

Vetting Checks Policy

Policy reference	POL-244
Policy Area	Human Resources
Policy owner	Alison Jones
Policy author	Alison Jones
Level of consultation	Level 1 - DSL, SLT
Approval level	SLT
Review date	1 st May 2024
Approval date	3 rd June 2024
Next review date	1 st April 2025

1. POLICY STATEMENT

- 1.1 This policy sets out the vetting checks that apply to those involved in the work of the College. It is a key element of the College's commitment to the safeguarding of children, young persons and vulnerable adults.

2. RESPONSIBILITIES AND OBLIGATIONS

- 2.1 Responsibilities and obligations in the application of this policy are as follows:

- (a) Human Resources Team
 - (i) To apply the policy consistently.
- (b) Line Managers
 - (i) To familiarise themselves with the policy and uphold its effective application.
- (c) Individuals
 - (i) To comply with the requirements of the policy.

3. PROCEDURE

3.1 Salaried Employees and Hourly Paid Workers

- (a) This policy will be brought to the attention of candidates during the recruitment process so that they fully understand that vetting checks will be required as a condition of them working at the College.
- (b) No salaried employees or hourly paid workers may commence working at the College until the College's HR team has advised the relevant line manager that all vetting checks have been completed satisfactorily (or an appropriate risk assessment has been authorised) and has confirmed clearance to commence work.
- (c) The vetting checks which require completion are those which are relevant to the role and nature of working relationship. They are detailed in Appendix 1.
- (d) A specialist third party provider may be utilised for some of the checks.
- (e) The College reserves the right to, at any time, require any checks to be repeated and/or further checks to be undertaken.
- (f) The College may, in exceptional circumstances, undertake a safeguarding risk assessment to determine if a salaried employee or an hourly paid worker can commence work while waiting for completion of the vetting checks process. Initiation of the risk assessment process must be authorised by a manager in the College's HR Team. All safeguarding risk assessments must be approved by the College's Designated Safeguarding Lead or, in their absence, one of their deputies.

3.2 Third Party Engagements

- (a) Third party engagements relate to those who:
 - (i) have an ongoing involvement with the College **and**
 - (ii) require unaccompanied access to the College when students are present whether onsite at one of the College's locations, off-site at another location where the College's students are present or online **and / or**
 - (iii) require access to student data and information.
- (b) Examples of third party engagements are: Governors; PGCE students; cleaning contractors; catering contractors; agency staff. (This list is illustrative rather than exhaustive.)
- (c) The College recognises that it has a duty to assure itself that those involved in third party engagements are appropriately checked and do not pose a risk of harm to children, young persons and vulnerable adults.
- (d) The vetting checks which require completion are those which are relevant to the specific engagement. They are detailed in Appendix 1.
- (e) The BMet manager responsible for the third party engagement is responsible for obtaining assurance from the third party that the relevant checks have taken place (the third party will meet the costs of the checks).
- (f) The BMet manager responsible for the third party engagement is responsible for providing the relevant details of the third party engagement in accordance with the standard format to ThirdPartySCR@bmet.ac.uk.
- (g) The College reserves the right to, at any time, require any checks to be repeated and/or further checks to be undertaken.
- (h) In exceptional circumstances a safeguarding risk assessment may be considered appropriate to cover a third party engagement. All safeguarding risk assessments must be approved by the College's Designated Safeguarding Lead or, in their absence, one of their deputies.
- (i) Those on a third party engagement will be issued with a College ID card or Unaccompanied Visitor Pass dependent on the nature and frequency of their engagement with the College.

3.3 Visitors

- (a) Anyone who is not a salaried employee, an hourly paid associate or on a third party engagement is a visitor.
- (b) Visitors to the College will be required to report to reception where they will be checked in and issued with an accompanied visitor pass. Visitors will be escorted at all times on College premises by their host employee.

4. COMPLIANCE

- 4.1 Everyone in the organisation is responsible for complying with this policy and for raising any concerns they have about their application of it with their line manager or with HR.

Vetting Checks Policy Appendix 1

	Salaried Employees		Hourly Paid Associate (HPA)				Summer Temps Period June to October		3 rd Party Checks performed by 3 rd Party provider except for those who do not have a 'provider' e.g. Governors, some volunteers	
			New		Rejoiner (check all vetting checks in place from original engagement and complete any that are outstanding)		New	Rejoiner (check all vetting checks in place from original engagement and complete any that are outstanding)		
	Regulated activity	Non - regulated activity	Regulated activity	Non - regulated activity	Regulated activity	Non - regulated activity			Regulated activity	Non - regulated activity
Right to work	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
ID	Y	Y	Y	Y			Y		Y	Y
DBS - Enhanced with child barred	Y	Y	Y	Y			Y		Y	
DBS - Enhanced										Y
International criminality	Y	Y	Y							
References	Y	Y	Y	Y			Y		Y	Y
Qualifications	Y	Y	Y	Y					Y	Y
Social Media	Y		Y							
Teacher's prohibition	Y		Y						Y	
Health	Y	Y	Y	Y	Y	Y	Y	Y		
Employment History	Y	Y	Y	Y			Y			

Clarification Points

1. International checks

- Required if lived in a place outside of the UK for 6 months or more in the last 3 years. See Footnote 1.
- Seek Certificate of Good Conduct in the first instance.

2. References

- Most recent two employers / educational institutions.
- Gaps in employment explored during the selection process.

3. Qualifications

- Need to be satisfied that someone has the qualifications required for the role.

4. Regulated Activity

- For BMet purposes for Social Media check:
 - curriculum delivery roles e.g. lecturer, assessor, trainer
 - inclusive support
 - pastoral roles (performance coaches, counsellors); enrichment (youth workers); careers.
 - designated safeguarding leads and deputies
- For 3rd party SCR selection between DBS types:
 - curriculum delivery roles e.g. lecturer, assessor, trainer;
 - inclusive support
 - pastoral roles (performance coaches, counsellors); enrichment (youth workers); careers.
 - designated safeguarding leads and deputies

5. DBS

- When are we ok to recognise an existing DBS (non-BMet) that's less than 3 years old?
 - See Footnote 1 regarding 3 month guidance. Also, we may be able to risk assess using a non-BMet DBS depending on the BMet role and the person's work/education history.
- When are we ok to recognise an existing BMet DBS that's less than 3 years old?
 - On a case-by-case basis, exploring the gaps and covered by a risk assessment.

- In what circumstances are we ok to do a separate child barred check?
 - See Footnote 2 and if it's being done for 3rd party, ensure we have the person's permission.

6. Salaried Employees

- How do we treat breaks in service e.g. to access pension?
 - DBS with BMet less than 3 years old
 - Other checks completed at point when originally employed
 - Gaps since then explored
 - Rejoin on Risk Assessment until records refreshed to meet requirements of new worker category

7. HPA

- What timeframe do we apply to rejoiners?
 - If not on update service, DBS with BMet needs to be less than 3 years old
 - All other vetting checks completed at point when originally registered and gaps since then explored
 - Treat as new if over 3 years since last engaged with BMet
- What do we do in instances of transfer from HPA to salaried?
 - If not on update service, DBS with BMet less than 3 years old
 - Other checks completed at point when originally registered and gaps since then explored
 - Complete any additional checks required for new worker category
 - Treat as new if over 3 years since last engaged with BMet
- What do we do in instances of transfer from salaried to HPA?
 - If not on update service, DBS with BMet less than 3 years old
 - Other checks completed at point when originally joined BMet. Any gaps in relation to new worker category addressed.

8. Summer temps

- What do we do in instances of transfer from summer temp to other HPA or salaried?
 - If not on update service, DBS with BMet less than 3 years old
 - Complete any outstanding checks for the relevant new worker category i.e. HPA or salaried

Footnote 1

- *For a college there is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked in:*
 - *a school in England in a position which brought him or her regularly into contact with persons aged under 18, or*
 - *another institution within the further education sector in England, or in a 16 to 19 academy, in a position which involved the provision of education and caring for, training, supervising or being solely in charge of persons aged under 18.*
- *Whilst there is no requirement to carry out an enhanced DBS check in the circumstances described above, schools or colleges should carefully consider if it would be appropriate to request one, to ensure they have up to date information. Schools and colleges **must** still carry out all other relevant pre-appointment checks including where the individual is engaging in regulated activity with children, a separate children's barred list check.*

Footnote 2

- *Where a school or college allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check.*
- *Separate barred list checks must only be carried out in the following circumstances:*
 - *For newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS)(and where all other relevant checks have been carried out),or*
- *Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks have been carried out).*