

Policy updated 29/04/2021

There are no significant changes to this policy.

The policy has been updated to reference UK GDPR and updated DfE (2021) 'Keeping children safe in education (2020)

2.1 Additional point - Ensuring a suitability check is carried out on any new chairs of trustees.



Single Central Record (SCR) Policy

Prepared by:	Adopted by Board of Trustees	Review Date (biannual cycle)
Safeguarding Lead	Summer 2021	Summer 2023

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Statement of intent

At The Aspire Educational Trust, we are committed to promoting the safety and wellbeing of our staff, pupils and visitors. Ensuring the safety of our trust community is of paramount importance and, as a result, this policy has been created to establish a comprehensive safer recruitment procedure so that pupils feel safe at school. The maintenance of a MAT SCR is required as part of this process as it provides the trust and its academies with a record of all pre-employment checks, ensuring staff, contractors and volunteers are safe to work in the trust's academies.

To ensure the trust is recruiting suitable individuals for a role, employment checks will be carried out, in line with the AET Safer Recruitment Policy and in accordance with the current DfE statutory guidance for schools and colleges: Keeping Children Safe in Education, Part 3. Checks will include identity checks, right to work in the UK checks, varying levels of DBS checks (depending on role), as well as checks for staff who have lived or worked outside the UK so that any relevant events that occurred outside the UK can be considered.

This policy outlines the trust's procedure for maintaining an up-to-date SCR in line with government statutory requirements and guidance.

1. Legal framework

1.1. This policy has due regard to legislation, including, but not limited to the following:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Freedom of Information Act 2000
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- DfE (2021) 'Keeping children safe in education (2020)'
- ESFA (2020) 'Academy trust chair suitability checks: guidance for applicants'

1.2. This policy operates in conjunction with the following policies:

- Child Protection and Safeguarding Policy
- Data Protection Policy (MAT)
- Safer Recruitment Policy (MAT)

2. Roles and responsibilities

2.1. The board of trustees is responsible for:

- Maintaining the single central record detailing checks carried out in each academy within the MAT.
- Ensuring that the data stored in the SCR is stored safely, securely and accessed by authorised persons only.
- Ensuring all mandatory safer recruitment checks are completed and recorded for each individual academy and for trust centrally employed staff/contractors and volunteers.
- Ensuring all prospective members of staff and all employed members of staff have the required level of DBS checks.
- Ensuring HR Manager is involved in making decisions whether any prospective member of staff who holds a criminal conviction is suitable to work within the trust.
- Ratifying decisions made regarding disclosure of information.
- Ensuring if an academy or the trust has concerns about an existing staff member's suitability to work with children, all relevant checks are carried out as if the person were a new member of staff.
- Ensuring the identity of all existing and prospective employees.
- Ensuring DBS checks are carried out on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees.

- Ensuring appropriate and relevant checks are completed for volunteers, trainee teachers, supply and agency staff and contractors in all trust academies.
- Ensuring a suitability check is carried out on any new chairs of trustees.

2.2. The principal of each academy is responsible for:

- Maintaining an up-to-date academy section of the AET SCR by updating it upon employment of any member of staff, as well as recording the identity and background checks made for other visiting staff.
- Maintaining an up-to-date academy section of the AET SCR for volunteers, contractors, agency, trainees and supply staff. Ensuring the relevant level of safer recruitment checks are made, including level of DBS check.
- Analysing whether any members of staff or returning volunteers, contractors or any other visiting party require an updated DBS check.
- Ensuring the school obtains legible copies of documentation used to prove workers' right to work in the UK, e.g. a copy of a passport.
- Ensuring that documentation evidencing workers' right to work in the UK is up-to-date, especially if visas have an expiry date on them.
- Informing the trust's HR Manager of any decisions made regarding DBS and other security checks.
- Carrying out all relevant checks on an existing staff member if there are concerns about their suitability to work with children, as if the person were a new member of staff.
- Ensuring the relevant checks are made and recorded for each individual person whilst complying with the Data Protection Act 2018 (DPA) and The UK General Data Protection Regulation (UK GDPR)
- Ensuring that the data stored in the SCR is stored safely and accessed by authorised persons only.
- Ensure there are robust record keeping procedures in place for the storage of documents related to the Single Central Register such as volunteer risk assessments, confirmation of checks for fee-funded teaching trainees, contractors and agency and supply staff.
- Completing the Single Central Register Review Register whenever an employee or other authorised person accesses the SCR.
- Acting in accordance with this policy.
- The Trust Lead Administrator will undertake the above responsibilities for the trust section of the MAT SCR.

2.3. The trust and academy staff are responsible for:

- Providing accurate and up-to-date information required for the SCR in a timely manner so that they can continue their employment within the trust.
- Informing their academy principal or line manager of any changes in personal data or additions that need to be made to the SCR.

2.4. Volunteers, contractors and other visiting parties are responsible for:

- Providing accurate and up-to-date information required for the SCR, so that they can continue their employment at school.
- Informing the principal of any changes in personal data or additions that need to be made to the SCR.

3. Contents and completion of SCR

- 3.1. The MAT SCR will detail checks for any member of staff who will likely come in to contact with a pupil. This includes the following:
 - Teachers, supply teachers and trainees
 - All central trust or individual academy staff
 - All members of the local academy committee
 - All members of the proprietor body, this means the members and trustees of the academy trust.
 - Any other individual likely to work in close proximity to the trust's pupils
- 3.2. Prior to the first day of employing agency staff from a third-party organisation, the academy will obtain and record receipt of written notification that the organisation has carried out all of the relevant pre-employment checks and obtained the appropriate certificates. This declaration will be retained and the date that confirmation was received, along with details of the enhanced DBS certificate with barred list check, will be recorded on the SCR. A photographic ID check must be made of the individual on their first day presenting at the school.
- 3.3. When engaging the services of a contractor, or any employee of a contractor, the individual academy or trust will obtain and record written notification that the organisation has carried out all of the relevant and appropriate level of checks required for the work to be undertaken. A photographic ID check must be made on the first day presenting at the school.
- 3.4. Where applicants for initial teacher training are salaried by the academy, the academy will ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained. Checks will be recorded on the academy's section of the SCR. A photographic ID check must be made on the first day presenting at the school.
- 3.5. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Academies will obtain written confirmation from the provider that it has carried out all pre-appointment checks that the academy would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children. The academy will record written confirmation has been received on the individual academy's section of the MAT SCR. The written confirmation received will be kept on file. A photographic ID check must be made on the first day presenting at the school.

- 3.6. The AET risk assessment for volunteers will be undertaken by the academy for all volunteers to determine the level of checks required prior to commencement of their role. See Annex B. For all volunteers working in regulated activity the academy must obtain an enhanced DBS certificate (which must include barred list information). For volunteers not working in regulated activity, the risk assessment will determine whether an enhanced DBS certificate should be obtained. An ID check must be carried out on all volunteers. The activities of volunteers must be reviewed regularly to ensure those who are new to regulated activity have the required level of checks.
- 3.7. The principal or trust line manager must ensure that the individual who presents themselves on their first day of employment is the subject of all required pre-employment checks.
- 3.8. A copy of photographic identification will be obtained for all employees. Identity checks will be made following DBS ID Checking Guidelines <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines>
- 3.9. MAT SCR will include the following mandatory checks:
- An identity check
 - A barred list check – for those who will be engaging in regulated activity
 - An enhanced DBS check
 - A teacher prohibition check
 - Right to work in the UK check
 - Professional qualifications check - school employees only
 - Pre 1st January 2021-employees - European Economic Area (EEA) check - workers who have lived or worked outside the UK only.
 - Post January 2021 – Workers who have lived or worked outside of the UK – further checks deemed appropriate to allow relevant checks that occurred outside the UK to be considered, e.g. criminal records for overseas applicants
 - A section 128 check – for senior leaders including principals, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship, for trustees and members of the academy trust and local academy committee members.
 - The SCR will detail all checks carried out in each academy within the MAT. The information will be recorded in a way that allows for details for each academy to be provided separately, and without delay, to those entitled to inspect that information. Each AET academy will have a separate area within the MAT SCR file. There will be a separate trust central staff and trustee spreadsheet within the MAT SCR file. Each spreadsheet in the MAT SCR files will be access protected to authorised employees from the academy and trust.
- 3.10. The SCR will also detail the following relevant checks:
- Disqualification under Childcare Act 2006 – date information given to relevant staff.

- Receipt of confirmation from external providers and agencies that they have carried out all the relevant and appropriate level of checks required for the work to be undertaken by their employees who will work in the school, this includes contractors and supply agency staff.
 - Receipt of confirmation from initial teacher training provider, for fee-funded trainees, that it has carried out all pre-appointment checks that the academy would otherwise be required to perform, and that the trainee has been judged, by the provider, to be suitable to work with children.
 - Checks made for volunteers including the date the AET risk assessment for volunteers was completed.
 - Child Protection and Safeguarding Training dates – (minimum Level 1 Basic Awareness).
 - Receipt of satisfactory references.
 - Date of medical clearance received.
- 3.10 Academy principals, trust level line managers and staff carrying out safer recruitment checks must ensure they only carry out the appropriate checks for the role and the work of the person subject to checking.
- 3.11 Academy principals, trust level line managers and staff carrying out safer recruitment checks must use the most up-to-date guidance in Keeping Children Safe in Education Part 3 to inform their practice.
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- 3.12 All columns must be completed for each person on the SCR. An entry of N/A (not applicable) should be entered when that check information is not a requirement of the role and work of the individual.
- 3.13 The MAT SCR will detail all checks carried out in each academy within the MAT. The information will be recorded in a way that allows for details for each academy and central trust staff to be provided separately, and without delay, to those entitled to inspect that information.

4. Disqualification under Childcare Act 2006

Link for full guidance to be followed

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

- 4.1 The Aspire Educational Trust must ensure that they are not knowingly employing a person who is disqualified under the 2018 regulations in connection with relevant childcare provision. The trust and its staff must ensure that they do not apply these arrangements to individuals who do not fall in the scope of the act or who are specifically excluded.
- 4.2 Academy principals and trust level line managers must identify and record on the SCR which staff, volunteers, people on work placements and salaried

trainees are covered by Disqualification under the Childcare Act 2006. Relevant staff are those engaged or employed to regularly provide childcare, or in a management role because they are: working with reception age children at any time in normal school hours; or working with children older than reception until age eight, outside school hours in the school's childcare provision.

In AET academies, this includes:

1. Early years provision

Staff who provide any care for a child up to and including reception age. This includes education in nursery and reception classes or any supervised activity (such as breakfast clubs, playtime and lunchtime supervision and after school care provided by the school) both during the normal school day and outside of school hours for children in the early years age range.

2. Later years provision (for children under 8)

Staff who are employed to work in childcare provided by the school outside of the normal school day for children who are above reception age but who have not attained the age of 8. This does not include education or supervised activity for children above reception age during school hours (including extended school hours for extra-curricular learning activities, such as the school's choir or sports teams) but it does include before-school settings, such as breakfast clubs, before and after school provision.

- 4.3 Academy principals and trust level line managers must provide relevant staff with information on disqualification under Childcare Act using the AET information sheet for staff. **See Annex A.** This information sheet will be issued as part of the recruitment checking process. Schools will check annually that the information sheet had been issued to relevant staff.
- 4.4 Academy principals and trust level line managers must have written confirmation that relevant agency and supply staff, contractors and their employees, teacher trainees have undergone the relevant checks, which may include Disqualification under Childcare Act. This will depend on the work they will be undertaking in the academy. It is the responsibility of the employer to make the relevant checks. Academies should always check the safeguarding policies and procedures of individual organisations in relation to safer recruitment when engaging their services.
- 4.5 Academy principals and trust level line managers must ask relevant volunteers to self-declare they are not disqualified under the Childcare Act. Annex A of this document will part of the recruitment for volunteers. This is included on the AET risk assessment for volunteers, which must be completed.

- 4.6 Academy principals and trust level line managers must record on the SCR the date on which the information about disqualification under the Childcare Act was provided to relevant staff.
- 4.7 Self-declaration must only be requested of relevant staff, volunteers, supply and agency staff and contractors.
- 4.8 Academy principals and trust level line managers must use the most up-to-date guidance to inform their practice.
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>

5. Storage

- 5.1. There will be only **one** copy of the MAT SCR created on an AET SCR format. Each academy will have a designated spreadsheet. The trust will have a designated spreadsheet for central staff and trust proprietors.
- 5.2. The MAT SCR will be stored securely and electronically in a format that will allow for details for each individual academy to be provided separately, and without delay, to those entitled to inspect that information.
- 5.3. The trust and its academies will not keep copies of DBS certificates, but staff have to be prepared to present them upon request.
- 5.4. After recruitment, the trust and its academies will keep copies of other documents used to verify the successful candidate's identity, right to work in the UK, required qualifications and references in the member of staff's personnel file.
- 5.5. All other documentation used to verify the employee's identity and required qualifications, e.g. photocopied proof of qualifications, will be securely stored in the employee's personnel file.
- 5.6. All documents will be stored in accordance with the trust's Data Protection Policy.

6. Monitoring and review

- 6.1. The SCR will be updated on the first occasion of an individual attending an AET academy or central trust team in an employment or voluntary capacity, or when any variation to the fields on the SCR is required.
- 6.2. Records will be transferred to a leavers tab of the SCR when an individual is no longer employed by the trust or visiting trust site on a contractual or voluntary basis.
- 6.3. Records kept on leavers will be disposed of safely six years after departure. Data is kept for this period for all persons recorded on the SCR, in line with the

data retention schedule period for employees. The reason for retention of all records for this period is to ensure any reported safeguarding concern investigation can evidence appropriate checks were made by the trust. A record of destroyed information will be recorded as required by the Trust Records Management Policy and on SCR review sheet.

- 6.4. The MAT SCR is a live document and will be updated as and when required.
- 6.5. The MAT Safeguarding Lead will review the MAT SCR termly and provided feedback to each academy and the trust's leadership team on whether safeguarding checks are present and up-to-date.
- 6.6. The SCR will be reviewed termly by the academy principal, ensuring all safeguarding checks are present and up-to-date.
- 6.7. The MAT SCR will be reviewed annually by the trustee with leadership responsibility for safeguarding arrangements, ensuring all checks are present, completed and up-to-date.
- 6.8. The board of trustees will review the Single Central Record Policy annually.
- 6.9. Any changes to this policy will be communicated to all relevant stakeholders.

7. Annex A: Information to be given to relevant staff about Disqualification under Childcare Act 2006 (2018 Regulations)

Your role and work within The Aspire Educational Trust comes under the Department for Education Statutory Guidance for Disqualification under the Childcare Act 2006. The full guidance can be found online at:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

The Aspire Educational Trust has a duty to provide you with the following information.

In certain circumstances an individual will be disqualified from providing childcare or being directly concerned with the management of a childcare provision. Your role is covered by this legislation for one or more of the following reasons:

- You regularly provide care for a child up to and including reception age during the normal school day
- You regularly work in childcare provided outside of the normal school day (before and after school provision/ breakfast club)
- You are directly concerned with the management of early or later years provision covered by this legislation, are the academy principal, a member of the school's leadership team, manager, supervisor, leader or volunteer responsible for day-to-day management of the provision.

You are required to self-declare whether you are disqualified under the Childcare Act 2006 legislation for any of the following reasons:

- found to have committed a relevant offence against a child
- made subject to an order or determination removing a child from your care or preventing a child from living with you
- found to have committed certain offences against an adult; for example, murder, kidnapping, rape, indecent assault, or assault causing actual bodily harm
- included on the list of those who are barred from working with children, held by the Disclosure and Barring Service

- made the subject of a disqualifying order
- previously refused registration as a child carer or have had registration cancelled, unless the cancellation was only for non-payment of fees
- refused registration as a provider or manager of children's homes or have had registration cancelled.

If you fall within one of the disqualification criteria in the 2018 regulations above you must declare this immediately to the academy principal or your trust line manager.

If you are disqualified you will not be able to work in a relevant childcare provision unless a waiver of disqualification is granted by Ofsted. Information about how to make an application for a waiver can be found in the guidance or by clicking the following link <http://www.ofsted.gov.uk/resources/applying-waive-disqualification-early-years-and-childcare-providers> .

If your circumstances change you must immediately inform the academy principal or your trust line manager

If you have any questions relating to this information you should speak with the academy principal, your line manager or contact The Aspire Educational Trust's HR Manager.

8. Annex B: Risk Assessment for Volunteers



Risk Assessment for Volunteers

Guidance on Safer Recruitment of Volunteers can be found in Keeping Children Safe in Education Part 3 – Safer Recruitment

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

This risk assessment should be completed when considering whether a person working as a volunteer at the school should be asked to apply for an enhanced DBS certificate.

Name of Person

Is the volunteer in 'Regulated' Activity? Yes No

If 'yes', an enhanced DBS with Barred list check is required.

Is the volunteer not in 'Regulated' Activity? Yes No

If 'no', an enhanced DBS without a Barred list check may be obtained

Areas to consider

What is the age group of the pupils that the volunteer will work with?	
Are these pupils regarded as particularly vulnerable?	
How frequently will the volunteer be in school?	
What will the volunteer be doing in school?	
Will the volunteer be supervised on a regular basis?	

Would the above be regulated activity if unsupervised by a member of staff in regulated activity? See Annex F KCSiE	
What is the connection of the volunteer to the school?	
What motivates the volunteer to want to work in the school?	
Is the volunteer in paid employment or do they work in a voluntary capacity elsewhere with children?	
Can the volunteer provide at least one reference from someone other than a family member, including a senior person at the employment or voluntary service named above?	
What information does the school already know about the person?	
Has the person's identity been verified?	
Is the person signed up to the DBS Update Service?	
Has a check been completed on the DBS Update Service?	
Is the person aware of any reason why they should not volunteer to work with children? Give the person Annex A of the Single Central Register Policy (Annex A : Information to be given to relevant staff about Disqualification under Childcare Act 2006 (2018 Regulations))	
Is this volunteer with children between the hours of 2am and 6am	This is regulated activity and the person must have an Enhanced DBS check

Decision

High Risk – the person has no previous connection with the school AND cannot provide references from elsewhere. There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school should consider whether the person's uncorroborated background would raise an unacceptable risk.

Medium Risk – The person can provide suitable references for other work with children (either paid or unpaid), they have a connection to the school, and no issues have come to light that would mean they would be unsuitable. There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school may wish to do so, as no enhanced DBS has been seen.

Low Risk – The person is signed up to the DBS Update Service and the checks reveal no negative information OR The person is employed or volunteers elsewhere and has a recent enhanced DBS and can provide references OR the school knows the person well (e.g. may be a former employee)

There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, unless the person uses the DBS Update service, the school may decide to obtain a new enhanced DBS.

Decision

Application for enhanced DBS check is not needed. State reason(s) below:

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Application for an enhanced DBS check is needed. State reason(s) below:

Application for an enhanced DBS check and a Barred List check is needed because the person is in Regulated Activity

Designated Safeguarding Lead (Print Name)

DSL (Signature)..... Date.....

Principal (Print Name)

Principal (Signature) Date