



SCHEDULE 2 STAFF FILE AUDIT POLICY

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1. Introduction to the Policy

This policy sets out the framework, principles, and procedures that **Byram House** follows to ensure all staff files are fully compliant with **Schedule 2 of the Children's Homes (England) Regulations 2015**. The policy applies to all employees, agency workers, volunteers, and anyone working at the home, whether at 62 Deighton Road, 66 Deighton Road, or elsewhere, and to the Registered Manager, Responsible Individual, and the Regulation 44 Independent Visitor.

The Home is Byram House, which comprises of 62 Deighton Road and 66 Deighton Road (in process). This policy applies equally across both residences.

The purpose of this policy is to provide a robust, systematic audit process that verifies the suitability, safety, and regulatory compliance of every staff member before, during, and after employment.

The objectives of this policy are:

- Ensure each staff file complies fully with Schedule 2 of the Children's Homes (England) Regulations 2015.
- Establish a clear pre-employment audit by the Registered Manager.
- Require **mandatory pre-start sign-off by the Responsible Individual (RI)** for every new staff member, bank worker, and agency worker.
- Provide a **periodic audit** by the Responsible Individual (at least every 6 months).
- Enable the **Regulation 44 Independent Visitor** to scrutinise staff files during monthly visits to provide independent assurance.
- **Define who audits whom**, including that the Director or Regulation 44 Visitor audits the Responsible Individual's file.

- Maintain an audit trail of who reviewed which files and when, with clear sign-off.
- Protect children from unsuitable adults by ensuring staff are fit and proper persons for their roles.

2. How this Policy Benefits the Home

This Schedule 2 Staff File Audit Policy benefits Byram House in the following ways:

- **Legal Compliance** – It meets duties under the **Children's Homes (England) Regulations 2015 (Schedule 2)** , **Working Together to Safeguard Children 2026**, and the **Social Care Common Inspection Framework (SCCIF) 2026**.
- **Child Protection** – It provides a multi-layer safety net (RM, RI, Reg44, Director) ensuring no unsuitable person works with children.
- **Clear Accountability** – The audit responsibility matrix defines exactly who audits each role.
- **Inspection Readiness** – All staff files are audit-ready, with sign-offs from both RM and RI.
- **Agency & Bank Staff Control** – No agency or bank worker starts a shift without RI sign-off.
- **Digital Storage** – Files are stored securely on **Bright HR** with access controls.

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, comprising 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD.
Byram House	The name used throughout this policy to refer to the home and its staff.
Schedule 2	The schedule to the Children's Homes (England) Regulations 2015 listing mandatory staff file documents.
Bright HR	The home's secure electronic HR information system for storing personnel files.
Responsible Individual (RI)	The person appointed under Regulation 5 with oversight of the home's management and quality.
Regulation 44 Independent Visitor	An independent person who visits the home monthly to inspect records (excluding children's case records without consent).
Pre-Employment Audit	Compliance check by the Registered Manager before a staff member starts.
RI Pre-Start Sign-Off	Mandatory final approval by the RI before any individual starts work.
Periodic Audit	Audit by the RI at least every 6 months.

3.2 Key Legislation and Statutory Guidance

Legislation / Guidance	Key Provisions
Children's Homes (England) Regulations 2015 – Schedule 2	Mandatory staff file documents: identity, DBS, references, employment history, qualifications, right to work, etc.
Regulation 44	Independent visitor monthly visits, power to inspect staff files.
Regulation 38	Records must be kept securely and accessibly.
Working Together to Safeguard Children 2026	Duty to ensure staff suitability.
SCCIF 2026	Inspects leadership, management, and staff suitability.
Equality Act 2010	Non-discriminatory application of audit.
Data Protection Act 2018 & UK GDPR	Lawful processing and storage of personal data.

4. The Policy

4.1 Overview – The Four-Tier Audit Structure

The home operates a **four-tier audit structure** to ensure Schedule 2 compliance:

Tier	Audit	Performed By	Timing
Tier 1	Pre-Employment Audit	Registered Manager (RM)	Before start date, but before RI sign-off
Tier 2	RI Pre-Start Sign-Off	Responsible Individual (RI)	Mandatory before any individual starts work
Tier 3	Periodic Audit	Responsible Individual (RI)	At least once a month
Tier 4	Independent Audit	Regulation 44 Visitor	Monthly (or as requested)

No individual (including agency, bank, or volunteer) shall start work at Byram House without a completed Tier 2 (RI Pre-Start Sign-Off).

4.2 Schedule 2 – Mandatory Documents for Each Staff File

Every staff file must contain the following **before the individual is permitted to work with children**:

Item	Description
1. Identity	Proof of identity (passport, driving licence, etc.) with recent photograph.
2. DBS Certificate	Enhanced DBS with children's barred list (within 12 months or on Update Service).
3. References	Two written references, one from most recent employer.
4. Employment History	Full employment history with written explanation for any gaps >28 days.
5. Reason for Leaving	Verification of reason why previous employment ended.
6. Qualifications	Documentary evidence of relevant qualifications.
7. Right to Work	Evidence of right to work in the UK.
8. Application Form	Completed application form (or CV with full history).
9. Interview Notes	Signed notes of interview(s).
10. Medical Questionnaire	Completed self-declaration of fitness to work.
11. Induction Record	Evidence of completed induction (post-start, but must be filed within 2 weeks).
12. Proof of Residence	Recent utility bill or bank statement (within 3 months).

4.2A New DBS Checks – uCheck Processing

All new DBS checks for candidates and existing staff are processed through **uCheck (an online DBS platform used by the home)** .

The following procedure applies:

1. **Staff information upload** – The Registered Manager (or with support from HR external company such as IHEC) uploads the candidate's personal details, identity documents, and any other required information into the **uCheck system**.
2. **Identity verification** – The candidate's identity is verified in line with current DBS guidelines. Once verified, uCheck submits the application to the **DBS Disclosure Service** for processing.
3. **Countersigning** – uCheck reviews the application and acts as countersignatory (as a registered umbrella body). The home monitors application progress via the uCheck portal.
4. **Certificate receipt and filing** – The DBS certificate is delivered to the candidate (or the home, depending on the service agreement). The Registered Manager must:
 - **Obtain the original certificate** from the candidate.
 - **Verify the certificate contents** match the candidate's details and role.
 - **Upload a scanned copy** of the certificate to the candidate's Bright HR file.
 - **Record the certificate number and issue date** on the relevant checklist.
5. **Ongoing monitoring** – Where a candidate is already registered on the **DBS Update Service**, the home performs a status check (via the DBS Update Service employer portal) **before the candidate starts** and subsequently **every 12 months**. The result of each status check must be recorded in the staff file.

4.2B DBS Update Service – Staff Encouragement

The home **strongly encourages all staff members (including agency workers)** to register with the **DBS Update Service** and to maintain continuous registration throughout their employment.

The Update Service is an online subscription that allows an individual to keep their standard or enhanced DBS check up-to-date and allows the home to check online whether a paper certificate is still current.

Employer responsibilities:

- The Registered Manager must **inform all new staff during induction** about the Update Service, its benefits, and how to subscribe.
- The home **provides information** on how to register (including the online link and guidance notes).
- The home **encourages paid staff and volunteers** to register for the service.
- Once a staff member has registered, the **RI is responsible for conducting an annual status check** via the DBS Update Service employer portal and recording the result in the periodic audit checklist.

Staff responsibilities:

- It is the **staff member's choice** whether to subscribe. However, **non-registration does not exempt the home from requiring a new DBS certificate** at the frequency specified by the home's risk assessment (typically every 12 months).

If a staff member is registered on the Update Service:

- The home **performs a status check before their start date** and records the result.
- The home **performs a further status check every 3 months** thereafter, as part of the periodic audit process.

If a staff member is not registered:

- The home **requires a new DBS certificate every 6 months** (or more frequently if required by risk assessment or regulatory changes).
- The cost of any required new DBS check is borne by the home (unless otherwise agreed with the staff member).

4.3 Tier 1 – Pre-Employment Audit (Registered Manager)

The Registered Manager must:

1. Collect all Schedule 2 documents from the candidate.
2. Verify each document (authenticity, expiry, content).
3. Complete **Appendix A – Schedule 2 Pre-Employment Audit Checklist**.
4. Flag any missing or invalid items to the candidate.
5. Once the file is **complete on the RM's checklist**, pass the file and checklist to the RI for **Tier 2 sign-off**.

The candidate **cannot start work** until the RI completes Tier 2 sign-off.

4.4 Tier 2 – RI Pre-Start Sign-Off (Mandatory Before Start)

No individual shall commence work at Byram House (either residence) until the RI Pre-Start Sign-Off is complete and the checklist signed.

The Responsible Individual must:

1. Receive the complete staff file and RM's Tier 1 checklist.
2. **Personally review every Schedule 2 document** (not rely on RM's notes).
3. Use **Appendix B – Schedule 2 RI Pre-Start Audit Checklist** to record verification.
4. If any document is missing or invalid, **reject the file** and return to RM with a remedial action plan.
5. Once satisfied, **sign and date** the checklist, and upload to the staff member's Bright HR file.
6. Inform the RM that the individual is authorised to start work.

This applies to all new permanent staff, bank staff, agency workers, and work placements

4.5 Tier 3 – Periodic Audit (Responsible Individual)

The RI must conduct a **Periodic Staff File Audit** at least once every months especially if there has been a new recruitment to track mandatory training

- **Scope:** For homes with ≤ 10 staff, audit **100%** of files. For larger, audit a representative sample (minimum 50%).
- Use **Appendix C – Schedule 2 Periodic Audit Checklist** to verify:

- All documents remain present and valid (e.g., DBS not expired, Update Service active).
- Any expired or missing documents are rectified.
- Action plans from previous audits have been closed.
- Produce a written report for the Registered Manager.
- If any Category 1 issue (safeguarding risk) is found, **suspend the staff member immediately** and notify the RI's line manager.

4.6 Tier 4 – Independent Audit (Regulation 44 Independent Visitor)

Under Regulation 44, the independent visitor has the right to inspect staff files during monthly visits.

The Regulation 44 Visitor may request access to:

- Any staff file (including the RI's, RM's, agency workers).
- All RI Pre-Start Audit Checklists (Appendix B) for individuals who started since the last visit.

The visitor will use Appendix D – Regulation 44 Visitor Staff File Review Log to record findings.

Findings are included in the **Regulation 44 Report** sent to Ofsted, host authority, placing authorities, and the RI.

If the visitor finds a staff member working without a valid RI sign-off, this is **serious non-compliance** and will be reported immediately.

4.7 Audit Responsibility Matrix – Who Audits Whose File

Role of staff member being audited	Who conducts the audit	Who checks / countersigns the audit	Notes
Deputy Managers	Registered Manager	Responsible Individual (RI)	RM completes audit (Tier 1); RI countersigns (Tier 2 and Tier 3).
Team Leaders	Registered Manager	Responsible Individual (RI)	Same as above.
Resident Support Workers	Registered Manager	Responsible Individual (RI)	Same as above.
Bank Staff	Registered Manager	Responsible Individual (RI)	Each bank worker must have full RI sign-off before first shift.
Agency Workers	Registered Manager	Responsible Individual (RI)	Home obtains all Schedule 2 documents; RM audits; RI signs off before first shift.
Registered Manager	Responsible Individual (RI)	Director (or Regulation 44 Visitor)	RI audits RM's file at least every 6 months (Tier 3). Director or Reg44 Visitor may review as independent check.
Responsible Individual (RI)	Director (or Regulation 44 Visitor)	Director (or Reg44 Visitor)	The RI's file is not audited by the RM. The Director must audit the RI's file at least once every 12 months. The Regulation 44 Visitor may also request the RI's file at any visit.

4.8 Agency Workers, Volunteers, Bank Staff and Contractors

Schedule 2 requirements apply to **all** individuals working at the home, including:

- Agency workers
- Volunteers
- Bank (casual) staff
- Contractors who have unsupervised contact with children

Agency workers: The home will **not** rely on the agency's assurance alone. The home must obtain all Schedule 2 documents directly (or through the agency) and the RI must complete **Tier 2 Pre-Start Sign-Off** before the agency worker's first shift.

Emergency cover: No exception for "emergency cover" – safeguarding cannot be compromised. Use only already audited staff.

4.9 Record Keeping and Storage (Bright HR)

Staff files and all audit documents must be stored in accordance with **Regulation 38** (secure and accessible).

- **Primary storage:** Electronic – **Bright HR** (the home's secure HR information system).
- **File naming convention:** Use clear names, e.g., "RI_PreStart_Checklist_Smith_2026-03-01.pdf".
- **Access rights:** Only authorised personnel (Registered Manager, Responsible Individual, Regulation 44 Visitor, Directors) have access to full staff files in Bright HR.
- **Physical fallback:** Hard copies may be kept in a locked cabinet, but must be transferred to Bright HR within 5 working days.

Audit trail document locations:

Document	Storage Location
Appendix A (RM Pre-Employment Checklist)	Staff file in Bright HR / hard copies stored in locked filing cabinet
Appendix B (RI Pre-Start Checklist)	Staff file in Bright HR / hard copies stored in locked filing cabinet
Appendix C (RI Periodic Audit Checklist)	Staff file in Bright HR / hard copies stored in locked filing cabinet
Appendix D (Reg44 Visitor Review Log)	Central "Regulation 44" folder in locked filing cabinet
Appendix E (Remedial Action Log)	Staff file in Bright HR and locked filing cabinet
Appendix F (Schedule 2 Confirmation Form)	Staff file in Bright HR and locked filing cabinet

4.10 Remedial Actions and Escalation

If an audit identifies a missing or invalid document:

- **Category 1 – Safeguarding risk** (e.g., expired DBS, no right to work): **Immediate suspension** from working with children. RI notified within 24 hours.
- **Category 2 – Non-urgent** (e.g., missing gap explanation): Rectified within 10 working days.
- **Category 3 – Minor** (e.g., proof of residence missing): Rectified within 20 working days.

All remedial actions recorded on **Appendix E – Schedule 2 Remedial Action Log**.

Escalation: If the RI fails to conduct audits, or if the RM repeatedly allows starts without RI sign-off, the matter is escalated to the Directors and may be reported to Ofsted.

5. How the Home Trains its Staff About this Policy

Training Element	Frequency	Method / Content
Induction (RM, RI, HR)	Upon appointment	Schedule 2 requirements, Bright HR use, audit checklists, RI sign-off process, Reg44 visitor rights.
Annual refresher	Every 12 months	Updates to legislation, DBS Update Service, right-to-work changes.
HR / Administration	As needed	Practical training on collecting documents, using online verification tools, and uploading to Bright HR.

Staff are required to:

- Read and sign this policy annually.
- Never allow a new start without completed RI Pre-Start Sign-Off (Appendix B).

6. Related Policies and Guidance

- Safer Recruitment Policy
- Disciplinary Policy
- Whistleblowing Policy
- Data Protection Policy
- Monitoring Quality Policy
- Children's Homes Regulations 2015 (Schedule 2, Regulations 38, 44, 45)
- Working Together to Safeguard Children 2026
- SCCIF 2026

7. Appendices

Appendix A – Schedule 2 Pre-Employment Audit Checklist (Registered Manager)

Staff member name:

Role:

Staff member name:

Date of offer:

Item	Document	Verified (Y/N)	Evidence ref	Notes
1	Identity (with photo)			
2	Enhanced DBS (barred list)			
3	Reference 1 (most recent employer)			
4	Reference 2			
5	Verification of reason left previous employment			
6	Qualifications (relevant)			
7	Full employment history (gaps explained)			
8	Right to work (UK)			
9	Application form (full)			
10	Interview notes (signed)			
11	Medical questionnaire			
12	Proof of residence			

RM signature: _____ **Date:** _____

Appendix B – Schedule 2 RI Pre-Start Audit Checklist (Responsible Individual)

Mandatory before any individual starts work.

Staff member name:				
Role:				
Date of RI audit:				
Item	Document	Verified by RI (Y/N)	Comments	
1	Identity (with photo)			
2	Enhanced DBS (barred list)			
3	DBS Update Service check (if applicable)			
4	Right to work (UK)			
5	Reference 1 (most recent employer) – content acceptable			
6	Reference 2 – content acceptable			
7	Reason for leaving previous employment verified			
8	Full employment history (gaps explained)			
9	Relevant qualifications			
10	Application form (full)			
11	Interview notes (signed)			
12	Medical questionnaire reviewed			
13	Proof of residence			

RI Declaration: I have personally examined each document. To the best of my knowledge the individual is suitable to work with children, and the file complies with Schedule 2.

RI signature: _____ **Date:** _____

RM acknowledgement (that sign-off received): _____ **Date:** _____

Appendix C – Schedule 2 Periodic Audit Checklist (Responsible Individual)

Staff member name:

Role:

Date of audit:

Item	Requirement	Status (Valid / Expired / Missing)	Action required
1	Identity (photo)		
2	DBS (barred list)		
3	DBS Update Service (if applicable)		
4	Right to work		
5	Relevant qualifications		
6	Employment history (up to date)		
7	Medical questionnaire (reviewed)		
8	Induction record (completed)		

9	Proof of residence (re-verified if needed)		
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Overall audit outcome: (Compliant / Partially compliant / Non-compliant)

RI signature: _____ **Date:** _____

RM acknowledgement: _____ **Date:** _____

Appendix D – Regulation 44 Visitor Staff File Review Log

Date of visit				
Staff member name	RI Pre-Start Audit Checklist present? (Y/N)	Any missing documents? (Y/N – specify)	Visitor comments	Visitor signature
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Overall compliance rating: (Compliant / Minor issues / Serious non-compliance)

Visitor signature: _____ **Date:** _____

Appendix E – Schedule 2 Remedial Action Log

Date	Staff member name	Issue identified (and audit source)	Action taken	Date resolved	Resolved by

Appendix F – Schedule 2 Confirmation Form

This form serves as a summary confirmation that all Schedule 2 documents have been seen, verified, and endorsed by the Registered Manager. It is retained in the staff file (Bright HR).

Schedule 2 Confirmation

Staff member name: _____

Item	Information
Current photo of them	(attached to file / verified electronically)
Address	_____

Emergency contact name, address and contact number	Name: _____ Address: _____ Contact number: _____
Date of birth	_____
Date of Schedule 2 check	_____
Date that all the information is completed in this document	_____
Start date	_____ (to be added once confirmed)

Checklist of Documents (to be seen and endorsed by the Registered Manager)

Information	Seen and endorsed by manager (Yes/No)	Comment
Application form		
Interview notes (x2)		
Offer of employment including job description		
All required ID information		

Up to date enhanced DBS		
Convictions or offences listed on the DBS check		
Right to work evidence		
Medical health declaration (held by HR)		
Two written references		
Confirmation of reason for change of employment		
Copies of qualifications		
Full employment / post-school chronology including gaps in history		

Signed by Registered Manager: _____

Date: _____

8. Policy Approval and Review Details



Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	