



Disclosure and Barring Service Policy

1. Background

- 1.1 Chichester College Group (the Group) is committed to safeguarding and promoting the welfare of children, young people and adults at risk, and expects all staff, agency workers, contractors and volunteers to share this commitment.
- 1.2 As part of the recruitment process, a number of checks are undertaken including an enhanced check via the Disclosure and Barring Service (DBS), disqualification check (if applicable) and any relevant overseas criminal records checks.

2. Scope

- 2.1 This policy applies to all staff, agency workers, volunteers, contractors and job applicants.
- 2.2 The policy should be read in conjunction with the Recruitment and Selection policy, Recruitment of Ex-offenders policy and Employee Data policy.

3. Principles

- 3.1 The Group uses the online umbrella company Care Check for all DBS checks. Individuals complete the DBS form online through the Care Check portal and the ID checks are then undertaken by the relevant Group member of staff. The form is then submitted to Care Check for countersigning. Once countersigned, the form is submitted to the DBS for processing. The Care Check portal will update once the DBS certificate has been issued.
- 3.2 All staff employed by the Group will be DBS checked to an enhanced level, and this will include a check of the barred lists depending on the type of workforce the member of staff is employed in.



- 3.3 Staff employed on fixed term contracts of less than eight weeks will not be automatically DBS checked, unless there is a specific reason why this is necessary and they have unsupervised access to children, young people and/or adults at risk.
- 3.4 Volunteers may be DBS checked if their placement is for eight weeks or more. It is the Head of Learning or Business Head's responsibility to identify these individuals and arrange for an online form to be completed, if required and for the cost of the DBS payment to be made if appropriate.
- 3.5 Trainee teachers who are seconded to the Group for their teaching practice must be DBS checked by their training organisation, but it is the Group's responsibility to check this. Heads of Learning using trainee teachers must check that the trainee has the relevant DBS Clearance.
- 3.6 All host families accommodating the Group's students will be DBS checked. Host family DBS checks are subject to a separate process owned by the Accommodation Service.
- 3.7 New staff will be DBS checked once they have been offered a role at the Group, unless they are signed up to the Update Service, in which case proof of this will be required for verification. Any DBS linked to the Update Service must match the same Workforce the Group requires.
- 3.8 Students on specific courses e.g. in Care and Early Years, PGCE or Sport require DBS checks and these will be co-ordinated through the relevant Head of Learning and department.



- 3.9 If a DBS certificate has not been issued before a member of staff's start date, the Pre-Clearance Risk Assessment process must be followed, placing the staff member under working restrictions until the time that the DBS clearances (including any overseas checks) and references are received and verified by Human Resources. Once the DBS certificate has been issued, staff will be required to bring their original DBS certificate into the Group for verification on their start date, or within one week of receipt.
- 3.10 Contractors working regularly on Group premises (e.g. catering, security and cleaning) must be DBS checked to the required level by the employing company. It is the responsibility of the Group member of staff designated to link with the contractor (e.g. Estates, Hospitality etc.) to seek written confirmation that all staff are DBS checked and to make a record of their DBS disclosure number and level of check. This must be re-confirmed in writing annually. Where contractors are on site for a short time, or have no contact with students, DBS checks will not be required, but they will need to be accompanied at all times by a member of Group staff who is DBS checked.
- 3.11 The Group will ask Agencies to supply evidence of DBS checks at the required level for any agency workers undertaking an assignment with the Group.
- 3.12 Group Governors will be DBS checked, facilitated by the Clerk to the Governing Body.
- 3.13 In addition to the DBS checks described, anyone who is employed to provide childcare to children who have not attained the age of eight, or who will be directly concerned in the management of that childcare, will be required to sign a disqualification self-declaration form to confirm that they have not been disqualified from this type of work, in accordance with the Childcare Act 2006.
- 3.14 Anyone who is appointed to carry out teaching work will require an additional check using the Employer Access Online Service, to ensure they are not subject to a prohibition order issued by the Secretary of State.



4. DBS Retention

- 4.1 In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.
- 4.2 Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- 4.3 The Group will not keep any photocopy or make an image of the Disclosure. However, notwithstanding the above, the Group will keep a record of the date of issue of a Disclosure, the level of Disclosure requested, the position and workforce for which the Disclosure was requested and the unique reference number of the Disclosure.
- 4.4 For unsuccessful job applicants, any DBS supporting documentation will be securely destroyed by Human Resources after the interview/selection process.
- 4.5 For successful job applicants, copies of the DBS supporting documentation is held securely in Human Resources during the DBS checking process, until the certificate has been issued and verified by Human Resources. Any documents which aren't required for other checks, such as eligibility to work in the UK, are then securely destroyed by Human Resources.

5. Criminal records process for new staff

- 5.1 Job applicants attending for interview will be required to bring the appropriate identification to interview. The original identification documents will be verified prior to the submission of a Disclosure application.



- 5.2 All successful applicants will also be required to read the Standard/Enhanced Check Privacy Policy <https://www.gov.uk/government/publications/standard-and-enhanced-dbs-check-privacy-policy> prior to submitting their DBS form through Care Check, which outlines how DBS will process their personal data and what the options available to them are.
- 5.3 The DBS has a confidential process specifically for trans applicants, who can contact the sensitive applicants line on 0151 676 1452 or by email to sensitive@dbs.gsi.gov.uk for further advice about completing the online form.
- 5.4 Where an applicant has resided outside the UK for 6 months or more within the last 5 years, they will be asked if they can provide a Certificate of Good Conduct (CGC) or equivalent, relating to this period. If the applicant is unable to provide a CGC, the Group may be required to undertake relevant overseas checks as part of their appointment.
- 5.5 Care Check will follow up with the DBS regarding any Disclosures which have not been received 60 days after being submitted to the DBS. It is Human Resources' responsibility to ensure that clearance has been issued and the member of staff's responsibility to bring the original certificate in for verification.

If the DBS clearance (including any overseas checks) and references, have not been received by the new member of staff's start date, the Pre-Clearance Risk Assessment process must be followed, placing the staff member under working restrictions until the time that these checks are received and verified by Human Resources. The manager will be required to undertake a risk assessment on their first day, to agree what control measures will be put in place in the interim. Both the manager and the new member of staff must sign the Pre Clearance Risk Assessment form and send it to the Safeguarding Manager, who will determine whether the agreed control measures are appropriate. This must then be returned to Human Resources by midday on their first day of employment.



Managers are required to enforce the control measures until all required checks have been received and verified by Human Resources. Staff working within the Group's under 18 Accommodation provision or the Group's First Steps subsidiaries will not be able to commence employment until all checks are received and verified.

- 5.6 Any reprimand, caution, or conviction highlighted by a criminal records check that has not previously been disclosed to the Group, will be discussed with the individual member of staff. An assessment of the information will then be made before any decision is taken on whether their employment should continue. Termination of employment on the grounds that a check has proved unsatisfactory may be the outcome of a meeting held with a member of the Group Leadership Team, as all offers of employment are conditional on DBS clearance satisfactory to the Group.

6 DBS process for continuing staff

- 6.1 There is no requirement for staff to be checked again following receipt of a satisfactory check at the start of initial employment, unless the Group has concerns about a person's suitability to work with children and/or adults at risk. However, staff are contractually obliged to inform Human Resources if they receive a caution or conviction following the issue of their contract of employment.
- 6.2 Staff working in Woodlands Halls of Residence, Chichester, will have a DBS check every 3 years in line with the Disclosure and Barring Code of Practice (Accommodation) guidance document.
- 6.3 Staff who change roles within the Group may be required to have a new DBS check undertaken.



7 Status of this policy

7.1 The operation of this procedure will be kept under review by the Director of Human Resources. It may be reviewed and varied from time to time by the Resources Committee. It has been equality impact assessed to ensure that it does not adversely affect staff. If you would like to review this policy in a different format please contact Human Resources.

Reviewed in: September 2024

Date for next review: September 2026