

Single Central Record Guidance

Adoption Arrangements and Date

All statutory policies in the Trust are ultimately the responsibility of the Trust Board. To enable it to discharge this responsibility appropriately and in collaboration with the constituent schools, the Trust Board will

1. set a full Trust wide policy,
2. set a 'policy principles' document (a framework within which Headteachers develop a full and appropriately customised policy),
3. or delegate to Headteachers or LGBs the power to develop their own policy.

Review Body:	Chief Executive Officer	Adopted:	October 2017 (revised May 2018)
Leadership Grp Responsibility:	Human Resources Director	Date of next review:	September 2020
Policy Type:	Non-statutory	Review period:	3 years

This is a Level 1 Policy against the Trust Governance Plan.

1 Background

Tenax Schools Trust is required by both The Education (Independent School Standards) (England) Regulations 2014, which also includes Academies and Free Schools, (the **ISSRs**), and Keeping Children Safe in Education 2016 (**KCSIE**) to maintain a Single Central Register of pre-appointment checks (**SCR**). This guidance note sets out what information the SCR must contain, who must be included on it and how it must be completed to ensure compliance with regulatory requirements. Personal and sensitive data is collected, processed and retained in order to fulfil these statutory obligations. This data will be stored securely, and accessed only by authorised persons.

2 Who must be included on the SCR

There are a number of categories of people who will work at the Trust. Set out below is guidance on which categories must be included in the SCR and at which school.

The ISSRs requires a school, academy or free school to include on the SCR the following people:

- all staff who work at the school;
- all supply staff who work at the school; and
- all members of the proprietor body i.e. the Governing Body (**GB**).

Category	Included on the SCR	Where Record Held
Staff whether or not in regulated activity	Yes	Individual schools
Staff working across schools	Yes	At the “main” or “base” school
Volunteer	If they are checked, the checks should be recorded on the SCR	Individual schools
Supply staff	Yes	Individual schools
Employees of contractors and other third parties (eg visiting professionals)	No*	
Self-employed contractors arranged by the School	Yes	Individual schools
Chair of proprietors / governors	No*	Held at Bennett
Other proprietor / governor	Yes	Held at Bennett
Local governor	No*	Individual schools
Adults who supervise children on work experience	No*	
Host families	Not required on SCR if a “private arrangement” between families. Otherwise, if the school is the regulated activity provider, they should be included.	

- NB those marked “No” may still require vetting checks as part of the School having regard to DfE safeguarding guidance, and schools may continue to include them on the SCR if they wish.

3 What information must be included on the SCR

Part 3 of KCSIE states that the SCR must show whether the following checks have been completed:

- Identity
- Children's Barred list / List 99 (date of DBS check unless a separate earlier barred list check was undertaken);
- Professional qualifications;
- Enhanced DBS Disclosure (or DBS Status check if the individual is subscribed to the DBS Update Service);
- Right to work in the UK;
- Prohibition from teaching check
- A section 128 (Prohibition from management) check
- Further checks on people who have lived or worked outside the UK; including recording checks for EEA teacher sanctions

In addition, the Trust requires that checks of references, medical fitness declaration (and disqualification from childcare if applicable) should be recorded on the SCR to enable a note of all checks to be recorded in one place.

In having regard to this, the Trust has decided to adopt a best practice approach by entering on the school's SCR all relevant checks (both statutory and non-statutory) and any relevant additional information. A list of all checks which must be recorded on each schools' SCR are detailed below together with additional details. Those categories marked with an asterisk * are entries that are in addition to those required by the ISSRs.

The information recorded on the SCR is whether or not each check was carried out, the date on which the check was completed (or the certificate obtained) and the details of the member of staff who carried out the check (initials, or first initial and surname are both acceptable formats).

NB ALL checks must be completed and logged on the SCR prior to a person's start date. The only exception to this is the DBS disclosure, provided it has been applied for prior to work commencing. Where a person starts work without the original DBS disclosure having been seen by the school a separate Children's Barred List check must have been undertaken. A risk assessment to determine whether it is appropriate for the person to start, and the level of supervision required, must have been carried out and approved before work can start (see “Comments” below).

Post details

- **Job title***
- **Employment start date***

The date entered on the SCR must be the date work actually starts rather than the date on which the contract of employment, or other agreement, was signed.

Identity check*

- Forename
- Surname
- Maiden name/other names used
- Surname at date of check
- House number
- House name
- Street
- District
- Town
- County
- Post code
- Date of birth
- **What photo evidence was seen (for appointments from 2016)**

A copy of the photo ID should be taken, signed and dated by a member of the recruitment panel, or administrator involved in the selection day. This will be required by the DBS ID verifier if this person does not meet applicants during the selection process.

Right to work in the UK

In most cases this will be confirmed by provision of an EEA/EU passport or current visa demonstrating right to work in the UK. If confirmation is anything other than an EEA/ EU passport then details must be entered in the “other evidence seen” column.

- Passport seen (date)
- Other evidence seen (type)
- Date seen
- Checked by

Qualifications

Where an individual claims to hold qualifications as part of an application for a position, these are checked in advance of employment and the date of the check logged under this section.

NB not all appointments are subject to qualification requirements. Qualifications should be checked where they are listed as “essential criteria” on the job description.

- **Prohibition from teaching check (Prohibition Order)**
This is required for anyone employed to carry out teaching work* on or after 1 April 2012 (NB original guidance stated April 2014 but ISI Update January 2015 confirmed that “The date of 1 April 2012 is when the underlying legislation was effective and the DfE has now confirmed that this is the date from when checks should be carried out”). For teaching staff this details the date that confirmation was received from the National College of Teaching and Leadership (NCTL) that the applicant is not subject to a prohibition order. Each school will carry out these checks via the NCTL’s Teacher Services’ System through the school’s own Secure Access account.

*Teaching work is defined to encompass: Planning and preparing lessons and courses for pupils; delivering and preparing lessons to pupils; assessing the development, progress and attainment of pupils, reporting on the development, progress and attainment of pupils. These activities are **not** seen as 'teaching work' if:

... the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

The school will carry out prohibition checks for all teachers. For those who are not employed specifically as teachers, the school will decide on a case by case basis, taking into account the individual roles, as to whether or not a prohibition check is appropriate, taking advice from the Human Resources Director as required. Reference should be made to the job description for the role, but it is likely that in many schools Teaching Assistants and Cover Supervisors will be engaged in some "teaching work".

- **Teacher reference number**
- **What qualifications have been seen**
- **Date qualifications checked**
- **Checked by**

Prohibition from management (Section 128 Direction)

The School will check whether applicants appointed to management positions after 12 August 2015 are subject to a Section 128 Direction. (This is a direction made by the Secretary of State under s.128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school, academy or free school).

The scope of the barring directions (as detailed in the DfE's confirmation letter of 11 August 2015) covers membership of proprietor bodies (including governors if the governing body is the proprietor body for the school), and all staff positions as follows: head teacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. Other teaching posts with additional responsibilities do not count as "taking part in management". For non-teaching staff, only posts which are part of the senior leadership team should be regarded as "management" for the purposes of checking for the existence of the barring direction. Checking staff promoted internally is not a statutory requirement, however, the school will check (and record on the SCR) any staff who are promoted internally to a position covered in the description above.

The checks will be made via either the DBS route or via the NCTL Teacher Services' System (as per DfE guidance dated 11 August 2015). As of 11 August 2015 no directions under s.128 had been made by the Secretary of State so all those appointed prior to this date and in positions of management (as defined above) have "YES" to the check being clear entered under the relevant column. Those appointed after 12 August 2015 and in positions of management have been checked via either the DBS or Teacher Services' System route for a s.128 direction and also had "YES" to indicate check is clear. All those not in a position of management have N/A entered.

The SCR should list

- **Reason for check (e.g. new appointment, change of role)**
- **Check clear YES/NO**
- **Checked by**

Police Check

- **Date requested**
- **Children's Barred List received date**

Where the position applied for amounts to "**regulated activity**" (see Keeping Children Safe in Education 2016, p24) the school obtains confirmation that the applicant is not named on the Children's Barred List. Most positions at a school will amount to regulated activity and a Children's Barred List check will therefore be carried out in nearly all cases. This check is completed as part of the Enhanced DBS check. Where an individual commences work prior to the School seeing the original DBS disclosure a separate check of the Children's Barred List must be carried out before work starts. Failure to do a separate check in these circumstances will amount to a regulatory non-compliance. If the check was completed as part of the DBS check only then the date on which the DBS disclosure was received should be the date entered in the Children's Barred List column. If a separate check was undertaken then the date on which it was carried out should be entered on the SCR.

Note – staff who have an opportunity for regular contact with children who are not engaged in regulated activity must not be checked against the barred list. This category includes contractors who have the opportunity for contact with children under a temporary or occasional contract (KCSIE 2016, p 23)

- **Enhanced DBS disclosure number**

The ISSRs require the School to undertake an enhanced DBS check on all staff. This covers nearly all appointments to the School workforce. In respect of volunteers, each school must carry out a risk assessment, and determine whether the volunteer meets the threshold of being in "**regulated activity**" making an Enhanced DBS check necessary.

There is no statutory requirement to undertake an enhanced DBS check if, in the three months prior to beginning work at the school, the applicant has worked in another school in England in a post which brought them into regular contact with children or in any position a school since 12 May 2006 OR in a college in England in a post which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18. The Trust will accept a DBS certificate (if it satisfies the above requirements) for short term, short notice staff but will carry out a separate Children's Barred List check. However, the Trust's general policy is to carry out a new DBS check when appointing all new permanent staff. When a DBS is accepted from another institution this will be logged on the SCR under this column (with the DBS certificate number and the date). Portability of DBS checks can only be accepted where Kent County Council is the Umbrella Body.

In the event that schools undertake further DBS checks during employment these subsequent disclosure numbers should be recorded on the personnel file and **not** on the SCR.

- **Date**
- **Evidenced by**

You should record documents used in the ID verification stage of the application. You should note on the copies made of these documents which were used for ID1, ID2 and ID3. These copies should record that the originals have been seen and checked, signed and dated by the ID verifier. Where the ID verifier has not been involved in the original selection process, this

ID must be checked against the photo ID used to verify the identity of the person attending the selection day.

- **Date evidence seen**
Must match the date on the signed copies.
- **Checked by**

Overseas Checks

Overseas criminal records or certificate of good conduct

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges (ie all those listed without an asterisk here). In addition, the school will make such further checks as it considers appropriate in order to verify a person's suitability to work with children due to them having lived or worked overseas prior to their being appointed to a position at the school. This is so that the school can check whether any relevant events occurred during any time spent outside the UK and consider them as part of the application process.

There is no mandatory period of time spent overseas which requires additional checks to be complete with guidance stating that "such further checks are made as the school considers appropriate having regard to any guidance issued by the Secretary of State". Each applicant should be assessed individually (and record details on personnel files) and advice sought from Human Resources if required. The Trust recommends that schools should usually undertake an overseas criminal record check if a candidate has resided overseas for a period of 3 months, or longer, in the five years prior to applying for a position at the school. In some cases it may be deemed necessary to request a criminal record check for each country in which an applicant has lived or worked for a minimum of three months since the age of 18. In addition, a criminal record check from the country of nationality will be requested.

The Trust refers to Home Office guidance on what checks are available from different countries. Extra references covering the period of time spent in the particular country will be requested. These will be assessed along with all other vetting checks to establish if the applicant is suitable to start work or whether the start date needs to be delayed until the certificate of good conduct is received. In these instances full details of any assessment will be detailed under the comments column on and the personnel file.

The SCR should include:

- **Required**
Note the check that is required for the specific candidate, with reference to their application form and interview notes exploring employment history and gaps in employment.
- **Date received**
- **Checked by**
- **European Economic Area (EEA) teacher regulatory authority restriction check**
From 18 January 2016 where any European Economic Area (EEA) teacher regulatory authority imposes a restriction on a person's ability to work as a teacher this information must be shared with other EEA Members States. The School checks for teachers sanctioned in other EEA member states online using the NCTL's Teacher Services' System. (NB EEA

Online will only show sanctions made after 18 January 2016). This check does not require a separate SCR column as it can be considered part of the overseas “further checks” but for

clarity (as this check does not relate to all categories of staff) a separate column is included on the school’s SCR

Health and References

- **Occupational Health clearance (date received)**
Staff must complete a medical questionnaire prior to appointment. The completed medical questionnaire must be considered by the school/Trust’s approved Occupational Health provider. In the absence of any substantive concerns precluding appointment, the date of receipt by the personnel contact of the confirmation of fitness for employment is to be logged in this column.
- **References requested**
Please note the date requested, and the referee used
- **Ref 1 received (date signed as satisfactory)**
- **Ref 2 received (date signed as satisfactory)**

All references are to be reviewed, signed and dated by the Headteacher to confirm that the references are satisfactory to the Trust. For Trust employees, references must be signed by a member of the senior team.

In some cases, additional references will be requested, in line with the Safer Recruitment/Reference Policies. Additional references may include a Church referee, or references from the individual’s last employer from the Children’s Workforce, where this is not their most recent employer. In general, references should cover, as a minimum, the last three years.

Internal forms

- **Disqualification by Association (Childcare (Disqualification) Regulations 2009)***

In February 2015 the Department for Education published supplementary advice to the ‘Keeping Children Safe in Education’ statutory guidance. The Childcare (Disqualification) Regulations 2009 place separate and additional requirements on schools to ensure that all staff working in early and later years settings are suitable to do so. The Regulations prohibit anyone who is disqualified themselves under the Regulations, or who lives in the same household as a disqualified person, from working in relevant settings, including schools.

Staff are covered by this legislation if they are employed and/or provide early or later years childcare, or are directly concerned with the management of such childcare. Early years childcare covers children from birth until 1st September following their fifth birthday, i.e. up to and including Year R. Later years childcare covers children above the age of five years, but who have not attained the age of eight in childcare provision out of school hours. This does not include extended school hours for co-curricular learning activities, but does include childcare at breakfast or after-school provision.

This includes:

All headteachers, deputy and assistant headteacher in Trust primary schools, who are considered to be directly concerned with the management of such provision.

All staff working in school managed nursery provision.

All teachers and teaching assistants working in Early Years classes, including any PPA cover.

All midday meals supervision for Early Years classes.

All staff working in wrap-around care provision.

The regulations do not cover staff who:

Only provide education, childcare or supervised activity during school hours to children above reception age; or

Only provide childcare or supervised activities out of hours for children who are aged eight or over; and

Have no involvement in the management of relevant provision.

Staff will not automatically be required to make a declaration if they are only occasionally deployed, and are not regularly required to work in relevant childcare as described above.

Trust staff may be required to complete such a declaration at any time if their role or duties change and as a result they become covered by the regulations.

Relevant staff are required to read and complete a declaration (see appendix 2) confirming that they are not disqualified under these Regulations from working in such provision for Tenax Schools Trust.

- **Confirmation of receipt of KCSIE, Part 1***

All staff sign to confirm that they have received the Safeguarding and CP policy and KCSIE, Part 1. On receipt of the signed declaration, the date of signing is logged on the SCR. This form was originally issued to all staff on the introduction of KCSIE in April 2014 and receipt logged. It is then reissued to staff when revisions are published. For new staff this form is provided with a copy of Part 1 as part of their Offer Pack.

- **Comments**

Referred to under column headings above. The comments column will include additional relevant comments, e.g. Risk Assessments put in place where original DBS certificates have not been seen prior to work commencing are also detailed under the comments column.

5 Administration of the SCR

The regulations do not specify the required format for the register but specify that all the required columns should have suitable entries as far as this is possible. Not applicable (N/A) should be entered on the SCR if a particular check was either not relevant to the appointment in question or

was not a requirement at the time of the person's appointment. Where recording the person who has undertaken a check is recorded, this should be the first initial and surname. Where this would not adequately identify the individual, full names should be used.

The SCR is held electronically in each school as an Excel workbook. This document is password protected, and, to ensure the security of the data, the password is to be changed at least once per notional term. Each school must appoint a named person who is accountable for completing and updating the SCR. School personnel authorised to access the school's SCR are members of the HR Department, Headteacher, Deputy Headteacher, Designated Safeguarding Leads and Designated Safeguarding Governors. The Chief Executive Officer, Chief Financial Officer and Human Resources Director reserve the right to access the SCR of any Trust school.

6 Categories of Worker logged on the SCR

Different tabs are identified for the following categories of workers:

Current Staff

Teaching staff – all columns to be completed.

Support staff – all columns to be completed

Directly employed casual staff (e.g. supply teachers, relief midday-meals supervisors)

Contractors in regulated activity

All columns to be completed. Staff employed by contractors, which may include cleaning and catering staff, are subject to the same checks and vetting *processes as the School's support staff.*

Contractors are required to carry out the relevant checks and the information is notified to the School and logged on the SCR.

- *Individual name*
- *Employer name and address details*
- *Date commencing at the school*
- *End date of supply to the school*
- *The Employer ID verification (this may be a letter on headed paper giving details of the individual being supplied or an employer's photo ID card)*
- *What personal photo identification has been seen, e.g. Driving license, passport.*
- *The person checking the identity documents*
- *Date of written notification from the supply agency that it has made checks of:*
 - Identity*
 - Children's Barred List*
 - Qualifications*
 - Overseas checks, where applicable*
 - Prohibition from teaching check, where applicable*
 - Prohibition from management check, where applicable*
 - Right to work in the UK*
 - DBS certificate*
- *Date original DBS certificate was seen by the School*
- *Who checked the original DBS certificate*

Where a contractor is likely to send the same individual on a continuous basis throughout the academic year, contractor details must remain on the current tab until the end of the academic year before being moved to a leaver tab. All contractor tabs are to be refreshed each academic year, after verification with the supplier.

Agency staff

The SCR must contain the same data as for other contractors. Due to the volumes involved, schools may choose whether to record Agency staff on their contractor tab, or hold a separate tab.

Volunteers

Refer to the school's volunteer policy as the arrangements for volunteers will vary by individual and activity. The checks necessary will depend on whether the volunteer will be in regulated activity and where checks are carried out on volunteers these will be recorded on the SCR.

Governors and Chair of Governors

The following checks are carried out and logged on the SCR for governors and the Chair of Governors:

- *Enhanced DBS Disclosure*
- *Identity*
- *Overseas checks where appropriate*
- *Right to work in the UK*
- *Dates of child protection training.*

NB *For the Chair of Governors the Secretary of State makes the following checks:*

1. *An enhanced criminal record check, countersigned by the Secretary of State;*
2. *Checks confirming the individual's identity and their right to work in the UK; and*
3. *In the case of an individual for whom, by reason of that individual living or having lived outside the UK, obtaining an enhanced criminal record certificate is not sufficient to establish the individual suitability to work in a school, such further checks as the Secretary of State considers appropriate.*

Tenax Trust staff

Ofsted guidance in 2017 states "Every academy in a MAT needs to maintain an SCR. Where the MAT employs staff who are not assigned to an individual academy, these employees must be recorded on the SCR for the MAT, along with all others employed by the MAT and Trustees. Where teaching staff work in more than one academy across the MAT, they should be recorded on the SCR for one academy. This should be the academy where they spend the most teaching time, or the one against which they are recorded for pay and other purposes. For other academies where the member of staff operates, there should be a reference on the SCR to the fact that their record is held at XX Academy"

Schools should record regular visitors from the Trust under this tab, noting that for Trust employed staff, full records are held at Bennett Memorial Diocesan School.

There will be occasions where staff become eligible for additional checks at a receiving school that are not required for their substantive post e.g. a Secondary or KS2 teacher working with Early Years who become subject to the Childcare Disqualification Regulations. Such additional checks required in that setting are to be recorded on the receiving school's SCR.

In progress

This tab should be used to record the details of checks undertaken prior to the start date of the individual. Individual details from this tab must be moved to the "Current" tab as soon as the individual starts work. Any gaps in the record must be highlighted and followed up.

Visiting Speakers

Visitors should sign in at reception in each school and be supervised/accompanied at all times. Where visitors meet the threshold of “regulated activity”, checks should be carried out and these recorded on the single central register under the relevant tab (e.g. volunteer, contractor etc).

Self-employed Contractors

These may include sports coaches, music teachers etc. As they are usually individuals and not via agencies then the School carries out all of the same vetting checks that are appropriate for support staff and these are recorded on the “Current Staff” tab.

Leavers

Leavers details should be moved to the Leaver tab at the effective date of termination. The Leaver tab should retain the following data: Full name, date of birth, role details, start and leaving dates, DfE prohibition, Police and Overseas check columns. This data is to be retained indefinitely. The Trust retains this data to maintain an indefinite record of all staff engaged by the Trust, and will only be processed for the purposes of assisting the investigation of any safeguarding allegations or offences that could not reasonably have been known at the time other employment records are destroyed.

Host families

There is no requirement to log host families on the SCR. Host family details, along with DBS certificate numbers will be held in the separate host family folder within the HR Department.

7 Reviewing the SCR

The headteacher should check the Single Central Record at least once per term (based on a six term year); more frequently if required during periods of significant recruitment. The Safeguarding Governor may review entries and carry out spot checks on the Single Central Record at regular intervals to check compliance with this guidance document. The outcome of such reviews will be reported to the Governing Body. Any deficiencies or weaknesses will be remedied without delay and reported as having been rectified to the Governing Body.

The Human Resources Director and Chief Financial Officer will also carry out spot checks of the Single Central Record and the Archive records at all schools.

Appendix 1 Example Single Central Record

Appendix 2 Example Childcare Disqualification Declaration