

# DUBAI COLLEGE

*A tradition of quality in education*



## **SAFER RECRUITMENT AT DUBAI COLLEGE (including Disclosure and Barring Service Secure Handling Policy)**

As a British School Overseas, a COBIS member and an organisation which champions best practice, where possible, we use the Safer Recruitment guidance as outlined in the latest version of the DfE document [Keeping Children Safe in Education](#). The most recent edition was published in September 2018. The Headmaster will also undertake Safer Recruitment Training refresher training every three years, update the Safer Recruitment Policy annually in order to incorporate the latest guidance and along with the Designated Child Protection Officer and Deputy Designated Child Protection Officer will undergo Advanced Level Child Protection and Safeguarding Training every two years.

We recognise that it is vital for schools to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children and where possible we follow this guidance to the letter.

### **DISCLOSURE AND BARRING SERVICE**

We have recently been informed by the Disclosure and Barring Service that British Schools Overseas (**BSOs**) can no longer request Standard or Enhanced DBS checks. This is because the legislation which permits schools to ask about spent criminal convictions (the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975) applies only to recruitment decisions which are being made in England and Wales, and not to recruitment decisions which are made in other jurisdictions.

Staff recruited from the UK, or who have lived in the UK, can still request basic level DBS checks, however. These will show a person's current criminal records history. As such we will continue to request that such staff request these basic level DBS checks **before we appoint them**.

### **INTERNATIONAL CHILD PROTECTION CERTIFICATE**

Dubai College can now access information about UK nationals, or non-UK nationals who have previously lived in the UK, and who wish to work with children abroad, through an International Child Protection Certificate (ICPC). The National Crime Agency's Child Exploitation and Online Protection Command and ACRO have created this joint initiative to help protect children from offenders who travel overseas with the intention of harming children.

Applications for an ICPC must be completed by the individual applying for a position at Dubai College, in keeping with GDPR. The member of staff in charge of teacher recruitment should request that applicants provide this proof **prior to employment**. Further questions about ICPC can be directed to the ACRO Customer Services team on +44 2380 479 920 or [customer.services@acro.pnn.police.uk](mailto:customer.services@acro.pnn.police.uk).

### **PRE-APPOINTMENT CHECKS**

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks. Primarily we will adhere to the [Recommended Screening and Assessment Practices for International School Recruitment](#) produced by the International Task Force on Child Protection in June 2016. These practices cover Candidate Profiles, Reference Checks, Referee Verification, Credential Verification, Criminal Background Checks, Internet Checks, Review of Sex Offender Registries and the School's Interview and Advertising Practices.

In line with Keeping Children Safe in Education 2018 Dubai College will also:

- (i) verify a candidate's identity using the identification checking guidelines found on the GOV.UK website or via methods most appropriate to the UAE;
- (ii) obtain (via the applicant) an enhanced DBS certificate if possible (including barred list information, for those who will be engaging in regulated activity);
- (iii) try to obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- (iv) try to verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- (v) verify the person's right to work in the UAE. If there is uncertainty about whether an individual needs permission to work in the UAE, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;
- (vi) if the person has lived or worked outside the UK, make any further checks the college consider appropriate;
- (vii) verify professional qualifications, as appropriate, by requesting attested transcripts of applicants' degree certificates and their Qualified Teacher Status.
- (viii) While there is no requirement, Dubai College will still obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:
  - in a school in England in a post which brought them into regular contact with children or young persons in any post in a school since 12 May 2006; or
  - in an institution within the further education sector in England or in a 16-19 Academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons

The Teachers' Disciplinary (England) Regulations 2012 define teaching work as:

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils;
- and reporting on the development, progress and attainment of pupils.

Where possible we will also use the Teacher Services' system to ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State.

Where an enhanced DBS certificate can be acquired, it will be obtained from the candidate before, or as soon as practicable after, the person's appointment.

### **Employment history and references**

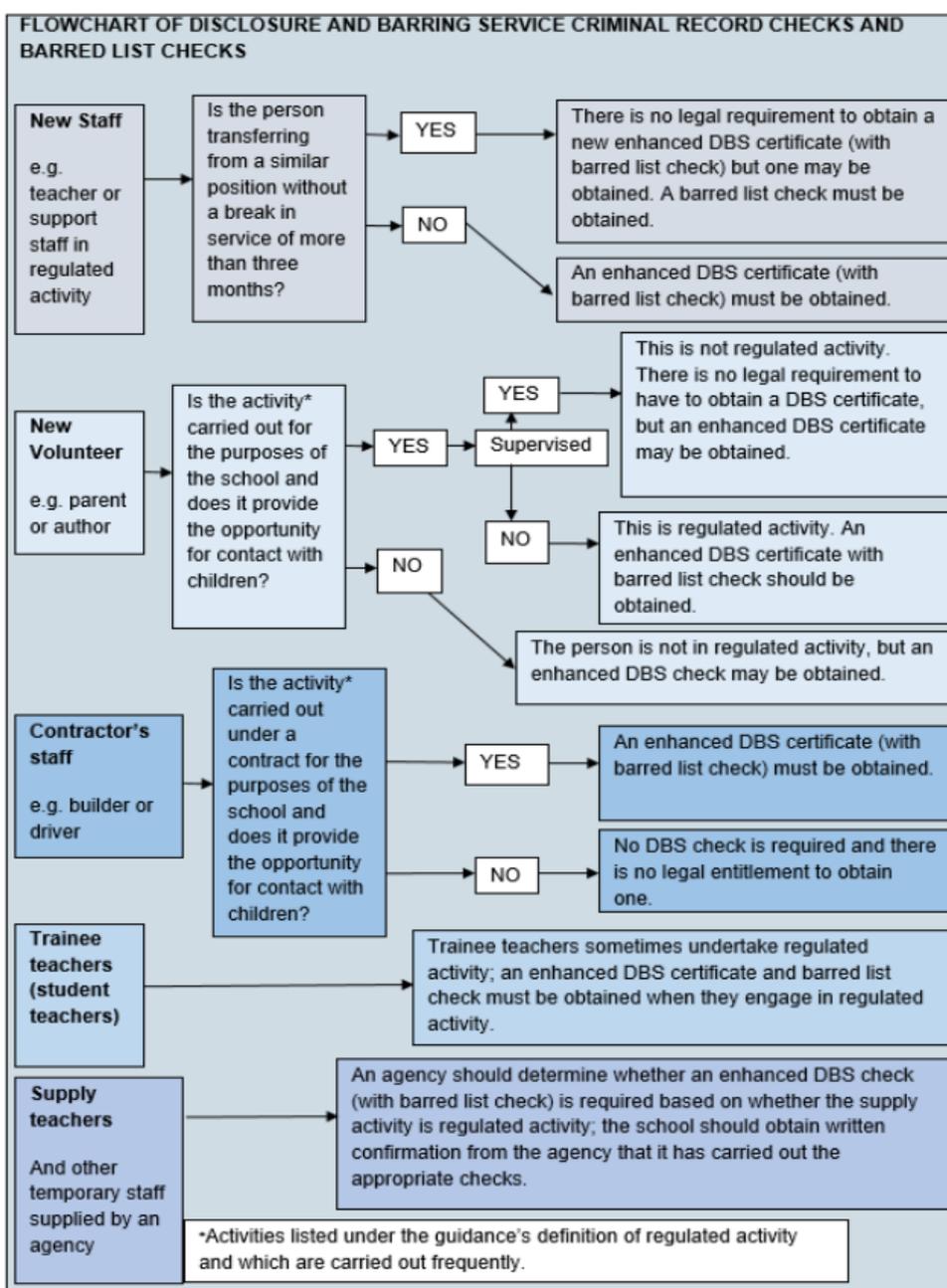
Dubai College always asks for written information about previous employment history and checks that information is not contradictory or incomplete. In alignment with the expectations of COBIS we require two references on professional letter head for each applicant verified by follow up telephone call, signed and dated by the person checking the reference.

References are sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

The purpose of seeking references is to obtain objective and factual information to support appointment decisions. References are always obtained, scrutinised and any concerns resolved satisfactorily, before the appointment is confirmed. They are always requested directly from the referee and we do not rely on open references, for example in the form of 'to whom it may concern' testimonials. If a candidate for a teaching post is not currently employed as a teacher, we also check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

On receipt, references are checked to ensure that all specific questions have been answered satisfactorily. The referee is contacted to provide further clarification as appropriate: for example if the answers are vague. They are also compared for consistency with the information provided by the candidate on their application form. Any discrepancies are taken up with the candidate.

Any information about past disciplinary action or allegations are considered carefully when assessing the applicant's suitability for the post (including information obtained from the Employer Access Online checks referred to previously).



## **Single central record**

Schools and colleges must maintain a single central record of pre-appointment checks, referred to in the Regulations (listed in paragraph 134) as the register. The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school. In colleges, this means those providing education to children; and
- for independent schools, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- a section 128 check (for management positions as set out in paragraph 111-112 for independent schools (including academies and free schools));
- further checks on people who have lived or worked outside the UK (see paragraphs 136-137); this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions described in paragraph 114;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

For supply staff, schools should also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

Whilst there is no statutory duty to include on the single central record details of any other checks, schools are free to record any other information they deem relevant.

For example, checks for childcare disqualification, volunteers, and safeguarding and safer recruitment training dates. Schools may also wish to record the name of the person who carried out each check.

The single central record can be kept in paper or electronic form.

We will include the date on which any certificate was obtained.

Schools and colleges do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. To help schools and colleges comply with the requirements of the Data Protection Act, when a school or college chooses to retain a copy, it should not be retained for longer than six months. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept for the personnel file. Further information on handling DBS certificate information can be found on GOV.UK.

## **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. The

Home Office guidance on criminal records checks for overseas applicants can be found on GOV.UK. These further checks should include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed, using the NCTL Teacher Services' system. See para 115 for further information on using this service. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.

The department has issued guidance on the employment of overseas – trained teachers. This gives information on the requirements for overseas-trained teachers from the EEA to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the United States of America.

16-19 academies and free schools are covered through their funding agreements.

### **Agency and third-party staff**

Schools and colleges must obtain written notification from any agency, or third-party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at the school or college that the school or college would otherwise perform.

Where the position requires a barred list check, this must be obtained by the agency or third-party prior to appointing the individual. The school must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by the school or college, the school or college must 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.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools 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.

There is no requirement for the school to record details of fee-funded trainees on the single central record.

### **Existing staff**

If a school or college has concerns about an existing staff member's suitability to work with children, the school or college should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school or college moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out.

Apart from these circumstances, the school or college is not required to request a DBS check or barred list check.

Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation, removal or redeployment of the individual.

Guidance on referrals can be found on GOV.UK.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.<sup>62</sup>

## **Volunteers**

Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. Volunteers who, on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in schools and colleges, will be in regulated activity. The school or college should obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, schools and colleges may conduct a repeat DBS check (which should include barred list information) on any such volunteer should they have concerns.

There are certain circumstances where schools and colleges may obtain an enhanced DBS certificate (not including barred list information), for volunteers who are not engaging in regulated activity. This is set out in DBS workforce guides, which can be found on GOV.UK. Employers are not legally permitted to request barred list information on a supervised volunteer as they are not considered to be engaged in regulated activity.

The school or college should undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so they should consider:

- the nature of the 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 suitability;
- whether the role is eligible for an enhanced DBS check; and

Details of the risk assessment should be recorded.

It is for schools and colleges to determine whether a volunteer is considered to be supervised. In making this decision, and where an individual is supervised, to help determine the appropriate level of supervision schools must have regard to the statutory guidance issued by the Secretary of State

(replicated at Annex F). This guidance requires that, for a person to be considered supervised, the supervision must be:

- by a person who is in regulated activity;
- regular and day to day; and
- “reasonable in all the circumstances to ensure the protection of children.”

The DBS cannot provide barred list information on any person, including volunteers, who are not in, or seeking to engage in regulated activity.

### **Maintained school governors**

Governors in maintained schools are required to have an enhanced criminal records certificate from the DBS.

It is the responsibility of the governing body to apply for the certificate for any of their governors who do not already have one. Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

### **Other school and sixth form college governors**

Governors who are volunteers should be treated on the same basis as other volunteers, that is, an enhanced DBS certificate (which will include a barred list check) should only be requested if the governor will be engaging in regulated activity. Governing bodies can request an enhanced DBS certificate without a barred list check on an individual as part of the appointment process for governors.

### **Proprietors of independent schools, including academies and free schools or alternative provision academies and free schools**

Before an individual becomes either the proprietor of an independent school or the chair of a body of people which is the proprietor of an independent school, the Secretary of State will:

- carry out an enhanced DBS check; where relevant, and where such a check is made, obtain an enhanced DBS certificate (either including or not including barred list information as appropriate);
- confirm the individual’s identity; and
- if the individual lives or has lived outside of the UK, where making an enhanced check is insufficient, such other checks as the Secretary of State considers appropriate.

The Secretary of State also undertakes these checks in respect of the chair of governing bodies of non-maintained special schools.

The requirement for an enhanced DBS check and certificate is disapplied for the chair of an academy trust if the academy is converting from a maintained school and the person has already been subject to a check carried out by the local authority.

Where the proprietor is a body of people, the chair must ensure that enhanced DBS checks are undertaken, where relevant, for the other members of the body and that where such a check has been undertaken, an enhanced DBS certificate is obtained, and that identity checks are completed before, or as soon as practicable after, any individual takes up their position. The chair must also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools). Further checks, as the chair considers appropriate, should be undertaken where, by reason of the

individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work in a school.

In the case of an academy trust, including those established to operate a free school, the trust must require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees.

## **Contractors**

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 will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

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

If a contractor working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

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

## **Visitors**

Schools and colleges do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). Headteachers and principals should use their professional judgment about the need to escort or supervise visitors.

## **Alternative Provision**

Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative 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.

## **Adults who supervise children on work experience**

Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.

Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school or college should consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves; and

- providing the teaching/training/instruction frequently (more than three days in a 30 day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school or college could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

Schools and colleges are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the child on work experience takes place in a ‘specified place’, such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

### **Children staying with host families (homestay)**

Schools and colleges quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as ‘homestay’ arrangements (see Annex E for further details). In some circumstances the arrangement where children stay with UK families could amount to “private fostering” under the Children Act 1989 see para 171 for further information about action that should be taken to alert the local authority in those circumstances.

### **Private fostering - LA notification when identified**

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. Where a member of staff or volunteer at a school or college identifies that a private fostering arrangement is planned, or is in place, this should be raised with the designated safeguarding lead (or deputy). The school or college should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

A link to comprehensive guidance on the circumstance in which private fostering may arise can be found in the private fostering section of this guidance.

Dubai College keeps a single central record, referred to in the regulations (described in the following paragraph) as the register. The single central record covers all staff (including supply staff, and teacher trainees on salaried routes) who work at the school and all members of the governing body.

The information that is recorded in respect of staff members is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check
- a barred list check
- an enhanced DBS check/certificate
- a prohibition from teaching check
- further checks on people living or working outside the UK or the UAE

- a check of professional qualifications
- a check to establish the person's right to work in the UAE.

For supply staff, Dubai College also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

Where checks are carried out on volunteers, we also record this on the single central record.

While we do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record we choose to retain a copy sometimes for longer than the six months required under the Data Protection Act in the UK.

### **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in Dubai College. In addition, we make further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. This mainly involves a local police check in the UAE.

### **Agency and third-party staff**

Where possible Dubai College obtains written notification from any agency, or third-party organisation we use that the organisation has carried out the checks (in respect of the enhanced DBS certificate that written notification has been received that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at Dubai College that we would otherwise perform.

Where the position requires a barred list check this must be obtained, by the agency or third-party prior to appointing that individual. The school must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including and barred list information) must be obtained.

### **Existing staff**

If we have concerns about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity are carried out. Apart from these circumstances, the school or college is not required to request a DBS check or barred list check.

We also recognise that we have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Referrals will be made as soon as possible after the resignation or removal of the individual.

Where Dubai College or an agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.

## **Volunteers**

Under no circumstances is a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

We understand that volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis at Dubai College will be in regulated activity. We will obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity will not be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which should include barred list information) on any such volunteer if we have concerns.

We will undertake a risk assessment and use our professional judgement and experience when deciding whether to seek an enhanced DBS check for any volunteer not engaging in regulated activity. In doing so we will consider:

- the nature of the 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 suitability;
- whether the role is eligible for an enhanced DBS check.

## **School governors**

Governors who are volunteers are treated on the same basis as other volunteers, that is, an enhanced DBS check (which will include a barred list check) should only be requested if the governor will be engaging in regulated activity. Governing bodies can request an enhanced DBS check without a barred list check on an individual as part of the appointment process for governors.

## **Contractors**

Where possible Dubai College will ensure that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check or local police checks. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information) or local police checks. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required or a local police check.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. We are responsible for determining the appropriate level of supervision depending on the circumstances.

Dubai College will always check the identity of contractors and their staff on arrival at the school or college.

## **Visitors**

Dubai College does not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). The Headmaster will use his professional judgment about the need to escort or supervise visitors.

### **Adults who supervise children on work experience**

When Dubai College organises work experience placements, for example in the Sixth Form, we will ensure that policies and procedures are in place to protect children from harm. However, we are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the child on work experience takes place in a 'specified place', such as Dubai College, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

### **Children staying with host families**

Dubai College quite often makes arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to "private fostering" under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

In such cases where it is possible to request a DBS certificate then we will follow the Disclosure and Barring Service Secure Handling Policy as outlined below:

## **DISCLOSURE AND BARRING SERVICE SECURE HANDLING POLICY**

### **General principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Dubai College complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the 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 and has a written policy on these matters, which is available to those who wish to see it on request.

### **Storage and access**

Certificate information should 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.

### **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 maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

To note: those registered care homes which are inspected by the Care Quality Commission (CQC), those organisations which are inspected by Ofsted and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain the certificate for the purposes of inspection.

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, 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.

### **Usage**

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. 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 prevail.

## **Disposal**

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. 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.

<b>Policy Details</b>	
Version date	September 2018
Last review	26 <sup>th</sup> September 2018
Next review	September 2019
Responsible SLT	Headmaster