

Safer Recruitment Policy

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Safer Recruitment

1 Our commitment

Surrey County Council (SCC) is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and volunteers to share this commitment.

SCC is committed to the fair treatment of its employees and potential employees, regardless of race, gender, religion, sexual orientation, and responsibilities for dependants, age, physical/mental disability or offending background. It undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against applicants on the basis of a conviction or other information revealed.

2 Our safer recruitment model

Our safer recruitment model is in four stages

- **Deter – unsuitable applicants:** with a clear commitment to safeguarding and an application process that includes face to face interviews, so that those who seek to harm children or vulnerable adults are deterred from applying for positions at Surrey;
- **Reject – unsuitable applicants:** as we scrutinise applications, reasons for leaving previous employment, and explore gaps in employment history, competence and motivation at interview
- **Prevent – unsuitable appointments:**
 - those who interview, and/or short list, are trained in safer recruitment and fair selection
 - informed judgements are made when an individual discloses unspent convictions
 - pre-employment checks:
 - verify identity documents and qualifications (where needed);
 - ensure suitable references are obtained
 - Criminal records checks are made from the Disclosure & Barring Service (DBS) and overseas equivalent..
 - New staff are given an appropriate induction.
- **Prevent and detect safeguarding issues**
 - risks are identified and managed through risk assessment and management.
 - that roles that include contact with children and vulnerable adults but are not “regulated activities” are adequately supervised
 - we develop and maintain a safe culture

Our arrangements ensure a fair process which fulfils our commitment to safeguarding and our commitment to complying with the Rehabilitation of Offenders Act. (ROA)

Records of recruitment process and decisions are kept for six months after the date the successful candidate is appointed and then those relating to unsuccessful candidates are shredded.

3 Key Responsibilities

The Recruitment team provide advice on how to deter unsuitable applicants, it will:

- Advise on the design and wording of advertisements so that these help deter those who may wish to harm the vulnerable. Adverts will include commitment to safeguarding is included in all recruitment and selection materials and make it clear appropriate checks will be made, marked with Rehabilitation of Offenders Act (ROA) exemption.
- Ensure application forms include required information
 - reiterate our commitment to safeguarding
 - include clear up to date job profiles (description and person specifications)
 - “Self – disclosure” forms for disclosing convictions
- Ensure application forms
 - Include reason for leaving
 - Note that failure to disclose will result in dismissal
 - Marked with ROA exemption where appropriate
 - e.g. whether the role is exempt for ROA, providing incorrect information and reason for leaving
- Ensure that information sent to applicants clearly states when an enhanced DBS (formerly CRB) disclosure is required
- Seek references on a manager's behalf, providing a copy of the job description to the referee. If the applicant is not currently working with children or vulnerable adults, but has done so in the past, a reference should be obtained from the relevant previous employer.
- Provide template letters used to ensure the correct information is provided to the candidate prior to interview and when an offer is made.

Managers will:

- Follow this guidance on recruitment to ensure safer recruitment whilst complying with the Rehabilitation of Offenders Act (ROA)
- Managers must ensure all employees and applicants for employment are aware of the recruitment of ex-offenders policy and apply it.
- Ensure that if the employee is on long term sick or maternity leave when their DBS (CRB) expires they start the re-checking process in advance of the employee's return to work.
- Where a professional qualification is mandatory for the post, managers must confirm professional registration with awarding bodies or professional registers and keep a record of that confirmation kept on file.

Chair of interview panel will:

- Check documentation as required to ensure that candidates are eligible to work. Only accept originals, take copies and sign to confirm the original was seen
- Keep records in accordance with this guidance
- Make candidates aware at interview that should they be successful, any offer of employment would be subject to satisfactory clearances including DBS disclosure and employment references.
- Explore gaps in employment history directly with the candidate
- Apply the recruitment of ex-offenders policy.

The safer staffing team will:

- Liaise with the Disclosure & Barring Service (DBS) to obtain DBS (CRB) clearances before appointment and at 3 yearly intervals
- Notify managers three months before DBS (CRB) is due to expire
- Maintain the e-CRB system
- Review DBS disclosures

Applicants, staff and volunteers will

- Disclose any unspent convictions where they are applying for, or occupying any position, that has exemption from the Rehabilitation of Offenders Act. Failure to disclose a relevant unspent conviction is grounds for dismissal.

The HR&OD team will:

- Provide appropriate recruitment and selection training
- Ensure recruitment and selection material and contracts include required information

Heads of Service will:

- Apply safer recruitment practice and procedures
- Decide which posts require disclosure, the level of disclosure required and actions to take when a positive disclosure is received
- Appoint counter signatories where needed
- Fund the required checks

Service or Designated counter signatories will

- Apply the procedures and make the final decisions on disclosures and their outcome. The role is to confirm the validity of an application for a DBS (CRB) disclosure and check relevant documents

The Deputy Head of HR and Organisational Development is the Lead Counter signatory for SCC (excluding school based staff, agency workers, and other contractors) and will:

- Ensure that our safer recruitment practice and procedures comply with national relevant protocols
- Promote good practice within SCC and with our partners and implement improvements where appropriate
- Develop quality assurance of systems and procedures to audit implementation

4 How to use the model

Review the job description to ensure that it is the most up to date and check whether any risk assessments required are in place. For example if the role requires

- Working in an regulated activity
- Working with confidential information
- Working with the opportunity for unsupervised access to children or adults

Then the risk assessment should set out what controls should be in place and provide topics to be explored in the interview.

All SCC employees are required to keep information that they have access to, or handle, as part of their work for SCC, confidential.

4.1 Checks before invitation to interview

- Scrutinise applications:
 - To check for gaps in employment
 - To review reasons for leaving
- Check eligibility to work in the UK
- For safeguarding roles it is preferable to obtain references prior to interview
- Encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process.

4.2 Interviews

4.2.1 Question design

Face to face interviews explore directly with the candidate

- Competence for the role
- Gaps in employment history
- Motivation and values
- Any convictions that the individual has shared - SCC is committed to only asking about “unspent” convictions, unless the nature of the position allows SCC to ask questions about their entire criminal record.

It is legitimate for an employer to ask directly about an employee’s previous convictions, the employee does not have to disclose any that are spent. Therefore make sure that you have an open and measured discussion on any offences that may be relevant to the position.

Although care must be taken not to ask discriminatory questions, do ask direct and probing questions at interview. It is important to investigate any areas that might be problematic, for example:

- any aspect of the applicant's background where there may be a weakness or lack of experience;
- to verify that qualifications have actually been obtained (this should never be assumed, but always checked); or
- where information appears incomplete (for example gaps between jobs).

It is important that satisfactory explanations for any gaps in employment are obtained. Questioning on this area must be completed sensitively and objectively, and be to raise any issues or inconsistencies for the purposes of safeguarding only.

If the reason for leaving, or a gap in employment given, relates to a health condition or disability this should not be explored at the interview, unless there is an inconsistency that raises safeguarding concerns. In line with the Equalities Act, further information regarding the health condition or disability can be checked after an offer is made, to find out about any adjustments needed for the candidate to perform at their best in the role.

“Warner style” questions are sometimes used to help check the suitability of applicants to work with children. This approach as well as assessing previous experience, skills and qualifications, explores each candidate’s attitudes and motives to work with children.

Warner style questions ask about: -

- Why someone wants to work with children
- How they deal with difficult issues in relation to work with children
- How individuals ensure they maintain a professional working relationship with children and do not overstep the boundaries of their role

Hypothetical questions should not be asked as candidates will only provide a hypothetical answer in return. This does not show their attitudes or motives to work with children.

For example ‘tell me what you would do if a child was aggressive?’ is a hypothetical question with which the candidate could provide a ‘text book’ answer. A Warner style question would be ‘tell me about a time when you have had to manage a child’s difficult behaviour?’ – this question draws on the candidate’s experiences, their attitudes, values and motives to work with children.

4.2.2 Document checks

At the interview check and verify

- Identity documents
- Eligibility to work in the UK

To check make sure that documents are valid, current and original. Photocopies or documents printed from the Internet are not acceptable. Look for evidence of tampering and refer any irregularities to the Service counter signatory to take up with the applicant.

To verify photocopy the original documents. The photocopy should be signed and kept with the interview file. When the successful applicant is verified in post, the ID information for the unsuccessful candidates must be kept in lockable safe storage for six months and then shredded.

If the role requires a DBS (CRB) check – follow e-DBS [guidance](#)

4.3 Checks before appointment

4.3.1 References

Two references covering the last three years which includes at least one from the most recent previous employer.

If the role is in social care and the applicant is not currently working with children or vulnerable adults, but has done so in the past, a reference should be obtained from the relevant previous employer.

References provide factual information to support appointment decisions, requests must include information on

- The candidate's suitability for the post
- The qualities and experience the candidate(s) have
- Details of any disciplinary offences against children or if there have been any child protection concerns (if the post involves working with vulnerable groups) and their outcomes.
- Reason for leaving their previous employer
- The referee's relationship to the candidate.
- Whether the referee is satisfied that the candidate is suitable to work with children, and, if not, the referees concerns and why they believe the candidate is not suitable

Check references

- are from a line manager not a colleague
- are signed and that all questions have been answered satisfactorily.
- against application forms to verify dates of employment.
- by telephone if you are concerned about a referee's authenticity or the content is ambiguous or unguarded, or where further information or clarification is needed.
- Note that testimonials are not acceptable as a reference to Surrey County Council (SCC).

Keep details of any contact with referees.

Consider information about past disciplinary action or allegations in the circumstances of the individual case.

The recruitment team has template letters which should be used to ensure the correct information is provided to the candidate prior to interview and when an offer is made.

4.3.2 Professional registration

Where a professional qualification is required for the role confirm with the awarding body or professional register and keep a record of that on file.

4.4 DBS (CRB) checks and regulated activities

Only staff who work in positions that meet the definitions of regulated activity as set out in the Safeguarding Vulnerable Groups Act and the Protection of Freedoms Act, are eligible for a criminal record check and periodic re-checks.

Below is a brief summary of the roles that are eligible for a Disclosure and Barring Service check. Please refer to [Appendix 1 \(working with adults\)](#) and [Appendix 2 \(working for children\)](#). The flow-charts will help you assess whether a position is eligible for a criminal record check and whether the check is an enhanced check or an enhanced check with children's or adults' barred list.

All staff who work in regulated activities, are subject to DBS checks before appointment and at a maximum of three yearly intervals throughout their employment with SCC.

4.4.1 Working with Children – regulated activities

- i. Unsupervised activities: teach, train, instruct, care for or supervise children or provide advice/guidance on wellbeing, or drive a vehicle only for children;
- ii. Work for a limited range of establishments (specified places") with opportunity for contact: for example schools, children's homes, child care premises. Not work by supervised volunteers.

Work under (i) or (ii) is regulated activity only if done regularly (at least once a week). The Department for Education has produced [statutory guidance on supervision](#) to describe the considerations an organisation should make when determining whether or not an individual is supervised to a reasonable level for the role.

- iii. Relevant personal care, for example washing or dressing; or health care by or supervised by a professional;
- iv. Registered childminding; and
- v. Foster-carers.

4.4.2 Working with Adults – regulated activities

- (i) Providing health care
- (ii) Providing personal care
- (iii) Providing social work
- (iv) Assistance with cash, bills and/or shopping
- (v) Assistance in the conduct of a person's own affairs
- (vi) Conveying - transport an adult because of their age, illness or disability either to or from their place of residence and a place where they receive health care, personal care or social care.

If the role requires a DBS (CRB) check – follow e-CRB [guidance](#)

4.4.3 Overseas workers

Applicants must obtain a disclosure from their country of origin. The relevant embassy should be approached for advice. It is the individual's responsibility to provide a certified translation and this should be checked by the hiring manager before appointment.

It is important to note that the DBS (CRB) checks will not establish the presence or currency of work permits. To check whether work permits are in place contact the Border and Immigration Agency Helpline and Employer Checking Service:
www.bia.homeoffice.gov.uk/employingmigrants.

4.4.4 Agency Staff:

- Roles that require which require DBS (CRB) checks are identified on the order.
- The supplying agency is required to follow safer recruitment procedures.
- Managers check that supplied workers have the requisite registration and clearance, which meets the requirements of the post. Manpower provide this using a care worker profile card. Evidence that the care worker profile card should be recorded and kept for 12 months for Ofsted and Care Commission inspections.
- The detailed records are held by Manpower.

4.4.5 Work Placement Students:

DBS (CRB) disclosures must be carried out on work placement students who will be carrying out regulated activities, unsupervised. Where possible, arrange work so that students do not carry out regulated activities, unsupervised, so that a DBS check is not needed.

4.4.6 Volunteers

Carry out a risk assessment to check that those who are volunteers or whose work brings them in contact with children and vulnerable adults are adequately supervised. Work must be arranged so that volunteers do not carry out regulated activities, unsupervised.

4.4.7 Positive disclosure

Having a criminal record will not necessarily bar someone from working with us. This will depend on the nature of the position and the circumstances and background of the offences. If in any doubt seek advice from your designated counter-signatory or HR Relationship adviser.

- If you receive a positive disclosure carry out a risk assessment to decide what controls needed to be in place.
- Discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer of employment or dismissal after appointment.

4.4.8 Handling disclosure information

- Keep disclosure information secure, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.
- Do not copy disclosure certificates and make sure that additional information supplied by the DBS (CRB) on disclosures is kept strictly confidential, not be stored nor revealed to the applicant.
- Use the information only for the purpose it was requested as the applicant will have given consent for that.
- Keep disclosure information for 6 months after appointment has been made and then delete unless it is required for Commission for Care annual inspections.

- For Commission for Care inspections keep disclosures for employees in relevant teams (e.g. residential establishments) up to the date of the notified annual inspection, i.e. for a maximum of 12 months. The disclosures should not be kept at the home but off site and available for inspection if needed.
- Keep a list of all disclosures carried out, showing the name of the applicant, the level of disclosure, disclosure reference number and date of issue, and whether the person was employed or not employed.
- Keep a record of all those who see the information
- Once the 6 or 12 month retention period has elapsed, destroy the disclosure information by shredding, pulping or burning.

4.5 Withdrawing an offer

In the event that the checks made following an offer are unsuitable then the procedure for withdrawing the offer should be followed. If the reason is because of a positive disclosure see 4.47 above.

4.6 Training

4.6.1 For those involved in recruitment

Those involved in the recruitment process are trained to identify and assess the relevance and circumstances of offences. The training provided includes the relevant legislation relating to the employment of ex-offenders.

- Recruitment and Selection STARS training
- E-learning for safer recruitment (currently available via CWDC – a SCC package aimed at all staff is being developed at the moment)

4.6.2 For all staff

There are [training courses](#) available for staff who work in Adults and Children's Directorates on the topic.

Other staff are invited to participate in training as part of our organisation's desire to become a "safe organisation".

5 When will criminal records be checked

All those who work in regulated activities, must have their criminal records checked before appointment and at a maximum of three yearly intervals throughout employment with SCC.

The safer staffing team will issue reminders to managers three months before expiry of the current DBS disclosure.

6 Induction to promote safeguarding

The introduction of a new member of staff to the organisation begins at the recruitment stage, when messages about being a 'Safe Organisation' are first given. This must be continued through the selection process and when the new person starts work as part of induction.

Staff need to feel confident that they can raise issues or concerns about the safety or welfare of children, young people and/ or vulnerable adults, and that they will be listened to and be taken seriously. That can be achieved by maintaining an ethos of safeguarding and promoting the welfare of children, young people and vulnerable adults.

All new staff, regardless of previous experience should have an [induction](#).

7 Reporting safeguarding concerns

All employees have a duty to disclose concerns about behaviour that might indicate that the safety or welfare of children, young people and/ or vulnerable adults is at risk. The council has experts who can provide advice on how to manage an allegation or concern.

Employees can raise a concern by speaking in confidence to their manager, HR, the SCC safeguarding teams or use [Expolink, the external whistleblowing service](#).

Appendices

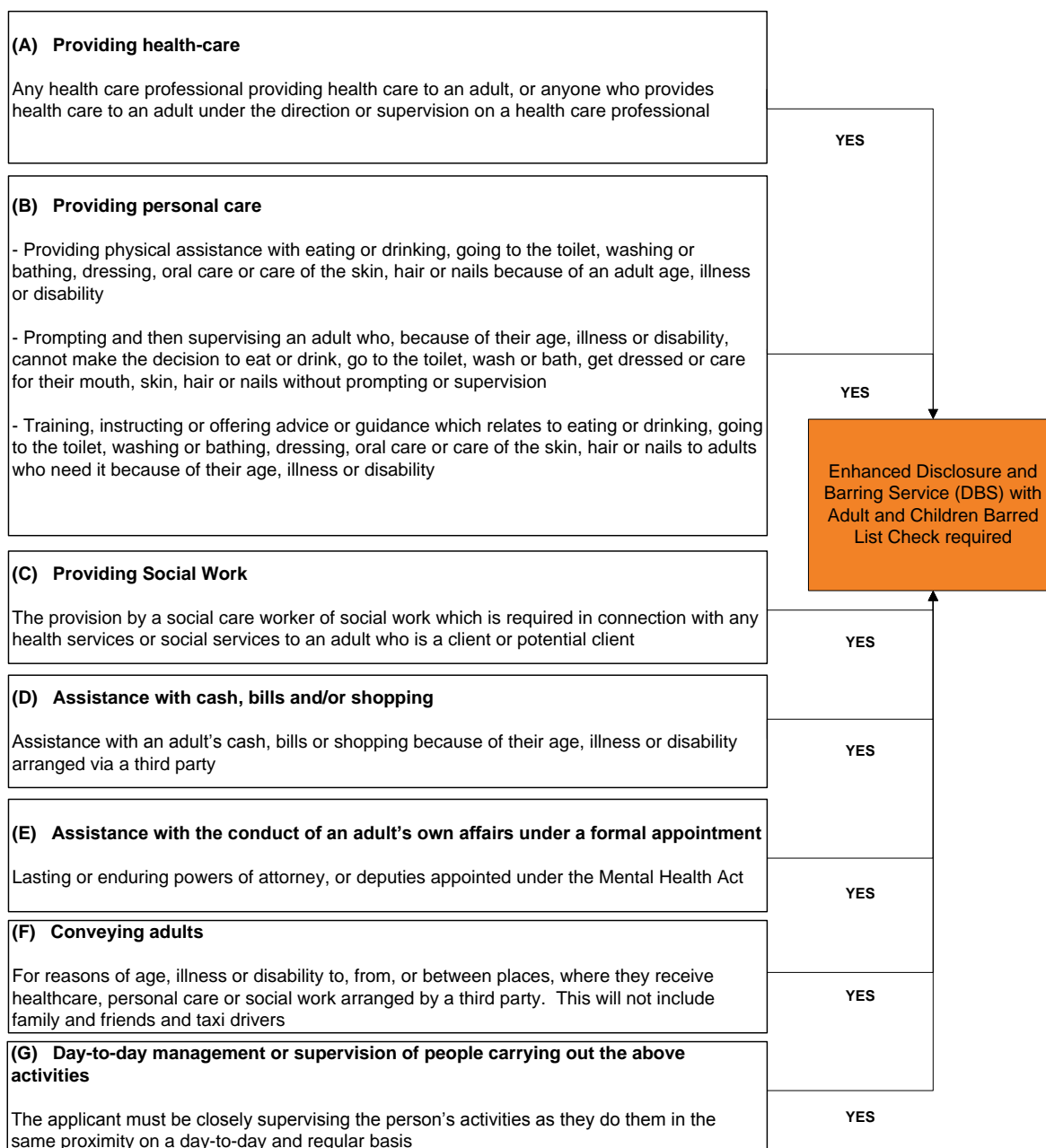
Appendix 1 - Flowchart on eligibility for DBS checks (working with Adults)

**Regulated activity relating to Adults
(Post September 2012 Definition)**

Regulated activity relating to adults identifies which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.

There is not a requirement to do the activity a certain number of times before it is considered as engaging in regulated activity.

Only those positions that meet the seven definitions below, can be subject to an Enhanced DBS with Adult and Children Barred List checks, under the Protection of Freedoms Act.



1.1 Regulated activities eligible for an enhanced disclosure with Adult's barred list check (the flowchart explained):

There are now only six types of activity which can be classed as regulated activity relating to adults. These activities are eligible for an enhanced DBS check with the Adults' barred list. An individual only needs to engage in the activities listed below once to be carrying out regulated activity relating to adults

- healthcare for adults provided by, or under the direction or supervision of a regulated health care professional
- personal care for adults involving hand-on physical assistance with washing and dressing, eating, drinking and toileting; prompting and supervising an adult with any of these tasks because of their age, illness or disability; or teaching someone to do one of these tasks
- social work - provision by a social care worker of social work which is required in connection with any health services or social services
- assistance with an adult's cash, bills or shopping because of their age, illness or disability arranged via a third party
- assisting in the conduct of an adult's own affairs under a formal appointment
- conveying adults for reasons of age, illness or disability to, from, or between places, where they receive healthcare, personal care or social work arranged via a third party
- a person whose role includes the day-to-day management or supervision of any person engaging in regulated activity, is also in regulated activity
- regulated activity relating to adults excludes any activity carried out in the course of family relationships, and personal, non-commercial relationships

The definition of an adult is a person aged 18 or over and regulated activity focuses on those activities which, should they be needed by any adult, mean that an adult is considered vulnerable at the point of receiving them.

1.2 Regulated activities eligible for an enhanced DBS check only

Any positions that meet the below criteria (from the Safeguarding Vulnerable Groups Act, 2006) are subject to an Enhanced DBS Check only.

They are not eligible for a Barred List check as they do not meet the terms of the Protection of Freedoms Act, as visually depicted above.

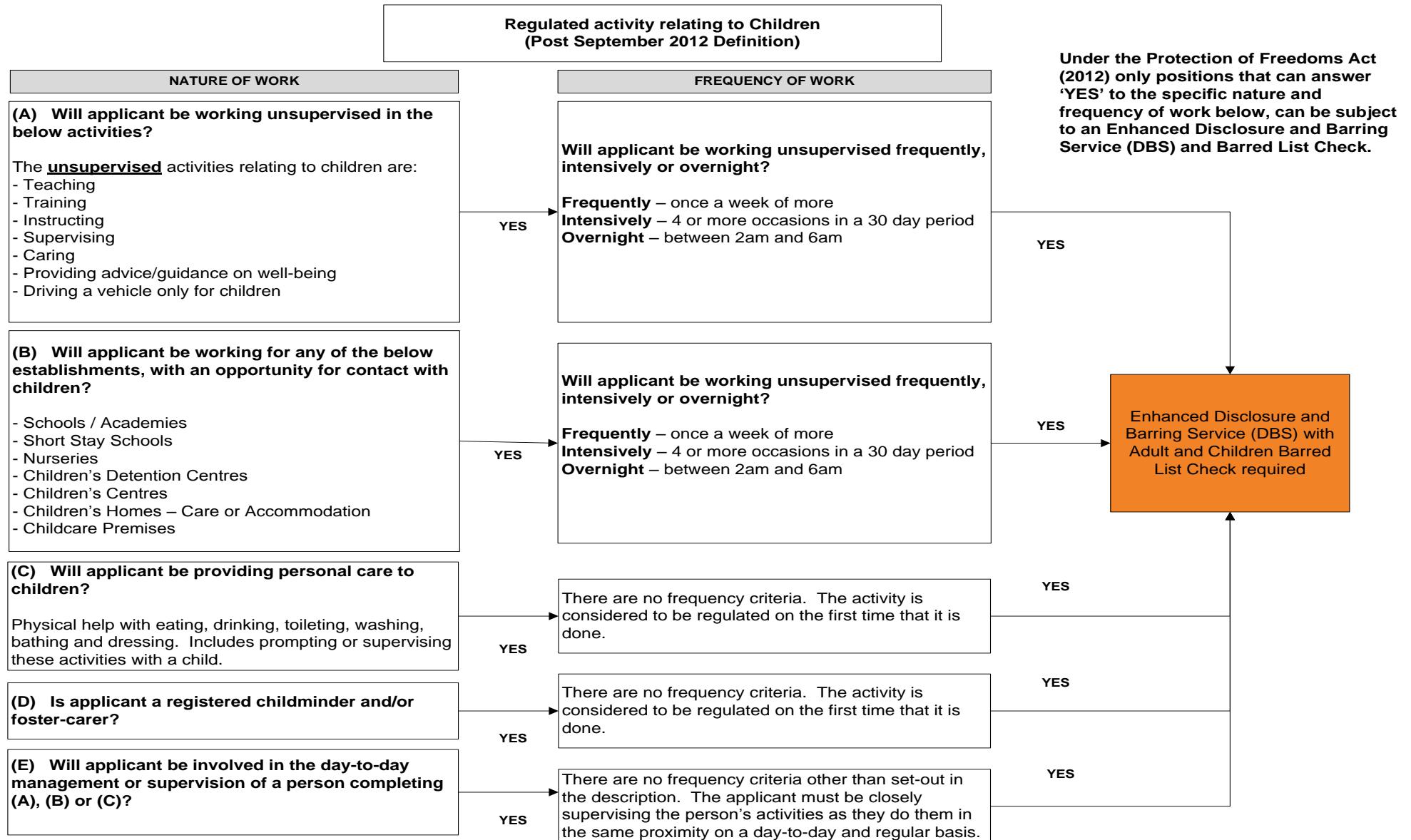
- Any form of assistance, advice or guidance provided wholly or mainly for vulnerable adults
- Moderating a public electronic interactive communication service which is likely to be used wholly or mainly by vulnerable adults
- An activity carried out in a care home which is exclusively or mainly for vulnerable adults. The establishment must be worked at frequently.

Please note that a vulnerable adult is defined by the Safeguarding Vulnerable Groups Act as a person who is aged 18 years or over and who:

- is living in residential accommodation, such as a care home or a residential special school
- is living in sheltered housing

- is receiving domiciliary care in their own home
- is receiving any form of health care
- is detained in lawful custody (in a prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999)
- is under the supervision of the probation services
- is receiving a specified welfare service, namely the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so
- is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability
- is an expectant or nursing mother living in residential care
- is receiving direct payments from a local authority or health and social care trust in lieu of social care services, or
- requires assistance in the conduct of their own affairs.

Appendix 2 - Flowchart on eligibility for DBS checks (working with Children)



2 Regulated activity – children (the flowchart explained):

The new definition of regulated activity relating to children applies to individuals undertaking the following:

2.1 Unsupervised activities

These activities are teaching, training, instructing, caring for or supervising children or providing advice/guidance on wellbeing or driving a vehicle solely for children .

Supervision means day to day supervision as is reasonable in all the circumstances for the purpose of protecting any children concerned.

The Department for Education has produced [statutory guidance on supervision](#) to describe the considerations an organisation should make when determining whether or not an individual is supervised to a reasonable level for the role.

2.2 Work for a limited range of establishments (specified places)

Work for a limited range of establishments (specified places”) with opportunity for contact with children as listed [below](#)

Work carried out by volunteers supervised to a reasonable level, in accordance with the statutory guidance on supervision, in these establishments is not regulated activity. However a supervised paid employee working for a specified establishment does come under regulated activity.

Work carried out involving either an unsupervised activity or in one of the listed establishments is only regulated activity relating to children if done regularly.

Regularly means carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30 day period (or in some cases overnight between 2am and 6am).

2.3 Health care

Health care for children provided by, or under the direction or supervision of a regulated health care professional

This is regulated activity even if the activity is only carried out once.

2.4 Personal care

Personal care for children involving hands-on physical assistance with washing and dressing, eating, drinking and toileting; prompting and supervising a child with any of these tasks because of their age, illness or disability; or teaching someone to do one of these tasks

This is regulated activity even if the activity is only carried out once.

It also applies to:

- registered childminders

- registered foster carers
- the day-to-day management or supervision of any person engaging in regulated activity, is also in regulated activity

2.5 The frequency test

For an individual to be in regulated activity because of the activity they are carrying out, or the establishment they are working in, they must also meet the frequency test as described below:

- regularly – carried out by the same person at least once a week
- carried out four or more days in 30-day period
- overnight – carried out between 2am – 6am

When does the frequency test not apply?

- when someone is carrying out health care or personal care – the individual only needs to carry out the activity once to be in regulated activity

2.6 Establishments for regulated activity relating to children

The new list of establishments is:

- an educational institution which is exclusively or mainly for the provision of full-time education to children
- pupil referral units or short-stay schools providing education for children or compulsory school age who because of illness, exclusion or other reasons cannot attend a school
- academies which do not fall within the definition of a school
- nurseries exclusively or mainly providing full-time or part-time education for children who have not reached compulsory school age
- children's detention centres
- children's homes providing care and accommodation wholly or mainly for children
- children's centres managed by or on behalf of, or under arrangements made with an English local authority securing early childhood services for their area
- childcare premises

3 New minimum age for DBS (CRB) applicants

The minimum age for someone applying for a DBS (CRB) check will be 16 years old. This means that counter signatories should no longer sign application forms for applicants under the age of 16, even if the applicant will have reached 16 by the time they begin the role.

Appendix 3. Secure storage, handling, use, retention and disposal of DBS (CRB) disclosures and disclosure of information

1. General Principles:

SCC complies with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information

SCC complies with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information.

2. Storage, copying and access:

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Copying of disclosure certificates is strictly prohibited

Any 'additional information' supplied by the CRB on disclosures is strictly confidential and must not be stored nor revealed to the applicant.

Electronic data is stored in the online DBS (CRB) system which requires a unique username and password and has a full audit trail of activity by every user. Access to the system and disclosure information is governed by the Safer Staffing Team Manager who ensures through secure logins ensures that only those required to access any information held in the system, are authorised to do so as part of their professional duties.

3. Handling:

Disclosure information is only passed to those who are authorised to receive it. We maintain a record of all those to whom disclosures or disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

4. Usage:

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.

5. Retention:

Once a recruitment (or other relevant) decision has been made, disclosure information is kept for 6 months, to allow for the consideration and resolution of any disputes or complaints. It will then be deleted unless it is subject to the exemption below..

6. Retention exemptions:

The Commission for Care allows organisations subject to their inspection to retain documents for more than the 6 months referred to above. This permits SCC to retain disclosures for employees in relevant teams (e.g. residential establishments) up to the date of the notified annual inspection, i.e. for a maximum of 12 months.

The DBS advice is that the establishments maintain a list of all disclosures carried out for that home, showing the name of the applicant, the level of disclosure, disclosure reference number and date of issue, and whether the person was employed or not employed. They should have this list signed off by the inspector to confirm that these disclosures were available during the inspection. They recommend that disclosures are not kept in the establishment, but off site (e.g. in the HR personnel files) – if the inspector insists on seeing

original documents arrangements will need to be made for them to be taken to the establishment at the time of the inspection.

7. Acting as an Umbrella Body:

Where a service offers to act as an Umbrella Body they must ensure that the organisation takes all reasonable steps to satisfy ourselves that they will handle, use, store, retain, and dispose of disclosure information in full compliance with the DBS Code of Practice and in full accordance with the policy and has a written policy to this effect.

8. Disposal:

Once the retention period has elapsed, we will ensure that any disclosure information is immediately suitably destroyed by secure means, ie by shredding, pulping or burning.

We will not keep any photocopy or other image of the disclosure of any copy or representation of the contents of a disclosure.

We will ensure that all electronic information is stored securely, on a FTPS server with robust unique username and password requirements, and secure deletion/disposal of data will take place.

However, notwithstanding the above, we may keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken. This same limited information will be held electronically on the online system, where the basic details of the disclosure only (as listed above) are held as an electronic data record.