



LIGHTHOUSE CENTRAL DBS POLICY

Updated: 1st April 2025

Overview

Lighthouse: is the name given to a non-residential, one week long, holiday camp for children run by Christians under the Lighthouse Brand.

Lighthouse Brand: is the identity, ethos and combination of properties that represents how Lighthouses are perceived by those who experience or interact with them.

Individual Lighthouses: a unique identifier that distinguishes one instance of Lighthouse from another (typically the name of a location). Each Individual Lighthouse is typically a registered charity in its own right that provides a Lighthouse week or other children's services using the Lighthouse Brand.

Lighthouse Central (LHC): the umbrella organisation that supports the Individual Lighthouses and is leading the nationwide growth of the Lighthouse movement. LHC provides the core administrative functions necessary to run a Lighthouse.

The Individual Lighthouse is responsible for the activities and implementation of any policies before during and after the Lighthouse week.

As part of its administrative remit LHC maintains a library of Policies and Procedures including an Adult to Child Ratios Policy.

Definitions

Throughout this policy, the term 'Lighthouse' shall be taken to mean, collectively:

Lighthouse Beaconsfield	Registered Charity No. 1198953
Lighthouse Burnham	Registered Charity No. 1182190
Lighthouse Cressex	Registered Charity No. 1183476
Lighthouse Derby City	Registered Charity No. 1207908
Lighthouse Haddenham	registered Charity No.1201685
Lighthouse Hazlemere	Registered Charity No. 1178562
Lighthouse High Wycombe	Registered Charity No. 1114541
Lighthouse Loudwater	Registered Charity No 1197125
Lighthouse Mansfield	Registered Charity No. 1164680
Lighthouse Marlow	Registered Charity No. 1178062
Lighthouse Princes Risborough	Registered Charity No. 1178119
Lighthouse Safe Harbour	Registered Charity No 1180779
Lighthouse Shelswell	Registered Charity No 1187651
Lighthouse Central	Registered Charity No. 1169839



And Lighthouse Water Eaton which is an associate Lighthouse through St Frideswide's Church, a resource hub in the Diocese of Oxford for community organising and church growth.

And Lighthouse Denham which is an associate Lighthouse through Denham Parish Church, yet to be registered as a separate charity.

These charities share a common administration system and database. Applicants may transfer between Lighthouses at any time. Data including DBS Disclosure information that is shared is done so under GDPR regulations.

This policy should be read in conjunction with the Lighthouse Safeguarding Policy and covers:

- DBS Policy
- Rationale for roles requiring a DBS check
- Recruitment of Ex-offenders
- Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information

1. Overall Statement of Policy on Safeguarding

The Trustees and Management Teams of each Lighthouse recognise the importance of our ministry with children and young people in need of protection and our responsibility to protect everyone entrusted to our care. We are committed to their safeguarding and well-being.

Specifically:

- We believe all adults should enjoy and have access to every aspect of the life of Lighthouse unless they pose a risk to the safety of those we serve.
- We undertake to exercise proper care in the appointment and selection of all those who will work with children and young people.

We are committed to:

- Keeping up to date with and following UK legislation; denominational requirements and good practice recommendations in relation to safeguarding children and young people.

In support of these ends we will:

- Apply current nationally required procedures and good practice recommendations in the recruitment of leaders and helpers

2. DBS Policy

- Lighthouse Central will observe guidance issued or supported by the Disclosure and Barring Service (DBS) and will comply fully with the DBS Code of Practice and Explanatory Guide.
- We will not unfairly discriminate against the subject of Disclosure information on the basis of conviction or other details revealed in accordance with our policy on the recruitment of ex-offenders (see below)



- We will handle, use, store, retain and dispose of Disclosure information in full compliance with the DBS Code and in full accordance with our policy on the handling and safe keeping of Disclosure information (see below).
- Lighthouse Central will ensure that Disclosures and the information they contain are available only to those who need to have access in the course of their duties.
- Lighthouse Central will co-operate with requests from the DBS to undertake assurance checks as to the proper use and safekeeping of Disclosure information.
- Lighthouse Central will report to the DBS any suspected malpractice in relation to the DBS Code of Practice or any suspected offences in relation to the misuse of Disclosures.
- Each Lighthouse will appoint a DBS administrator who will ensure that all persons involved in checking DBS applications for their Lighthouse are trained in and kept up to date on changes to DBS requirements. We are aware of the potential pitfalls of identity checks being carried out by connected persons and ensure that DBS identity checks are not undertaken by any such connected persons.
- If the applicant refuses to complete a DBS application, we will not proceed further with the applicant. In addition if an applicant fails to complete a DBS after having a Trustee sign-off the previous year Lighthouse will be unable to proceed further with this applicant.
- In exceptional circumstances e.g. where the applicant has applied too late or is unable to provide the appropriate supporting documentation Lighthouse may still offer the applicant a volunteer position but only after a careful risk assessment. This is entirely at the discretion of the Trustees and will be clearly documented in the individual's record in the database.
- Volunteer positions will be conditional upon a satisfactory DBS check having been received
- Lighthouse accepts existing DBS disclosures from other organisations where the applicant has registered with the DBS Update Service
- Lighthouse accepts existing Enhanced Child Workforce DBS disclosures from key organisations namely: the Church, Schools, charities, children's homes, fostering service, organisations working with young people such as scouts, Girls Brigade etc. The volunteer will need to show the certificate and a form of ID with an address to a Lighthouse DBS checker
- Certificates from other organisations must be the correct type of DBS for the role applied for - see below **Section 3 rationale for DBS checks**
- Disclosures and the information they contain will only be available to those who need to have access in the course of their duties.



- DBS applications will be processed through APCS, there is a charge of £6.00 per application processed paid by the Lighthouse.
- We only conduct ID checks on a face to face basis.
- If an applicant is unable or unwilling to comply with this policy they will be advised to use the 'Veri-fy' service. <https://www.veri-fy.co.uk/>
- On reviewing the applicant's DBS Certificate the Lighthouse DBS administrator will update the LH database to show that the DBS is satisfactory. In the event of it not being satisfactory the Lighthouse DBS administrator will contact the relevant Lighthouse chairman who will then review the volunteer's application to see if the information on the DBS Certificate is in line with the information supplied at the time of application. If not, the Lighthouse chairman will contact the applicant to provide them with a final opportunity to supply information about any undeclared convictions. The Lighthouse chairman, in consultation with other trustees, will make the decision as to whether or not the applicant may be accepted. If full information has not been provided, the applicant will be refused automatically.
- At no time will Lighthouse Central be involved in recruitment decisions.
- No copies of DBS disclosures will be kept.
- The Database has Risk Assessments with details of all applicants who do not have a fully executed DBS Disclosure ie: application processed by the DBS, certificate issued and seen by the DBS checker.

3. Rationale for DBS Checks

For Lighthouse we apply for a Child Workforce DBS.

The DBS definition of those who require a DBS is **Individuals who carry out regulated activity with children** as defined below:

Individuals who provide teaching, training or instruction to children on more than 3 days in a 30 day period except where the recruiting organisation decides the individual is sufficiently supervised in line with DfE statutory guidance and they are not a paid member of staff in a specified establishment

This would apply to the roles of:

- Age Group Leader (AGL)
- Age Group Teacher (AGT)
- Lighthouse Keeper (LHK)
- Lamplighter (LL)
- Creche team
- SEN roles (the Space, the Lifeboat etc) and Quiet Area team



Additionally this would apply to the Designated Safeguarding Lead (DSL) and the First Aid team owing to the sensitivity within those roles.

Using the DBS Eligibility Check for those with the most contact with children as described above, an **Enhanced Check with Child Barring** is required

The second relevant DBS definition is;

Individuals who provide care for or supervision of children on more than 3 days in a 30 day period except where the recruiting organisation decides the individual is sufficiently supervised in line with DfE statutory guidance and they are not a paid member of staff in a specified establishment;

This would apply to all supervisory roles ie Co-ordinators where they may have a child under the age of 18 in their team.

Using the DBS Eligibility Check for those volunteers whose role would be as described above, an Enhanced Check is required.

Volunteer roles with no regulated activity with the children will not require a DBS.

4. **Lighthouse Policy Statement on the Recruitment of Ex-offenders**

- As an organisation using the DBS Disclosure service to assess applicants' suitability for positions of trust, Lighthouse complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.
- Lighthouse is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- This policy statement on the recruitment of ex-offenders is made available to all Disclosure applicants at the outset of the recruitment process (advertised as available from www.lighthousecentral.org or on request).
- We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates based on their skills, qualifications and experience.
- A Disclosure is always requested as Lighthouse is working with children and young people. All application forms will contain a statement that a Disclosure will be requested. We ask all applicants to provide details of their criminal record on the application form provided. This form will only be seen by those who need to see it as part of the recruitment process.
- As a position with Lighthouse may lead to having sole charge of children, young people or vulnerable adults, applicants are exempt from the "Rehabilitation of Offenders Act 1974". We
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- therefore require details of both “spent” and “unspent” convictions as defined in the act.
- We will ensure that all those in Lighthouse who are involved in the recruitment process fully understand how to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974. In the first instance, we will ensure that all who are involved in the recruitment process are aware of the guide produced by social justice charity NACRO (National Association for the Care and Resettlement of Offenders) in association with CIPD and DBS.
<https://www.nacro.org.uk/resettlement-advice-service/support-for-employers/recruiting-safely-and-fairly-guide-a-practical-guide-to-employing-ex-offenders/>
- In any interview, we will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an invitation to participate.
- We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and make a copy available on request.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before declining the applicant a position at Lighthouse. Having a criminal record will not necessarily bar an applicant from working with Lighthouse. This will depend on the nature of the position and the circumstances and background of the applicant’s offences.

5. Lighthouse Policy Statement on the Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information

- **General Principles:** As an organisation using the Criminal Records Bureau (DBS) Disclosure service to help assess the suitability of applicants for positions of trust, Lighthouse complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under GDPR (2018) and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a Lighthouse Data Privacy Notice on these matters, which is available at www.lighthousecentral.org
- **Storage and access:** Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.



- **Handling:** In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.
- **Usage:** Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- **Retention:** Once a recruitment (or other relevant) decision has been made we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than 6 months, we will consult DBS about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.
- **Disposal:** Once the retention period has elapsed, we will ensure that any DBS Certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However notwithstanding the above we will keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken for a period of 15 years. This is a requirement of our insurance policy.