

Reviewed: July 2025

POLICY AND PROCEDURE ON DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

PURPOSE

We are not obliged to apply for disclosure but given the nature of our cause, the people we work with and potential access to sensitive information relating to the financial situation and health of our service users, it is advisable to have some level of check on everyone.

SCOPE

All staff, trustees, volunteers, contractors and students on placement who work for AUKCAP are required to undergo a Disclosure and Barring Service (DBS) check if the check is relevant to their role and in line with current legislation.

POLICY

Level of disclosure

Requests for disclosure are assessed on roles and responsibilities and shall be either basic or enhanced level.

The application form for posts within AUKCAP will be amended to ask for details of spent **and** unspent convictions. Applicants who disclose that they have been convicted of a criminal offence will be required to provide further details in complete confidence to a named officer of AUKCAP.

Training on recruitment and retention

Staff involved in recruitment will be given training to ensure they understand the policy on the recruitment and retention of ex-offenders and are able to identify and assess the relevance and circumstance of offences.

PROCEDURES

Advertisements and job vacancy details must state that we will seek DBS disclosure and at what level the check will be made.

The policy statement on the recruitment of ex offenders will be included in the recruitment pack for staff and with the application form for volunteers.

The application form for staff and volunteers asks whether the applicant has any convictions. We would therefore expect to be given details of convictions

which in other circumstances might be considered to be 'spent' in addition to information relating to 'un-spent' convictions. Applicants are instructed to send these details under 'private and confidential cover' to a named officer of AUKCAP, using the form provided for this purpose.

We make the application for the DBS check through First Advantage (Know Your People) online platform. The online form is completed by the applicant and then reviewed by the allocated verifier who carries out a check of essential documents (see below).

Completion of the DBS application form requires evidence that we have verified identity – through sight of original, not photocopied, documents. The documents we need to see depend on whether the applicant has signed their agreement for the DBS check. We will not normally proceed with appointments of candidates who have not consented. Assuming the applicant has agreed, we must see 3 documents:

One document from Group 1
plus any two from Groups 1 or 2 or
five documents from Group 2.

At least one document must confirm applicant's current address and at least one must confirm applicant's date of birth.

The checklist must be completed to ensure that all necessary information from identity documents is recorded as the application form is very specific.

Disclosures are sent to the applicant and notification of the completion is given via the online service to the Account Managers who can then approve the applicant for recruitment.

Applicants whether staff or volunteers are NOT PERMITTED to start work in advance of the result of the application.

Portability of Certificates

We can accept certificates that have been issued through another organisation or company, provided that they are not more than 6 months old, are at the appropriate level and that the original certificate is seen and verified by AUKCAP.

A DBS certificate contains the DBS logo on the front face and contains several security features which can be used to verify whether it has been counterfeited or altered. The areas to be aware of and examined are as follows:

- an original DBS certificate has printing on both sides; the paper size is 209mm width x 404mm length which is larger than A4
- the personal information print colour on the certificate is purple
- a 'crown seal' watermark repeated down the right-hand side of the certificate is visible both on the surface and when holding the certificate up to the light
- a background design with the word 'Disclosure' appears in a wave-like pattern across both sides of the document – on the front of the

certificate this pattern is green and on the rear of the document it is purple.

The Update Service

The Update Service allows another route of portability. The Update Service is an online subscription that enables us to carry out a free, instant online check to view the status of an existing standard or enhanced DBS certificate.

This can only be done if:

- we have the individual's consent
- we can legally request a new DBS check for the role that the individual is applying for
- it is for the same workforce, where the same type and level of criminal record check is required

The Update Service is not currently available for basic checks

Three documents of identification (one of which should be a photo ID) need to be seen, copied and verified as the true identity of the applicant and accompany the DBS certificate or update service check. In addition, anyone joining the organisation on a portable DBS check will need to complete an Annual Declaration form.

Further information about DBS checks can be obtained from the Chief People Officer.

Risk assessments

Should a conviction be disclosed this will be reviewed on a case by case basis. A risk assessment (see appendix 1) shall be conducted by the recruiting manager where the full details of the conviction shall be discussed. This is then reviewed by the Chief People Officer and Chief Executive to make a final decision on whether the person shall be appointed based on the information provided and details on the disclosure.

Storage, Handling, use retention & disposal of information

Disclosure information will be kept electronically on our HR database in the form of the certificate number and date. No original or copy of a DBS certificate are retained. It is unlawful for the information to be available other than to those within the organisation who need to see it in connection with the appointment process.

Changes in circumstances

Every member of staff or volunteer is required to advise their line manager of any change in their circumstances which they believe to be material. If anyone is in any doubt as to what constitutes a material change in their circumstances, such as a conviction, they should seek advice from their line manager. In the event of change, a Declaration form should be completed by

the staff member or volunteer. All employees complete a new declaration annually and DBS rechecks are conducted every 3 years for all employees.

Deductions from Salary

For any employee who is required to undergo a DBS check as a condition of their employment, the cost of this check may be deducted from your final salary or other sums due to you, if your employment is terminated within 3 months of the check being carried out.

REVIEW OF THIS POLICY

This policy will be reviewed every 24 months years or earlier if concerns are raised by older people, staff or volunteers.

DBS Disclosure policy approved: September 2025 (Date)

A handwritten signature in black ink that reads "Hazel Williams". The signature is written in a cursive style with a long horizontal flourish at the end.

Signed by Chair of Trustees

APPENDIX 1

DISCLOSURE RISK ASSESSMENT FORM

To be used to assess the suitability of the applicant where a Disclosure certificate has revealed offences.

Please note: the information and evidence referred to in the form will be relied upon to make an employment decision in relation to staff working with vulnerable groups. It is therefore important that it is fully completed and included evidence rather than a series of statements.

Name of Applicant	
Position applied for	
Disclosure Ref No	
Name of person undertaking risk assessment	

SECTION A – To be completed during the discussion between applicant & HR/staff member

Question	Applicable	Evidence relied upon to support this decision
Did the applicant declare the offence on the applicant form and/or at interview?	Yes / No (if not why not)	
Did the applicant agree that the information on the DBS Certificate was correct?	Yes / No (if not why not)	

Offences declare by applicant	Brief circumstances behind offence

Question	Applicable	Evidence relied upon to support this decision
How did the applicant regard the offence with hindsight?	Please explain	

What would they do differently now?	Please explain	
Is the applicant stating any mitigating circumstances? E.g. peer pressures, financial need	Yes/No Please explain	

Declaration by individual and any additional comments in support of their employment

I understand that any offer of employment will be subject to the information I have supplied and that this is complete and correct. False information, or failure to supply details required, could result in disciplinary action being taken.

Signature:.....

Date:.....

Print Name:

SECTION B – HR/Recruiting Manager assessment

Question	Applicable	Evidence relied upon to support this decision
Did the offences disclosed form any pattern? E.g. is there a cycle of history of repeat offences	Yes/No Please explain	
Did the applicant demonstrate any efforts not to re-offend e.g. rehabilitation?	Yes/No Please explain	
Can any safeguards be implemented to reduce/remove risk?	Yes/No/Not applicable	
Is the nature of the conviction violent or sexual offences? (if yes will automatically result in	Yes/No (

declining application)		
What supervision is available and how will it be used to mitigate risk?	Please explain	
Does the post have any direct contact with the public and how vulnerable are they?	Yes/No Please explain	
Summary of evidence taken into account and rationale for this decision. Any additional comments: Do you wish to proceed with employment? Yes/No Signature:..... Date:..... Print Name:		

SECTION C – Authorisation

Outcome: Agreement to continue with offer/withdraw offer (give details of evidence relied upon to make decision) Signature:..... Date authorised:..... Print Name:	
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