

# **Independent Schools Inspectorate Safeguarding Policy**

**June 2025**

<b>DATE OF POLICY:</b>	<b>June 2025</b>
<b>POLICY OWNER:</b>	<b>Chief Executive Officer-Chief Inspector</b>
<b>APPROVED BY:</b>	<b>ISI Board</b>
<b>DATE OF NEXT REVIEW:</b>	<b>June 2026</b>

## Contents

Aims and objectives.....	3
Scope .....	3
The definition of safeguarding .....	3
Raising safeguarding concerns.....	3
Inspecting safeguarding.....	4
Managing safeguarding concerns that arise on inspection.....	5
Sharing information and confidentiality .....	5
Codes of conduct .....	5
Training .....	6
Recruitment checks.....	6
Whistleblowing.....	7
Handling allegations .....	7
Roles and responsibilities in relation to safeguarding .....	8
Review and reporting .....	9
Table of changes.....	10
Annex A: ISI's policy on disclosure and barring service (DBS) checks .....	11
Introduction.....	11
Scope.....	11
Principles .....	11
Duties and responsibilities .....	12
Levels of DBS checks .....	14
Further information about the DBS update service .....	14
Process to be followed at recruitment stage .....	15
Starting work before the return of a satisfactory DBS check.....	15
Assessing the relevance of criminal records .....	16
Legal duty to refer to the DBS.....	16
Confidentiality and data protection.....	16

## **Aims and objectives**

1. School inspection, as part of the wider safeguarding system, provides assurance to the Department for Education (DfE) on the extent to which schools meet the required standards in relation to safeguarding at the time of inspection. It contributes to the promotion of strong safeguarding practice in schools.
2. ISI's values: are putting children first, integrity, diversity and transparency. ISI reviews its policies and practices regularly to promote their continued effectiveness. This policy is reviewed annually.
3. This document sets out the arrangements ISI makes to ensure:
  - a. that ISI inspections prioritise the safety and welfare of children in accordance with the latest statutory guidance incorporated into the ISI Framework, the Independent School Standards and other relevant standards and frameworks applicable to the school being inspected;
  - b. the suitability of ISI staff, directors, inspectors and other contractors to perform their respective roles;
  - c. that the ISI executive is held to account effectively by its Board.

## **Scope**

4. This policy applies to ISI staff, inspectors, contractors, and ISI Board members.

## **The definition of safeguarding**

5. ISI adopts the definition in the introduction to [Working together to safeguard children](#). This defines safeguarding and promoting children and young people's welfare as:
  - a. providing help and support to meet the needs of children as soon as problems emerge
  - b. protecting children from maltreatment whether that is within or outside the home, including online
  - c. preventing impairment of children's mental and physical health or development
  - d. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - e. promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
  - f. taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

## **Raising safeguarding concerns**

6. If a child is in immediate danger, call 999.
7. If you think a child is at risk, contact the children's social care team at their local council or call your local police on 101.
8. You should also tell the designated safeguarding lead (DSL) at the child's school. You can find out who this is in the school's safeguarding policy, which must be on their website.
9. Anyone may raise a concern about a school inspected by ISI and should do so directly with the DfE here: [complain-about-school/private-schools](#), unless an inspection is taking place at the school,

in which case concerns can be emailed directly to [safeguarding@isi.net](mailto:safeguarding@isi.net) and ISI will forward the concern/s to the inspection team. If ISI receives a concern during an inspection, the inspection team will consider the broad nature of the concern in the context of inspection of the relevant standards. ISI does not investigate individual concerns.

10. If a concern is received by ISI outside of an inspection, it will be passed directly to the DfE, as the regulator of independent schools

### **Inspecting safeguarding**

11. ISI inspectors are responsible for carrying out inspections, including the inspection of safeguarding, in line with the guidance in the [ISI Handbook](#) for the inspection of association independent schools, including residential (boarding) schools and registered early years settings and the detailed guidance provided to inspectors on the regulatory requirements set by the DfE. Safeguarding standards for British Schools overseas are set out in Standard 8 of [British schools overseas: standards for schools](#) and for under-18s in Private Further Education (PFE) colleges in Standard 40 of the [Inspection Framework for Educational Oversight](#).
12. National requirements for safeguarding and promoting the welfare of pupils in state-maintained and independent schools are set by the Secretary of State through the DfE. ISI inspects whether schools are meeting statutory safeguarding requirements on every inspection and reports its findings to the DfE.
13. ISI prioritises the safety and welfare of children throughout its inspection practice. On inspection, ISI checks that schools and colleges have appropriate measures in place to safeguard and promote the welfare of children, having regard to statutory guidance. It also checks that school staff refer concerns to the appropriate authorities in the relevant jurisdiction, whether in the United Kingdom in the case of English schools and colleges, or overseas in the case of British Schools Overseas<sup>1</sup>.
14. ISI does not investigate individual safeguarding concerns or child protection cases. The statutory authorities for the conduct of enquiries into specific child protection concerns are the police and the local authority. Inspectors and ISI staff must follow and advise others (e.g. parents/schools) to follow relevant local and national procedures to ensure that all allegations or suspicions of abuse or significant harm to any child are reported to the local authority designated officer/s (LADO) or the children's services department of the relevant local authority, and/or the police as appropriate and without delay.
15. Where information indicates that a child or children may be at risk of harm, ISI may contact relevant external agencies, such as the police, local authority designated officers or children's services for the relevant area, the Health & Safety Executive or the Charity Commission, as appropriate. The reasons for action taken, or not taken, by ISI will be recorded in the evidence of a relevant inspection or elsewhere in ISI's records, as appropriate to the circumstances.
16. ISI's inspection responsibilities for safeguarding also include:
  - a. gathering evidence on the effectiveness of safeguarding arrangements to inform inspection judgements;
  - b. working with statutory agencies in order to protect children from harm;
  - c. raising awareness in the independent sector, through our reporting of safeguarding, of developments in safeguarding practice and statutory policies, including, where appropriate,

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<sup>1</sup> For further information on standards for British Schools Overseas, see [British schools overseas: standards for schools](#)

- how practice might be strengthened;
- d. participating in serious case reviews and relevant national inquiries to enable lessons to be learned for inspection practice and to improve safeguarding practice in schools;
- e. actively participating in national consultations with a view to improving safeguarding practice.

### **Managing safeguarding concerns that arise on inspection**

17. If inspectors observe, hear or receive information which causes them concern about the safety or wellbeing of a pupil, they should act immediately to ensure the safety of the pupil, in line with ISI's policy. Inspectors will follow the school's safeguarding and/or child protection policy. Concerns will normally be reported to the appropriate person within the school for child protection procedures to be implemented according to the disclosure, concern or allegation made, and external agencies will be informed directly if required.
18. If a pupil raises safeguarding concerns, inspectors should listen to what they are being told, take notes, and avoid promising confidentiality or asking leading questions. They must not communicate with the person who is the subject of the allegation or suspicion or investigate the matter themselves.

### **Sharing information and confidentiality**

19. As stated in [Keeping children safe in education](#), information sharing is vital in identifying and tackling all forms of abuse and neglect. **The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.** Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. All information coming into ISI from whatever source (including from a parent, child, member of staff, other concerned person, the DfE, statutory agencies, and arising out of inspection) is confidential except when it is in the best interests of children to pass on the information for safeguarding reasons. In those instances, the information is passed on according to proper processes to the correct recipient. See paragraph 21 below. All staff, inspectors and directors are bound by a duty of confidentiality.
20. Further information may be found in ISI's [Privacy Notice](#).
21. Areas of concern may be shared with a school in order to facilitate the collection of relevant evidence, but no information regarding who raised a concern or details of a concern that to the inspector's knowledge might enable that person to be identified will be shared. If a concern has been raised by the LADO, this may be shared with the school, again ensuring that no individual complainant (for example, who may have approached the LADO) is identified.

### **Codes of conduct**

22. ISI inspectors are required to follow the Code of Conduct for inspectors which is published in the [Inspection handbook](#) on the ISI website. They are also obliged by contract to declare anything that may call into question their suitability to work with children.
23. ISI staff must maintain high standards of behaviour in and outside work, both in accordance with the ISI Code of conduct for employees, and that do not call into question their suitability to work

with children. Staff are under an on-going duty to report any such circumstances to their line manager.

24. All ISI Board directors must abide by the Code of conduct for Board directors and by the Nolan Principles.

## Training

25. **ISI inspectors** receive initial and on-going update safeguarding training. This training covers the safeguarding duties of schools and statutory requirements; how to inspect safeguarding; how to gather and triangulate evidence to evaluate a school's culture of safeguarding.
26. Inspectors are required to have a secure understanding of safeguarding, including detailed knowledge of statutory guidance. Inspectors must have a good understanding of safeguarding concerns, including potential abuse and neglect of children and young people which may come to light in the settings ISI inspects both in England and internationally.
27. **ISI staff** receive initial safeguarding training which is refreshed annually. ISI employees must maintain a proper focus on safeguarding children, young people and vulnerable adults, and this must be reflected both in sound individual practice and in our internal policies and guidance. All permanent and contracted staff must:
- be aware of the importance of the role of inspection in promoting the safety and welfare of children and young people
  - contribute, as necessary, to all stages of ISI's safeguarding processes
  - give highest priority to the safety and welfare of children
  - know the internal processes within the inspectorate for responding to safeguarding concerns relating to children, including for responding to a disclosure to ISI by a child of abuse
  - respond appropriately to concerns (including allegations) against staff, inspectors and against themselves.
28. **ISI Board directors** receive initial safeguarding training to introduce them to and familiarise them with the government's key documents and the safeguarding requirements for schools. These are currently: [Keeping children safe in education](#); [Working together to safeguard children](#); [Prevent duty guidance: England and Wales](#). As part of their induction, board directors are provided with key documents, including the ISI [Safeguarding policy](#) and the requirements which the inspectorate must meet to maintain approval. These include: [Approval of Independent Inspectorates - DfE advice 2014](#); [Letter of approval – DfE to the Chief Inspector of ISI, Vanessa Ward, 29 March 2023](#); [Memorandum of Understanding – DfE/Ofsted/ISI November 2019](#).
29. The Board receives an annual safeguarding report. The Assurance Committee reviews data relating to unmet Standards at each of their meetings. In this way, the Board's strategic decision making is informed by up-to-date knowledge of safeguarding matters.

## Recruitment checks

30. Inspection of schools is regulated activity that gives a person opportunity to have contact with children<sup>2</sup>. There must be no concerns about the suitability to work with children of those who

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<sup>2</sup> Para 1(9C) and 1(10), Schedule 4 to the Safeguarding Vulnerable Groups Act 2006

inspect or otherwise work for or with ISI, or govern or manage ISI, whether or not they come into direct contact with children through ISI. ISI's policy on undertaking disclosure and barring (DBS) service checks is set out at Annex A.

31. As a condition of continuing to approve ISI as an independent inspectorate, the DfE requires that inspectors are subject to the same vetting checks as teachers.
32. ISI requires that all inspectors are signed up to the DBS update service. All inspectors are requested to provide their consent to ISI undertaking update service checks. ISI undertakes termly checks on all inspectors and reserves the right to undertake a check outside of this termly timetable. More information about recruitment processes for reporting inspectors is available in ISI's '*recruitment and deployment of inspectors*' policy and procedure, including the safer recruitment checks for inspectors who live and work abroad and who inspect only for British Schools Overseas.
33. ISI staff who are involved in inspection are subject to the same level of vetting checks on appointment as inspectors. While staff involved in inspection are in continuous employment at ISI, no repeat checks will be undertaken unless a particular safeguarding concern is raised.
34. All other permanent and contracted staff and ISI Board directors undergo a basic DBS check on appointment. See Annex A for further detail.

### **Whistleblowing**

35. ISI welcomes constructive challenge. Concerns about practice within ISI, including inspection practice, or suggestions for areas where practice might usefully be strengthened and developed, may be raised without fear of detriment with the CEO-CI, the COO, the Senior director, other directors or the Chair of the Board via the ISI *whistleblowing policy* (available [here](#) on the ISI website and on the inspector portal). It is the duty of all members of the ISI community to raise such concerns so that they can be fully aired and improvements can be made where appropriate.

### **Handling allegations**

36. This section deals with how ISI would handle any concerns that might arise about the suitability of any person connected with the inspectorate to work with children.
37. **Internal reporting:**
  - a. If there are suitability concerns relating to contracted inspectors, ISI employees, and all other consultants and contractors of ISI, these must be reported to the CEO-CI.
  - b. Concerns relating to members of the Board must be reported to the Chair, who must keep the CEO-CI informed.
  - c. Concerns relating to the CEO-CI must be reported to the Chair.
  - d. Concerns relating to the Chair must be reported to the CEO-CI who must speak to the Vice-Chair and one other Board Director in confidence who will take the matter forward, keeping others who may need to know appropriately informed.
38. **External reporting:** In all cases where the following criteria appear to have been met, the recipient of the information or concern (as above) will report the concern to the relevant police force or local authority via the authority's designated officer or officers. Where the information suggests that the person has:
  - a. behaved in a way that has harmed a child, or may have harmed a child
  - b. possibly committed a criminal offence against or related to a child or

- c. behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children or,
  - d. behaved or may have behaved in a way that indicates they may not be suitable to work with children.
39. **Internal procedures:** After taking external advice where appropriate (see ‘external reporting’ above), depending on the nature and gravity of the concern, an individual may be removed from an inspection-facing role and/or access to ISI ‘systems’ may be terminated at the discretion of the CEO-CI. In the case of:
- a. **Staff** – internal employment processes will be applied where relevant at the discretion of the CEO-CI (e.g. disciplinary)
  - b. **Inspectors** – deployment may be suspended or terminated at the discretion of the CEO-CI on the recommendation of the relevant Senior Director/Directors
  - c. **The CEO-CI or Chair** – the DfE will be informed and internal disciplinary removal processes commenced.
40. Following completion of procedures, or as advised by statutory agencies, referrals will be made to the DBS or Teaching Regulation Agency, as appropriate.

### **Roles and responsibilities in relation to safeguarding**

41. [ISI's Board](#) is responsible for ensuring ISI complies with its legal responsibilities and meets its objectives, including to promote and safeguard the welfare, health and safety of children and young people through the provision, promotion and support of independent inspection services.
42. ISI's Articles of Association require the Board to include ‘individuals with an appropriate range of skills and experience, commensurate with the Company’s function and purpose, including education, inspection and safeguarding’.
43. National requirements for safeguarding and promoting the welfare of pupils in state-maintained and independent schools are set by the Secretary of State through the DfE. Each Board director recognises the central part played by the inspectorate in holding schools to account against their duty to keep children safe, and the role of the Board in ensuring the inspectorate is equipped for that task.
44. **Board level lead** - In accordance with the guidance in [Working together to safeguard children](#) the ISI Board has nominated a board-level lead for safeguarding who brings depth of expertise in safeguarding to strategic decisions, while recognising that all directors share responsibility for ensuring that ISI carries out its duties with a view to safeguarding and promoting the welfare of children in the institutions it inspects.
45. **The Chair of the Board** is responsible for ensuring:
- a. that all directors support the commitment of ISI to the safety of children and young people in educational settings inspected by ISI, acknowledging the important contribution of inspection activity to keeping children safe and the centrality of safeguarding considerations in inspection activity;
  - b. the suitability of all directors, drawing on the executive through the Chief Executive Officer-Chief Inspector (CEO-CI) to carry out formal vetting checks as required, as described below;
  - c. that the directors are suitably inducted and trained in relation to safeguarding and the role of inspection in relation to safeguarding, and are kept apprised of relevant regulatory

- developments; and
- d. the appropriate conduct of all directors, having regard to the need to protect ISI from the risk of reputational damage as a result of proven, alleged or perceived wrong-doing in relation to safeguarding.
46. **ISI's CEO-CI** is responsible for ensuring:
- a. the suitability of those who work for or with ISI at all levels including that suitability checks required by the DfE are duly carried out prior to the appointment of inspectors; and
  - b. that ISI is properly resourced to fulfil those duties.
47. **ISI's Director National Inspections** leads on safeguarding practice in the context of inspection, including participating in the selection, training and conduct of inspectors and leading on all matters relating to the inspection of safeguarding. Director National Inspections leads the safeguarding team and is responsible for liaison with Local Authority Designated Officers (LADOs) and children's social care staff and other agencies.
48. **ISI inspectors** are responsible for carrying out inspections, including the inspection of safeguarding, in line with the guidance in the [ISI Handbook](#) for the inspection of association independent schools, including residential (boarding) schools and registered early years settings and the detailed guidance provided to inspectors on the regulatory requirements set by the DfE. Safeguarding standards for British Schools overseas are set out in Standard 8 of [British schools overseas: standards for schools](#) and for under-18s in Private Further Education (PFE) colleges in Standard 40 of the [Inspection Framework for Educational Oversight](#). If inspectors observe, hear or receive information which causes them concern about the safety or wellbeing of a pupil on inspection, they should act immediately to ensure the safety of the pupil, in line with the ISI instructions for inspectors on responding to [Safeguarding concerns raised during inspection](#). Inspectors will follow the school's safeguarding and/or child protection policy. Concerns will normally be reported to the appropriate person within the school for child protection procedures to be implemented according to the disclosure, concern or allegation made, and external agencies will be informed directly if required.

## **Review and reporting**

49. This policy will be reviewed annually by the CEO-CI or the CEO-CI's nominated deputy, working with the Board-level safeguarding lead, and substantive amendments recommended to the Board. Minor amendments may be approved by the CEO-CI following discussion with the Board safeguarding lead.
50. **Internal arrangements:** The CEO-CI will report to the Board annually during the autumn term on the efficacy of ISI's internal arrangements for safeguarding, including matters such as:
- a. **Pre-recruitment checks and training**– whether the required recruitment checks and internal training are being carried out;
  - b. **Record-keeping** – the rigour of ISI internal record-keeping, such as those relating to recruitment checks and training;
  - c. **Resource** – whether the inspectorate has been provided with sufficient resource to support implementation of this policy.
51. **Inspection:** The CEO-CI will report to the Board annually during the autumn term on the efficacy of the inspection of safeguarding, including matters such as:
- a. **Compliance** - analysis of the rates of compliance by schools with safeguarding requirements;

- b. **Quality assurance** - review and analysis of the inspection of safeguarding and, where appropriate, the identification of future developments;
- c. **Resource** - linked to quality assurance - whether adequate resources have been provided to enable the inspectorate to fulfil its responsibilities effectively relating to the inspection of safeguarding.

52. **The Executive** will also provide termly summary reports to the Board in the spring and summer to keep the Board sighted on ISI safeguarding activity.

### Table of changes

Date of change	Paragraph	Amendments
June 2025	All	Policy restructured to clarify
	New	Annex A DBS policy
June 2024	All	All hyperlinked documents updated where relevant
	19-20, 31	Clarified wording
	49	Updated wording to reflect changes in <i>Keeping Children Safe in Education 2024</i>
	57	Clarified wording to reflect ISI practice

## Annex A: ISI's policy on disclosure and barring service (DBS) checks

### Introduction

1. This policy sets out how Independent Schools Inspectorate (ISI) undertakes Disclosure and Barring (DBS) checks.
2. ISI is committed to ensuring that appropriate pre employment checks have been undertaken on its employees and contractors, and that relevant safeguarding checks have been undertaken for all inspectors as set out in guidance for independent school inspectorates [here](#).
3. ISI will ensure that it adheres to the [DBS Code of Practice](#), including by:
  - a. Publishing this policy on ISI's website
  - b. Making sure that all applicants for relevant positions (volunteer, contracted or employed) are notified in advance of the requirement for a DBS check
  - c. Notifying all potential applicants of the potential effect of a criminal record history on the recruitment and selection process and any recruitment decision
  - d. Discussing the content of the Disclosure with the applicant before withdrawing any offer of employment
  - e. Complying with the prescribed data handling requirements.

### Scope

4. The policy applies to all ISI board members, employees, and potential employees who are applying for employment with ISI in permanent, fixed term, voluntary or temporary roles, and includes agency workers and individuals who contract directly with ISI. References to employees throughout this policy refers to all these groups.
5. The policy additionally applies to all ISI inspectors and potential inspectors whether working under a contract for services or a volunteer agreement.
6. The purpose of this policy is to:
  - a. set out the requirements to undertake DBS checks and the level of checks
  - b. prevent inappropriate and any illegal checks
  - c. provide a framework and supplementary guidance in relation to DBS checking and the use of the information provided by the DBS
  - d. ensure consistency and fair treatment.

### Principles

7. The following key principles outline ISI's approach to DBS Checks:
  - a. ISI will ensure that disclosure information is treated fairly and without discrimination whilst ensuring a safe and robust recruitment process.
  - b. ISI requires all inspectors, whether self-employed or voluntary, to subscribe to the DBS update service. This is free for volunteers.
  - c. An employee / inspector will not require a new DBS check if they subscribe to and remain subscribed to the DBS Update Service. In order to accept this subscription, ISI will need to review the certificate to ensure that the check is at the required level. A new check **will** be required in the following circumstances:
    - i. Where a role is reviewed or changed as part of an organisational change process, the requirements of the role will be reviewed to ensure that the level of check is

- appropriate eg if an employee is appointed to a new position which involves engaging in regulated activity with children, ISI will carry out an enhanced DBS check (including barred list information). This includes all employed inspector roles; and
- ii. Where there is a change in the arrangement under which an inspector contracts with ISI eg if a volunteer team inspector leaves school employment and ISI subsequently contracts with the inspector on a self-employed basis, ISI will need to undertake a new 'non volunteer' DBS check. If such a new check is carried out, the inspector is required to subscribe to the DBS update service with this new DBS check and to pay any associated subscription fee.
  - d. The DBS process will form part of the pre-recruitment checks for all newly appointed staff, inspectors and other contracted workforce when appointing into eligible positions.
  - e. ISI will assess the relevance of disclosure information to the suitability for employment or engagement on a voluntary or self-employed basis of an individual.

## Duties and responsibilities

8. **ISI Board:** to assure that relevant policies are in place and are effectively implemented.
9. **CEO-CI:** to ensure that appropriate processes and actions are in place that ensure required checks are undertaken at the appropriate level. In addition, to assess any disclosure information on a DBS certificate for employees taking into consideration:
  - a. the seriousness of any offence and relevance to the post applied for
  - b. how long ago the offence occurred
  - c. whether it was a one-off incident or a history of incidents
  - d. the circumstances around the incident, and,
  - e. whether the individual accepted responsibility for their actions
  - f. any explanation from the applicant.
  - g. any other relevant information.
 See [below](#) for further information.
10. **Human Resources:** the HR team is responsible for ensuring that this policy is effectively and appropriately implemented with regards to employees and that any disclosure information is brought to the attention of the CEO-CI. HR is also responsible for ensuring that the process within the policy is monitored and non-compliance is acted upon. They have responsibility for ensuring appropriate action is taken when an employee fails to comply with their responsibilities under this policy.
11. **Inspection Workforce Manager and Inspector Recruitment Administrator**  
 The Inspection Workforce Manager and the Inspector Recruitment Administrator are jointly responsible for ensuring that, with regard to the inspection workforce:
  - a. this policy is effectively and appropriately implemented with regards to ISI inspectors including with regard to any recruitment material.
  - b. the processes outlined in this policy are monitored and non-compliance is acted upon with regard to inspectors.
  - c. DBS checks for inspectors are undertaken in accordance with the requirements of this policy, the DBS requirements and the DBS Code of Practice.
  - d. inspectors provide their consent before DBS update service checks are undertaken.
  - e. appropriate records of DBS checks, consent and update service checks are held and updated on the ISI inspection portal.
  - f. A rolling programme of DBS update service checks is maintained in accordance with ISI's [safeguarding policy](#).

- g. Any disclosures relating to the inspection workforce identified through the DBS update service check is brought to the attention in the first instance of the Senior Director Inspections who will bring it to the attention of the CEO - CI, and any resulting action undertaken accordingly. After consideration, this may include notifying the inspector that they can no longer be deployed.
  - h. Appropriate action is taken when an inspector fails to comply with their responsibilities under their inspector agreement. After consideration, this may include notifying the inspector that they can no longer be deployed.
  - i. Any reporting or non-serving inspector whose subscription has lapsed, is removed from any inspection in the academic term for which the check has been undertaken, and action is taken to undertake a new DBS check prior to their redeployment. See paragraph 13 below for rare exceptions to this arrangement.
12. **Senior Director Inspections:** to assess any disclosure information on a DBS certificate for an inspector, taking into consideration the explanation from the applicant, including for example:
- a. the seriousness of any offence and relevance to the post applied for
  - b. how long ago the offence occurred
  - c. whether it was a one-off incident or a history of incidents
  - d. the circumstances around the incident, and,
  - e. whether the individual accepted responsibility for their actions.
- See [below](#) for further information.
13. Where a reporting inspector's subscription to the update service has lapsed and the inspector is to be deployed imminently, the Senior Director Inspections will undertake a risk assessment to determine whether the inspector can be deployed while a new DBS check is being undertaken. This would only be the case for a low-risk inspection e.g. a material change inspection occurring outside of term time, or where a monitor is attending the inspection. In such circumstances, the risk assessment will set out any considerations and/or mitigating measures to be put in place.
14. **Prospective employees/inspectors** are responsible for engaging with ISI's background screening provider for their DBS Check, for providing accurate information, for providing consent for ISI to check their update service status where required and for maintaining their subscription to the DBS Update Service throughout their term with ISI where required.
15. In addition, **prospective employees/inspectors** have a responsibility at application stage to disclose any convictions, cautions, reprimands or warnings. Where no evidence of a satisfactory DBS Check can be obtained and/or the prospective employee/inspector is found to have knowingly withheld information or provided false or misleading information then the conditional offer of employment or offer to be accredited as an ISI inspector will be withdrawn.
16. **All employees** have an ongoing responsibility to inform HR if during the course of their employment or term as an inspector they are arrested, charged, cautioned or convicted of any criminal offence. This includes notification of any pending court appearance, bind overs, absolute and conditional discharges. Failure to do so will result in formal action being taken under ISI's *disciplinary policy* and may result in termination of employment.
17. **All inspectors** are required to subscribe to the DBS Update Service, renewing this on an annual basis and for providing consent for ISI to carry out a DBS update service check. If an inspector fails to provide consent, ISI will not deploy them. Further information is provided in ISI's [safeguarding policy](#). Inspectors who do not maintain their subscription to the DBS update service will be charged the full fee for any repeat DBS check.

18. **ISI** will meet any cost of a DBS Check on initial appointment. Where there is a cost to subscribing to or maintaining a subscription to the update service, ISI will not meet this cost.

### Levels of DBS checks

19. ISI will carry out DBS checks for its employed and contracted workforce as set out in the table below. The level of check will depend on the nature of the role and **its involvement in regulated activity**. *Note that school inspection is a regulated activity as given in Schedule 4 Para 1(9C) and 1(10) of the [Safeguarding Vulnerable Groups Act 2006](#)*

Type of check	What details are provided	Role
<b>Basic DBS check</b>	this provides details of convictions and conditional cautions considered to be ‘unspent’ under the terms of the Rehabilitation of Offenders Act 1974	<ul style="list-style-type: none"> <li>ISI board members</li> <li>Employees not involved in inspection including any agency / IR35 contractors</li> </ul>
<b>Standard DBS check</b>	this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out	n/a
<b>Enhanced DBS check</b>	this provides the same information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) as a Standard DBS check, plus additional information held by the police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed. The position being applied for/or activities being undertaken must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002	n/a
<b>Enhanced DBS check with child barred list.</b>	this allows an additional check, to be made, about whether the person appears on the children’s barred list, along with a check of the Police National Computer records plus additional information held by the police as above. The position being applied for, or activities being undertaken, must be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check can also include information as to whether an individual is subject to a section 128 direction (if relevant wording is selected on application)	<ul style="list-style-type: none"> <li>All inspectors working under a contract for services or as a volunteer. This role involves working in regulated activity by way of inspecting schools or colleges</li> <li>ISI Chief Executive Officer-Chief Inspector</li> <li>All ISI employed inspection roles</li> </ul>

### Further information about the DBS update service

20. All inspectors are required to subscribe to the DBS update service on receipt of their DBS certificate. Information regarding the DBS update service including how to register is [here](#).

21. Subscription generally lasts for one year, but applicants may be able to set up an auto-renew option on initial subscription. A subscription cannot be renewed on the last day of that subscription.
22. If a subscription lapses, a new DBS check must be undertaken.
23. Once registered inspectors can:
  - a. Add or remove a certificate
  - b. Give any employer permission to check if anything has changed on their certificate
  - c. See who has checked their certificate
  - d. View their details

### **Process to be followed at recruitment stage**

24. All posts requiring a DBS Check will be clearly referred to in the advertisement for the post and all offers of employment or engagement as a volunteer or contractor will be made on condition of receipt of a satisfactory disclosure at the appropriate level for any post where one is required.
25. The following principles will apply:
  - a. Only the applicant who has been offered a role as an ISI employee or place to train as an ISI inspector will be required to complete the DBS application.
  - b. DBS applications will be completed using ISI's third-party background screening provider(s).
  - c. Prospective employees and inspectors will be advised of the level of DBS Check required and if there is a requirement to subscribe to the DBS Update Service throughout their employment or engagement with ISI.
  - d. Inspector applicants (including employed inspectors) will be required to declare whether they have any convictions cautions, reprimands or final warnings which are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) and advised that further details will be requested separately.
  - e. Prospective applicants with positive disclosures will be required to provide further information.
  - f. Full assessment of the relevance of a criminal record will be undertaken by the Chief Executive Officer-Chief Inspector for employees, and the Director Inspection Quality for inspectors to ensure a fair and consistent approach.
  - g. A conditional offer of employment, or to train to be an inspector cannot be confirmed until all the appropriate information has been received / considered.

### **Starting work before the return of a satisfactory DBS check**

26. Inspectors, whether employed, contracted or voluntary will not start inspecting prior to a satisfactory DBS check being received.
27. Employees other than those involved directly in inspection, may be able to start work before the return of a satisfactory DBS check depending on the nature of their role. The HR team and Chief Executive Officer-Chief Inspector will assess the risk of doing so.

### **Assessing the relevance of criminal records**

28. The suitability for employment or deployment of an individual with a criminal record will vary, depending on the nature of the role and the details of circumstances of any conviction. To facilitate this process, an individual's criminal record should be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out.
29. ISI will make a fair, non-discriminatory assessment based on the individual's skills, experience and suitability for the post. Where the DBS Check indicates that the DBS has made a barring decision against the child's barred list, it is illegal for ISI to allow the individual to be engaged in a regulated activity from which they are barred ie in such circumstances, the individual cannot inspect for ISI in any capacity.

### **Legal duty to refer to the DBS**

30. ISI has a legal responsibility to refer an employee or employees to the DBS in circumstances where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
  - a. engaged in relevant conduct in relation to children and/or adults, and/or
  - b. satisfied the harm test in relation to children and/or vulnerable adults, and/or
  - c. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found [here](#).

### **Confidentiality and data protection**

31. ISI will comply with the DBS Code of Practice and ISI's [data protection policy](#). The DBS code is in place to ensure that ISI meets its obligations when receiving the sensitive information available to it and that the information will be used fairly and that sensitive personal information, disclosed by the DBS is handled and stored appropriately and is kept for only as long as necessary.