



Briefing Note

Young People Aged 15-17 in Work Experience Placements or Employment

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Following on from delivering a recent training session on the Single Central Record, there was a discussion and questions about the level of DBS check required for 15 - and 17-year-olds who may be on school site (either in work experience or employment). This followed from my statement that children (those under 18 years) cannot be in regulated activity with other children. To clarify, I was referring to the safeguarding principle that no young person under 18 should ever be left solely responsible for the criteria of regulated activity for other children. They don't yet have the maturity, experience or authority to safely manage care tasks and/or emergencies. I was also referring to children who may be on work experience placements and therefore not within an employment status (However I am aware that some schools and colleges are completing enhanced DBS checks anyway).

Legally, when a 16–17-year-old is **employed** or on an **apprenticeship**, they are treated as staff for DBS purposes. Regulated activity (teaching, training, instructing, caring for or supervising children) is defined by the work being done, and the role that person holds (e.g. in employment), not the age of the worker, so they **do need an Enhanced DBS and Barred List check**. The DBS may also include information relevant to safeguarding - including domestic abuse or vulnerability - because it's based on police-held information. This information may also be relevant to support that young person in their employment role. This is particularly important given proposed changes in law around the age of victims of domestic violence following the death of Holly Newton.

It would also be necessary for any safeguarding information that may be pertinent for the young person to be shared with the receiving school, in order to protect them (e.g. the young person is themselves the subject of a child protection plan).

However crucially, even for young people who are in employment or apprenticeship, their role is **always supervised**, always supported, and always developmental. They are there to learn from the adult in charge, not to replace them or take sole responsibility for children.

If a young person is simply on work experience, shadowing, or helping and supporting at events a DBS must not be requested.

Under the new EYFS framework:

From **1 September 2026**, the EYFS requires enhanced DBS and Barred List checks for anyone aged **16+ working or volunteering regularly** in Early Years. New staff cannot start until checks are received. Regular volunteers must now be checked even if supervised. Only occasional supervised helpers (not in regulated activity) are exempt.

In Summary:

A young person under 18 must never be left solely responsible for children, **that's safe practice**, not DBS law.

Whether they need a DBS depends on whether they are **working** with children or **learning** in the workplace.

Anyone aged 16+ working or volunteering regularly in Early Years must have an enhanced DBS and Barred List check.

Please remember an Enhanced DBS and Barred List check is only one element of safer recruitment. A clear DBS does not confirm someone's motivation, values, boundaries or suitability to work with children. All other checks - references, employment history, identity, right to work, interview probing, supervision and ongoing monitoring - are essential to ensure a person is safe and appropriate for work with young people.

Safeguarding a young person aged 16 or 17 who is in employment or an apprenticeship is **equally as important** as safeguarding the children they are working alongside. Even when they hold a job role and have an enhanced DBS and barred list check, they are still legally a child and must be supported, mentored and supervised as such. A DBS does not make a young person "safe to do regulated activity" - it simply confirms police-held information at a moment in time. What keeps them safe is the quality of supervision, the strength of relationships, clear boundaries, and a culture where adults actively guide, support and protect them. Their wellbeing, vulnerability and developmental needs must remain central to any decisions about their role and responsibilities.