

# The Disclosure and Barring Services & Recruiting of Ex-Offenders

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## Introduction

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1. Access to information provided by the Disclosure and Barring Service (DBS – formerly CRB) enables the City of London Corporation to make safer recruitment decisions for appropriate posts, when made in conjunction with other pre-employment checks.
2. The purpose of DBS checks is to safeguard the children and vulnerable adults for whom we provide a service.
3. We will comply fully with the DBS Code of Practice and:
  - treat all applicants without discrimination based on DBS disclosure information: All candidates, including those with criminal records will be treated according to their merits; and
  - handle, use, retain and dispose of information appropriately.

4. DBS checks will be carried out in accordance with legislation and this policy sets out how the checks will take place before an appointment with the City of London can be confirmed, and how the information will be handled.
5. This policy applies to all staff: employees, agency workers, work placements, consultants and volunteers. All posts within the City of London Police are subject to police checks, covered under alternate arrangements unless the post deals directly with children and/ or vulnerable adults.

## **Guiding Principles**

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6. Prospective employees will be made aware of the necessity for the City of London to request DBS disclosures and the level of disclosure for particular posts in the recruitment literature.
7. Prospective employees will be asked to disclose convictions on their application in accordance with the DBS Code of Conduct
8. The existence of convictions will not preclude the appointment of candidates to the City of London unless relevant to the post. In line with good recruitment practice clarification about conviction information should be sought from candidates at interview.
9. DBS disclosures will only be obtained, in the recruitment procedure, from successful applicants in specific job roles.
10. An unconditional offer of employment in respect of posts requiring a DBS check should not be issued unless a disclosure has been received, and agreed as satisfactory.
11. Appropriate matters revealed in a disclosure will be discussed with the prospective employee before a decision about the withdrawal of any conditional offer of employment is considered.
12. Where disclosure information relates to existing staff, disciplinary action will only be taken if the conviction information is relevant but may include dismissal.
13. Repeat disclosures will be made every 3 years for employees who require a Standard check. Employees who require an Enhanced check are expected to register with the DBS Update Service. (Only employees who have not had a clearance or there have been changes to the initial disclosure will be required to have a DBS clearance).
14. DBS disclosure information will only be shared on a need to know basis by those making employment decisions and will be maintained as strictly confidential.

15. The City of London Corporation reserves the right to check the DBS status of employees on an annual basis using the Update Service, with consent from the employee.

## **Responsibilities**

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16. The decision of whether a conviction is relevant to the job applied for rests with the recruiting manager: this should be taken in consultation with the departmental HR Business Partner, to ensure consistency
17. Employees must declare any new convictions.
18. Line managers will check the DBS status of all agency workers before they are allowed to work in areas of identified risk.
19. Disclosure information, and any risk assessments, will be handled, retained and disposed of by the Corporate HR. This information will never be stored on an employee's personal file, and must not be retained within departments.
20. Corporate HR/Departmental HR will arrange for existing staff to be rechecked every 3 years for employees who require a Standard check. Corporate HR/Departmental HR will check the status of employees who require an Enhanced check by using the DBS Update Services on an annual basis.
21. A copy of the DBS Code of Conduct can be obtained from the [DBS Website](#)

## **Monitoring**

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22. Corporate HR will co-ordinate the monitoring of the recruitment procedures to ensure that prospective employees with criminal convictions are treated equally in respect of the legislation.

## **Checks on Members**

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23. The decision to carry out DBS checks for Members was by the Chairman of each Board of Governors for the three City schools, the Guildhall School of Music & Drama and the Community and Children's Services Committee in January 2015.
24. Members appointed to these Boards/Committees after 15 January 2015 are expected to complete the enhanced DBS Disclosure Form and also register with the Update Service.
25. The DBS status of Members will be reviewed on an annual basis using the Update Service, with consent from the Member.