

Report to Appointments and Conditions of Service Committee

Subject: Review of Disclosure & Barring Service Policy and Procedures

Date: 18th June, 2025

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Purpose

To present to the Committee the review of our DBS procedures to ensure Gedling Borough Council remains compliant in its use of DBS checking to reduce safeguarding risks and increase efficiency in the processing of applications.

Recommendations:

The Appointments and Conditions of Service Committee is asked to approve:

- 1. Changes to the current policy which determines which roles are checked, the level and frequency of checks.**
- 2. Combining all existing policies and procedures on DBS checks into one document for ease of reference for managers and staff.**

1	Background
1.1	<p>A Disclosure and Barring Service (DBS) check is where an employer can check the background of its staff, in any role, for a criminal record.</p> <p>It is important to note that no Disclosure can be issued without the consent of an individual applicant.</p>
1.2	<p>There are 4 levels of DBS Check as follows:</p> <p>Types of check</p> <ul style="list-style-type: none"> • a basic check, which shows unspent convictions and conditional cautions • a standard check, which shows spent and unspent convictions and cautions • an enhanced check, which shows the same as a standard check plus any information held by local police that's considered relevant to the role • an enhanced check with barred lists, which shows the same as an enhanced check plus whether the applicant is on the list of people barred from doing the role

1.3	<p>The Council conducts Enhanced DBS checks for front line roles in Parks and Street Care near schools, Community Relations, Public Protection, Customer Services and Leisure. However, the exceptions in Leisure are the cleaners and bar staff at the Richard Herod Centre.</p> <p>Cleaners at other leisure centres are checked on appointment. See attached list of roles subject to Enhanced DBS checks at Appendix 1.</p>
1.4	<p>The Council has a policy statement at Appendix 35 of the Staff Handbook - on The Use and Funding of Disclosure and Barring Service Registration and DBS Disclosures which was last reviewed by the CMT on 1/2/24. See Appendix 2.</p>
1.5	<p>The current policy refers to conducting checks at conditional offer stage or moving into an area where a check is needed. It also states the following:</p> <p><i>“The Council does not operate a regime of systematic DBS re-checking. A re-check of an employee (or similar) is only conducted where there is legislative requirement to do so.”</i></p> <p>This practice exposes us to safeguarding and reputational risks where we may have staff in posts who may have received cautions or warnings, etc.</p> <p>Some Revenues and customer service staff have a basic check due to using the in-house revenues system which contains personal information.</p>
1.6	<p>There is a separate policy on ‘the use of DBS checks and the recruitment and licensing of ex-offenders’ at Appendix 25 of the Staff Handbook, which confirms candidates will be treated fairly and sensitively and having a criminal record will not necessarily bar candidates from working with us depending on the nature of the position and the background of their offences. See Appendix 3.</p>
1.7	<p>There is another policy on the Storage and retention of information at Appendix 26 in the Staff Handbook. See Appendix 4.</p> <p>Having separate policies on the same subject does make it difficult to easily locate all the information needed on this subject in the Staff Handbook, as managers or staff may just look at one policy and not search for all.</p>
2	Proposal
2.1	<p>a) To establish consistency of DBS checking for specific roles and conduct rechecks:</p> <p>It is proposed we continue to conduct Enhanced checks on staff appointed to roles on the current list at Appendix 1 and conduct rechecks in 2025/6.</p>

	<p>Enhanced checks are needed where staff undertake work with children or vulnerable adults, once a week or 4 days in any 30-day period or overnight. This check covers:</p> <ul style="list-style-type: none"> • unspent convictions • spent convictions • cautions, warning and reprimands • Other relevant police information
2.2	<p>Following a review by the Senior Leadership Team, the following roles will be added to the list: Housing Officers and all Caretakers</p>
2.3	<p>Advice on the DBS government website advises that DBS countersignatories should have enhanced checks. It is proposed, therefore, that we repeat these in 2025/6.</p>
2.4	<p>b) Conduct Standard checks on staff in: Finance and Legal , where staff have access to personal data and in positions of trust. This would be a new approach for the Council and propose we do this for 2025/6. Standard checks cover:</p> <ul style="list-style-type: none"> • Unspent convictions • Spent convictions • Cautions, warnings and reprimands <p>It is proposed that our policies and DBS check lists are updated to reflect points a) and b) if approved, and that these roles are subject to DBS checks every 3 years.</p>
2.5	<p>c) Conduct basic checks on all remaining staff.</p>
2.6	<p>Whilst offences may occur between checking, having a minimum standard for re-checking does demonstrate a commitment to protecting the Council from safeguarding and reputational risks.</p>
3	Alternative Option
3.1	<p>Do nothing and wait for direction following the Local Government Reorganisation. This may continue to leave the Council exposed to risks in this area linked to safeguarding and reputational damage.</p>

4	Financial Implications
4.1	<p>The Disclosure Barring Service fees are:</p> <ul style="list-style-type: none"> • Basic DBS check – £21.50 • Standard DBS check – £21.50 • Enhanced DBS check – £49.50 • Enhanced DBS check with Barred List(s) – £49.50 <p>Based on the proposal at 2.1, to re-check all staff that require an Enhanced DBS, the potential costs would be approximately: £8,386.5</p> <p>Enhanced – Leisure staff 82 x 49.50 = £4,059 Enhanced – Casuals 71 x 49.50 = £3,514.5 (69 Leisure, 2 Community Caretakers) Enhanced – 1 x HR & 5x Customer Services counter signatories = 6 x 49.50 = £297</p> <p>Standard - Finance and Legal staff 24 x 21.50 = £516</p> <p><u>Total = £8,386.5</u></p> <p>To conduct Basic DBS checks on all remaining staff, potential costs would be approximately an additional 185 staff x 21.50 = £3,977.5</p> <p>To conduct checks on all staff in 2025/6 approx. Total Costs = £8,386.5+3,977.5 = £12,364.</p> <p>Please note these staff numbers do not include new starters who have been DBS checked within the last 12 months.</p>
5	Legal Implications
5.1	<p>The Council needs to ensure compliance in ensuring the correct level of checks are completed specific to roles that require a standard or enhanced check. The government's online checker can be used for this.</p> <p>Anyone, however, can have a basic check if the Council chooses.</p>
6	Equalities Implications
6.1	Transgender staff can request a confidential DBS check which can be used.
7	Carbon Reduction/Environmental Sustainability Implications
7.1	N/A

8	Appendices
8.1	<p>Appendix 1 – List of roles currently subject to Enhanced DBS checks</p> <p>Appendix 2 - Extracts from Staff Handbook. Appendices 35 – Policy statement on the Use and Funding of DBS registration and DBS disclosures.</p> <p>Appendix 3 – Extract from Employee Handbook - Appendix 25 - Policy statement on the use of criminal record checks</p> <p>Appendix 4 - Employee Handbook - Appendix 26 - The storage, handling, use, retention & disposal of disclosures & information</p> <p>Appendix 5 – Updated New DBS Policy</p>
9	Background Papers
9.1	N/A

Statutory Officer approval

Approved by:

Date:

On behalf of the Chief Financial Officer

Approved by:

Date:

On behalf of the Monitoring Officer

Appendix 1

Team	Post ID	Post Description
PASC	DPS15	Play Area Maintenance Worker
PASC	LRS15	Urban Park Ranger (work in schools)
Community Relations	COM01	Service Manager - Community Relations
Community Relations	LFA20	Caretaker
Community Relations	LRS03	Events & Play Officer
Community Relations	LRS05	Arts Strategy and Development Officer
Community Relations	LRS20	Sports & Health Development Officer
Leisure Services (Arnold LC)	LAR04	Duty Manager
Leisure Services (Arnold LC)	LAR20	Assistant Manager
Leisure Services (Arnold LC)	LAR22	Theatre Manager
Leisure Services (Arnold LC)	LAR24	Trainee Theatre Administration - Intern
Leisure Services (Arnold LC)	LAR25	Apprentice Theatre Support
Leisure Services (Arnold LC)	LAR26	Theatre Duty Manager
Leisure Services (Arnold LC)	LAR27	Theatre Support Officer
Leisure Services (Arnold LC)	LAR28	Theatre Admin Assistant
Leisure Services (Arnold LC)	LAR29	Theatre Cleaner
Leisure Services (Arnold LC)	LAR30	Duty Manager
Leisure Services (Arnold LC)	LAR40	Leisure Attendant
Leisure Services (Arnold LC)	LAR50B	Receptionist
Leisure Services (Arnold LC)	LAR80B	Centre Attendant
Leisure Services (Arnold LC)	LAR90	Cleaner
Leisure Services	LCA20	Assistant Manager
Leisure Services	LCA30	Duty Manager
Leisure Services	LCA40	Leisure Attendant
Leisure Services	LCA50	Receptionist
Leisure Services	LCA60	Fitness Advisor
Leisure Services	LCA80	Centre Attendant
Leisure Services	LCA85	Facility Attendant
Leisure Services	LCA90	Cleaner
Leisure Services	LCA91	Cleaner (Pool)
Leisure Services	LCF01	Centre Manager
Leisure Services	LCF20	Assistant Manager

Leisure Services	LCF30	Duty Manager	
Leisure Services	LCF40	Leisure Attendant	
Leisure Services	LCF50	Clerk/Receptionist	
Leisure Services	LCF60	Fitness Advisor	
Leisure Services	LCF80	Centre Attendant	
Leisure Services	LCF90	Cleaner	
Leisure Services	LFA01	Service Manager- Leisure & Culture	
Leisure Services	LFA06	Fitness Promotion Officer	
Leisure Services	LFA07	Centre Manager	
Leisure Services	LFA10	Swim Promotions Officer	
Leisure Services	LRE20	Assistant Manager	
Leisure Services	LRE30	Duty Manager	
Leisure Services	LRE50	Receptionist	
Leisure Services	LRE60	Fitness Advisor	
Leisure Services	LRE85	Facility Attendant	
Leisure Services	LRE90	Cleaner	
Public Protection	HMP02	Housing Improvement & Enforcement Officer	
Public Protection	ELI01	Licensing Officer DBS & NPV	Enhanced check- working in police environment
Public Protection	EEE11	Community Protection Manager	Enhanced check- working in police environment
Public Protection	CCT99	CCTV Operator	Enhanced check- working in police environment
Public Protection	PUP01	Service Manager - Public Protection	Enhanced check- working in police environment
Customer Services	FRO05A	Customer Services Advisor	Counter signatory for DBS checks on taxi drivers
Customer Services	FRO05G	Customer Services Advisor	Counter signatory
Customer Services	FRO07	Customer Services Assistant Manager	Counter signatory
Customer Services	FRO07B	Customer Services Assistant Manager	Counter signatory
Customer Services	FRO09	Customer Services Manager	Counter signatory
Human Resources	ODV01	Assistant Director - Workforce	Lead Counter signatory
Human Resources	PPE09	HR & Training Manager	Counter signatory

NB: Roles in Public Protection are pending Restructure outcome.

Appendix 2

APPENDIX 35 – POLICY STATEMENT ON THE USE AND FUNDING OF DISCLOSURE AND BARRING SERVICE REGISTRATION AND DBS DISCLOSURES

As a general principle:

1. The Council maintains a list of posts that it considers require Disclosure and Barring Service Authority registration. Each Director will determine which posts within their department should be included on the list. Posts that require a DBS check will be similarly listed.
2. Directors will ensure within their department that appropriate DBS check are applied to volunteers, contractors and partners, broadly as would be applied to employees carrying out the same or similar functions or services. Costs arising from such checks are wholly met by contractors and partners.
3. The Director responsible for licensing functions of the Council will ensure that adequate policies in respect to DBS data handling and information storage are in place for these functions.
4. When a DBS checked is deemed appropriate the DBS check will be administered as follows:
 - a. A DBS check is made at the point of conditional job offer when the person first joins the organisation or first moves into a post for which the Council requires a DBS check. This is the only DBS check conducted for this individual whilst in continuous employment (or if a break in service with Gedling is of less than three months) with the Council.
 - b. The Council does not operate a regime of systematic DBS re-checking. A re-check of an employee (or similar) is only conducted where there is legislative requirement to do so.
 - c. In respect to employees, any costs arising from a DBS check only are met by the Council.
 - d. In respect to volunteers, there are no costs for a DBS check.
 - e. In respect to contractors, partners or similar, all fees and charges are met by those parties direct, with DBS checks or details of DBS registration numbers being provided prior to commencement of service provision.

Reviewed September 2023 through DBS self-assessment audit

Reviewed CMT 1/2/24

Appendix 3

Employee Handbook - APPENDIX 25 - POLICY STATEMENT ON THE USE OF CRIMINAL RECORD CHECKS

The Recruitment and Licensing of Ex-offenders

The following policy applies to the recruitment of prospective employees to the Council and licensing of prospective taxi drivers.

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to assess applicants' suitability for positions of trust, Gedling Borough Council aims to comply with the CRB Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

Gedling Borough Council is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, disability or offending background.

This written policy on the recruitment of ex-offenders is made available to all Disclosure applicants at the outset of the recruitment process or on request.

We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, application information will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.

Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to the Personnel Manager in cases of direct employment within Gedling Borough Council and to the Licensing Officer in cases of application for taxi licensing. This information is only be seen by those who need to see it as part of the recruitment or application process.

All job applicants will be expected to declare "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974. This requirement is highlighted on the standard application form. Additionally, if the nature of the work allows Gedling Borough Council to ask questions more detailed questions about a candidate's criminal records, this will be done sensitively and as far as possible, within the guidance provided by the Criminal Records Bureau.

We ensure that all those in Gedling Borough Council who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

The CRB has produced a Code of Practice, and a copy will be provided to anyone who is the subject of a Disclosure application available on request.

We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.

Appendix 4

Employee Handbook - APPENDIX 26 - THE STORAGE, HANDLING, USE, RETENTION & DISPOSAL OF DISCLOSURES & INFORMATION

General principles

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for positions of trust, Gedling Borough Council aims to comply fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also aims to comply fully 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.

Storage & 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.

Handling

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. 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.

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.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months, we will consult the CRB about this and will give full consideration to the Data Protection and Human Rights individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately and suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. 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.

Disclosure & Barring Service (DBS) Policy

Serving people, Improving lives

DOCUMENT CONTROL	
Version control number: 1:0 Draft	
Date approved:	Approved by:
Date of next review:	
Job title of responsible officer: Assistant Director - Workforce	

DISCLOSURE & BARRING SERVICE (DBS) POLICY

1.	Purpose
1.1	Gedling Borough Council is an equal opportunities employer and welcomes applications from all.
1.2	The purpose of this policy is to ensure that Gedling Borough Council acts in accordance with the DBS Code of Practice as a Registered organisation and the Rehabilitation of Offenders Act 1974, in its use of the Disclosure and Barring Service (DBS), in conducting criminal background checks on prospective and existing employees appointed to positions of trust.
2.	Scope
2.1	This policy applies to all staff, contractors, voluntary and agency workers with the Council.
3.	Types of Disclosure and Barred List Checks
3.1	<p>There are different levels of checks depending on the nature of work undertaken. The Protection of Freedoms Act 2012 resulted in a differentiation between positions which can legally have an Enhanced DBS check and those which can also be legally checked against the Children or Adults Barred List.</p> <p>The Council will conduct Enhanced Checks on specified roles with contact with vulnerable adults and children, Finance and Legal staff and roles who act as DBS countersignatories. (See List Appendix 1)</p> <p>All remaining staff will be subject to a Basic Check.</p>
3.2	<p>Enhanced DBS Check (including child and/or adult barred list) – Used only for individuals undertaking regulated activity</p> <p>This check covers:</p> <ul style="list-style-type: none"> • Unspent convictions • spent convictions • Cautions, warnings and reprimands • Other relevant police information • Children's or adults barred list
3.3	<p>Enhanced DBS Check (excluding barred list) – Used for example when an individual is undertaking work with vulnerable adults, once a week or more, or 4 days in any 30-day period, or overnight.</p> <p>This check covers:</p> <ul style="list-style-type: none"> <input type="checkbox"/> unspent convictions, <input type="checkbox"/> spent convictions, <input type="checkbox"/> cautions, warning and reprimands, <input type="checkbox"/> Other relevant police information.

3.4	<p>Standard DBS Checks – Used for example when an individual has access to personal sensitive data about children and vulnerable adults.</p> <p>This check covers:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Unspent convictions, <input type="checkbox"/> Spent convictions, <input type="checkbox"/> Cautions, warnings and reprimands.
3.5	<p>Basic DBS Checks – Used when it is in the interest of the Council to obtain a criminal record history, for example when an individual in working in a position of trust.</p> <p>As part of a safer recruitment drive- all colleagues will undergo a minimum of basic level DBS check. This check covers:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Unspent convictions <input type="checkbox"/> Conditional warnings
4.	Recruitment
4.1	All recruitment will be in line with the Council's Recruitment and Selection Protocol.
4.2	Where a post requires a criminal records check, the advertisement and job pack will contain a statement that any offer of employment will be subject to the outcome of this check.
4.3	Details of disclosed criminal records will only be seen by those that need to as part of the recruitment process.
4.4	It is an offence for the Council to employ someone to work in regulated activity if they have been barred by the DBS. Equally, if a barred person made an application they would be breaking the law. If the checks reveal that a candidate is on the barred list for regulated activity the Council will make a referral to DBS to notify them of the individual's attempt to apply for barred work.
4.5	<p>Where an individual has undertaken a DBS Disclosure for a position and they move to another position within the Council, the DBS Disclosure will be acceptable in the following instances:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the type of DBS Disclosure is the same for the old and new post and <input type="checkbox"/> the individual has not had a break in service of more than three months and <input type="checkbox"/> The new work does not represent a significant increase in responsibility for, and contact with, children and/or vulnerable adults.
5.	Validity and Portability of DBS Disclosures

5.1	There is no period of validity for a DBS Disclosure. Whilst accurate at the time of issue, it is technically out of date following the date issued as a new conviction; caution etc. may be recorded against the individual at any time after the issue date.
5.2	All employees are required to advise Human Resources if they are convicted or cautioned etc. Failure to do so will lead to disciplinary procedures being invoked.
6.	Commencing Employment prior to receipt of DBS Disclosure
6.1	<p>In all circumstances every effort must be made to ensure a DBS Disclosure is obtained prior to an individual commencing employment. Only in exceptional circumstances can an employee take up employment without the full results of the DBS Disclosure being known. Approval for this will be undertaken by Human Resources and take into account the following factors:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The correct recruitment and selection procedure has been followed <input type="checkbox"/> The other pre-employment checks being confirmed as being satisfactory and <input type="checkbox"/> A correctly completed DBS Disclosure application form having been submitted to the umbrella organisation <input type="checkbox"/> A risk assessment form completed by the line manager to confirm that sufficient safeguards are in place to ensure the individual has no unsupervised access to children or vulnerable adults.
7.	Recruiting from Overseas and UK Applicants who lived Abroad
7.1	DBS Disclosures do not record convictions that were committed abroad. When recruiting candidates who have spent some time living or working abroad, a DBS Disclosure must be obtained in the normal way and a criminal records check, or 'Certificates of Good Character' should be requested in accordance with home office guidance. Further guidance is available on the DBS website.
8.	Adverse Disclosures/New Offences
8.1	<p>In cases where a DBS check reveals details of a criminal background or details of concern a risk assessment will be conducted using an Adverse Disclosure Form (See Appendix 2) which will involve:</p> <ul style="list-style-type: none"> • Line/recruiting manager and HR representative discussing the adverse disclosure with the employee/candidate • establishing why the offence was not declared • reviewing the serious nature of the offence • how long ago the offence took place • whether the offence will create a high level of risk that cannot be tolerated based on the work they will be doing
8.2	In accordance with the Rehabilitation of Offenders Act, a criminal conviction may not automatically bar an individual from employment. Further guidance may need to be sought from the CRB or the police.

8.3	The risk assessment and decision should be recorded on an Adverse DBS form within 3 working days of initial notification. Confirming whether to appoint or withdraw offer or, for a current employee whether to retain in employment. A Director with the Assistant Director of Workforce needs to provide approval.
8.4	Should the offence have no bearing on the work that the employee will be doing and took place many years ago, it may be possible to go ahead with the appointment or employment.
8.5	If a current employee is issued with a caution or warning, etc., during the course of their employment they should notify their line manager and HR as soon as possible. An adverse disclosure assessment will be conducted to protect the Council as per 8.1 above.
9.	Rechecks for Employees
9.1	The Council has adopted as best practice a rechecking policy, for checks to be undertaken on a three yearly basis .
9.2	The Human Resources Team will trigger the umbrella organisation to issue an online DBS application when rechecks are required to initiate the process every three years.
9.3	Failure to complete the DBS application form and provide the appropriate evidence will have implications on continued employment. In such cases, employees will no longer be able to fulfil their duties and continue in their role and disciplinary procedures will be invoked.
9.4	Where an existing employee's DBS Disclosure reveals details of a criminal record the Human Resources Department will implement the adverse disclosures process.
10.	Data Protection and Storage of Information
10.1	The Council will ensure that sensitive personal information is treated as confidential, held securely, and only accessed by those entitled to see it in the course of their duties.
10.2	Recipients of disclosure information, through electronic means or via the applicant's copy of the disclosure, must note that it is an offence to disclose information contained within a DBS Certificate to any person who is not a member, officer or employee of the Registered Body or their client, unless a relevant legal exception applies.
10.3	It is also an offence to disclose information to any member, officer or employee where it is not related to that employee's duties.
10.4	All information will be retained as per the DBS Code of Practice and not placed on an employee's personal file. It will be retained for no longer than six months , unless a dispute is raised or, in exceptional

10.5	<p>circumstances, where CRB agreement is secured.</p> <p>No reproductions of the Disclosure or its contents should be made, including photocopies or scanned images, unless with prior agreement of the CRB.</p> <p>DBS information will be kept separately and securely, in lockable, non-portable, storage or on-line in folders with access strictly controlled and limited to those who are entitled to see it as part of their duties.</p>
11.	Agency Workers
11.1	<p>All agency staff require a DBS check. The agency is legally the employer of agency workers and the responsibility to obtain a relevant DBS check is theirs. The manager requesting the agency worker should indicate the level of DBS required.</p>
11.2	<p>When using an agency worker, the line manager or Human Resources Team should have written confirmation from the agency or a copy of the DBS check, including disclosure number and date of disclosure to ensure that each worker supplied to them has had a satisfactory DBS check and checks against the Children's and/or Adult's barred list as required for that area of service.</p>
12.	Contractors and Sub-Contractors
12.1	<p>All contractors require a DBS check; the manager should include this in the procurement documentation. The organisation providing the contractor is legally the employer of any contractors and the responsibility to obtain a relevant DBS check is theirs as well as meeting the costs for them.</p>
12.2	<p>The lead manager should have written confirmation from the employer or a copy of the DBS check, to ensure that each worker has had a satisfactory DBS check and checks against the Children's and/or Adult's barred list as required for that area of service.</p>
13.	Volunteers and Work Placements
13.1	<p>Volunteers and work placements who are undertaking activity which meets the criteria for a DBS check are required to undertake a relevant DBS check. The costs for conducting the checks will be met by the Council at its discretion.</p>
14.	The Recruiting and Licensing of Ex-Offenders
	<p>All job applicants will be expected to declare "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974. This requirement is highlighted on the standard application form and where members of the public are applying for licences, e.g., Taxi Drivers.</p> <p>We ensure that all those in Gedling Borough Council who are involved in the recruitment process have been suitably trained to identify and</p>

	<p>assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974 and ensure confidentiality is paramount when handling personal sensitive information.</p> <p>A breach of confidentiality would be a breach of the CRB Code of Practice and may lead to further action.</p> <p>In the event of receiving an unsuitable CRB Check for a role, we undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.</p> <p>A copy of the CRB Code of Practice will be provided to applicants upon request.</p> <p>Having a criminal record will not necessarily bar an individual from working for the Council. This will depend on the nature of the position, the circumstances and background of your offences as part of a risk assessment.</p>
15.	Referral to the Disclosure and Barring Service
15.1	<p>Under the Safeguarding Vulnerable Groups 2006 Act there is a legal duty to refer information to the DBS if an individual is dismissed or removed from working with children and/or adults (in what is legally defined as Regulated Activity) because they meet the referral criteria.</p> <p>The Council has a duty to refer information to the DBS as both a regulated activity provider and as a local authority.</p>

Appendix 1

Team	Post ID	Post Description
PASC	DPS15	Play Area Maintenance Worker
PASC	LRS15	Urban Park Ranger (work in schools)
Community Relations	COM01	Service Manager - Community Relations
Community Relations	LFA20	Caretaker
Community Relations	LRS03	Events & Play Officer
Community Relations	LRS05	Arts Strategy and Development Officer
Community Relations	LRS20	Sports & Health Development Officer
Leisure Services (Arnold LC)	LAR04	Duty Manager
Leisure Services (Arnold LC)	LAR20	Assistant Manager
Leisure Services (Arnold LC)	LAR22	Theatre Manager
Leisure Services (Arnold LC)	LAR24	Trainee Theatre Administration - Intern
Leisure Services (Arnold LC)	LAR25	Apprentice Theatre Support
Leisure Services (Arnold LC)	LAR26	Theatre Duty Manager
Leisure Services (Arnold LC)	LAR27	Theatre Support Officer
Leisure Services (Arnold LC)	LAR28	Theatre Admin Assistant
Leisure Services (Arnold LC)	LAR29	Theatre Cleaner
Leisure Services (Arnold LC)	LAR30	Duty Manager
Leisure Services (Arnold LC)	LAR40	Leisure Attendant
Leisure Services (Arnold LC)	LAR50B	Receptionist
Leisure Services (Arnold LC)	LAR80B	Centre Attendant
Leisure Services (Arnold LC)	LAR90	Cleaner
Leisure Services	LCA20	Assistant Manager
Leisure Services	LCA30	Duty Manager
Leisure Services	LCA40	Leisure Attendant
Leisure Services	LCA50	Receptionist
Leisure Services	LCA60	Fitness Advisor
Leisure Services	LCA80	Centre Attendant
Leisure Services	LCA85	Facility Attendant
Leisure Services	LCA90	Cleaner
Leisure Services	LCA91	Cleaner (Pool)
Leisure Services	LCF01	Centre Manager
Leisure Services	LCF20	Assistant Manager
Leisure Services	LCF30	Duty Manager
Leisure Services	LCF40	Leisure Attendant
Leisure Services	LCF50	Clerk/Receptionist
Leisure Services	LCF60	Fitness Advisor

Leisure Services	LCF80	Centre Attendant	
Leisure Services	LCF90	Cleaner	
Leisure Services	LFA01	Service Manager- Leisure & Culture	
Leisure Services	LFA06	Fitness Promotion Officer	
Leisure Services	LFA07	Centre Manager	
Leisure Services	LFA10	Swim Promotions Officer	
Leisure Services	LRE20	Assistant Manager	
Leisure Services	LRE30	Duty Manager	
Leisure Services	LRE50	Receptionist	
Leisure Services	LRE60	Fitness Advisor	
Leisure Services	LRE85	Facility Attendant	
Leisure Services		Caretakers	
Leisure Services	LRE90	Cleaner	
		Housing Options Officers	
Public Protection	HMP02	Housing Improvement & Enforcement Officer	
Public Protection	ELI01	Licensing Officer DBS & NPV	Enhanced check- working in police environment
Public Protection	EEE11	Community Protection Manager	Enhanced check- working in police environment
Public Protection	CCT99	CCTV Operator	Enhanced check- working in police environment
Public Protection	PUP01	Service Manager - Public Protection	Enhanced check- working in police environment
Customer Services	FRO05A	Customer Services Advisor	Counter signatory for DBS checks on taxi drivers
Customer Services	FRO05G	Customer Services Advisor	Counter signatory
Customer Services	FRO07	Customer Services Assistant Manager	Counter signatory
Customer Services	FRO07B	Customer Services Assistant Manager	Counter signatory
Customer Services	FRO09	Customer Services Manager	Counter signatory
Human Resources	ODV01	Assistant Director - Workforce	Lead Counter signatory
Human Resources	PPE09	HR & Training Manager	Counter signatory

Managing Adverse Criminal Record Disclosure

Date:.....Role Applied For.....

Recruiting/Line Manager

Applicant Declaration Form Details/Notification of new offence

Information Provided:

.....

Disclosure and Barring Service document

Information on Disclosure:.....

.....

Date of Disclosure:.....

Risk Assessment (please circle as appropriate)

(a) Does the position involve contact with children and/or vulnerable groups? Yes/No

(b) What level of supervision will the individual receive during the normal course of duties at work?

(c) Does the position involve direct contact with the public? Yes/No

(d) Does the position applied for involve direct responsibility for finance or items of value? Yes/No

(e) Will the nature of the position present opportunities for the individual to re-offend in the workplace?
Yes/No

Outcome/decision (please circle as appropriate)

Director/Assistant Director of Workforce (or nominated Deputy)

Appoint/Reject

Name:..... Signature:.....

Date:.....