**ABBEY THEATRE TRUST (ST ALBANS) LTD**
**Disclosure and Barring Service (DBS) Policy and Procedures**

## Scope

This policy applies to The Abbey Theatre Trust (St Albans) Ltd, including its resident theatre companies: the Company of Ten, Company of Teens, St Albans Youth Music Theatre ("SAYMT") and any other theatrical companies established from time to time, collectively known as "ATT" or the Trust.

This policy applies to anyone working, volunteering or undertaking any duties on behalf of ATT, including the Theatre Manager, the Board of Trustees/Management Committee, paid staff, members, volunteers, sessional workers, agency staff and students.

## Purpose

This policy forms part of the processes, policies and procedures of ATT and has been adopted for safeguarding purposes. This policy should be read in conjunction with the other policies referred to in it, including the Safeguarding and Child Protection Policies.

As we are an organisation which works with Vulnerable Persons, we need to have a clear policy in place for when Disclosure and Barring Service checks (DBS) are required, a policy on how we assess the level of check needed and how we handle the information. Those requirements are set out in this policy document.

The ATT actively promotes equality of opportunity for all: both in terms of membership and employment.

The ATT welcomes applications for employment from a wide range of candidates, including those with criminal records. We will ensure that all candidates are selected for interview or appointment based on their skills, qualifications and experience.

## Definitions

- *Children* – anyone up to the age of 18.

- *Young People* – anyone up to the age of 18.

- *Adults at risk* – this is defined by the Care Act 2014 and encompasses anyone over the age of 18 who is, or may be, in need of care services by reason of disability, age or illness; who is experiencing or at risk of abuse or neglect; and who is unable to protect themselves against either risk, or the experience of harm, abuse, or neglect.

  While the ATT acknowledges that 'adults at risk' (those with vulnerabilities) may be at additional risk of harm, this may not always be apparent, and the Trust is conscious that any adult could be at risk of harm at some point in their life. The ATT's approach is to encourage a culture of safeguarding that recognises the importance of keeping everybody safe.

- *Vulnerable Person* –a Child, Young Person or an Adult at Risk.

**The ATT:**

- will only ask an individual to provide details of convictions and cautions about which the organisation is legally entitled to know.

- will undertake a written risk assessment before deciding whether it is both proportionate and relevant to the position to apply for a Basic, Standard or Enhanced DBS check. ATT will also ensure the role is legally eligible for one of these types of check.

- for those positions, either for a member who is involved in a production or, in the case of employment, where a DBS check is identified as necessary, the ATT will ensure that the member or applicant is aware that an application for a DBS certificate is required.

- will undertake to treat all applicants for employed positions fairly and will not discriminate unfairly against any subject of a criminal record check on the basis of a conviction, caution or other information revealed.

- will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be revealed on a DBS check where it is not explicit in the policy that such information would be a barrier to taking part in a production or employment.

- will abide by the DBS Code of Practice and/or the Basic check: Processing standards

**Confidentiality and data protection**
As an organisation using the DBS checking service to help assess the suitability of applicants for positions of trust, in particular in relation to our youth productions, the ATT complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention, and disposal of certificate information.

*Storage and access*
Certificate information should 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, certificate 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 certificates, or certificate information has been revealed, and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

*Usage*
Certificate 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*
We do not keep certificate information for any longer than is necessary. Once a member has been involved in a production, has indicated that they no longer wish to be involved with our youth groups, or any other relevant decision has been made, they will be removed from our DBS register. Any necessary retention period will enable us to consider and resolve disputes or complaints and to complete safeguarding audits.

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, for example by shredding, pulping, or burning. While awaiting destruction, certificate information will continue to be kept in a secure receptacle.

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of any decisions taken.

*DBS logo*
The DBS logo is protected by Crown copyright. Copying or using the DBS logo is not permitted without prior approval from the DBS.

**DBS statement on recruitment of ex-offenders**
The ATT has a statement on the recruitment of ex-offenders, and this is attached to this policy as **Appendix 4**.

**Review**
This policy and set of procedures are reviewed annually and updated as required.

**Record of Policy**

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| Version | V2 |
| Policy First Created | 2021 |
| Last Updated | October 2026 |
| Review Frequency | Annual |
| Person/s responsible | Chairman<br>Secretary<br>Theatre Manager<br>Safeguarding Lead |
| Associated Policies | Data Protection Policy<br>Safeguarding Policy<br>Child Protection Policy |

## Appendix 1 - DBS Check Risk Assessment

A DBS will search police records to identify people who are unsuitable for certain types of work, especially work involving Vulnerable Persons.

There are various levels of checks that could be undertaken:

- Basic
- Standard
- Enhanced
- Enhanced with Children's Barred List check

The level selected depends on the role and risk analysis.

An Enhanced level is required for any person working on a Regulated Activity, which is one which involves close and unsupervised contact with a Young Person, and which is conducted regularly or intensively. Examples of Regulated Activity are:

- teaching, training, or instructing a Young Person
- care and supervision of a Young Person
- driving a Young Person

An Enhanced level with Children's Barred List check should be obtained if a person teaches, trains, instructs, cares for or supervises children:

- on more than 3 days in any 30-day period
- once overnight, between 2am and 6am

These scenarios are equally applicable to an Adult at Risk.

For the purposes of this assessment "work" includes both paid employment and any membership based activities such as participating in a production, be that on or off stage.

**Perspective**
The Charity Commission states that "*whenever there is a legal entitlement to obtain a DBS check in respect of such a trustee, a check should be carried out*". Trustees of a charity that conducts work with children or vulnerable adults are eligible for an "*Enhanced Disclosure*" (normally without a check of the barred list). The Trustee does not need to work with children or vulnerable adults personally to be entitled to this check – they are being checked because of the work of the charity.

**Assessment of the level of check required**
The ATT's approach of appointing chaperones to all productions involving children, and maintaining a consistent two-adult presence. This is considered to be a sound approach to mitigate risk to Vulnerable Persons.

For all productions involving Vulnerable Persons, a risk assessment must be conducted (please see the model form at **Appendix 3**).

If an individual will be involved in the teaching, training, instruction, care or supervision of children or young persons for **more than 3 days in a 30-day period**, which will often be the case given the nature of the ATT rehearsal schedule, then members in certain roles, as set out below, will be required to have a current DBS check.

Accordingly, the regime which the ATT has determined is as follows:

| Role | Level of Check | Reasons | Timing of Check | Frequency of Check | Retention Period of Admin Info |
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| Trustee | Enhanced | As the ultimate persons responsible for all activity of the Trust; it is considered appropriate and as an example, that all trustees undertake this level. This is also consistent with Charity Commission's view. | At the time of appointment | 3 years– Auto-renew | Otherwise, 3 years from when retire as a Trustee unless also involved with Youth productions or performing another relevant role |
| Theatre Manager | Enhanced with Children's Barred List check | As the Theatre Manager is often on site alone; there is a risk of a Vulnerable Person being or coming onto the site and the situation being unsupervised. | As part of the recruitment process | 3 years– Auto-renew | 21 years from the date of last activity involving children<br><br>Otherwise, 3 years from last activity with ATT |
| Organisers and volunteers delivering | Enhanced with Children's Barred | Working with Young Persons on a regular basis | Prior to taking up the role and attending | 3 years– Auto-renew | 21 years from the date of last activity |

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| Company of Teens and SAYMT group activity or any other activity involving Vulnerable Persons | List check | | auditions and rehearsals | | involving children |
| Chaperone | Enhanced with Children's Barred List check | Any person who applies to be a Chaperone requires an Enhanced Check as part of application process.<br><br>*The Chaperone system is based on HCC guidelines | Before commencing any chaperone work on behalf of the ATT | Annual – Auto-renew | 21 years from the date of last activity involving children |
| Wardrobe | Enhanced<br><br>or<br><br>Enhanced with Children's Barred List check | If working with Vulnerable Person as part of wardrobe team to assist with dressing or applying makeup in private or in an unsupervised setting, as this will be a Regulated Activity.<br><br>Risk assessment must consider if there is a possibility of member caring or | As and when appointed to the production team – to be in place before any costume fittings and the dress rehearsal | As and when required | 21 years from the date of last activity involving children<br><br>Otherwise, 3 years from last activity with ATT |

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| | | supervising children on more than 3 days in a 30 day period. This could cover a show run for COT productions so needs to be identified early and as part of wardrobe planning process | | | |
| Stage Managers | Basic<br><br>or<br><br>Enhanced with Children's Barred List check | For all Company of Teens and SAYMT productions.<br><br>Applicable for COT if Vulnerable Person is part of cast.<br><br>Risk assessment must consider if there is a possibility of member caring or supervising children on more than 3 days in a 30 day period. This could cover a show run so needs to be identified early and as part of the SM risk assessment | As and when appointed to the production team | As and when required | 21 years from the date of last activity involving children |

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| Directors | Enhanced with Children's Barred List check | For all Company of Teens and SAYMT productions.<br><br>Applicable for COT productions if a Vulnerable Person is part of cast. | As and when play is approved by the Management Committee | As and when required | 21 years from the date of last activity involving children |
| Technical (including lighting, and sound) | Enhanced<br><br>or<br><br>Enhanced with Children's Barred List check | If working with Vulnerable Person as part of technical team in an unsupervised setting and in circumstances where a two adult presence cannot be guaranteed, this will be a Regulated Activity<br><br>Risk assessment must consider if there is a possibility of member caring or supervising children on more than 3 days in a 30 day period. This could cover a show run for COT productions so needs to be identified early and as part of the production | As and when appointed to the production team | As and when required | 21 years from the date of last activity involving children |

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| | | planning process | | | |
| Other functions | Enhanced<br><br>or<br><br>Enhanced with Children's Barred List check | As decided by the Management Committee | As and when identified by the Management Committee | As and when required | 21 years from the date of last activity involving children |

The Theatre Manager will be responsible for maintaining a register of members and employees who have in place a DBS check, the level of that DBS check, and whether they have signed up for auto-renew.

The Safeguarding lead maintains a separate list of licensed chaperones which includes their DBS check information.

## Appendix 2 – Procedure for Obtaining a DBS Check

**Responsibility**
For Trustees and the Theatre Manager – Honorary Secretary of Trust.

For COT – the Production and Technical Officers/Executives for the respective roles under their responsibility.

For Company of Teens, SAYMT and any other Youth/Young Adult groups established – the Youth Groups, Training and Development Officer/Executive.

Directors and Stage Managers will provide a second level of checks for each production and alert the relevant Executive to the need for DBS checks.

If the role requires a DBS check, the individual should obtain the required DBS check to meet the timing requirements stipulated above at **Appendix 1**.

**Enhanced checks including those with Children's Barred List check**
Checks for members who are performing a function for the ATT are free.

It is possible that your employment role or other voluntary activity means you already hold a DBS check, and if at the requisite level and valid this will suffice.

Once a DBS certificate is obtained, the original **must** be shown to the Theatre Manager, who will log certain details as set out in this policy. We do not keep copies of your DBS certificate, only administrative details.

Those obtaining a DBS certificate should register for the update service and the ATT requires that certificates are reshown every 3 years or earlier as set out above.

**Procedure**
Applications shall be made following the process set out below.

**STEP 1 - Application**
The relevant individuals responsible for procuring an enhanced DBS check will contact the Honorary Secretary via email to secretary@abbeytheatre.org.uk

The Theatre Manager will alert the Honorary Secretary as and when DBS checks come up for renewal if the individual has not already been registered with the DBS update service.

The Honorary Secretary will then contact the relevant organisation to obtain an Enhanced DBS check. At the time of preparing this Policy the relevant organisation is Communities 1st DBS.ID@communities1st.org.uk

**STEP 2 – Identity verification**
The Applicant will then be contacted directly by Communities 1st, who will perform the required ID checks on behalf of the ATT. The Applicant must cooperate with

Communities 1st and arrange the necessary virtual meeting as soon as reasonably practicable.

**STEP 3 – Final application**
Communities 1st will then make the relevant application and provide the invoice via email to the Secretary, who will arrange for it to be settled by the Theatre Manager.

**STEP 4 – Receipt of certificate**
Typically, the outcome of the DBS application will be known within approximately four days. An email confirming the result will usually be sent by Communities 1st to the Secretary and the Applicant.

The Applicant will then receive the issued certificate by post. Upon receipt, the Applicant **must** show the original certificate to the Theatre Manager. A copy of the certificate will not suffice; the original must be presented.

**Step 5 – DBS Update Service**
Upon receipt of the certificate, all applicants should apply to the DBS Update Service at
https://www.gov.uk/dbs-update-service within 30 days of the certificate being issued and notify the Theatre Manager that this has been undertaken.

There is no charge for members; otherwise, a charge may be levied which will be paid by the ATT if it is required due to the member undertaking activities on behalf of the ATT i.e. in the case of the Theatre Manager.

**Appendix 3 – DBS Risk Assessment Example**

The following risk assessment should be conducted if it is considered likely that an individual under the age of 18 will be cast in a production, be that with the Company of Ten, Company of Teens, St Albans Youth Music Theatre ("SAYMT") or any other theatrical group established.

This risk assessment **must be completed before the first rehearsal date and then updated before the dress rehearsal or any quick changes are rehearsed**. Individuals who require a DBS check must have a certificate in place before **directing, caring for or supervising Vulnerable Persons**.

| Role / Factor | Vulnerability Context | Level of Risk | Control / Safeguard Method |
|---|---|---|---|
| Director | Responsible for directing children during the rehearsal process, which is likely to be more than 3 days within a 30 day period, | High | Mandatory Enhanced DBS with Barred List. Minimum of two adults present at all times. |
| Chaperone | Responsible for children during the rehearsal process, which is likely to be more than 3 days within a 30 day period.<br><br>Responsible for children backstage and in dressing rooms during the production run. | High | Mandatory Enhanced DBS with Barred List. Minimum of two adults present at all times. |
| Backstage Crew including Stage Manager, Assistant Stage Manager and Deputy Stage Manager | Working in dark, confined backstage areas where children are present. | High | Enhanced DBS (no barred list) if contact will not be more than 3 days within a 30 day period.<br><br>Enhanced DBS with Children's Barred List check required if will be supervising children more than 3 days within a 30 days period.<br><br>Chaperones assigned to escort children through backstage areas. |
| Wardrobe | Close physical contact involved in the measuring, fitting, and altering costumes on children or vulnerable actors. | High | Mandatory Enhanced DBS with Barred List. |

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| | | | "Two-Adult Rule": Fittings must never happen 1-on-1 behind closed doors. A licensed chaperone or parent must always be present in the room.<br><br>If a parent is present, no other children should be present during the fitting. The parent in this circumstance is not acting as a licensed chaperone. |
| Wardrobe | Backstage Quick Changes - High-pressure, fast-paced dressing in darkened or semi-private backstage wings. | Medium | Clear Open-Space Policy: Quick-change areas must use privacy screens but remain open to tech/stage management visibility. Chaperones must supervise the area.<br><br>Enhanced DBS with Children's Barred List check required if working on youth productions. |
| Wardrobe | Dressing Room Access Delivering or repairing costumes inside active changing areas. | Medium | Knock-and-Announce Policy: Wardrobe staff must never enter a changing room unannounced.<br><br>Enhanced DBS with Children's Barred List check required if working on youth productions. |
| Lighting and Sound | Working in tech box during a production if an individual over 16 but under 18 wishes to shadow or be involved in a production in this capacity. | Medium | "Two-Adult Rule" – two adults should always be present within the tech box<br><br>Enhanced DBS (no barred list) if contact will not be more than 3 days within a 30 day period. |

## Appendix 4 – Recruitment and Volunteering Involvement of Ex-Offenders

- The ATT is committed to equal opportunity for all job applicants, employees and volunteers. We actively promote equality of opportunity for all with the right mix of talent, skills and potential, including those with criminal convictions.

- The ATT undertakes to treat all applicants and those individuals who wish to volunteer fairly. It undertakes not to discriminate unfairly against anyone who is the subject of a Disclosure on the basis of a conviction or other information revealed.

- For any employed positions, the ATT will select all candidates for interview based on their skills, qualifications, and experience.

- At any interview, or in a separate discussion, the ATT 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 offer of employment

- The ATT undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

- The ATT recognises that no applicant, employee, volunteer or member should receive less favourable treatment than another on grounds of gender, sexual orientation, gender identity, marital or family status, civil partnership status, disability, race, colour, nationality, ethnic or national origins, religion or belief, age or trade union membership, criminal record or any other condition or requirement which cannot be shown to be justifiable and directly related to the job or role offered by the ATT and its essential criteria.

- The ATT will only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. We recognise that volunteers and members do not have to provide us with information about their criminal record unless specifically asked. The ATT will consider carefully whether the volunteering role in question requires knowledge about criminal convictions.

- Spent or unrelated convictions need not be disclosed or discussed, unless the role in question is exempt under the Rehabilitation of Offenders Exceptions Order. The ATT will work towards preparing a volunteer information pack which includes relevant information on this.

- When we assess an applicant's suitability for a position, the ATT will comply fully with the DBS Code of Practice.

- An application for a criminal record check will only be submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts, and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.