



TBAP

Tri-borough Alternative Provision

Disclosure and Barring Employment Checks Procedure

2014-15



DISCLOSURE AND BARRING EMPLOYMENT CHECKS

All staff employed by the TBAP Trust are required to obtain an Enhanced DBS Certificate.

Disclosure and Barring Scheme

Background

1. The original Vetting and Barring Scheme was introduced in 2009. The scheme was one of the recommendations made by the Bichard Report into the Soham murders and was implemented by the Safeguarding Vulnerable Groups Act 2006. There were originally two bodies involved in the scheme:
 - The Independent Safeguarding Authority (ISA) – responsible for making all barring decisions relating to individuals and for the upkeep of the lists of barred individuals
 - The Criminal Records Bureau (CRB) – a processing, but not a decision-making, function in relation to the barred lists and the online database.
2. In 2010 the Government commenced a review of the scheme and changes were implemented in the Protection of Freedoms Act 2012. From December 2012 the ISA and CRB have been merged to form the **Disclosure and Barring Service (DBS)** and the terminology and process in this guidance reflects that change. Many parts of the original scheme remain unchanged – in particular
 - It is a criminal offence for a barred person to work, or volunteer, in Regulated Activity.
 - It is a criminal offence for an employer to knowingly employ (either on a paid or voluntary basis) a barred person in Regulated Activity.
 - It is a criminal offence to allow someone to work or volunteer in Regulated Activity without carrying out the required checks.

Where a person is removed from Regulated Activity by an employer because the person has caused harm to a child or adult considered vulnerable, the ISA must be notified.

The Definition of Regulated Activity

3. From September 2012 the definition of Regulated Activity is as follows:

Regulated Activity for Children

A person can be in Regulated Activity because of what they do (activities), where they work (establishments) or who they are (specified position):-

- (a) Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on wellbeing, moderate a public electronic interactive service or drive a vehicle only for children carried out on a frequent, intensive or overnight basis. **An individual carrying out activities as above, under reasonable day-to-day supervision by**

another person who is also engaging in Regulated Activity is not undertaking Regulated Activity.

(b) Work for a limited range of establishments (schools, nursery schools, childcare premises, children's homes, children's centres) with the opportunity for contact with children carried out on a frequent, intensive or overnight basis. A volunteer carrying out supervised activities under reasonable day-to-day supervision by another person who is also engaging in Regulated Activity is not undertaking Regulated Activity. However, a supervised paid employee working for a specified establishment does come under Regulated Activity.

Supervision means day to day supervision as is reasonable in all the circumstances for the purpose of protecting any children concerned.

The Department for Education has produced [statutory guidance on supervision](#) to describe the considerations an organisation should make when determining whether or not an individual is supervised to a reasonable level for the role.

Work under 1 or 2 above is Regulated Activity only if done "regularly" i.e. carried out by the same person

- Frequently (once a week or more often) or
- On 4 or more days in a 30-day period or
- Overnight (anytime between 2am -6am)

(c) Activities by a person contracted (or volunteering) to provide occasional or temporary services (which are not teaching, training or supervision of children) is not Regulated Activity (e.g. maintenance contractors) but, as stated above, supervised paid employees in specified establishments are in Regulated Activity.

(d) Providing healthcare – provision by a healthcare professional or under the direction or supervision of one. This may include psychotherapy and counselling, first aid administered on behalf of an organisation established for the purposes of providing first aid. This does not include workplace first aiders, members of peer support groups or life coaching.

(e) Providing personal care – physical assistance (or prompting with supervision or training or providing advice or guidance) with eating or drinking because of illness or disability, physical assistance (or prompting with supervision or training or providing advice or guidance, with going to the toilet, washing or bathing or dressing because of age, illness or disability.

(f) Registered childminders and foster carers

(g) Day to day management or supervision of individuals carrying out Regulated Activity relating to children.

Further guidance can be found [here](#).

Regulated Activity for Adults

4. The definition of Regulated Activity for adults defines the activities provided to any adult as those which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time.
5. Six categories of people fall within the definition of those carrying out a Regulated Activity. In addition, anyone supervising those in these six categories falls within the definition. The categories are:
 - (a) Providing health care – provision by a healthcare professional or under the direction or supervision of one. This may include psychotherapy and counselling, first aid administered on behalf of an organisation established for the purposes of providing first aid. This does not include workplace first aiders, members of peer support groups or life coaching.
 - (b) Providing personal care (for example help with washing and feeding)
 - (c) Providing social care
 - (d) Assisting with general household matters - assistance with handling cash, paying bills or shopping
 - (e) Assisting a person in their management of their affairs
 - (f) Those who transport an adult because of their age, illness or disability from their place of residence to a place where they are receiving health or social care.

There is no frequency test relating to adults. An individual only needs to engage in a defined activity once to be carrying out Regulated Activity.

An adult is a person aged 18 years or over.

A person whose role includes the day-to-day management or supervision of any person engaging in Regulated Activity is also in Regulated Activity.

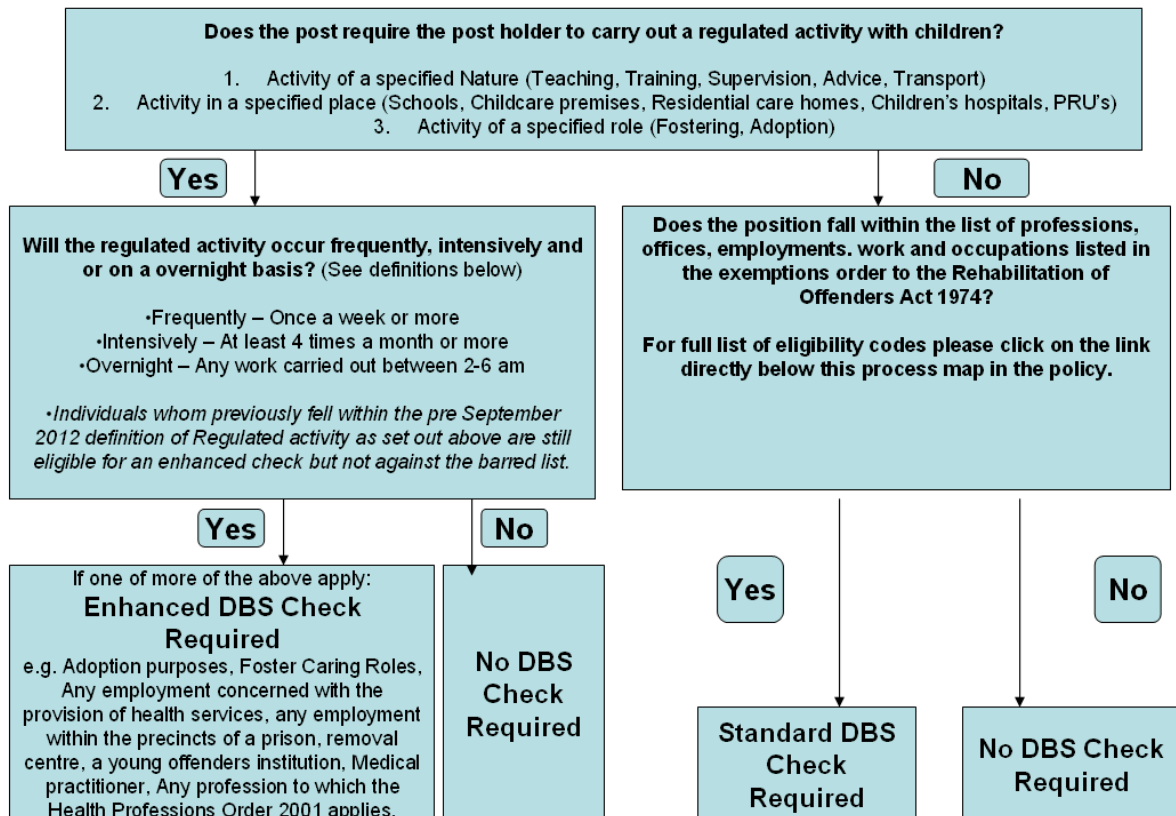
Regulated Activity for adults excludes activity carried out in the course of family relationships and personal, non-commercial relationships.

Further guidance is available [here](#).

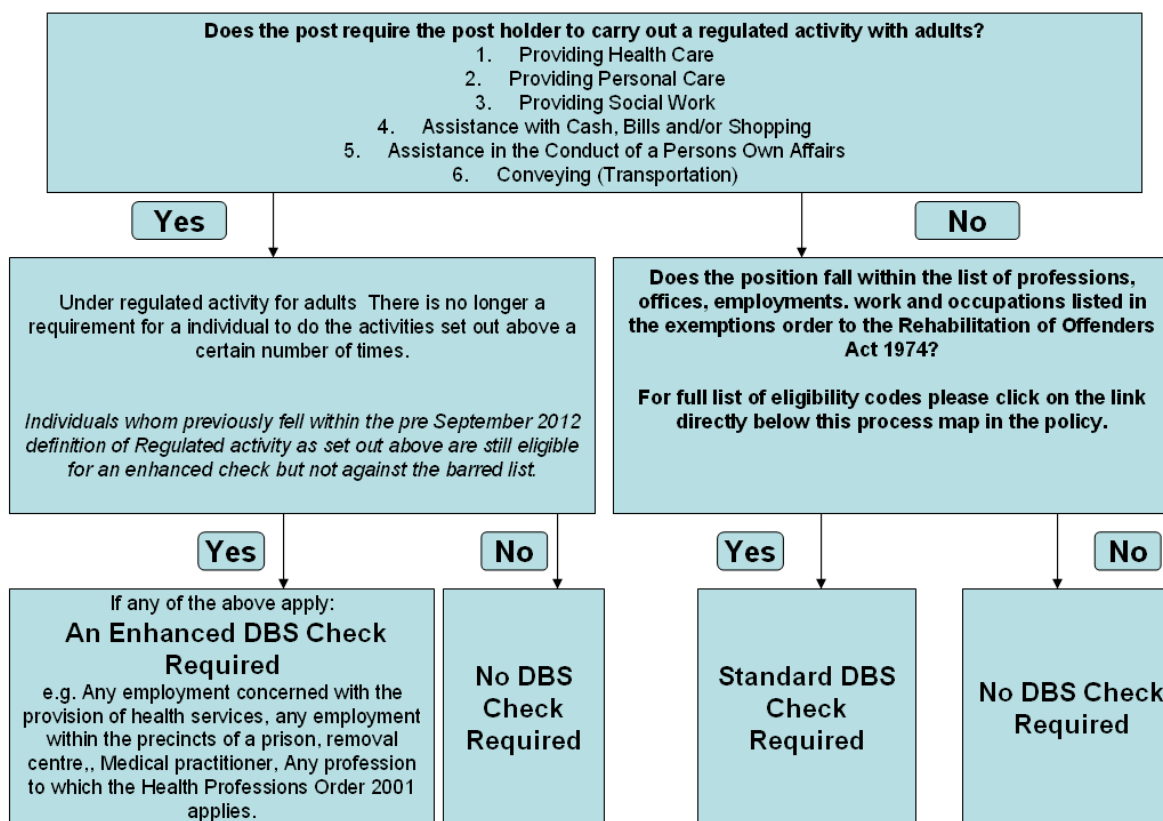
Disclosure and Barring Checking Process

6. The DBS provides a system of background checks on employees and volunteers known as 'Disclosures' (see below). **In schools there will be a general assumption that employees and volunteers will be engaged in a Regulated Activity and a check against the relevant barred list as part of an enhanced Disclosure will be required.** The process maps below give the basis for making this assumption.

DBS CHECK ELIGIBILITY CHILDREN'S – PROCESS MAP



DBS CHECK ELIGIBILITY ADULTS – PROCESS MAP



Further guidance to eligibility can be found [here](#).

However, under the Police Act 1997, it is unlawful to conduct a DBS check for an employee, where there is no jurisdiction under the eligibility guide to do so. Please see Appendix D for the legal framework.

So, for example, it will not usually be necessary to obtain a Disclosure for members of the Trustee Board or Local Advisory body (other than staff governors), since they will not have unsupervised access to pupils or otherwise be engaged in regulated activity. Similarly, those who are invited by a school to speak to large groups of pupils on an occasional basis will not need a Disclosure.

Barred Lists

7. Barred individuals are placed on one of two ISA barred lists: the Childrens' Barred List and the Adults' Barred List. The only individuals who are eligible for checks against the relevant barred list are:
 - Those in Regulated Activity with children or adults
 - Actual or prospective foster parents
 - Persons aged 16 and over living in the same household as a foster or prospective foster parent
 - Persons aged 16 and over living in the same household as a foster or prospective private foster parent

- People who provide or wish to provide childminding or day care
- Persons aged 16 and over who have regular contact with children because they either live on the premises where day care or childminding is or will be provided, or because they work or will work on those premises at times when day care or childminding is or will be provided
- Persons aged 16 and over who have regular contact with children and who are members of a household of a person who is being or has been assessed for the purposes of engaging in Regulated Activity relating to children, where both individuals live on the premises where the Regulated Activity would normally take place, e.g. spouse of a boarding school manager where the manager and the spouse live on site at the school.
- Prospective adopters.
- Persons aged 18 and over living in the same household as a prospective adopter.
- Applicants for a taxi or PHV licence.

DBS Disclosures

8. An enhanced DBS Disclosure contains details of both spent and unspent convictions as well as cautions, reprimands and final warnings held on the Police National Computer (PNC) together with non-conviction information from local police records if thought to be relevant to the post applied for.
9. A standard DBS disclosure contains only information held on the PNC and should be carried out for certain professions, offices, employments and occupations listed in the exemptions order to the Rehabilitation of Offenders Act 1974 e.g. solicitors, chartered/certified accountants, legal executives.

Further guidance can be found [here](#).

Adverse information contained in a Disclosure will not necessarily act as an automatic bar to employment in a school.

Disclosure and Barring Procedure

10. The TBAP Trust has a SLA with the Tri-borough the Human Resources (HR) Safeguarding team will undertake disclosure and barring checks, where appropriate, on their behalf.
11. The responsibility to ensure that individuals are appropriately checked lies with Head of School (see paragraph 24 for full responsibilities).
12. Disclosure requirements and arrangements for agency workers and other temporary workers, such as self employed consultants, are detailed in paragraph 69.
13. Disclosures should normally be obtained before an individual commences working for, or with, a school in any capacity which falls under the definition of Regulated Activity. **The TBAP Trust's policy is to recheck those individuals who require a Disclosure every three years .**
14. See also paragraph 31.
15. The DBS has a [Code of Practice](#) which all individuals and organisations using the procedure are required to follow.

Update service

16. The Disclosure and Barring Service (DBS) update service lets applicants keep their DBS certificates up to date online and allows employers to check a certificate online.
17. TBAP Trust have agreed that the Update service will be mandatory for existing staff from 1 September 2014, when their recheck is next due (every three years) and the cost will be reimbursed. All new staff whose post requires a DBS check will have it as a condition of employment that they subscribe to the Update service.

Applicants can register online as soon as they have an application form reference number, or they can wait and register with their certificate number when they receive a DBS certificate (disclosure). If so, they must do so within 14 days of the certificate being issued.

To check the progress of a DBS certificate use the DBS tracking service.

Registration lasts for 1 year and costs £13 per year (payable by debit or credit card only).

Read the [detailed guidance for applicants](#)

18. Employers and other organisations can [check someone's DBS certificate status online](#) and get a result straight away

There's no registration process or fee for employers to check a certificate online, but employers:

- must be legally entitled to carry out a check
- have the worker's permission (Consent form has been signed)

Read the [detailed guidance for employers](#).

Information provided on a Disclosure

19. The information provided on a Disclosure certificate is limited to basic facts, for example, the date, offence and sentence. It does not set the offence in context. If the information on the Disclosure certificate gives cause for concern the applicant/employee must be given the opportunity to discuss this information. Only then should a final decision on the individual's appointment or employment be made.
20. Disclosure certificates requested by other employers should not be accepted because a Disclosure will only contain relevant information on offences up to the date it was issued.
21. When someone has subscribed to the Update Service, their DBS disclosure becomes portable, as the new employer can check online and at no cost, whether there is any change in the status of

their DBS clearance.

The Rehabilitation of Offenders Act

22. The Act provides some protection to individuals who have been convicted of offences in the past by providing that a criminal conviction can become *spent* after a set period, on condition that there has not been a reconviction and the sentence was not of a category excluded by the Act. Once a conviction is *spent* the rehabilitated person is to be treated as if the conviction had not occurred.
23. However, those working or volunteering in schools are exempt from the provisions of the Act and individuals must disclose spent convictions. Executive Headteacher will need to consider these convictions when assessing an individual's suitability for a post.

Responsibilities

24. It is an offence under the Police Act 1997 to pass Disclosure information to unauthorized persons. This means that the Disclosures and the information they contain are only passed to staff that need to have access to it in the course of their duties. Members of staff who have responsibilities in respect of Disclosures must hold that information in strictest confidence.
25. The responsibilities of those involved in ensuring that the Council complies with the DBS Code of Conduct are set out below.

Head of Business Development and Operations

Is responsible for:

- Ensuring that TBAP Trust adopts policies that comply with the DBS Code of Practice.
- Ensuring that countersignatories comply with the DBS Code of Conduct guidance.

The TBAP Human Resources Team

26. TBAP DBS countersignatories are based within the HR Teams. They are responsible for:
 - Administering the Disclosure and Barring process on behalf of schools;
 - Providing regular reports to schools on the posts requiring a Disclosure, the status of Disclosures, along with forthcoming renewal dates.

Head teachers/the school

- Ensuring that job applicants are informed as part of the recruitment process that successful candidates will have to apply for a Disclosure where necessary;
- Ensuring that job descriptions and person specifications for posts in the school state that they are subject to a Disclosure;
- Following the DBS Code of Practice, maintaining records of Disclosures requested and received, ensuring applicants complete forms correctly, ensuring that the applicant's identity has been verified;
- Scrutinising requests for Disclosures to ensure that there is a genuine need to undertake one, and at the appropriate level;

- Making decisions on Disclosure information received on existing employees in the school and on any job applicant to posts in the school;
- Recording decisions in relation to Disclosures in the school's Single Central Record;
- Ensuring that all managers take their responsibilities around disclosure and barring seriously and that outstanding or forthcoming action required on the reports provided by HR Safeguarding Team are actioned in a timely manner;
- Ensuring that the school's management team hold current, acceptable Disclosures where required and that forthcoming renewals are applied for in good time;
- Ensuring that any Disclosure that contains convictions for either an existing employee or job applicant is discussed with the relevant HR Consultant/Adviser, if required, so that a decision regarding their suitability can be made in a timely manner and consistent manner.
- Making existing staff aware of the Update service, when their DBS is due for rechecking, and remind staff of the need to renew their annual subscription;
- Taking reasonable steps to ensure that any individual who is not an employee, but is covering a post or undertaking work within the school holds a Disclosure where necessary, before they perform duties on the school's behalf;
- Ensuring that new workers do not commence without a satisfactory Disclosure or an appropriate risk assessment on whether service needs justify an individual commencing pending the receipt of a Disclosure. Deciding whether the completion of a conduct form pending the return of a Disclosure is appropriate.
- **Information Verifiers .**
They are responsible for ensuring that the identity of the individual concerned is verified beyond doubt and that during this process both internal policies and the DBS Code of practice with regard to Disclosures are adhered to at all times.
- When the applicant shows the school their Disclosure they will be asked to confirm the data is accurate (if it is not accurate including spelling of names and date of birth, the staff member will be asked to contest this with the DBS by calling them on 0870 9090 811. The DBS will then contact the TBAP Trusts HR Provider to confirm the action(s) they will take. The individual will need to be supervised when with children or adults until the inaccuracy is rectified and the applicant shows an accurate replacement Disclosure.
- Asking the applicant to sign a consent form for scanning their Disclosure to the DBS team and their agreement to subscribe to the Update Service (to allow future checks to be made online by The TBAP Trust.
- Sending the scanned copy of the Disclosure and the Consent form (if not already completed) to the appropriate school's HR Adviser , to enable HR systems to be updated;.
- Up to 8 weeks will be allowed for a DBS disclosure to be received by the applicant, after that time the DBS tracking service will be checked to see if the Disclosure has been dispatched. **If an employee does not bring the Disclosure to the school within 2 weeks of its dispatch, along with a signed Consent form and proof of registration with the Update service, disciplinary proceedings will be considered. Job applicants will have job offers withdrawn if they fail to produce these documents.**

Recruiting to posts that require a disclosure

27. When recruiting to posts that require a Disclosure, recruitment advertisements will reflect this requirement.

28. Candidates who are successful following assessment and interviews will be informed that the offer of employment is subject to receipt of a satisfactory Disclosure where applicable.
29. Countersignatories will ensure that the applicant's identity has been verified when they check completed applications and sign them before they are sent to the DBS. Applications will normally be sent to the DBS within 48 hours of receiving a satisfactory completed application.
30. The TBAP Trust's HR Provider will keep a record on ResourceLink (RBKC)/DBS Database (LBHF) of the Disclosure application in accordance with the DBS Code of Practice. On receipt of the scanned Disclosure and consent form, they will update the records appropriately.

31. As a general rule, no applicant will be allowed to commence employment in a post requiring a Disclosure until a satisfactory Disclosure has been received. This includes temporary employees and secondees.
32. However, in exceptional circumstances, the Executive head teacher may decide that an applicant can start work before the Disclosure is received. This will only be in situations where there is an urgent need to maintain service delivery and all reasonable steps have been taken to protect the safety of children and vulnerable adults. These reasonable steps include not allowing the applicant to undertake Regulated Activity, or allowing the applicant to start work under supervision.
33. From 29 May 2013, some offences are excluded from Disclosures, and applicants no longer have to declare these on Conduct forms, even when applying for posts that are exempt from the Rehabilitation of Offenders Act.
34. The filtering rules for criminal record check certificates are: [Filtering](#)

- **For those 18 or over at the time of the offence:**

An adult conviction will be removed from a DBS certificate if:

- 11 years have elapsed since the date of conviction; and
- it is the person's only offence, and
- it did not result in a custodial sentence

Even then, it will only be removed if it does not appear on the list of offences which will never be removed from a certificate. If a person has more than one offence, then details of all their convictions will always be included.

An adult caution will be removed after 6 years have elapsed since the date of the caution – and if it does not appear on the list of offences relevant to safeguarding.

- **For those under 18 at the time of the offence:**

The same rules apply as for adult convictions, except that the elapsed time period is 5.5 years

The same rules apply as for adult cautions, except that the elapsed time period is 2 years.

Making decisions following receipt of a disclosure containing criminal activity

35. This section refers to the procedure for making decisions where a Disclosure contains information and applies to the following groups of individuals. Any variations in guidance between existing employees and new recruits are detailed within the section.
- New recruits
 - Employees in posts that require a Disclosure to be obtained once every 3 years
36. A Disclosure containing criminal activity is considered to be one that contains details of:
- A police record of convictions, cautions, reprimands and final warnings
 - Children's Barred List/ Adults Barred list; or,
 - Other relevant information disclosed by the Police.

From 17 June 2013 only the applicant receives a Disclosure certificate (there is no longer a duplicate copy sent to the employer). The applicant is responsible for bringing the disclosure to the school. The school will then complete the form in Appendix A if there are any cautions/convictions to be considered. Disclosures must be brought to the school within two weeks of receipt (and for existing staff it may be a disciplinary offence not to do so).

Gaining relevant information and next steps

37. If a Disclosure contains any of the details described in paragraph 38, the TBAP Trust will first check whether the individual has previously disclosed details of any convictions or cautions on their application form, or any other form of record on an existing employee's personal file.
38. Where appropriate for new recruits, and in all cases involving existing employees, The TBAP Trust will discuss the contents immediately with the Executive Headteacher so that an appropriate course of action can be determined. Usually this would involve meeting with the individual to discuss the content and to confirm that they are in fact their convictions/cautions. Existing employees have the right to be accompanied to this and subsequent meetings by their trade union representative or a work colleague.
39. If a meeting cannot be held immediately with an existing employee and depending on the information contained in the Disclosure and the employee's job, the Executive head teacher may need to consider whether it is necessary, in the interest of children or vulnerable adults, to undertake one of the following options (for safeguarding rather than disciplinary reasons), until a meeting can be held:
- have closer supervision of the employee in their job
 - be temporarily transferred to other duties
 - suspended on full pay
40. **If the individual has not disclosed the convictions**, either on an application form, or to the head teacher, if employed by the school when the offence took place, they will be asked why they had not done so.

41. If an individual denies that the contents relate to them, the DBS must be contacted by the individual to advise them of a dispute on the contents. The DBS will then undertake an investigation. All job offers will be 'pending' whilst the investigation continues.
42. If it is established that the convictions/cautions relate to the individual, the head teacher will explore with them the circumstances surrounding the convictions/cautions and when they took place.
43. For existing employees and depending on the information contained in the Disclosure and the employee's job, the head teacher may need to consider whether it is necessary to undertake one of the following options (for safeguarding rather than disciplinary reasons) until a meeting can be held:
 - have closer supervision of the employee in their job
 - be temporarily transferred to other duties
 - suspended on full pay
44. Following a meeting with an existing employee, the head teacher should decide whether the employee:
 - can continue working in their current post
 - can be transferred to another post in the school
 - should be dealt with under the Disciplinary Procedure

Factors considered when making a decision

45. An applicant's criminal record will be assessed in relation to the tasks they will be required to perform and the circumstances in which the work is to be carried out. Factors considered will include:
 - The nature of the job i.e. does it present any opportunities for the postholder to re-offend in the course of their work
 - The degree of risk involved in undertaking the job i.e. the extent to which they are working with children/ adults considered vulnerable/finances or items of value
 - The nature of the offence
 - The seriousness of the offence and the damage caused. For example, drugs offences cover everything from possession of a small amount of cannabis for personal use to possession of class a drugs with intent to supply.
 - The length of time since the offence took place
 - Repeat offences i.e. was the offence a one-off or part of a history of offending
 - The extent of job supervision i.e. does the job involve one-to-one contact with children or other vulnerable groups and what level of supervision will the postholder receive
 - The degree of remorse, or otherwise, expressed by the applicant and their motivation to change
46. The fact that someone has a conviction or a caution would not necessarily prevent them from taking up or continuing in employment with The TBAP Trust although serious consideration will be given to the information received before a decision is made.

47. In reaching that decision, head teachers should consider the possible implications, if any, for the school employing, or continuing to employ, this person. The checklist attached at Appendix A will provide a guide when making decisions.
48. In the event that a decision is taken to recruit, or continue to employ, someone with a criminal history that may be relevant to the work load that is allocated to them, a note will be placed on the personal file together with any recommendation regarding work allocation.
49. Applicants/employees have the right under the Data Protection Act to see what information The TBAP Trust or their agencies handle about them. This right is known as the right of Subject Access and applicants/employees can submit a Subject Access Request to obtain a copy of their personal information. Upon receipt of a request the information should be provided promptly and in any event no later than 40 calendar days

Information that will lead to an individual automatically being unsuitable

50. Enhanced Disclosures provide details of whether the individual is included on a list of people named as barred from working with children or adults considered vulnerable.
 - Children's Barred list (Formerly List 99 and POCA - Protection of Children's Act list)
 - Adults Barred List (Formerly POVA – Protection of Vulnerable Adults)
51. Candidates/employees who are named on the lists are considered unsuitable to work with children/adults and must not be employed in Regulated Activity. There is no discretion. It is a criminal offence to allow someone to engage in Regulated Activity when barred.
52. It is a criminal offence for a person on either list to apply to work with children or adults considered vulnerable. If a Disclosure reveals that a job applicant on these lists has applied to work with children, or a Disclosure reveals that an existing employee is registered on one of the lists, the TBAP Trust has a legal duty to inform the police.

Additional Non-conviction information

53. The police may choose to use common law powers to provide information directly to employers in cases where this is necessary, for example to prevent crime or harm to others.
54. If a decision is made not to confirm an offer of employment to a job applicant because of non-conviction information, the individual will be informed that the offer of employment has been withdrawn.
55. If the individual queries the decision no further justification can be given. Non-conviction information is exempt from the Data Protection and Freedom of Information Acts. In the event of The TBAP Trust being taken to an employment tribunal as a result of a decision based on non-conviction information, the details will be given to the Chair of the tribunal.
56. Head teachers will give careful consideration to non-conviction information received on an existing employee/applicant to ensure that a reasonable decision is made. This means analysing the risks to the school and children and vulnerable adults whilst ensuring that the employee/applicant is treated fairly. Records will be kept of decisions.

Overseas Applicants

57. A job applicant from overseas will be checked in line with all applicants. Although the DBS cannot access police records from overseas, a check is required to ensure the person has disclosed any criminal background whilst spending time in this country – at present or any other time they may have visited.

58. A Disclosure is not always sufficient for those who have lived abroad. As the DBS cannot access criminal records held overseas (except in the case of service personnel) a DBS check may not provide a complete picture of an individual's criminal record. In addition to a Disclosure additional checks will be made during the recruitment process. A Certificate of Good Conduct from relevant embassies or police forces as appropriate will also be obtained by the applicant together with a certified translation of the certificate where necessary.

Handling and storage of Disclosure information

Storage and handling

59. Countersignatories will ensure that all Disclosure certificates are securely stored in locked non-portable storage containers and that access is strictly controlled and limited to those entitled to see it as part of their duties.
60. Disclosure certificates will only be passed to individuals who are involved in the selection process or process for checking an existing employee for the post the Disclosure has been requested for. A record of those individuals to whom the information is disclosed will be maintained by the Countersignatory.

Retention

61. Disclosure certificates will only be retained as long as is necessary to support the recruitment and employment decision making processes. It is never kept for more than 6 months other than in circumstances agreed on a case by case basis with the DBS.
62. Countersignatories will ensure that the following information is retained for monitoring and record purposes only:
- The name of the Disclosure subject (the applicant)
 - The post applied for
 - The date Disclosure was issued
 - The type of Disclosure check sought (standard or enhanced)
 - The unique Disclosure reference number
 - The details of the recruitment decision taken. This will include the reason why the applicant was considered unsuitable for appointment but will not include details of any conviction disclosed.
 - The checklist to assess the relevance of convictions will be held with DBS identity documents, rather than on the personal file.

Disposal

63. Countersignatories will ensure that all Disclosure certificates are suitably destroyed by secure means such as shredding pulping etc. once the retention period is over.

Appendix A - Checklist to Assess the Relevance of Convictions

Individual's Name:	
School:	
New Recruit/Existing Employee (please specify):	

		Comments	Completed by/Discussed with:
1	Is the conviction relevant to the position in question?		
2	How serious was the offence?		
3	Were there mitigating circumstances surrounding the offence and what explanations are offered by the individual?		
4	How long is it since the offence?		
5	Does the individual have a pattern of offending behaviour, which suggests that they are a continuing risk?		

6	Has the individual's circumstances changed since their offending?		
7	Detail any further action required, or points to note		

Decision:

Decision discussed with HR Consultancy/Adviser?	Yes/No Name of HR Consultant/Adviser
Continue with Appointment?	Yes/No
Individual notified of outcome?	Yes/No
HR consultancy notified of outcome?	Yes/No
Signed (Head teacher or senior member of management team):	Date:

July 2014