

The Northern Lights Community Choir



Subject: Compliance Update – Launch of Charity DBS Checks

Board Proposal: Implementation of Background Screening

Date: September 2026

To: The Board of Trustees, The Northern Lights Community Choir

From: Alana Mackenzie, Governance & Compliance Trustee

Subject: Proposal for Mandatory Background Screening (DBS) and Compliance Framework

1. Purpose & Objective

The purpose of this proposal is to establish a formal background screening policy for all individuals holding fiduciary, operational, or instructional authority within the charity. This ensures our foundation aligns with regulatory expectations set by the **Charity Commission** and remains compliant with the **Crime and Policing Act 2026**.

- The Charity Commission expects charities to proactively manage risks and run appropriate background checks on individuals holding fiduciary and operational positions of trust.
- UK safeguarding laws tightened on 1 September 2026. Ensuring our operational leaders possess up-to-date checks keeps our organisation compliant with the latest legal definitions of regulated activity.
- As a registered foundation, safeguarding our choir's assets, reputation, and members is our ultimate duty.

2. Legal Context & Eligibility Assessment

Under UK data protection and safeguarding legislation, the charity cannot legally request standard or enhanced DBS checks unless a role meets explicit statutory criteria. Requesting an ineligible check level is a breach of the law.

Based on our current operational structure, our eligibility is defined as follows:

- **The Board of Trustees:** As fiduciaries overseeing charity governance and financial assets, trustees are eligible for a **Basic DBS Check** to ensure financial transparency and suitability for public office.
- **The Choir Director (Adult Group Context):** Under the Care Act 2014, an "adult at risk" may join our choir to sing, socialise, and rehearse. However, because the Choir Director only provides musical instruction rather than legal "Regulated Activity" (such as personal care, healthcare, or financial management), the law dictates that a **Basic DBS Check** is the correct and maximum legal tier permitted for this role.

3. Proposed Resolution

The Board of Trustees resolves to adopt the following measures, effective immediately upon formal agreement:

- **Mandatory Checks:** All current and incoming Trustees, alongside the Choir Director, must undergo a **Basic DBS check**.
- **Central Register:** The Compliance Trustee will maintain a secure, confidential Single Central Record (SCR) documenting check submission dates, certificate numbers, and renewal cycles.
- **Financial Coverage:** The charity will fully fund the administrative and application fees associated with these checks. Trustees and key persons (such as the Choir Director) will utilise the **Reimbursement Claim Form**, within the **Expenses Policy**, to clear out-of-pocket costs.

4. Financial & Implementation Impact

- **Cost per Check:** Approximately **£18** for the basic check.
- **Total Budget Impact:** Estimated at **£108** total for 5 trustees and 1 choir director, to be absorbed by the general governance budget.
- **Timeframe:** All Trustees and key persons to initiate their applications within **30 days** of this proposal's formal approval.

Please review the instructions below on how to complete your application.

Kind Regards,

Alana Mackenzie

Governance & Compliance Trustee

Step-by-Step Instructions: Completing Your Basic DBS Check

Please follow these instructions to complete your mandatory **Basic DBS check**. You will need to pay the **£18 application fee** upfront and reclaim the full amount from the charity using our Reimbursement Form (Annex A of the Expenses Policy)

You will need:

1. **Your National Insurance (NI) number**
2. **Your Passport and Driving Licence** (if you have them)
3. **Your address history** for the last **5 years** (including the exact dates you moved into each address)
4. **A debit or credit card** to pay the £18 fee

Step 1: Submit Your Application Online

1. Go directly to the official government portal: www.gov.uk
 2. Click the green "Start now" button.
 3. The system will ask you to verify your identity using **GOV.UK One Sign-in**. If you do not have one, you will need to create one.
 4. Fill out the application questions accurately.
 5. When prompted for the delivery address, ensure you select your home address. The physical paper certificate must be posted directly to you.
 6. Pay the **£18 fee** at the end of the portal and **download or print your payment receipt** immediately.
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Step 2: Show Your Certificate to the Compliance Trustee

- Your physical certificate will arrive in the post within **7 to 14 days**.
 - Once it arrives, please bring the **original paper certificate** to the next rehearsal, or arrange a brief meeting with **the Governance & Compliance Trustee who will** visually verify the certificate and log your unique certificate number into a confidential **Single Central Record (SCR)**. *Note: The charity will not keep copies or scans of your certificate*
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Step 3: Claim Your Reimbursement

1. Fill out the **Reimbursement Form** provided to you.
2. Attach your downloaded **GOV.UK email payment receipt** or a screenshot of your payment confirmation. Hand the form and receipt to the **Treasurer** (Caroline at present), to receive your £18 bank reimbursement.