

Revised Sept 2018

POLICY AND PROCEDURE ON DBS DISCLOSURE REQUESTS

Introduction

We are not obliged to apply for disclosure but given the nature of our work and client group and potential access to sensitive information relating to the financial situation and health of our clients, it is advisable to have some level of check on everyone.

Level of disclosure

As a result of a risk assessment we have determined that all requests for disclosure shall be at the **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.

Who is affected by this policy?

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

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.

Procedure

Advertisements and job details must state that we will seek DBS disclosure.

The policy statement on the recruitment of ex offenders will be included in the job 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.

Staff and volunteers are required to advise their Line Manager of any material changes in their circumstances- e.g. a conviction made after commencing work (paid or voluntary) with AUKCAP. If an individual is in any doubt as to what is "material" they should discuss the matter with their Line Manager or other senior member of staff.

We make the application to DBS through GBG Online Service. The on-line form is completed by the applicant and then reviewed by the allocated verifier who carries out a check of essential documents (see below).

The on-line form can only be completed on-line by the allocated verifier.

Completion of the 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 to the DBS checking the details. We will not normally proceed with appointments of candidates who have not consented. Assuming the applicant has agreed, we have to 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

Complete checklist (attached) 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. The Counter Signatory is the only person who can view completed DBS and approve the applicant for recruitment. Each certificate has certain security features which we must check on the original copy to verify it as genuine if it is submitted to County Office, these are:

- a 'crown seal' watermark repeated down the right hand side, visible both on the surface and when holding it up to the light
- a background design featuring the word 'Disclosure', which appears in a wave-like pattern across both sides of the certificate; the pattern's colour alternates between blue and green on the reverse of the certificate

- ink and paper that change colour when wet (although there have been issues with this check and we have been advised to overlook this check by Age UK at Tavis House)

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, at the Enhanced level and that the original is seen and verified by AUKCAP. 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. In addition, anyone joining the Organisation on a portable DBS will need to complete an Annual Declaration form.

Further information about DBS Disclosures can be obtained from the HR Manager.

Storage, Handling, use retention & disposal of information

This is covered in the policy. Disclosure information will be kept in a locked drawer or cupboard. 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, an Annual Declaration form should be completed by the staff member or volunteer.

Deductions from Salary

For any employee who is required to undergo a Disclosure Barring Service (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.