

Quality Controlled Document

Policy: Disclosure and Barring Service

Date: September 2025

Approved By: Director of People, Facilities and Infrastructure

1. Policy Statement

- 1.1 Gloucestershire College is committed to ensuring a safe environment for all learners and staff, and to exercising its duty of care by verifying the suitability of individuals working in roles involving contact with children, young people, and vulnerable adults.
- 1.2 This policy outlines the way in which Disclosure and Barring Services (DBS) checks are utilised as part of a wider range of Safer Recruitment checks, to fulfil the College's commitment to safeguarding.
- 1.3 It outlines the framework that the College uses to ensure that DBS checks are properly carried out for employees, agency staff, volunteers and other individuals, as appropriate to their role, in line with relevant UK legislation and statutory guidance.

2. Scope

- 2.1 All employees and Governors of Gloucestershire College, including Gloucestershire Professional Services and Gloucestershire Facilities Management, are subject to an Enhanced DBS with a Barred List check.
- 2.2 A DBS assessment is made for all other individuals providing work or services to the College, including but not limited to agency workers, volunteers. This takes into account the work that they are undertaking, in accordance with the requirements of Keeping Children Safe in Education (KCSIE), to determine the appropriate level of DBS check that is required.

3. Legal Framework

3.1 This policy is aligned with legislation and statutory guidance, including:

- Rehabilitation of Offenders Act 1974 and Exceptions Order 1975 (amended 2013 and 2020)
- Police Act 1997
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Data Protection Act 2018
- Equality Act 2010
- Keeping Children Safe in Education (KCSIE)
- Disclosure and Barring Service Code of Practice

3.2 Gloucestershire College works in partnership with eSafeguarding, an online provider of DBS checks, registered with the DBS as an umbrella body.

4. Types of DBS Checks

4.1 DBS checks are requested at the level appropriate to the role being undertaken:

- Basic DBS Check: Shows unspent convictions only.
- Standard DBS Check: Shows spent and unspent convictions, cautions, reprimands, and warnings that are not filtered.
- Enhanced DBS Check: As above, plus any relevant police information held locally.
- Enhanced DBS with Barred List Check: Required for positions engaging in regulated activity with children or vulnerable adults.

4.2 A Barred List check identifies if an individual is prohibited from working with children and/or vulnerable adults.

5. Filtering of Convictions

5.1 Certain spent convictions and cautions will be "filtered" and not disclosed on a DBS certificate. Candidates are not required to disclose filtered offences.

5.2 Guidance on filtering is available from the DBS and Ministry of Justice.

6. Recruitment and Fair Assessment of Disclosures

6.1 Commitment to Fairness and Equality

- 6.1.1 Gloucestershire College is committed to the fair treatment of its staff, applicants, students, and users of its services.
- 6.1.2 Having a criminal record does not automatically bar an individual from joining the College. Decisions are made based on relevance, potential safeguarding risk, and legal compliance.
- 6.1.3 All job descriptions will state the requirement for a DBS check and application documents will inform applicants that a criminal record will not automatically bar them from applying for, or being appointed to, a role.

6.2 Assessment Criteria

- 6.2.1 When considering the relevance of a conviction or caution, the College will assess:
 - The nature and seriousness of the offence
 - Time elapsed since the offence
 - Circumstances of the offence
 - Repetition or pattern of offending
 - Age of the individual at the time
 - Efforts at rehabilitation
 - Risk to students, staff, or College reputation
 - Level of supervision required and safeguards available

6.3 Self-Declaration Process

- 6.3.1 All shortlisted candidates are required to complete a self-declaration form and state any criminal convictions, cautions, or reprimands prior to interview.
- 6.3.2 A pre-employment disclosure is reviewed, in confidence, by the Director of People, Facilities and Infrastructure. The disclosure will be assessed, and a decision will be made as to whether it is appropriate for the application process to proceed.

7. Conditional Offer of Employment

- 7.1 All offers of employment will be 'conditional' and subject to satisfactory pre-employment Safer Recruitment checks, including a DBS check.
- 7.2 A DBS check will only be processed following the acceptance of a conditional offer of employment. Refusal to complete a required DBS check will result in withdrawal of the offer.
- 7.3 When an existing member of staff is appointed to a new role, a new DBS check may be undertaken if it cannot be evidenced that an existing DBS check, that is appropriate to the new role, has been undertaken.

8. Existing Employees and Notifications

- 8.1 Employees must notify the Director of People, Facilities and Infrastructure if:
- They are charged with a criminal offence
 - They receive a caution or conviction
 - They are placed on the DBS Barred List
- 8.2 An assessment will be made as to whether the offence affects the employee's suitability for continued employment.

9. Students Requiring DBS Checks

- 9.1 Certain programmes (e.g., Early Years, Health and Social Care, PGCE) require students to complete an Enhanced DBS check to support placements involving regulated activity. It is the responsibility of the relevant School or Department to:
- Confirm DBS completion
 - Verify and record the original certificate number
- 9.2 Where students transition to paid employment within the College, they will be treated as employees and subject to the College's recruitment process, including relevant DBS checks.

10. Agency Staff

- 10.1 Members of staff engaged in regulated activity, via a Recruitment Agency, are subject to the same Safer Recruitment checks as those employed directly, including an enhanced DBS with Barred List check.
- 10.2 Recruitment Agencies engaging with Gloucestershire College will be made aware of this requirement and will provide confirmation of a satisfactory DBS check, as part of wider Safer Recruitment checks. If the agency cannot comply with these requirements, the individual will not be permitted to work at the College.

11. Contractors and Volunteers

- 11.1 A decision on whether a DBS check is required, and at which level, will be made for Contractors, Volunteers, and any other individual who may be required to work at the College. This will be made in accordance with the provisions of KCSIE and take into account the work that is being undertaken and other relevant circumstances, for example supervision.

12. Risk Assessments

- 12.1 Where there is an urgent and essential need for an individual to start work before the results of a DBS check has been received, consideration may be given to this, via a risk assessment process.

12.2 A DBS risk assessment must:

- Be completed by the hiring manager, in conjunction with the People Team
- Detail the working environment, level of contact, supervision, and interim safeguarding controls
- Be a short-term measure
- Be approved by the Head of People or Director of People, Facilities and Infrastructure

13. Handling, Storage, and Retention of Disclosure Information

- 13.1 Disclosure information will only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- 13.2 Disclosure information will be kept on the applicant's electronic file, on a secure network, with access strictly controlled and limited to those who need to see it as part of their duties.
- 13.3 DBS application information may be retained for a period of up to six months after the date on which the recruitment decision is taken, after which it will be destroyed, unless a dispute or regulatory requirement necessitates longer retention.

Next review due: September 2026

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