

Safer Recruitment and Vetting Policy

Dragon Academy Ltd (company number 16871720)

Version 1.0 · Approved by Dylan Powell, Director · Designated Safeguarding Lead: Dylan Powell · Next review: by 31 October 2027

1. Our commitment

Dragon Academy will only let people work with children once we have taken every reasonable step to check that they are suitable. Safer recruitment does not stop at the first session: we keep checking, and we act on anything that comes to light. These steps apply in full to self-employed coaches. Being self-employed does not change what Dragon must check.

2. Who needs an enhanced DBS check with the children's barred list

Teaching, training, instructing, caring for or supervising children is **regulated activity** when the same person does it often enough: on **more than 3 days in any 30-day period**, or **once overnight** between 2am and 6am. A coach who works one Dragon session a week normally meets this test. Since **1 September 2026** (Crime and Policing Act 2026, section 139), this includes people who are supervised by someone else, such as an assistant coach working under a head coach. The old exemption for supervised staff has ended, and the change applies in Wales. Regular day-to-day management or supervision of someone in regulated activity with children is also regulated activity. (*Sources: GOV.UK, "Change to the definition of regulated activity with children from 1 September 2026" and "DBS checks in sport – working with children".*)

Dragon therefore requires an **enhanced DBS check with a check of the children's barred list** for:

- every coach and assistant coach, whether paid, self-employed or a volunteer;
- anyone who regularly helps at sessions with children;
- the Designated Safeguarding Lead and Deputy DSL; and
- anyone who regularly attends sessions in a role that makes them responsible for children, including Dragon's director(s).

Dragon's umbrella body confirms each person's eligibility for this level of check before applying.

It is a criminal offence, with a maximum of five years' imprisonment, to permit someone to work in regulated activity when you know or have reason to believe they are barred from it. A barred person who seeks, offers or engages in regulated activity also commits an offence. When Dragon asks for a DBS check for regulated activity, it is a **regulated activity provider**, which brings the legal duty to refer in policy 06. This applies even though Dragon's coaches are self-employed.

Occasional helpers who are not in regulated activity (for example a parent helping once at a tournament) must never be left alone with children, and stay under the direct supervision of a vetted coach.

3. The steps, in order

No one coaches, helps or is left with children until **all** of steps 1 to 8 are complete and Dylan has confirmed this in writing.

Step	What happens	Who
1. Role	A short written role description, including the safeguarding duties.	Dylan
2. Application	An application form with full work history, explaining any gaps, and previous work with children.	Applicant
3. Self-declaration	A signed confidential self-declaration (Appendix A).	Applicant
4. Interview	A face-to-face interview including questions about safeguarding, boundaries and how the applicant would respond to a concern. Notes kept.	Dylan and, where possible, a second person
5. Identity	Identity checked under the DBS identity checking guidelines: through a certified digital identity service offered by Dragon's umbrella body, or by Dylan seeing the original documents in person. Documents seen only on a video call are not enough.	Dylan / umbrella body
6. References	Two references, taken up directly by Dragon, not from relatives. At least one from someone who has seen the applicant work with children. Each referee is asked directly whether they know of any safeguarding concern. Open references or "To whom it may concern" letters are not enough on their own.	Dylan
7. DBS	An enhanced DBS check with the children's barred list, for the child workforce. GOV.UK allows a self-employed coach to apply through an umbrella body, or the organisation to apply on their behalf. Dragon's rule is that Dragon applies, through its chosen umbrella body. An existing certificate is only accepted under section 4.	Dylan / umbrella body
8. Training and induction	The safeguarding training Dragon specifies completed, this policy pack read, the Coach Code of Conduct and coach agreement signed, and a venue and session induction.	Coach / Dylan
9. First sessions	The first 4 sessions are worked alongside an experienced vetted coach, and Dylan reviews how they went.	Dylan

4. Existing DBS certificates and the Update Service

1. Dragon accepts an existing certificate only if it is an **enhanced certificate with a children's barred list check, issued for the child workforce**, and the coach is **subscribed to the DBS Update Service**. With the coach's written consent, Dragon runs an online status check, which shows whether any new information has been added since the certificate was issued. Status checks are free. Dragon must see the original certificate. Copies, or a certificate shown on a video call, are not enough.
2. Coaches must join the Update Service within 30 days of the certificate being issued. That is the DBS deadline for joining with that certificate. Dragon may pay the subscription with the coach's

permission.

3. The DBS does not tell Dragon when a status changes. Dragon runs an Update Service status check for every coach **at least every 12 months**, and at any time a concern arises.
4. A coach whose Dragon-requested certificate is not on the Update Service needs a **new enhanced check every 3 years**.
5. Every coach signs a new self-declaration every 12 months.

5. Existing coaches

This policy applies to coaches already working with Dragon. Each existing coach must complete steps 3, 5, 6 (where Dragon has no reference on file), 7 and 8 by the date Dragon sets and tells each coach in writing.

While an existing coach's checks are being completed, they are never left alone with children, they always work with at least one other adult present, and the DSL keeps a written risk assessment for them.

6. If something is disclosed

1. A conviction, caution or other information on a certificate or self-declaration does not automatically rule someone out. Dylan considers it with the person: what it was, when, how relevant it is to working with children, and what they say about it. The decision and the reasons are recorded.
2. Anyone who is **barred from working with children** is not engaged, and the matter is recorded.
3. Anyone who **did not disclose** something they should have disclosed is not engaged, or their agreement ends.
4. Where information suggests a risk to children, Dylan follows policy 06 (Managing Allegations) and seeks advice from the local authority.

7. Keeping DBS information

DBS certificate information is handled in line with the DBS code and GOV.UK guidance:

- Dragon never photocopies or scans DBS certificates.
- Dragon records only: the person's name, the date of issue, the type of check, the position it was for, the certificate number and the recruitment decision.
- Any certificate information Dragon does hold is kept securely and only for as long as needed for the recruitment decision, and no longer than 6 months unless there is a dispute (Dragon's rule).
- Only the DSL sees DBS information.

8. Records

Dragon keeps a single vetting register (one row per person) showing: role, start date, DBS certificate number and date, Update Service status and last check date, ID checked (date), references received

(dates), self-declaration date, training course and date, code and agreement signed (dates) and the date Dylan cleared the person to work.

Appendix A: Confidential self-declaration (template)

Dragon Academy Ltd. Confidential: seen only by the Designated Safeguarding Lead.

Because you will work with children, this role is exempt from the Rehabilitation of Offenders Act 1974. You must tell us about any convictions, cautions, reprimands or final warnings that are **not protected** (filtered) under the DBS filtering rules. You do not need to tell us about protected convictions or cautions. GOV.UK explains the filtering rules: <https://www.gov.uk/government/publications/db-filtering-guidance>

Question	Yes / No	If yes, details
1. Do you have any convictions, cautions, reprimands or final warnings that are not protected?		
2. Are you currently under investigation, or have you been arrested, charged or bailed, for any offence?		
3. Are you barred, or have you been told you are being considered for barring, from work with children or adults?		
4. Has any employer, club, governing body or other organisation ever investigated, suspended, dismissed or disciplined you, or asked you to stop working with children, because of a concern about your conduct with children or adults at risk?		
5. Has a local authority or the police ever been involved because of a concern about your conduct with children?		
6. Has a court ever made an order that limits your contact with children?		
7. Is there anything else that might affect your suitability to work with children?		

I confirm the information above is true and complete. I understand that giving false information, or leaving something out, will mean I am not engaged or that my agreement ends. I will tell Dragon Academy straight away in writing if anything above changes.

Name: _____ Signature: _____ Date: _____

Official guidance

- GOV.UK: Change to the definition of regulated activity with children from 1 September 2026
- GOV.UK: DBS checks in sport – working with children
- GOV.UK: DBS Update Service employer guide
- GOV.UK: Handling of DBS certificate information
- GOV.UK: DBS identity checking guidelines

- [GOV.UK: DBS filtering guidance](#)