



Single Central Record (SCR) Policy

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1.0 Statement of Intent

At Together Learning Trust, we are committed to promoting the safety and wellbeing of our staff, pupils and visitors. Ensuring the safety of our school communities is of paramount importance and, as a result, this policy has been created to establish a comprehensive safer recruitment procedure to help ensure the safety of pupils within our schools. The maintenance of an SCR is required as part of this process as it provides schools with a record of all pre-employment checks, ensuring staff are safe to work in the school.

To ensure our schools are recruiting suitable individuals for a role, employment checks will be carried out by the governing board and the headteacher, in line with the trust Recruitment Policy. The checks will include identity checks, right to work in the UK checks, varying levels of DBS checks depending on the 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 procedure for maintaining an up-to-date SCR in line with government statutory requirements and guidance.

2.0 Scope and Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- Freedom of Information Act 2000
- Education Act 2002
- The Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007
- The Non-Maintained Special Schools (England) Regulations 2015
- The Education (Independent School Standards) Regulations 2014
- DfE (2023) 'Keeping children safe in education 2023'
- ESFA (2021) 'Academy trust chair suitability checks: guidance for applicants'

This policy operates in conjunction with the following trust policies:

- Child Protection and Safeguarding Policy
- Data Protection Policy
- Recruitment Policy

3.0 Contents of an SCR

The SCR will detail checks for the following:

- All staff, including teacher trainees on salaried routes
- All members of the governing board
- Agency and third-party supply staff, even if they work for only one day
- All members and trustees
- Any other individual likely to work in close proximity to the school's pupils

When employing agency staff from a third-party organisation, the school will obtain written notification that the organisation has carried out all of the relevant checks and obtained the appropriate certificates. This declaration will be included in the SCR along with the date that confirmation was received any enhanced DBS certificate check has been provided in respect of the member of staff.

The headteacher must ensure that the individual who presents themselves on their first day of employment is the subject of all pre-employment checks.

A copy of photographic identification will be required.

The SCR will record the following checks:

- An identity check
- A barred list check
- An enhanced DBS check requested/certificate provided
- A teacher prohibition check
- Right to work in the UK check
- Professional qualifications check (for school employees)
- Further checks deemed appropriate on workers who have worked outside the UK to allow relevant events that occurred outside the UK to be considered, e.g. criminal records checks for overseas applicants and a letter from the professional regulating authority in the applicant's country
- A section 128 check for senior leaders
- A section 128 check for those in a governance role

The trust has created a trust-wide SCR template, which details all checks carried out in each school within the MAT. The information is recorded in a way that allows for individual academy details to be provided separately, and without delay, to those entitled to inspect that information.

The SCR will also record the following information:

- Checks for childcare disqualification (as applicable)
- Checks on volunteers
- Checks on governors
- Safeguarding training dates

The details of an individual will be removed once they no longer work at the school.

4.0 Roles and Responsibilities

4.1 The trust board (including through the activities of the central team) is responsible for:

- Ensuring the consistent application of this policy and associated recruitment policies within all schools.
- Ensuring all prospective members of staff and all employed members of staff have the required level of DBS checks.
- Ensuring enhanced DBS checks are carried out on all members of the academy trust, individual trustees, and the chair of the board of trustees.
- Supporting schools in deciding the suitability of any prospective member of staff who holds a criminal conviction.
- Ensuring annual checks are undertaken to ascertain the accuracy of school SCRs.
- Ensuring a suitability check is carried out on any new chairs of trustees.
- Ensuring this policy is updated annually in accordance with DFE requirements.

4.2 The local governing committee is responsible for:

- Ensuring all proposed new members of staff and all employed members of staff, within their respective schools, have the required level of DBS checks. For new starters this must be prior to the commencement of their contract. For existing staff, updates should be sought every five years as per trust policy.
- Deciding whether any prospective member of staff who holds a criminal conviction is suitable to work within the school.
- Informing the LA and trust central team of any decisions made regarding disclosure of information.
- Ensuring the identity of all existing and prospective employees.
- Applying for an enhanced DBS check for any governors who do not already have one, including a barred list check if, in addition to their governance duties, a governor also engages in regulated activity.

4.3 The headteacher is responsible for:

- Maintaining an up-to-date 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 to school.
- Ensuring DBS checks are carried out on ALL new employees prior to the commencement of their contract.
- Ensuring any cover teachers, volunteers, contractors and/or any other visiting party to school hold the relevant level of security check, including a 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.
- Ensuring a rolling programme is in place to update / renew DBS checks of staff every five years as per trust policy.
- Informing the LA and trust central team of any decisions made regarding DBS and other security checks.
- Ensuring that the data stored in the SCR is stored safely.
- Undertaking the risk assessment process for any staff already in post for whom two references are not available and/or held on file.
- Acting in accordance with this policy.

4.4 Staff 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 headteacher of any changes in personal data or additions that need to be made to the SCR.
- Completing the annual self-declaration form regarding any changes to circumstances.
- Participate in the missing references risk assessment process where applicable.
- Providing the necessary information for schools to undertake a DBS update/renewal every five years as per trust policy.

4.5 Volunteers 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. *This does not apply to all visitors, only those involved in regulated activity.*
- Informing the headteacher of any changes in personal data or additions that need to be made to the SCR.
- Being aware of and adhere to all safeguarding and child protection policies and procedures.

4.6 Contractors are responsible for:

- Working alongside the school to plan works outside of the school day wherever possible.
- Following all signing in and out procedures and where necessary liaise with the school to ensure appropriate chaperoning is in place as required.
- Providing accurate and up-to-date information required for the SCR if work is required to be undertaken during the school day and the work is of such nature that chaperoning is unreasonable.
- Being aware of all health and safety and safeguarding policies and procedures.

5.0 Storage and Retention of Information

There will only be one copy of the SCR created for each school on an online spreadsheet, which is secured via password / access rights.

The school will only keep copies of DBS certificates if there is a valid reason for doing so and will not be kept for longer than six months. Staff must always be prepared to present them upon request. When information is destroyed relating to checks, the school may keep a record of the fact that vetting was carried out, the result and the recruitment decision.

The school will keep a legible copy of employees' evidence for their right to work in the UK, e.g. a copy of their passport.

All other documentation used to verify the employee's identity and required qualifications, e.g. photocopied proof of qualifications, will be safely stored in a personnel file.

Where documentation relating to the safe recruitment of employees may be missing or unavailable, for example where a member of staff has been in employment for a significant period and references were not required at the time of appointment, a risk assessment process will be undertaken by the school and stored on file to assess the continued suitability of the employee to work with children. Where applicable, this risk assessment process will also be identified within the SCR.

All certificates will be stored in accordance with the school's Data Protection Policy.

6.0 Policy Monitoring and Review

The SCR will be updated after each instance of an individual attending school in an employment or voluntary capacity, or when any variation to the fields on the SCR is required.

The SCR is a live document and will be updated as and when required, e.g. following each safeguarding check. The SCR will also be reviewed termly by the DSL / headteacher, ensuring all safeguarding checks are present and up-to-date. This will include a reconciliation with payroll.

The trust central team will conduct annual checks to ensure SCRs are up-to-date and compliant.

The trust board will review this policy annually. The scheduled review date for this policy is September each year. Any changes to the policy will be communicated to all relevant stakeholders.

MISSING REFERENCES RISK ASSESSMENT

Details: **Individuals Name**Carried out by: **Staff Name(s)**Date: **Insert Date**

<p style="text-align: center;"><i>ISSUE</i></p> <p style="text-align: center;">Areas in which risk has been identified</p>	<p style="text-align: center;">HOW TO MANAGE IT</p> <p style="text-align: center;">What procedures will we have? (Control measures)</p>	<p style="text-align: center;"><i>WHO TO BE INFORMED</i></p>		
		EMPLOYEE	HEAD	GOVERNORS
<p>The following risk assessment details the process undertaken in acknowledgement that the school does not have on record or cannot identify references for a member of staff already in post.</p>				
<p>Policy and procedures</p>	<ul style="list-style-type: none"> Staff are made aware of relevant policies, including but not limited to, Safeguarding and Child Protection Policy, Keeping Children Safe in Education, Health & Safety Policy, Staff Code of Conduct. Staff are briefed at least annually regarding the procedures for reporting and recording safeguarding and child protection concerns. 	X	X	X
<p>Child Protection and Safeguarding checks</p>	<ul style="list-style-type: none"> Appropriate checks have been undertaken and are recorded on the Single Central Record, including enhanced DBS and identification checks. Where required, the individual is able to show evidence of previous checks, including DBS checks, that were undertaken prior to their start date. Where required, the individual is able to show evidence of previous checks undertaken from overseas, including the equivalent of a DBS or police check, that were undertaken prior to their start date. Where the individual is already in their post, the school considers the length of their service, any disciplinary records during the time of their service, and their conduct in their role when completing this risk assessment. Where the individual is already in their post and references are missing or have not been identified, the individual completes a missing references self-declaration form. The school asks the individual about the reason for their missing references, where appropriate. Where the individual is a school leaver or has not been in employment for a significant period, a character reference is obtained. The school ensures its Safer Recruitment Policy is followed. 	X	X	X

Job role	<ul style="list-style-type: none"> • The remit of the individual's role has been assessed and any regulated activity has been determined. • Where it is deemed that the individual will be undertaking regulated activity, an enhanced DBS check has been issued. • Where required, a section 128 check has been issued. • The individual is not permitted unsupervised contact with children and young people (those under the age of 18) unless the necessary checks have been completed. • The individual is not permitted unsupervised or unauthorised access to sensitive pupil records held by the school unless the necessary checks have been completed and it is deemed appropriate for them to do so. • Where concerns are raised about the individual's suitability to work with children and young people, the DSL is consulted for advice. 	X X X X X X	X X X X X X	X X X X X X
Employment gaps, discrepancies and anomalies	<ul style="list-style-type: none"> • The individual's employment history is reviewed for any discrepancies or anomalies – this is reviewed against the individual's checks and interview notes, where an interview was held. • The individual's employment history is reviewed for any gaps and the reason for any gaps is discussed with the individual. • The individual is invited to talk about any gaps, discrepancies or anomalies in their employment history. • Length of continuous service with the school considered when assessing risk. • The school seeks HR advice where concerns are raised about employment gaps, discrepancies and/or anomalies. 	X X X X X	X X X X X	X X X X X
Qualifications and training	<ul style="list-style-type: none"> • The individual's qualifications have been checked and reviewed to ensure they fulfil the requirements of the role – the individual is able to provide records of these, where required. • The individual is able to provide any records of training required for the role. • The individual is invited to talk about their qualifications and/or training prior to their start date. • The school considers arranging for any missing training that is required for the role, where appropriate. • The school seeks advice from its HR team or provider where there are concerns about the any missing qualifications and training that cannot be provided prior to the individual undertaking responsibilities that require it. 	X X X X	X X X X	X X X X

Previous instances of fraud, theft and other criminal activity	<ul style="list-style-type: none"> • The remit of the individual's role has been assessed and any potential for fraudulent or criminal activity identified, e.g. where the individual has access to school finances and bank accounts. • The individual is not permitted unsupervised or unauthorised access to sensitive information, data, bank accounts, and other activities at high risk of misuse unless the necessary checks have been completed and is it appropriate for them to do so. • Where concerns are raised about the individual's suitability to work with money, data or high-value items, the school consults its HR team or provider for advice. 	X X X	X X X	X X X
Illegal working	<ul style="list-style-type: none"> • Where required, immigration checks have been completed and verified. • Where required, asylum checks have been completed and verified. • The school seeks advice from its HR team or provider following any concerns about the individual's right to work in the UK. 	X X X	X X X	X X X
Ill health	<ul style="list-style-type: none"> • The individual has completed and returned a health information form and this is stored securely – this form is updated where changes to the individual's health and/or disability status occur. • Where necessary, any significant health issues are discussed with the individual, to ensure that they are able to attend work as expected and carry out their role safely. • Where concerns about the individual's ability to attend work and/or work safely arise, the school seeks advice from its HR team or provider. 	X X X	X X X	X X X
Previous and ongoing disciplinary action	<ul style="list-style-type: none"> • The individual is given the opportunity to talk about any previous disciplinary action or ongoing sanctions. • Where there is cause for concern about the previous disciplinary actions or ongoing sanctions, the school seeks advice from its HR team or provider. 	X X	X X	X X
Previous poor attendance	<ul style="list-style-type: none"> • The individual is given the opportunity to talk about any previous poor attendance that may or may not have required disciplinary action. • Where there is cause for concern about any previous poor attendance, the school seeks advice from its HR team or provider. 	X X	X X	X X
Previous poor behaviour or performance	<ul style="list-style-type: none"> • The individual is given the opportunity to talk about any previous poor behaviour or performance that may have required disciplinary action or capability management. • Where there is cause for concern about any previous poor behaviour or performance, the school seeks advice from its HR team or provider. 	X X	X X	X X

Where the individual has been in their post for a significant amount of time and does not have any references, the school will invite the individual to complete the missing reference self-declaration form. For any recent or newly appointed individuals, references are required and will be kept on file.



Missing References Self-Declaration Form

You have been invited to complete this self-declaration form because your school has found that no evidence of references exist in our records for you and you are already in your post. This may be because you were not asked for references at the time of appointment, references were not provided at the time of appointment, or access to the evidence of your references is no longer available to the school.

Please be aware that, where the school deems it necessary, we may ask for references to support your self-declaration. This will be decided by the governing board upon the return of this form.

A completed copy of this self-declaration form will be retained on file alongside the school’s single central record (SCR). Please complete this form and return it to the HR office.

Name	
Position	
School	
Start Date	
Length of Continuous Service	

I can confirm that:

- I do not need to declare any previous disciplinary issues.
- I do not need to declare any previous safeguarding allegations or concerns raised about me.
- I do not have any gaps in my employment longer than one month.

Signed	
Date	

Please do not sign this self-declaration form if you cannot confirm all three conditions outlined above. Should it be the case that you cannot sign this form, please provide additional information below and contact your Headteacher to discuss these conditions.

Additional Information:

For use by the Headteacher and Governing Body only

Please tick one option, sign and ensure this form is kept on file.

- References not required** – I can confirm that I have reviewed this self-declaration form and deem that the school **does not** need to acquire references for the person stated above at this time.
- References required** – I can confirm that I have reviewed this self-declaration form and deem that the school **does** need to acquire references as soon as possible for the person stated.

Headteacher

Name	
Position	
Date	
Sign	

Representative of the Local Governing Body

Name	
Position	
Date	
Sign	

Supporting Information

No Gaps

It is important that no gaps appear on the SCR as this implies missing information. Where information is not required for a particular person or does not apply “N/A” is to be used. Where information is missing or is being waited upon, a note should be added to the relevant box and any appropriate safeguards implemented in the interim period.

Staff Leavers

Employees are to be removed from the SCR once they cease their employment with Together Learning Trust, as per the guidance in KCSIE. Documentation held on staff files will be retained in line with our Records Management Policy for the specified purposes and duration.

Documents – Evidence and Retention

Evidence to be retained on staff files following the pre-employment vetting are a UK Passport, two references (see section below) and any relevant professional qualification certificates. Where any of these are not available, please refer to the trust Recruitment Policy for alternatives and further guidance.

From September 2022 onwards, the trust will ask for a person’s birth certificate as part of the pre-employment checks. This ensures that we are able to confirm a person’s name at the point of birth compared to the name on the documentation provided for right to work in the UK, e.g. passport. If there is a change of name between the two, further evidence of name change will be required, such as marriage certificates, etc. This ensures as far as practicably possible that the vetting processes is a complete check. Where a person is unable to provide a birth certificate, the trust will offer further advice and guidance to schools.

DBS Renewals

DBS renewals will be undertaken every five years for employees of Together Learning Trust. In addition, as part of the safeguarding updates issued each September, staff will be asked to declare any changes in circumstances which may affect their ability and/or suitability to work with children and young people. This self-declaration will be retained on file for one year, until replaced with a new declaration.

Section 128 Checks

A Section 128 check, checks the names of individuals who are barred from taking part in the management of any independent or maintained school. Within the Together Learning Trust, this applies to all executive and senior leaders, Governors, Trustees and Members. Section 128 checks form part of a Enhanced DBS with barred check. Alternatively, a Section 128 check can be carried out at any point using the Teaching Regulation Agency website <https://teacherservices.education.gov.uk/>

Prohibition from Teaching

In addition to Teaching staff, a Prohibition from Teaching check should be carried out on anyone deemed to be carrying out “teaching work”. Teaching work is defined as:

- Planning and preparing lessons and courses for pupils
- Delivering lessons to pupils, including through distance learning or online
- 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 doing them is under the direction and supervision of a qualified teacher (or someone nominated by the headteacher to direct and supervise them), unless this is for the purposes of induction. As such, school must take a measured approach to deeming which staff this may include, but

for example, HLTAs, LSAs, TAs and Cover Supervisors would fall into this category. These checks can be conducted any time using the Teacher Regulation Agency website <https://teacherservices.education.gov.uk/>

Supply / Agency Staff

The latest guidance regarding supply and agency staff is as follows. “The SCR should include agency and third-party supply staff, even if they work for only one day”. The required information is detailed on the SCR template under the appropriate tab. The organisation providing the member of staff should supply the school with a letter of assurance detailing the checks they have carried out for each individual. The date this letter was received and checked alongside the DBS number should be recorded on the SCR. Furthermore, a check of the companies safeguarding policies should be made by the school to ensure they are appropriate. If the school is using the same company, checks on these policies only need to be done on a termly basis, but always prior to the first time the company is used. Supply and agency staff will remain on the SCR for a period of 6 months after the last day they were deployed in the school, after which they will be removed. Should that member of staff later be re-deployed, new checks will need to be conducted.

Volunteers

Any volunteers who will be involved in Regulated Activity, which includes “teaching, training or instruction, care or supervision of children”, must be subject to the appropriate vetting checks. When engaging volunteers, a quick assessment of the nature of their role should determine whether or not they are undertaking regulated activity. If you are in any doubt, please refer to the trust central team.

Contractors

Together Learning Trust policy is that contractors will attend and work on school estates outside of the school day, to minimise any associated risks to pupils. Where this is not possible, i.e. in the event of emergency repairs, the schools leadership can enact one of the following alternatives:

- Ensure that all contractors are chaperoned by a member of school staff (or by the FM team in the instance of a PFI arrangement) at all times whilst working on the premises.
- Ensure that all required vetting checks are carried out prior to the work commencing and for all contractors working on site (see SCR template for required checks). Evidence of these checks will be recorded on the SCR and kept for a period of 6 months before being removed.

Visitors

Visitors who fall outside the categories previously documented would not ordinarily appear on the SCR (for example parents, professionals visiting for a meeting etc). In these instances, visitors will be required to adhere to the schools signing in/out procedures and any systems the school has in place to safeguard children, for example, being chaperoned throughout their visit. It is for the schools leadership to determine the level of access a visitor may have depending on a range of factors, including type of visitor, nature of the visit and known safeguarding clearance (if any).

References

New appointments are subject to two satisfactory references which are then held on file. Where reference documentation relating to the safe recruitment of employees may be missing or unavailable, for example where a member of staff has been in employment for a significant period and references were not required at the time of appointment, a risk assessment process will be undertaken by the school, including a staff self-declaration and stored on file. This will assess the continued suitability of the employee to work with children. Where applicable, this risk assessment process will also be identified within the SCR.

Alternative Provision Providers

If a school has pupils who attend an alternative provision provider, it would not be a requirement to keep a record of the safeguarding checks on individual staff members at the alternative provider in the SCR; however, given that

schools will need to obtain written confirmation from the provider that they have conducted all the appropriate safeguarding checks on the individuals working in its setting, it may still be appropriate to seek records of individuals. Schools remain responsible for the safeguarding of a pupil placed with an alternative provision provider and should be satisfied that the provider meets the needs of the pupil. In addition to safeguarding checks, schools should establish that the provider meets any applicable requirements for registration and may wish to seek assurance that the provider has implemented appropriate health and safety procedures and offers high-quality education. Any information received on the alternative provision provider should be stored securely. Safeguarding and Quality Assurance visits should be undertaken before the placements and at appropriate intervals (but at least half termly).

SCR Monitoring and QA

Checks of the SCR should be undertaken termly by the DSL and/or Headteacher. Annual checks will also be carried out by the Local Governing Committee and by the trust central team during the summer term.