk or different responsibilities (e.g. from general support to 1:1 care)
- There has been a break in service of 12 weeks or more (excluding maternity, long-term sickness or official leave) before the individual returns.
- The College becomes aware of any incident, concern, or allegation about the individual's suitability, behaviour, or safeguarding risk — regardless of time since last check.
- As per the Employee Handbook (Disclosures page 58) employee's are required to inform their line manager or HR if there are any circumstances that could be deemed a cause for concern or potential criminal convictions, cautions or warnings.
- The individual fails to maintain their DBS Update Service subscription

## **6. Record Keeping**

The College will maintain an up-to-date Single Central Record (SCR) documenting for every person subject to DBS checks: their name, role, start date, date of certificate, certificate number, status-check dates, and re-check dates where applicable.

Where the Update Service is used, a copy of the original DBS certificate will be retained or details logged (certificate number, issue date, date seen, name of verifier). (see paragraph 237 & 254-257) and we will examine that certificate to ensure validity (para 256 KCSIE)

All DBS and status-check information will be stored securely and handled in accordance with data protection laws and the College's Data Protection Policy.

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. If we choose to retain a record there should be a valid reason for doing so and it should not be kept for longer than 6 month (paragraph 281-283 KCSIE)

## **7. Communication and Responsibility**

All staff, volunteers and contractors will be informed of this policy on induction and required to confirm their understanding and compliance periodically.

It is a condition of safe practice that individuals promptly notify the College if they become subject to any police investigation, charge, conviction or caution while employed — irrespective of whether it falls under automated Update Service notification. More information can be found in the Employee Handbook (Disclosures)

The College's Designated Safeguarding Lead (G Stonier) and HR staff have responsibility for overseeing DBS checks, status-checks, re-checks and record-keeping, and for deciding on action where suitability concerns arise.

## **8. Review of Policy**

This policy will be reviewed every year, or sooner if legislative or regulatory guidance changes, or if there is a significant safeguarding incident that warrants review.