Disclosure and Barring Service Policy

Policy Owner	Director of Operations
Approved By	Board of Directors
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Applies To	Candidates and workers for whom London Teaching Supply Limited (LTS) requires a DBS check, relevant voluntary or other roles, and LTS personnel involved in DBS processes and decisions

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1. Introduction

London Teaching Supply Limited is committed to safeguarding children, young people and adults at risk and to ensuring that appropriate criminal record and barring checks are undertaken as part of its safer recruitment arrangements.

The Disclosure and Barring Service (DBS) enables eligible organisations to obtain criminal record information and, where applicable, barred list information to support safer recruitment decisions.

LTS will only request the level of DBS check for which the relevant role is legally eligible and will handle all DBS information fairly, securely and in accordance with applicable legislation and the DBS Code of Practice.

This policy applies to:

- candidates and workers for whom LTS requires a DBS check
- relevant voluntary or other roles involving work with children, young people or adults at risk
- LTS personnel involved in requesting, checking, recording or making decisions based on DBS information

2. Purpose

The purpose of this policy is to:

- assist LTS in safeguarding children, young people and adults at risk by supporting safer recruitment and engagement decisions
- ensure DBS information is requested and used properly, fairly and in accordance with applicable legislation
- provide assurance to applicants, candidates and workers that DBS information will be handled confidentially and appropriately
- set out LTS's arrangements for the handling, access, retention and secure disposal of DBS information

3. Basis for Requesting a Disclosure

- LTS will only request a DBS check where the role is legally eligible for the level of check required.
- Candidates undertaking regulated activity with children will be required to have an appropriate Enhanced DBS check, including a Children's Barred List check where the role is eligible.

In determining whether a role constitutes regulated activity with children, LTS will apply the statutory definition in force at the time. From 1 September 2026, the supervision exemption was removed for relevant teaching, training, instruction, care and supervision of children carried out frequently or overnight. Where a role falls within regulated activity, LTS will ensure that the appropriate Enhanced DBS check with Children's Barred List information is obtained where legally permitted and required.

- Where a role involves regulated activity with adults at risk, LTS will obtain the appropriate level of DBS and barred list check for which the role is eligible.
- Candidates will be informed during the recruitment process of the DBS requirements applicable to their role.

- LTS requires relevant candidates to subscribe to and maintain their subscription to the DBS Update Service, where applicable. The Update Service subscription is personal to the individual and must be created, maintained and managed by the subscriber.
- LTS will obtain the individual's consent before carrying out an Update Service status check and will carry out periodic status checks in accordance with its safer recruitment and compliance procedures. The frequency of repeat checks will be determined on a proportionate, risk-based basis. The Update Service will be used as part of, and not as a substitute for, LTS's wider safer recruitment and safeguarding arrangements.
- Where a candidate has lived or worked overseas, LTS will consider whether appropriate overseas criminal record or equivalent checks are required in accordance with its safer recruitment procedures.
- An existing Enhanced DBS certificate may be accepted where it is at the appropriate level and workforce for the role, includes the appropriate barred list information where required, and the candidate is subscribed to the DBS Update Service. Before LTS relies on an Update Service status check, the candidate's original paper DBS certificate must have been physically verified as genuine and the candidate's identity checked. A copy of the certificate or viewing it by video link is not sufficient. A satisfactory Update Service status check must then confirm that no new information has been identified.

4. Handling of DBS Checks

- LTS uses an approved external provider to process DBS applications.
- Where a DBS certificate contains relevant information, the information will be considered in accordance with LTS's Recruitment of Ex-Offenders Policy and an appropriate risk assessment will be undertaken.
- The candidate will be given an opportunity to discuss any information disclosed before a final suitability decision is made.
- DBS information will only be accessed by authorised personnel and shared only where there is a legitimate and lawful need to do so.
- Relevant DBS information may be communicated to a client where necessary and appropriate, while maintaining confidentiality and complying with data protection requirements.

Verification of Original DBS Certificate

Candidates relying on an existing Enhanced DBS certificate and the DBS Update Service must provide their original paper certificate for physical verification as part of the recruitment and compliance process. The original certificate may be verified by LTS or, where LTS uses an authorised local verification arrangement, by the recruiting organisation acting in accordance with LTS's process. Copies and viewing a certificate by video link are not sufficient for this purpose.

Commencement of Assignment

Where LTS intends to rely on an existing DBS certificate through the Update Service, the required original certificate verification, identity check, consent and satisfactory Update Service status check must be completed before the candidate is approved to commence the assignment. If these requirements have not been completed, the candidate must not be treated as DBS-cleared on the basis of the Update Service.

5. Recruitment of Ex-Offenders

LTS is committed to the fair treatment of applicants and candidates with criminal records. A criminal record or other information disclosed through a DBS check will not automatically prevent an individual from working with or through LTS.

Any information disclosed will be considered fairly and proportionately, taking account of the nature of the role and the relevance and circumstances of the information disclosed.

All such decisions will be made in accordance with LTS's Recruitment of Ex-Offenders Policy.

6. Confidentiality and Record Keeping

- DBS information will be treated as confidential and accessed only by authorised personnel with a legitimate need to know.
- DBS information will be stored securely and handled in accordance with the DBS Code of Practice, UK GDPR, the Data Protection Act 2018 and LTS's data protection and information security requirements.
- LTS will retain only the DBS information necessary for its recruitment, safeguarding and compliance purposes and will not retain DBS certificates or disclosure information for longer than permitted or necessary.
- Records of DBS checks and recruitment decisions will be retained in accordance with LTS's Data Retention Policy.
- DBS information will be securely destroyed when it is no longer required.

7. Policy Communication and Review

- This policy will be communicated to relevant staff, candidates and contractors as appropriate.
- Relevant staff involved in recruitment, vetting and DBS decisions will be made aware of their responsibilities under this policy.
- This policy will be reviewed annually, or sooner where there are significant legislative, regulatory or operational changes.
- The policy will be made available to relevant stakeholders where appropriate.

8. Legislative and Guidance Framework

This policy is informed by, and should be read in conjunction with:

- Police Act 1997
- Rehabilitation of Offenders Act 1974 and applicable Exceptions Orders
- DBS Code of Practice
- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- UK GDPR and Data Protection Act 2018
- Department for Education guidance on regulated activity with children (effective 1 September 2026)
- DBS Update Service employer guidance (updated August 2026)
- Crime and Policing Act 2026
- Safeguarding Vulnerable Groups Act 2006 (as amended)
- LTS's Safer Recruitment Policy
- LTS's Recruitment of Ex-Offenders Policy
- LTS's Safeguarding and Child Protection Policy

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