



# DBS Policy for Students

## Background

1. The training and qualifications offered by the bpf may bring students into contact with vulnerable groups, i.e.: infants, children, adolescents and vulnerable adults.
2. Definition of vulnerable groups:
  - a. A **child** is anyone under the age of 18 years old. Children have the right to be safe and should be protected from all forms of abuse and neglect, which may include: bullying and cyberbullying; child sexual exploitation; child trafficking; criminal exploitation and gangs; domestic abuse; emotional abuse; female genital mutilation; grooming; neglect; non-recent abuse; online abuse; physical abuse; and/or sexual abuse.
  - b. A '**vulnerable adult**' is someone who requires regulated activity to be provided to them. For the purposes of this Policy, this means that the trainee must be carrying out an activity with adults who are receiving a health and social care service in paragraph 9, or a specified activity in paragraph 10, of the Police Act 1997 (Criminal Records) (Amendment) Regulations 2013 and the trainee must be providing one of the activities in paragraph 6 of the Police Act 1997 (Criminal Records) (Amendment) Regulations 2013 often enough to meet the threshold of carrying out an activity with a vulnerable adult<sup>1</sup>.
3. Course components that bring students into contact with children and/or vulnerable adults may mean that the activity meets the definition of '**regulated activity**'. Regulated activity is defined in the HM Government (2006) Safeguarding Vulnerable Groups Act (Chapter 47) and subject to amendments in the HM Government (2012) Protection of Freedoms Act (Chapter 1).
  - a. The definition of regulated activity in relation to adults outlines those activities which, if provided to any adult who requires them, will mean that the adult is considered vulnerable at that particular time.
  - b. The definition of regulated activity in relation to children includes: (i) unsupervised activities, includes teaching, training, instructing, caring for and/or supervising children; the provision of advice and/or guidance on physical, emotional and educational wellbeing; and/or the conveying of a child; (ii) work for a limited range of establishments (specified

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<sup>1</sup> See [Disclosure and Barring Service: A guide to adult workforce roles for registered bodies and employers](#)

places) with opportunity for contact with children; and which meet the period condition (frequency/regularity of the activity)<sup>2</sup>

4. The **Disclosure and Barring Service** (DBS) was established under the Protection of Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The bpf process the criminal record applications for trainees and staff through a Responsible Organisation called [Complete Background Screening \(CBS\)](#).
5. Students who have access to children and/or vulnerable adults and who meet the definition of regulated activity, are required to have a relevant DBS check.
6. [A DBS check](#) is a check which will reveal any convictions, cautions, reprimands or warnings that a student may have received in the past. There are four different levels of DBS checks that provide different types of information. This provides the bpf with information they need to make sure all appropriate safeguards are in place before a trainee can come into contact with children and/or adults at risk. The DBS may also include information held on the children and adults 'barred lists', as well as information held by the police that might be relevant to the course component or work that the trainee is undertaking.
7. The [DBS Update Service](#) allows trainees to keep their DBS certificates up to date, and employers and organisations such as the bpf to check a DBS certificate. The service is for standard and enhanced DBS checks only.
8. Under the **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975**, students who will be engaged in jobs and activities listed in the Exceptions order (such as work with children, health or social care) must disclose: all unspent convictions and cautions and any unprotected spent specified and unspecified convictions or cautions, which includes any convictions resulting in a custodial sentence. Specified offences relates to sexual offences, violent offences and/or are relevant to safeguarding children and vulnerable adults. Students may disclose this information during the application process as this information will come to light as part of their DBS check.

## **Review and consultation of DBS checks for trainees.**

9. [Appendix A sets out the training courses and qualifications](#) offered by the bpf and provides an overview of the course components which will bring students into contact with children and vulnerable adults as part of their training. For example, students will come into contact with children as part of infant observations, as well as the child and adolescent psychotherapy

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<sup>2</sup> See [Disclosure and Barring Service: Regulated activity with children in England](#)

training. Likewise, students will come into contact with adults when their course requires clinical practice with clients who are aged 18 and over.

10. Clients may be signposted to experienced students who are undertaking advanced training in psychotherapy by way of the bpf's low fee intensive therapy.
11. The bpf, as a Regulated Activity Provider, contract CBS to undertake DBS checks for trainees and staff. [Appendix B outlines the types of DBS checks](#), the eligibility requirements for DBS checks and information on the DBS Update Service.

## **Process for DBS checks and requirements for trainees**

12. The process for carrying out DBS checks for students is complex because a student may require a new DBS check or have an existing DBS check which has been carried out by a third party. They may also have lived overseas for a significant period of time. The outcome of a DBS check may affect whether a student can participate in their course of study and in any capacity as a trainee or qualified psychotherapist. The process for DBS checks for bpf's trainees is outlined in [Appendix C](#) and in the following paragraphs.
13. Staff who are responsible for administering DBS checks must adhere to this DBS Policy for Students and they should also be familiar with the following published information:
  - a. [A guide to DBS checks](#) (Disclosure and Barring Service);
  - b. [ID checking guidelines for standard/enhanced DBS check applications from 01 July 2021](#) (Disclosure and Barring Service);
  - c. [DBS Update Service: employer guide](#) (Disclosure and Barring Service);
  - d. [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#) (HM Government).
14. The disclosure and criminal records checks requirements and process may vary for applicants in Scotland and Northern Ireland.

### **15. Applying for a DBS check.**

The bpf will continue to administer new DBS checks for students when the role meets the definition of '[regulated activity](#)' and [the bpf are eligible to do so](#). A student cannot themselves apply for a standard or enhanced DBS check because this must be carried out by a Responsible Organisation.

- a. The bpf will share the student's name and email address with CBS, who will contact the student directly in order to process the DBS check. CBS carry out digital ID checks and DBS checks on behalf of the bpf. The fee for an enhanced with barred lists check is £63.30 which is paid by the student to CBS.

- b. On receipt of the DBS certificate, the student must show the certificate to the bpf's General Administrative Assistant if information has been disclosed on the DBS certificate, who will refer the information to the Course Director.

## **16. Identification checks**

- a. As part of the DBS application process, students are required to complete a identification (ID) check. There are a number of different ID pathways (otherwise known as 'routes') and whilst the bpf will normally ask the applicant to complete a Digital ID check, there are times when this may not be possible, such as when the student does not have all required identification documents.
- b. The cost of one digital ID check is included in the DBS application fee; all other attempts are payable by the trainee.
- c. The cost of other forms of ID checks is payable by the student to the ID check provider.

## **17. Accepting a previously issued DBS certificate.**

- a. If the student has registered with the Update Service, the bpf will carry out a [Status check](#) for the workforce that is appropriate to the training and only when the bpf could legally require a new DBS check for this role. Students must provide their certificate number, their surname as it is printed on the certificate and their date of birth and this information will be shared with CBS who will complete the Status check. If the outcome of the Status Update is that the DBS certificate is no longer current, the student will be required to [apply for a new DBS check](#).
- b. If the DBS certificate is for more than one workforce and the bpf are only entitled to check a single workforce, the bpf will require the student to apply for a new DBS check for the workforce that is appropriate to their training.
- c. If the student had not joined the update Service, the bpf will require the student to apply for a new DBS check.

## **18. Joining the Update Service.**

The bpf require students to join the Update Service and students must follow the [DBS Update Service registration process](#).

- a. The student is responsible for the annual subscription to the Update Service which is currently £16 p/year.
- b. CBS will, on behalf of the bpf, carry out an annual Update Service check on all students where the role meets the definition of 'regulated activity' and the bpf are eligible to do so. The cost of the annual Update Service check is paid by the bpf to CBS.
- c. If the student has not joined the Update Service the bpf will require the student to apply for a new DBS check at the point of the annual Update Service check.

## 19. Information disclosed in the DBS check.

Information disclosed in the DBS check may affect the student's participation on their course.

- a. The information will be shared with the Course Director who will carry out a risk assessment in order to make a balanced judgement. The risk assessment may take into consideration:
  - i. how long ago the offence took place;
  - ii. whether it was an isolated offence or part of a pattern of offending;
  - iii. the nature of the offence;
  - iv. the circumstances when the offence took place;
  - v. what responsibility the student has taken for the offence;
  - vi. its relevance to the training in question;
  - vii. what else is known about the trainee's conduct before and since the offence.
- b. The student may wish to provide a self-disclosure statement<sup>3</sup> to explain their conviction(s).
- c. The Course Director may refer the information to the Chief Executive Officer, or in their absence a member of the bpf's senior management team, for a final decision. The Course Director will communicate the decision to the student. The bpf will not discriminate on the bases of an unprotected conviction or caution.
- d. The student may appeal the decision. The appeal should be made in writing to the Chair of the Ethics Committee within 10 working days of receiving the decision and clearly state the reasons for the appeal and attach any supporting evidence.

## 20. Students who have lived overseas

If the student is living in the UK but has lived overseas during the past 10 years for 6 months or more, as well as a DBS check the bpf require the trainee to have a [criminal records overseas check](#). The document needed will depend on the country they have lived in. To prevent any delay to the student starting their course, students should be encouraged to obtain the document before the course start date.

- a. The bpf will share the student's name and email address with CBS who will contact the student directly in order to process the criminal records overseas check. CBS carry out DBS checks and overseas checks on behalf of the bpf. The fee for an overseas check varies and is paid by the student to CBS.
- b. On receipt of the criminal records overseas check, the student must show the information to their training coordinator. If information has been disclosed, the training

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<sup>3</sup> Information on self-disclosure statements has been published by UNLOCK [unlock.org.uk/advice/self-disclosure-statements](https://unlock.org.uk/advice/self-disclosure-statements)

coordinator will inform the student that the information will be referred to the Course Director.

## **21. Foreign nationals currently living overseas**

If the student lives outside the UK and are studying remotely, the bpf are unable to apply for a DBS certificate for them. The training coordinator and Head of Safeguarding will liaise with the student to advise on alternative police checks.

## **22. Recording and storing DBS information**

Information on DBS checks will be stored securely in accordance with the bpf's retention schedule. The training coordinator will record the:

- i. student's full name;
- ii. reference number of the DBS certificate;
- iii. certificate issue date;
- iv. DBS check outcome;
- v. confirmation that the student has joined the Update Service;
- vi. the start and end date of the course (the DBS certificate is valid for the duration of the course); and
- vii. if information has been disclosed in the DBS or overseas check, the decision made by the Course Director, Chief Executive Officer or nominee, including any appeal decision.

23. Students can find additional information about DBS checks, the application process and ID checks on the bpf's Disclosure and barring service (DBS) checks for students: frequently asked questions

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## Appendix A: Overview of Courses

Course	Course Contact	Course Content	Regulated Activity		DBS requirement		
			Children	Adults	Enhanced with a barred list check – adult workforce	Enhanced with a barred list check – child workforce	Other
Foundation Course	<a href="mailto:foundation@bpf-psychotherapy.org.uk">foundation@bpf-psychotherapy.org.uk</a>	Supervised clinical placement.	Y	Y	Yes	Yes	May follow child or adult path
Infant Observation	<a href="mailto:infantobstraining@bpf-psychotherapy.org.uk">infantobstraining@bpf-psychotherapy.org.uk</a>	Pre-cursor to <i>bpf</i> qualifying courses. Regular direct infant observation in family home setting.	Y	-		Yes	
Developing a psychoanalytic approach to working with children and adolescents	<a href="mailto:sandrap@bpf-psychotherapy.org.uk">sandrap@bpf-psychotherapy.org.uk</a>	Trainees will already be engaged in direct work with children and young people.	Not within course.	-			
MSc Psychodynamics of Human Development (Birkbeck University of London)	<a href="mailto:msc-enquiries@bpf-psychotherapy.org.uk">msc-enquiries@bpf-psychotherapy.org.uk</a>	Includes 2 year regular infant observations	Y	N	No	Yes	
Doctor of Psychodynamics/Psychoanalytic Psychotherapy Clinical Practice (Exeter University)	<a href="mailto:admin-psychoanalyticstudies@exeter.ac.uk">admin-psychoanalyticstudies@exeter.ac.uk</a>	Clinical practice. Institutional observation. Child observation	N/A	N/A	N/A	N/A	Responsibility of University of Exeter
Doctor in Clinical Practice (Research) (Exeter University)	<a href="mailto:admin-psychoanalyticstudies@exeter.ac.uk">admin-psychoanalyticstudies@exeter.ac.uk</a>	N/A	N/A	N/A	N/A	N/A	Responsibility of University of Exeter
Jungian Psychotherapy Training	<a href="mailto:bjaatraining@bpf-psychotherapy.org.uk">bjaatraining@bpf-psychotherapy.org.uk</a>	Infant Observations. Weekly work with patients.	See infant observations	Yes	Yes	Yes – see Infant Observations	
Doctorate in Child and Adolescent psychotherapy	<a href="mailto:ipcapatraining@bpf-psychotherapy.org.uk">ipcapatraining@bpf-psychotherapy.org.uk</a>	NHS funded positions. Children in intensive therapy.	Yes	No	No	Yes	NHS to carry out DBS checks

Course	Course Contact	Course Content	Regulated Activity		DBS requirement		
			Children	Adults	Enhanced with a barred list check – adult workforce	Enhanced with a barred list check – child workforce	Other
		Treat children and work with parents.					before placements, we still need to keep a record.
BJAA Jungian analytic training	<a href="mailto:bjaatraining@bpf-psychotherapy.org.uk">bjaatraining@bpf-psychotherapy.org.uk</a>	Adult clients 3 x weekly. Infant observation if not previously completed.	See infant observations	Yes	Yes	Yes – see Infant Observations	
BJAA Jungian analytic training – modified entry scheme	<a href="mailto:bjaatraining@bpf-psychotherapy.org.uk">bjaatraining@bpf-psychotherapy.org.uk</a>	Adult clients 3 x weekly. Infant observation if not previously completed.	See infant observations	Yes	Yes	Yes – see Infant Observations	
PPA psychoanalytic psychotherapy training	<a href="mailto:PPAtraining@bpf-psychotherapy.org.uk">PPAtraining@bpf-psychotherapy.org.uk</a>	Adult clients 3 x weekly. Infant observation if not previously completed.	See infant observations	Yes	Yes	Yes – see Infant Observations	
PPA psychoanalytic psychotherapy training – modified entry scheme	<a href="mailto:PPAtraining@bpf-psychotherapy.org.uk">PPAtraining@bpf-psychotherapy.org.uk</a>	Adult clients 3 x weekly. Infant observation if not previously completed.	See infant observations	Yes	Yes	Yes – see Infant Observations	
Psychodynamic psychotherapy training (PD training)	<a href="mailto:pdtraining@bpf-psychotherapy.org.uk">pdtraining@bpf-psychotherapy.org.uk</a>	Patient supervision in a clinical setting.	No	Yes	Yes	No	
Couple Psychodynamic Psychotherapy	<a href="mailto:sandrap@bpf-psychotherapy.org.uk">sandrap@bpf-psychotherapy.org.uk</a>		No	No	No	No	
Psychodynamic or Psychoanalytic Parent-infant Psychotherapy (PIP)	<a href="mailto:pipttraining@bpf-psychotherapy.org.uk">pipttraining@bpf-psychotherapy.org.uk</a>		Yes	Yes	Yes	Yes	All trainees are in employment while training, usually in the NHS or 3 <sup>rd</sup> sector with enhanced



Course	Course Contact	Course Content	Regulated Activity		DBS requirement		
			Children	Adults	Enhanced with a barred list check – adult workforce	Enhanced with a barred list check – child workforce	Other
							DBS in their workplace.
Psychoanalytic & Psychodynamic Psychotherapy training (bpf North)	<a href="mailto:NPPT@bpf-psychotherapy.org.uk">NPPT@bpf-psychotherapy.org.uk</a>	See Infant Observations	Yes	Yes	Yes	Yes	

## Appendix B: Overview of DBS checks

### 1 [Types of DBS checks](#)

Basic check	The basic check can be used for any position or purpose. A basic certificate will contain details of convictions and cautions from the Police National Computer (PNC) that are considered to be unspent under the terms of the Rehabilitation of Offenders Act (ROA) 1974.	Can be carried out by a student or carried out by the Regulated Activity Provider.
Standard check	The standard check is available for duties, positions and licenses included in the ROA 1974 (Exceptions Order 1975). A standard certificate contains details of all spent and unspent convictions and adult cautions from the PNC which have not been <a href="#">filtered in line with legislation</a> .	Carried out by the Regulated Activity Provider.
Enhanced check	The enhanced check is available for specified duties, positions and licenses included in both the ROA 1974 (Exceptions Order 1975) and the Police Act 1997 (Criminal Records) regulations, for example, regularly caring for, training, supervising or being solely in charge of children and specified activities with adults in receipt of health care or social care services.	Carried out by the Regulated Activity Provider.
Enhanced with a barred list check	The enhanced with barred list check(s) is only available for those individuals who are carrying out regulated activity and a small number of positions listed in the Police Act 1997 (Criminal Records) regulations. An enhanced level certificate with barred list check(s) contains the same PNC information and check information held by police forces as an enhanced level check but in addition will	Carried out by the Regulated Activity Provider.

	<p>check against the children's and/or adult's barred lists.</p> <p>If the application includes a request to check the barred list(s) the DBS has a statutory duty to consider any information that suggests that the person may pose a risk of harm.</p>	
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## 2. Eligibility

Excerpt from [A guide to adult workforce roles for registered bodies and employers](#)

Enhanced level DBS certificate with access to the DBS ADULT'S BARRED LIST

1. Individuals who provide health care to adults, either as a health care professional or under the direction or supervision of a health care professional. This includes providing psychotherapy and counselling.

Excerpt from [A Guide to child workforce roles for registered bodies and employers](#)

Enhanced level DBS certificate with access to the DBS CHILDREN'S BARRED LIST – REGULATED ACTIVITY

6. Individuals who provide health care to children, either as a health care professional or under the direction or supervision of a health care professional. This includes psychotherapy and counselling. This only has to be done once.

8. Individuals working in any of the places listed in the Safeguarding Vulnerable Groups Act 2006 as specified establishments [a children's home] who:

- work there on more than 3 days in a 30 day period.....with the opportunity for face-to-face contact with children; and
- have the opportunity, because of their job, to have contact with the children in the establishment; and
- work there for the purpose of the establishment; and
- are not temporary or occasional workers; and
- are not a supervised volunteer.

These are individuals who are not providing teaching, training, instruction, care, supervision or advice.

## Appendix C: Process for carrying out DBS checks for trainee's

