



The Vetting and Barring Scheme (VBS)

Briefing Document for English UK Members

The Vetting and Barring Scheme represents the biggest ever overhaul of the system for vetting those who have contact with under-18's or vulnerable groups through employment.

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Summary

1. The Vetting and Barring Scheme is a mandatory checking system aimed at preventing those who are deemed unsuitable from gaining access to employment in jobs that involve contact with under-18's or vulnerable adults.
2. The Scheme will create one central register that will be managed by a statutory body called the Independent Safeguarding Authority (ISA).
3. Unlike the current CRB system there will be a one off requirement to join the register from which point relevant information will then be continuously updated.
4. From July 2010 the registration process will open and new or transferring employees or volunteers involved in regulated activity can start to apply to join the new register.
5. From November 2010 it will become a criminal offence if employers fail to check whether a prospective employee is on the register for roles that involve regulated activity. These checks must be conducted prior to employment.
6. Initial requirements for registration from November 2010 will be restricted to new employees only. Existing employees (including returning teachers, in the case of summer operators) will be able to join the register over a five year phasing in period depending on the age of their last CRB check. Phasing in will start in early 2011.
7. Registration costs £64 per person and is processed through the current CRB application process. English UK acts as a CRB umbrella body on behalf of the industry and will help members to process applications. The administration fee is £5 per application.
8. It is the responsibility of the employee to cover the cost of ISA registration.
9. Overseas group leaders are now exempt from joining the register for a period of up to three months on the condition that they only have responsibility for their own group.
10. The primary care provider in homestay provision will be required to be on the register along with any other adult resident of the property who is actively engaged in the provision of care to students within that setting.
11. Potential employees based overseas will be able to join the Scheme but in the vast majority of cases the Scheme will not have the capacity to actually check any of their records. The employer must confirm the identity of the applicant prior to submitting the CRB application.
12. An employer must refer an employee to the Authority in cases of serious malpractice in the workplace that involve the harm or potential to harm an under-18 or vulnerable adult where the employee has been dismissed, had to be removed from that activity or where the individual has opted to resign or retire.
13. Any referral should be made after full disciplinary investigations have been concluded (i.e. not at point of suspension).
14. Register to attend a road-show or download further information from: www.isa.gov.org.uk and monitor English UK communication channels for further updates.

The Vetting and Barring Scheme

1. Introduction

The new Vetting and Barring Scheme (VBS) is being phased in from January 2009 in a process that will last up until November 2010. The new scheme will have a significant impact on the recruitment and monitoring practices of providers who offer courses for any students who are under the age of 18 or classified as a vulnerable adult.

The VBS is the new name for what was previously known as the Independent Safeguarding Authority (ISA) Scheme. This mandatory checking system aims to prevent those who are deemed unsuitable from gaining access to employment in jobs that involve contact with under-18's or vulnerable adults.

The Scheme will create one central register that will be managed by a statutory body called the Independent Safeguarding Authority (ISA). It will be mandatory for employers to check the register prior to employment and if an individual is not included on the register through either not having been assessed by the ISA, or having been assessed and placed on a barred list, that individual will be unable to volunteer or work with children and/or vulnerable adults.

It is anticipated that over 9.5 million people will join the Scheme making it the biggest scheme of its kind in the world. Because of the scale of the scheme there will be a five year phasing in period for individuals to join the register and only new job applicants will be required to join the register from its inception in July 2010. From November 2010, it will be a legal requirement for individuals to register with the ISA if they intend to work with children and/or vulnerable groups.

2. Background

The VBS was set up as a direct result of the Bichard Inquiry. The Bichard Inquiry Report was published on 22nd June 2004 following an investigation into a series of systemic failures surrounding the Soham murders (committed by school caretaker, Ian Huntley). Various protection agencies had raised concerns about Ian Huntley but this information had not been shared between agencies and because he didn't hold any actual convictions his name had not appeared on any barred lists. As a result one of the key conclusions of the Inquiry Report was that:

“New arrangements should be introduced requiring those who wish to work with children, or vulnerable adults, to be registered. The register would confirm that there is no known reason why an individual should not work with these client groups.”



The Safeguarding Vulnerable Groups Act received Royal assent on 8th November 2006 and has involved unprecedented inter-departmental cooperation between the following agencies: the Home Office, the Department for Children, Schools and Families (DCSF), the Department for Health (DH), the Criminal Records Bureau (CRB) and the recently formed Independent Safeguarding Authority (ISA).

This document has been updated to include the modifications to the Scheme arising from Roger Singleton's 14th December 2010 report entitled, 'Drawing the Line' which has effectively reduced the coverage of the Scheme by around 2 million people. Roger is chief advisor to the ISA on the safety of children.

The Scheme operates in England, Wales and Northern Ireland. Scotland is developing an almost identical version of the scheme which will work closely with the VBS.

3. Definition of a Vulnerable Adult

A vulnerable adult is a person who is over the age of 18 and *'may be in need of community care services by reasons of mental health or other disability, age or illness and is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'*. The following would be classified as a vulnerable adult:

- Is elderly or frail
- Has learning disabilities (excluding dyslexia)
- Suffers from mental illness (e.g. dementia , personality disorder)
- Has a physical disability
- Is a substance abuser
- Is homeless
- Is incarcerated
- Is in an abusive relationship

4. Improvements brought about by the Scheme

The Scheme introduces a number of key improvements and safeguards in the protection of young and vulnerable people:

- **The integration of the lists** - There will be a single register of those eligible for employment with under-18's and/or vulnerable adults which will facilitate the sharing of information. The new central register will supersede a number of current lists: Protection of Children Act (POCA) List, List 99 and the Protection of Vulnerable

Adults (POVA) List. The new register will also supersede the existing system of Disqualification Orders which is operated by the criminal justice system. From January 2009 the ISA took over full responsibility for all of the barring decisions on new cases referred through these integrated lists.

- **Wider range of sources** - The Scheme will gather information from a much wider range of sources than present and this will include referrals from employers, inspectorates and professional regulators. An employer must refer an employee to the Scheme in cases of serious malpractice in the workplace.
- **Pre-employment vetting** - The Scheme will ensure that those who are known to present a risk of harm to children and/or vulnerable adults are prevented from entering the relevant workforce in the first place.
- **The introduction of continuous updating** - Relevant new information about an individual, who is already in the workforce and registered with the Scheme, will be made available to the ISA. If necessary, the ISA will then reconsider the original decision not to bar. If the person is barred then he or she will be withdrawn from Scheme membership and providing that the employer has registered to be notified, the ISA will inform them that they can no longer be used in activities with children or vulnerable adults.
- **Independent and consistent decision making** - The new Independent Safeguarding Authority (ISA) will take all discretionary decisions on who should not be given the right to join the register both prior to an individual's employment and, if necessary, following a referral into the Scheme. Under the existing schemes, decisions are made in the name of the Secretary of State. Under the new scheme, Ministers will no longer have any role in making decisions on individual cases.
- **Reduction in cost and delay of repeat checks** - An individual only need apply to join the register once. Online checks are free for employers and a decision can be expected within 7 days in 90% of cases where a new applicant is seeking to join the register. Where an applicant is already on the register the employer will have the capacity to check online by inputting the individual's unique reference number and will learn almost immediately if the individual is ISA registered.

5. Classifications of activity

There are two types of activity as defined by the Scheme: Regulated activity and Controlled activity. Activity relates to roles in the workplace and degrees of access that an individual may have with an under-18 and/or vulnerable adult.

5a. Regulated Activity

Regulated activity includes paid or voluntary work that involves;

- **Definition of the term ‘Regulated’.** It is anticipated that around 95% of the workers and volunteers expected to join the Scheme will be participating in regulated activity. This involves types of activities that entail employees having contact with under 18’s and/or vulnerable adults that they carry out frequently, intensively, and/or overnight (defined as between 2am and 6am). It is of a specified nature (e.g. teaching, training, care, supervision, advice, treatment or transport) or in a specific setting like a school, a care home, a juvenile offenders’ institute, or a children’s hospital. Regulated activity applies where the activity is frequent, i.e., once a week or more on an ongoing basis (previously defined as once a month or more), and/or intensive which is defined as occurring on four or more days in any 30 day period (previously defined as three or more days in any 30 day period). The changes will reduce the numbers of visiting lecturers, maintenance contractors and others that would previously have had to join the scheme.
- **Specific issues of eligibility under the term ‘Regulated’.** If a centre was providing a work experience opportunity to a 15 year old, for example, as an activity co-ordinator, then the direct supervisor of that co-ordinator would need to be on the ISA register but other work colleagues would have no such requirement. A 16-17 year old employee would have to be on the register if he had direct contact with other under-18’s and/or vulnerable groups unless he or she was undertaking this activity as part of a school-initiated work experience programme.
- **Group Leaders.** Overseas group leaders are exempt from joining the register for a period of up to three months on the condition that they only have contact with their own group.
- **Fostering (e.g. homestay) and childcare,** *“Any organisation that arranges (and has the power to terminate) a placement will be required to check the carer’s status.”* Current policy is clear regarding the primary care provider in a homestay as being classified as conducting regulated activity and that person will need to be on the register. Other adult residents in the homestay who provide an active role in the provision of care to students will also be required to join the register. All adults normally resident in the property must be on the register where an under-18 and/or vulnerable adult is placed for over 28 days.
- The term **incidental** in relation to activity is also important. For a mainly adult teaching centre, if a parent brought along a 16-17 year unexpectedly and the school had no choice but to accept the student on that occasion then this would be deemed as incidental to the school’s normal operations and would not therefore constitute eligible activity. However, if the school actively recruited an under-18 or vulnerable adult then this would make the centre eligible.
- The **status and authority conferred** by a particular position. Certain defined positions of responsibility (e.g. school governor, director of social services, and trustees of certain charities) will be regarded as constituting regulated activity.

Duties and responsibilities under regulated activity

- A barred individual must not undertake regulated activity. From 12th October 2009 it will be a criminal offence, punishable by up to five years in prison, for a barred individual to take part, or attempt to take part in a regulated activity for any length of time. Currently around 8,500 people are barred and it is estimated that once the Scheme starts this figure will have risen to 25,000.
- To undertake regulated activity the individual must be ISA registered.
- From 12th October 2009 it will be a legal requirement that an employer must not knowingly engage a person in employment if they know that person is barred. Such an offence carries a six month jail term.
- From July 2010 an employer must check that any applicant, employee, or volunteer involved in regulated activity is a member of the Scheme.
- From July 2010 an employer must not engage a barred person in regulated activity or a person who is not a member of the Scheme.
- From November 2010 an employer will be committing a criminal offence if they fail to comply with any of these requirements. Fines are currently set at £5000.
- No distinction is made between paid and voluntary work.
- Personal and family relationships are not covered by this Scheme.

5b. Controlled activity

The existence of the controlled category is currently under review. Controlled activity includes the following:

- Support work in general health, NHS, FE settings (e.g. cleaner, caretaker, shop worker, catering staff, car park attendant, and receptionists).
- Those working for specified organisations (e.g. a Local Authority or Health Authority) with frequent access to sensitive records about children and vulnerable adults.
- Support work in adult social care settings (e.g. day centre cleaners, those with access to social care records).
- As well as all ancillary staff this will also apply to contractors who work on the premises when they meet the definitions of working 'frequently' and 'intensively'.

Duties and responsibilities under controlled activity

- From July 2010 it will be mandatory for employers to check the status of individuals engaged in controlled activity.
- A barred person can, in certain limited circumstances, be employed in controlled activity, providing strict safeguards have been put in place. The restrictions concerning controlled activity are likely to be even more stringent in Wales.

- It is anticipated that very few employers will wish to employ an individual who is not registered in controlled activity.
- A customer (in our case a school, college or university) may ask for written confirmation of the status of a contractor or supplier from his or her employer before execution of a contract. Written confirmation would need to be received directly from the employer and not from the employee. The customer can also make the check himself (where possible) prior to the commencement of the contract. However, please note that the full responsibility for checking whether the contractor is on the Register lies firmly with that contractor's employer and not with the customer.

Students do not fall under the auspices of either regulated or controlled activity and do not have to be ISA registered.

5c. Domestic employment circumstances

This term covers those employed (e.g. nannies and care workers) by domestic employers (e.g. parents and carers) and the self-employed (e.g. music teachers).

Duties and responsibilities under domestic employment circumstances

- It will not be mandatory for employers in domestic circumstances to check their employees, but they can.
- A barred person must not engage in this type of employment.

6. The Independent Safeguarding Authority

The Independent Safeguarding Authority (formerly referred to as the *Independent Barring Board (IBB)*) is a non-departmental public body (NDPB), a statutory body that formally started to handle barring decisions from January 2009.



The Authority:

- Is an independent Non-Departmental Public Body (NDPB). Ministers will no longer have any role in making decisions on individual cases.
- Maintains the two new barred lists: for working with under 18's and vulnerable adults, and decide whether to include individuals on the barred lists
- Considers representations and processes appeals through the *Care Standards Tribunal* (and their successor body following the 2009 Tribunal Reform proceedings)
- Comprises a balance of different expertise
- Employs case workers and has a Board of Public Appointees to examine cases and make discretionary decisions

- Will make an estimated 40-60,000 decisions per year
- Is based in Darlington with a full-time staff of 250
- Delegates administrative functions to the Criminal Records Bureau.

7. Duty to refer

From 12th October 2009 there will be a duty on employers, personnel suppliers, adult and child protection teams at local authorities, professional bodies and inspectorates in sectors that are engaged in regulated and/or controlled activity to refer individuals to the Independent Safeguarding Authority under the following circumstances:

- The employer has dismissed the individual (or otherwise withdrawn permission for the individual to engage in regulated or controlled activity) or would have dismissed the individual had the individual not otherwise stopped engaging in regulated or controlled activity that has harmed or may harm an under-18 or vulnerable adult.
- The employer must also refer the individual if they think that an individual who may work with an under-18 or vulnerable adult in the future has caused or may cause neglect, emotional, physical or sexual harm, demonstrate an abuse of trust and power, or expose the child to grooming. An employer should refer an individual if they have good reason to believe that someone should be barred from the Scheme.
- Any referral should be made after full disciplinary investigations have been concluded (i.e. not at point of suspension).
- The reason for the dismissal matches any of the criteria under which the individual could be barred or considered for barring, such as a specified offence against a child/vulnerable adult, or conduct which endangers a child/vulnerable adult.
- The ISA will expect the employer to submit among other documents the following; witness statements, a written response answering the allegation from the individual, details of other known and previous employment, details of any outcomes from previous allegations and the minutes of any child protection strategy meetings.
- An individual will not be barred automatically on the strength of a referral. Before a barring decision is made, the ISA will fully investigate the case and will be vigilant for any emerging patterns of behaviour, the individual will be supplied with the information on which the decision is based and will be given the opportunity to make a representation to the Authority.
- Any false allegations will be severely punished.

8. Barring decisions

- The extent of the risk posed by the employee will be assessed by the ISA. If there are sufficient concerns even without a prosecution then ISA can ask an individual to undergo psychological profiling or the ISA will contact all those employers that have shown an interest in this employee in the past and inform them that they are 'minded to bar.' Decisions are made 'on the balance of probability'.

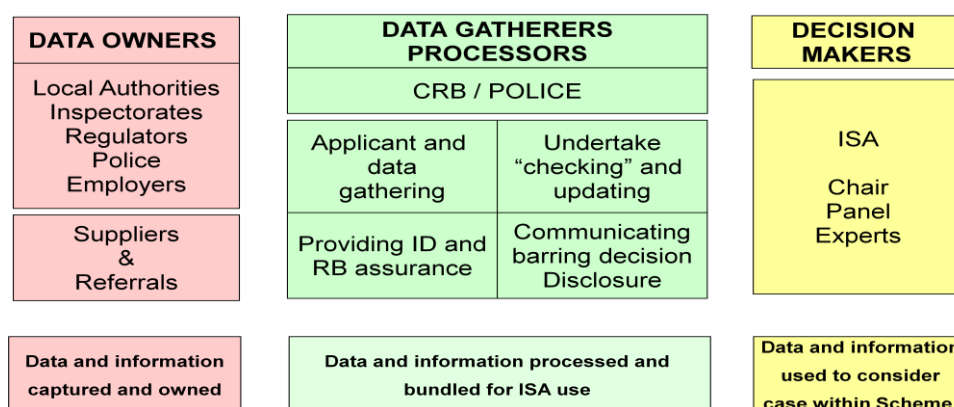
- When notice is received by the employer that an employee has been barred they must immediately cease employing this individual in any onsite activity. An individual may be re-deployed to an alternative role in the organisation that does not fall under the auspices of regulated activity but this is not an obligation.
- If an individual becomes barred then the employer has the right to dismiss that employee and is fully protected from any threat of employment tribunal.
- If an individual who is engaged in regulated activity refuses to join the Scheme then the employer has the right to dismiss the employee and again is fully protected from any threat of employment tribunal.

9. Types of Barred Status

The types of barred status are detailed below:

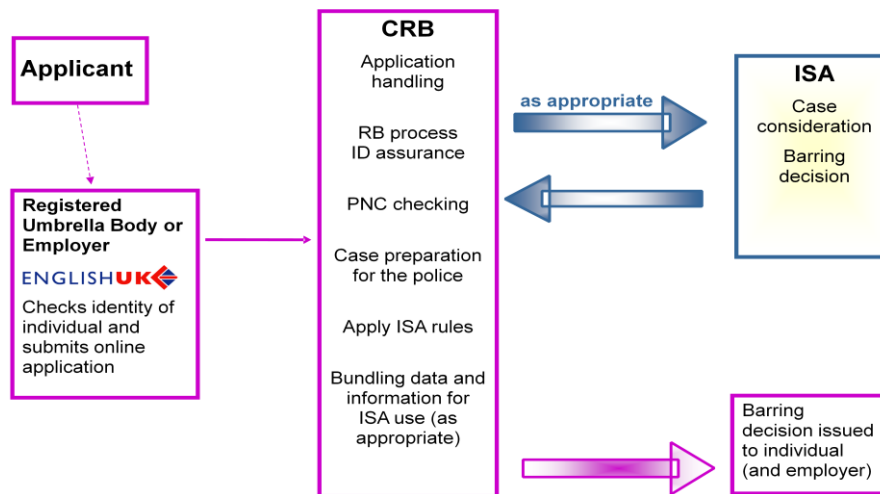
- Automatic bar – without representation to the ISA for serious criminal activity, primarily specified violent and sexual offences.
- Automatic bar – with representation to the ISA for other serious specified criminal activity.
- Discretionary bar - after all information has been examined from CRB, employers referrals, police intelligence.
- Not barred – bear in mind that the Scheme is effective in screening out known offenders but employers should maintain robust student welfare procedures through sensitive pastoral care and supervision procedures. Employers are also strongly advised to maintain rigorous recruitment processes including: taking up references and carefully vetting employment history.

10. Supply chain relationship



The data processing procedure will include all information that would previously have been considered for a standard CRB check plus additional data from the four lists (POCA, POVA, List 99 and Disqualification Orders) and referrals.

11. Application process overview



- The Employer will be asked to follow the existing CRB application procedure applying through English UK who will continue to act as an umbrella body offering the service on behalf of its members.
- Employers will be able to submit applications on behalf of employees or homestay providers for entry onto the ISA register using an adapted version of the CRB Enhanced Disclosure form.
- The application form will have multiple-functionality including: ISA registration only (£64), ISA registration with Enhanced CRB check (£64), Enhanced CRB check only (£36) and Standard CRB check (£26). Note that the standard CRB check is no longer available for those who work with vulnerable adults and under 18's. A small administration charge will also be levied by English UK to cover its administration costs in accordance with its duties as an umbrella organisation.
- There is no charge for individuals who are classified as volunteers for joining the Scheme but full payment must be received once that individual becomes employed in regulated or controlled activity at a later date.
- The responsibility for the cost of the application fee to join the Scheme lies with the employee.
- Each application will need to be checked and counter-signed by a registered body (employer) or umbrella body (English UK). Individuals in Northern Ireland will apply through AccessNI.
- There is an obligation on the part of the employer to verify the identity of an applicant by checking the accuracy of their application details and by establishing the true identity of the individual through close scrutiny of their identification documents. This could represent a considerable logistical challenge when recruiting overseas-based staff, however, the fact that staff can now join the register in July 2010 and that joining the register will not be mandatory until

November 2010 will allow the vast majority of applicants to join the register in good time. Alternative measures may include: starting the recruitment process earlier, asking agents to verify documents on your behalf, asking teachers to register while on holiday in the country at other times of year, or asking teachers to report to the school well ahead of the start date.

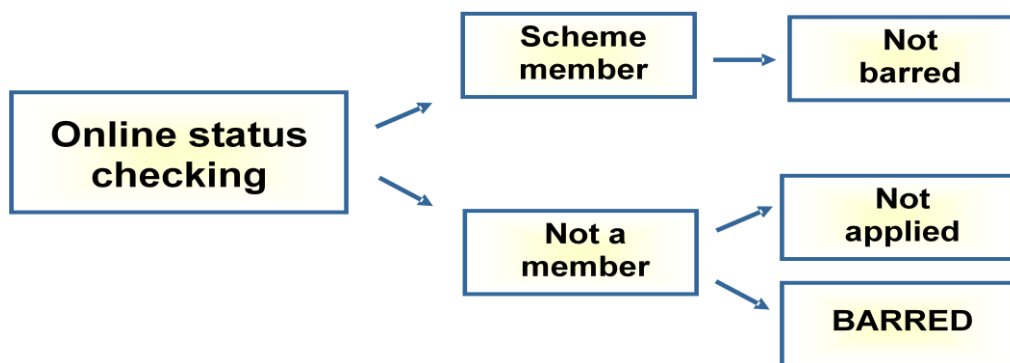
- The application will be captured and processed by the Criminal Records Bureau and will trigger a search of the various databases holding details of spent and unspent convictions, cautions, reprimands and final warnings as well as other information held by local police forces which is relevant to work with children or vulnerable adults. The CRB will then pass this information over to the ISA.
- The ISA will consider this information together with any information they hold on the individual (e.g. direct referrals from employers, regulatory bodies and others) and make a decision as to whether the individual is barred from working with children and/or vulnerable adults.
- An individual may appeal against a negative ruling from the ISA by making a representation to the Care Standards Tribunal. However, an individual may only appeal on the basis of point of fact or point of law – they may not appeal against the quality of the decision making. There is no right of appeal for individuals who have previously committed serious harm on under-18's or vulnerable adults.
- On first application to the scheme, applicants and employers will receive all of the information that would have been received in a CRB Enhanced Disclosure application.
- The Scheme will not have the capacity to check any overseas records at launch so if any individual that is normally resident or has always resided overseas wishes to apply to join the register, they may do so, with acceptance almost a formality because of the likely absence of any previous information found in checks of existing UK sources.
- The Home Office and the CRB are in negotiations with a number of countries and it is likely that reciprocal agreements will be in place in the future. Talks are currently progressing with former Commonwealth countries such as: Australia, New Zealand, Canada as well as France, Poland and other EU states. Information sharing internationally is very complex. In Germany, for example, it is against the constitution to divulge the nature of any offences committed by anyone under the age of 25. In Spain and the Netherlands the age of consent is 13. In parts of the Middle East, homosexual activity would be grounds for being placed on the local version of the sex offenders register.
- It is anticipated that the application process will take no more than seven days in an estimated 90% of cases where no previous information exists on the applicant.
- The applicant will be issued with a personal ISA registration number which he or she will supply to any potential new employer prior to employment. Prospective

employers are only able to check registration status if they have the explicit consent of the individual, along with a unique reference number and other personal data.

- Standard CRB checks will no longer be available for those working with children or vulnerable groups.
- The Register will only check information directly related to potential employment with under-18's and/or vulnerable adults. For information about criminal records and for a fuller picture of the applicant an Enhanced Disclosure is recommended and will remain obligatory for some bodies like Ofsted.
- Subsequent CRB Enhanced Disclosure checks will still be available in addition to ISA registration checking. Disclosures will be available to a wider range of employees engaged in regulated activity and will cost £36. The CRB will provide the completed Disclosure to the individual and the employer – via the Registered Body as appropriate. The employer will have discretion over whether or not to offer the individual a job, on the basis of the information received, except where the individual has been barred from working with children and/or vulnerable adults.
- It is envisaged that the CRB process will be organised along the same lines as the VBS in the future switching over to a continuous monitoring system.

12. Barring and online status

- The status of individuals will be continuously updated on receipt of new information, such as new convictions or referrals from employers.
- The employer will receive a personal ISA registration number from the potential employee and will be able to log on to a website to a secure site to check the status of the candidate. Employers will only be able to see if the person is or is not a Scheme member. Non-Scheme membership could mean that the person is either barred or has simply not registered to join the Scheme. This service is free for employers and their interest in the individual is logged.
- Once on the register, an individual has the right to apply to leave the register, for example, in cases of retirement.
- Employers will be **notified**, where they have registered an interest, if the status of their employee changes.



13. Implementation Timetable

- From January 2009 the ISA started taking all barring decisions on new cases referred under the current barring provisions of POVA, POCA and List 99.
- From 12th October 2009 the definition for 'regulated' activity came into force and it is an offence for an individual who is barred to seek employment in such activity.
- From 12th October 2009 it is an offence for an employer to employ an individual that he/she knows to be barred.
- Applicants to the Scheme can start to submit their applications to the CRB from 28th June 2010.
- The CRB will begin processing the first applications to join the Scheme from 26th July 2010 and in time the Scheme expects to hold details of up to 9.5 million citizens.
- To avoid a sudden and overwhelming rush only new employees will need to join the register from its outset in July 2010.
- There will be a transition period of 5 years for staff who are currently employed and they will be invited to join the Scheme based on the age of their last CRB report. In the case of seasonal centres returning staff are treated as existing employees and not as new employees. The least current CRB holders will be earmarked for early entry onto the register. Further guidance will be forthcoming on how this process will be managed.
- In recognition that the launch of the register will coincide with the peak summer season and in order not to disrupt normal recruitment procedures, relevant criminal offences for non-compliance will not be brought into force until November 2010.
- Therefore, registration for the Scheme will become mandatory from November 2010.

14. Current Best Practice in Safeguarding

- It should be remembered that the Vetting and Barring Scheme is not a substitute for already having a rigorous internal strategy towards maintaining the safety of vulnerable groups. The key components of such a strategy should include but not be limited to the following:
- A clear statement for all learners and staff that includes zero tolerance for abuse and other harmful behaviour.

- A Child Protection Policy and a designated Child Protection Officer who is usually a senior member of the organisation.
- A rigorous risk-management system to ensure the safety and security of under 18's and vulnerable adults.
- Regular child protection training for teachers and other staff members.
- An optional safeguarding statement in recruitment literature, *'This organization is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.'*
- At least one member of staff with responsibility for recruitment should be trained. The National College for School Leadership (NCSL) provides an excellent and free online training programme:
- http://forms.ncsl.org.uk/mediastore/image2/safer_school_recruitment/module/shell/fullscr.htm
- The Accreditation UK Scheme outlines that there should be no mixing between students who are over 18 and under 18 in residential and homestay accommodation.
- Local authorities place additional private fostering requirements on homestay providers accommodating under 16's or students with disabilities under the age of 18 for over 28 days. Homestay providers must provide six weeks' notice of such an arrangement and inform the local authorities when the arrangement has transpired. If students make private accommodation arrangements independently of the centre then the centre will not be responsible for that arrangement.

15. What Next?

- Prepare an information campaign and relevant training for all of your staff, overseas teachers and homestay providers preparing them for the introduction of the VBS.
- Start the recruitment process for summer staff for the 2010 season at a sufficiently early stage, particularly for overseas-based teachers.
- Bear in mind that this Scheme will be phased in over a five year period. English UK will act as an umbrella body and will start processing the applications to join the ISA register of your prospective employees from July 2010.
- Keep abreast of further clarifications and updates through English UK via the membership area of the website, the Newsflash and the Forum.
- English UK will organise a national briefing event in the spring of 2010 for members.
- Sign up for updates from the ISA and attend one of the road shows that are being held around the country.

16. Further Information

- To register for updates, order the latest DVD, order a leaflet or attend a briefing session at one of the regular road-shows please view: <http://www.isa-gov.org.uk/>
- To download a copy of the full act: www.opsi.gov.uk
- To learn more about the Criminal Records bureau (CRB): www.crb.homeoffice.gov.uk

- Please note that there will inevitably be further changes, updates, tweaks and clarifications of policy. English UK will endeavour to keep members fully informed as developments happen and we are happy to collect any comments, requests for clarification, questions and suggestions from members that can be filtered back to the agencies involved in the Scheme for further discussion or clarification. Please contact Mark Rendell by email: mark@englishuk.com or call: 020 7608 7960.