Hope SENTAMU LEARNING TRUST

PART 3:

SAFER RECRUITMENT & SELECTION POLICY

PART 3 OF THIS POLICY APPLIES TO THE HOPE SENTAMU LEARNING TRUST BOARD, THE CENTRAL TEAM, AND ALL TRUST SCHOOLS/ACADEMIES

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Policy Updates

Date	Page	Policy Updates
July 2024	Whole policy	NEW document

Definitions

"Regulated activity" includes:

- Being responsible, on a regular basis in a Trust educational role or school/academy, for teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.
- Working for a limited range of establishments (known as 'specified places', which include schools/academies, or in connection with the purposes of the establishment, with the opportunity for contact with children, but not including work undertaken by supervised volunteers.
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Regulated activities do not include:

- Paid work in specified places which is occasional and temporary and does not involve teaching or training.
- Supervised activities which are paid in non-specified settings.
- A supervised volunteer who regularly teaches or looks after children.

"Teaching role" refers to a role involving planning and preparing lessons and courses for pupils; delivering lessons to pupils; and assessing and reporting on the development, progress and attainment of pupils. These activities are not teaching work for the purposes of KCSIE if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Principal to provide such direction and supervision.

A "standard DBS" provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless 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.

An "enhanced DBS" provides the same information as the standard DBS, plus any additional information, e.g. interviews and allegations, held by the police which the Police reasonably believes to be relevant and considers ought to be disclosed.

An "enhanced DBS with barred list check" check is required for when people are working or seeking to work in regulated activity with children. This check allows for additional checks to be made as to whether the person appears on the children's barred list.

The "children's barred list" is a list maintained by the DBS which covers individuals who are unsuitable to work with children and vulnerable adults. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the candidate is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.

A "section 128 check" provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school (which includes academies and free schools). A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a governor of a maintained school.

"Safer recruitment" is the safeguarding and protection of pupils during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

1. Introduction

This Safer Recruitment Policy has been developed in line with the DfE statutory guidance 'Keeping Children Safe in Education - September 2024 (KCSiE). Where there is any doubt or confusion about the policy commitments within this document, the KCSiE 2024 [Part 3] statutory guidance on safer recruitment will be relied upon.

This policy aims to ensure a safe and fair recruitment and selection is conducted at all times. Safeguarding and promoting the welfare of children, young people and vulnerable adults is an integral factor in recruitment and selection and is an essential part of creating safe environments for everyone in the school community.

It is the responsibility of the Trust Board to prevent those who are unsuitable from working with children and they will do this by giving due regard to statutory responsibilities.

2. Legal Framework

2.1. This policy has due regard to all relevant legislation including, but not limited to, the following:

- Rehabilitation of Offenders Act 1974
- Children Act 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Amendments to the Exceptions Order 1975, 2013 and 2020
- 2.2. This policy has due regard to guidance including, but not limited to, the following:
 - DfE (2020) 'Governance handbook'
 - DfE (2021) 'Staffing and employment advice for schools'
 - DfE (2022) 'ID checking guidelines for standard/enhanced DBS check applications from 1 July 2021'
 - DfE (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'
 - DfE (2024) 'Keeping children safe in education'
 - DfE (2023) 'Recruit teachers from overseas'
 - Disclosure & Barring Service (2018) 'Regulated activity with children in England'
 - Home Office (2022) 'Employer's guide to right to work checks'
 - Safer Recruitment Consortium (2022) 'Guidance for safer working practice for those working with children and young people in education settings'

3. General Aims of the Policy

- 3.1. The Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment.
- 3.2. The Trust is committed to attracting, selecting and retaining employees who will successfully and positively contribute to providing a valuable service. A motivated and committed workforce with appropriate knowledge, skills, experience and ability to do the job is critical to the Trust and school/academy performance and fundamental to the delivery of a high quality service.
- 3.3. The Trust will ensure the recruitment of all staff is conducted in a fair, effective and economic manner with full considerations to safeguarding and promoting the welfare of children at each stage of the process.
- 3.4. To achieve this purpose, those that are responsible for each stage of the recruitment process will demonstrate a professional approach by dealing honestly, efficiently and fairly with all internal and external applicants.
- 3.5. The objective of the recruitment process is to attract, select and retain staff who will successfully and positively contribute to the future development of the Trust and school/academy. The first experience an individual is important; therefore the experience should be positive and all those responsible for recruiting will:
 - Leave a positive image with unsuccessful applicants
 - Give successful applicants a clear understanding of the post and what is expected of them
 - Take reasonable actions to reduce the risk of a bad selection decision recognising the potential cost and the Trust/school/academy commitment to safeguarding children, young people and vulnerable adults.

4. Scope

- 4.1. This policy applies to all schools/academies and Trust employees, Trustees and Governors, and those who are responsible for and involved in recruitment and selection of all staff.
- 4.2. The ultimate responsibility for recruitment and selection remains with the Trust Board.

5. Equity, Diversity & Inclusion

- 5.1. The Trust and the school/academy values the diversity staff bring to the workplace. They will be committed to providing equality of opportunity for all and ensuring that all stages of recruitment and selection are fair. Recruitment and selection procedures will be reviewed on a regular basis to ensure that applicants are not discriminated against on the grounds of a protected characteristics named in the Equality Act [2010], unless there is a genuine occupational reason for doing so (only in very limited and exceptional circumstances and in relation to achieving a clear legitimate aim).
 - Age
 - Disability
 - Gender Reassignment
 - Pregnancy and maternity
 - Race (including ethnic or national origins, colour and nationality)
 - Religion and belief

- Sex
- Sexual Orientation
- Marriage and civil partnership

6. Schools/Academies with a Religious Character

- 6.1. There are some specific exceptions to the religion or belief provisions of the Equality Act for employment by schools/academies designated as having a religious character. Schools/academies within the Trust with a religious character may apply religious criteria when recruiting a member of their teaching staff or Principal. In line with DFE guidelines such academies, may give preference to persons:
 - Whose religious opinions are in accordance with the tenets of the religions of the School/Academy;
 - Who attend religious worship in accordance with those tenets; or
 - Who give, or are willing to give, religious education in accordance with those tenets
- 6.2. Religious criteria can only be applied with Chief Executive Officer and Chair of Trustee approval and may not be applied to any other posts, such as non-teaching staff, unless it can be justified that there is a genuine occupational requirement.
- 6.3. Adverts and personal specifications must clearly state that there is a genuine occupational requirement when religious criteria is being applied.
- 6.4. York Diocean Board of Education and/or Methodist Schools and Academies Trust should be informed regarding the recruitment of the Principal role with a school/academy with the associated religious character.

7. Reasonable Adjustments

- 7.1. The Trust will ask whether an applicant needs any reasonable adjustments for any part of the recruitment and selection process. Further, if a candidate has indicated a disability on their application form, or the Trust becomes aware of it, or the candidate asks for reasonable adjustments to be made, the Trust will endeavour to make them.
- 7.2. In many cases, reasonable adjustments are relatively simple and inexpensive to make:
 - a candidate with a hearing impairment may need to clearly see the interviewer so they can lip read
 - a candidate with limited mobility may need to know the 'accessibility routes' to the interview rooms in the building
 - a candidate with recognised learning difficulty may need access arrangements to accommodate assessments and to help them familiarise themselves with materials used for a presentation
 - a candidate may have dietary requirements or preferences that can easily be accommodated
 - a candidates may have limited access to IT and may need help completing an application form.
- 7.3. In addition, all applicants who declares themselves disabled and who meet all the desirable/minimum criteria of the person specification will be granted an interview.

8. Safer Recruitment – Recruitment and Selection Training

- 8.1. It is a requirement that at least one member of the interview panel has completed the Trust approved Safer Recruitment Training prior to the start of the recruitment process. The approved training will be the Safer Recruitment developed by the Safer Recruitment Consortium and Training provided by the NSPCC. The Trust will ensure that line managers and appropriate Trustees/Governors receive this training and subsequent refresher training.
- 8.2. Administration staff involved in the recruitment process should also complete Safer Recruitment Training.
- 8.3. The Trust will also ensure that one or more of its staff becomes an 'Accredited Trainer' with the Safer Recruitment Consortium to ensure the Trust will have capacity to deliver an internal programme of Safer Recruitment Training to the relevant staff.
- 8.4. All new staff at the Trust will receive information and instruction on the Trust Guidance on Safer Working Practice. This will form a part of their induction.

9. Recruitment & Selection Documentation

9.1. Application Forms

A standard online application form will be used to obtain a common set of data from all applicants. The application form will always include key information on safeguarding. As such, candidates must provide information on employment history and if appropriate adequately explain the reasons for any gaps. The candidates must complete, sign and date the declaration and follow instructions regarding the appropriate disclosure of relevant criminal convictions.

9.2. Job Description and Person Specification

A job description and, where applicable, a person specification will be issued for all posts. In the case of volunteers this will include a volunteer role profile. The job description/volunteer role profile will have a clear reference to an individual's responsibility to safeguard children, adults and promote their welfare.

9.3. Disclosure of Criminal Convictions [inc. cautions, warnings, arrests and 'current' Police investigation(s)]

All short-listed candidates who have indicated on the standard application form that they may have spent/unspent criminal convictions, cautions, warnings or they are currently subject to a police Investigation(s), will be asked to complete a self-disclosure form with their invitation to interview. The information will be processed by the HR team prior to interview and the relevant disclosures will be passed to the Chair of the interview panel.

9.4. Risk assessment for a relevant disclosure of a criminal conviction [inc. cautions, warnings, arrests and 'current' Police investigation(s)]

Where the conviction falls under a relevant category, a risk assessment will be carried out. The relevant category will, in the vast majority of disclosures, relate to offences against a child or other offences where transferable risks to children have been identified which indicate unsuitability for working with children, or where the conduct may determine unsuitability.

The relevant disclosures will normally (but not exclusively) include:

- Sexual Harm Offence related to sexually harmful behaviour
- Physical Harm Offences in relation assaults, Grievous Bodily Harm, Actual Bodily Harm

- Controlled substances Production or possession of, or to supply of controlled substances (eg. cannabis, cocaine, etc)
- Firearms, firework or weapons (possession of and or used in relation to criminal activity)
- Child Grooming and Exploitation (CSEE/CCE)

9.5. The Risk Assessment Process and Deciding Panel

The risk assessment process will be overseen and finalised by a panel consisting of key staff to ensure thorough and fair evaluation. The following staff will oversee and decide the risk assessment and decision:

- The **Director of Safeguarding** will ensure the risks are clearly identified and the control and risk reduction measures receive robust scrutiny prior to being considered by the panel.
- The **Director of Human Resources** will ensure that the process adheres to legal standards and respects individuals' rights under the Human Rights Act [1998] and other relevant legislation and statutory codes of practice).
- The **Chief Executive Officer** or **Chief Operating Officer**, in consultation with the **Director of Safeguarding**, or the **Director of Human Resources**, will form a final decision (referred to as 'Deciding Panel'). This panel will consider the risk assessment, making the final decision on the suitability of the individual to work with children.

10. Interviews

- 10.1. The interview will assess the merits of each candidate for the post, including at least one value based question exploring their suitability to work with children and young people. The selection process for people who will work with children and young people will always include a face-to-face interview even if there is only one candidate.
- 10.2. In addition to assessing and evaluating the applicant's suitability for the particular post, the interview panel will also explore:
 - Implication that adults and children are equal
 - Lack of recognition or understanding of the vulnerability of children
 - Inappropriate idealisation of children
 - Inadequate understanding of appropriate boundaries between adults and children
 - Indicators of negative safeguarding behaviours
 - Attempts to push or overstep boundaries
 - Consistent rule-breaking behaviour
 - Any gaps in the candidate's employment history;
 - any concerns or discrepancies arising from the information provided by the candidate and/or a referee.
- 10.3. Pupil involvement, or observing short listed candidates' interaction with pupils, is common and recognised good practice. i.e. asking candidates to teach a lesson, arranging for pupils to show candidates around the school/academy (accompanied) or allowing pupils to meet short listed candidates.

10.4. Interview Panel

A minimum of two interviewers will form the interviewing panel and at least one member of the interview panel will have undertaken the Trust Safer Recruitment Training.

Where a candidate is directly or indirectly known in a personal capacity to a member of the selection panel, this will be declared before shortlisting takes place. It may then be necessary to consider changing the selection panel to ensure that there is no conflict of interest or positive or negative bias.

11. Employment History and References

- 11.1. The purpose of references is to obtain objective and factual information to support appointment decisions, including an applicant's suitability to work with children and young people. It is important to obtain independent professional references that seek objective and justifiable information and not subjective opinion.
- 11.2. The Trust will seek two written references, one of which will be from the current or most recent employer and wherever possible at least one should be from a previous role where the applicant worked with children and/or young people.
- 11.3. References should be sought on all short-listed candidates, including internal ones, and obtained prior to interview. This allows issues to be explored with the referee in advance and with the candidate at interview. Any job offer will be subject to receipt of satisfactory references. In accordance with the Equality Act information asking about sickness absence and health should not be included on reference requests, this information will be picked up for the successful candidate at the pre-employment health screening stage.
- 11.4. A copy of the job description and person specification should be included with reference requests.
- 11.5. On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate, for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form.
- 11.6. Any information about past disciplinary action or allegations should be considered carefully when assessing the applicant's suitability for the post.

11.7. All reference requests will ask:

- About the referee's relationship with the candidate i.e. if it is a working relationship, how long has the referee been working with the applicant and in what capacity
- Whether the referee is satisfied that the applicant has the ability and is suitable to undertake the job in question, specific comments about the applicant's suitability for the post and how s/he has demonstrated that s/he meets the job description/person specification
- Confirmation of details relating to the applicant's post and salary
- Specific verifiable comments about the applicant's performance history and conduct
- Details of any live disciplinary procedures/suspension to which the applicant is subject
- Details of any substantiated allegations or concerns that have been raised with the candidate that relate to the safety and welfare of children and young people and/or their behaviour towards children and young people. Allegations which were proven to be false, unsubstantiated or malicious should not be included in an employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

- In addition to all of the above, reference requests for all teaching posts will also ask for details of any non-health capability procedures to which the applicant has been subject to within the last two years and the outcome
- A Trust standard reference pro forma will be used for all posts in order to ensure consistency.

11.8. Referees should be mindful that:

- They have a responsibility to ensure that the reference is accurate and does not contain any material misstatement or omission;
- Any relevant factual content of the reference may be discussed with the applicant;
- A candidate can ask to see information held about them for example interview notes and references, or the full personal file if the candidate already works for the organisation. The Information Commissioner's Office at www.ico.org.uk has more information

12. Conditional Offer of Appointment: Pre Appointment Checks

12.1. An offer of appointment to the successful candidate will be conditional upon:

- Verification of the candidate's identity
- Verification of eligibility to work in the UK
- Verification of Birth Certificate (where available)
- Appropriate overseas check, and references from any overseas education employer after this date.
- Online checks
- Verification of the candidate's mental and physical fitness to carry out their role
- The receipt of at least two satisfactory and verified references
- Verification of qualifications
- Verification of professional status where required e.g. QTS status (unless properly exempted)
- A check of the DfE Children's Barred List
- A satisfactory DBS Enhanced Disclosure, with the certificate seen and verified by the Trust/school/academy (for Volunteers a written risk assessment in relation to the undertaking of an Enhanced DBS Disclosure)
- Where relevant, a check using the Employer Access Online Service to see if a prohibition order issued by the Secretary of State for Education or GTCE sanction exists against the individual (for posts carrying out 'teaching work')
- Any additional checks, as deemed appropriate

12.2. Online searches on shortlisted candidates

In line with KCSIE, the school will consider carrying out online searches on shortlisted candidates as part of its due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, that the school/academy may want to explore with the applicant at interview.

- Online searches will be conducted on shortlisted candidates only. The school/academy will
 consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy,
 and will ensure staff conducting online searches are clear on the purpose of the search. Shortlisted
 candidates will be made aware that online searches may be conducted as part of due diligence
 checks.
- Online searches will only examine data that is publicly available. Staff will not 'follow' or submit a friend request to shortlisted candidates on social media platforms to access further details or information.

- Online searches will be carried out by an individual who is independent of the recruitment process to minimise the risk of bias or discrimination and to ensure that only relevant information is considered. The person responsible for carrying out online searches will have due regard to Part three of KCSIE.
- The online search process may include searching for the candidate by name via search engines and social media platforms.
- 12.3. When carrying out searches of shortlisted candidates' online presence, the school will look out for indicators of concern, such as:
 - Inappropriate behaviour, jokes or language
 - Discriminatory comments
 - Inappropriate images
 - Drug or alcohol misuse
 - Anything that suggests the candidate may not be suitable to work with children
 - Anything that could harm the reputation of the Trust/school/academy.
- 12.4. Any concerns will be addressed during the interview process. The school/academy will ensure that candidates are given an opportunity to discuss any concerns raised by the online search.
- 12.5. All checks will be appropriately documented and retained on the individual's personnel file with information recorded on the Trust/school/academy's Single Central Record (SCR) in line with the statutory requirements set out in KCSiE. Where information is unsatisfactory or there are discrepancies in the information provided this will be followed up.
- 12.6. A referral will be made to the Local Authority Designated Officer (LADO) where:
 - the candidate is found to be on the relevant Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a Court; or,
 - an applicant has provided false information in, or in support of, his/her application; or,
 - there are serious concerns about an applicant's suitability to work with children
- 12.7. If an individual's DBS certificate is not completed a member of staff would only be able to commence work if the Trust is satisfied that:
 - DBS risk assessment is in place and approved by the Chief Operating Officer (COO) or CEO
 - appropriate supervision is in place
 - all other checks (references, etc) have are completed satisfactorily
 - the DBS children barred list check has been completed

12.8. Agency Staff

When the Trust/school/academy needs to use the services of a supply agency we will ensure the agency operates a safer recruitment process and provides confirmation that the following have been checked and judged as satisfactory:

- Identity
- Enhanced DBS Disclosure
- Right to work in the UK
- The DBS Barred List
- Any Prohibition Order, Interim Prohibition Order or GTCE sanction for those undertaking ' teaching work'

- Qualifications (where applicable)
- Overseas Checks, including and EEA check where applicable
- 12.9. When the supply member of staff arrives at the Trust/school/academy, their identity will be checked and it will be confirmed that they are the same person on the documentation from the agency. The supply staff's details will be entered on the SCR.

12.10. Individuals who have Lived or Worked Outside the UK

Individuals who have lived or worked outside the UK will undergo the same checks as all other staff. In addition, the Trust will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Overseas checks should be undertaken for individuals who have lived/worked overseas for 3 months or more in the last 10 years. It is the individual's responsibility to obtain a Certificate of Good Conduct.

Further information can be obtained from: <u>https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants</u>

These further checks will include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed, using the TRA Teacher Services' system. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, the Trust will consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Online checks may also be carried.

13. DBS Certificates/Disclosure

(Read in conjunction with the 'Risk assessment and Decision Panel' process - in section 9.5 of this Policy)

- 13.1. Enhanced level DBS certificates are required for all posts and renewed on a rolling 5-year programme. The requirement of checks for any prohibition, direction, sanction, or restriction will depend on the role that is being offered and duties involved.
- 13.2. The DBS will only issue a certificate to the individual and it is therefore the responsibility of the Trust to verify that the certificate is valid once it has been received. An Update Service is available which allows individuals to subscribe to the service and re-use their DBS certificate for the same level and type of roles. Trust/schools/academies can also access the service for free, with the individual's permission, and check the status of the certificate online:
 - For all posts where a DBS certificate is required, the Trust/school/academy must ensure that they see the certificate once the individual has received it and check that the certificate is valid.
 - A DBS certificate must be obtained from the individual before, or as soon as practicable after, the person's appointment (see 12.1).
 - A job offer can be withdrawn if the results of DBS checks/and or other pre-employment checks show anything that would make the individual unsuitable for the post that they have been offered.
 - Enhanced DBS checks on all members of the Trust Board and Governors appointed to an Local Governing Committee (LGC). The school/academy will also check that members are not barred from taking part in the management of the school as a result of a section 128 direction (see 12.1).
 - Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. The Trust should obtain written confirmation from the provider that it has carried out all pre-appointment checks.

13.3. All checks must be:

- Satisfied prior to commencement of employment
- Followed up where they are unsatisfactory, or where there are discrepancies in the information provided
- Recorded, retained and used in accordance with the General Data Protection Regulations (GDPR) and other legislative provisions

14. Single Central Record (SCR)

- 14.1. Trust/schools/academies will maintain a SCR on the Trust designated system, which will cover the following people:
 - All staff, including teacher trainees on salaried routes, and supply staff (who work at the Trust).
 - The members and trustees of the academy trust.
 - Contractors and volunteers.
- 14.2. The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record must indicate whether the following checks have been carried out or certificates obtained, the date on which each check was completed/certificate obtained and the name of the person who has carried out the check on behalf of the Trust/school/academy:
 - an identity check. Identification checking guidelines can be found on the GOV.UK website
 - a barred list check
 - an enhanced DBS check/certificate
 - a prohibition from teaching check
 - a section 128 check
 - further checks on people who have lived or worked outside the UK (this would include recording checks for European Economic Area (EEA) teacher sanctions and restrictions)
 - a check of professional qualifications, where required; and
 - a check to establish the person's right to work in the United Kingdom
- 14.3. For supply staff, the Trust must also include whether a written clearance statement has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.
- 14.4. Trust/school/academy SCRs will be securely stored and easily accessible to those who need to see it, including Ofsted inspectors.

15. Contractors

15.1. The Trust/school/academy will ensure that contractors who provide services to them that give rise to contact with children/young people carry out appropriate checks. The contractor is responsible for ensuring that sub-contractors also follow the same procedures. All contractors must provide a list of direct employees and those of any subcontractors before they start work on site.

- 15.2. Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. The Trust is responsible for determining the appropriate level of supervision depending on the circumstances.
- 15.3. If a contractor is self-employed, the Trust will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. The Trust will always check the identity of contractors and their staff on arrival.