


Reference Number: P06

**DISCLOSURE AND BARRING SERVICE (HANDLING)
POLICY & PROCEDURE**

Staff, Learners, and Associates



| Policy Review | | | | | |
|---------------|------------|--|---------------|--------------|----------------------|
| Author | Position | Approved by | Approval date | Review Cycle | Published on Website |
| Rachel Gage | Head of HR | SMT Signed:  | 09/09/2025 | 2- years | N |

| Author/Owner | Summary of Changes | Date | Date last review ed by SED | Recommend to SED Y/N |
|----------------|--|------------|----------------------------|----------------------|
| Steve Chattell | Minor amendments to reflect updated procedure | 05.10.18 | 18.03.16 | No |
| Gayle Williams | No changes | 03.12.2021 | | No |
| Donna Short | Merged with R40, P06 and R06 to create this new P06 Policy. Procedure for students, and staff also added policy information on Contractors on site. | 13.02.2023 | | |
| Rachel Gage | Updated to remove reference to 'registered body status', sections 1.3 and 2.8. and 'umbrella body' status 4.5 Updated 5.5 for information that college uses external supplier for Electronic DBS Updated 4.3 to be specific about enhanced adult with barred list being required for some posts. Remove any reference to 'lead signatory' or 'counter signatory'. At 3.3. added an additional responsible person for ensuring checks on nursery are completed every 3 years. Job titles updated as appropriate. 8.1 updated to current practice. | Sept 2025 | | |

| Initial Equality Impact Screening | | | | | |
|--|---|------------------------------|-------------------|--------------|-------------------|
| Has anyone else been consulted on this policy and/or procedure? | | | | | |
| What evidence has been used for this impact screening (e.g., related policies, publications)? | | | | | |
| Declaration (please tick one statement and indicate any negative impacts) | | | | | |
| <input checked="checked" type="checkbox"/> | I am satisfied that an initial screening has been carried out on this Policy and/or Procedure and a full Equality Impact Assessment is not required. There are no specific negative impacts on any of the Protected Characteristics groups. | | | | |
| <input type="checkbox"/> | I recommend that an Equality Impact Assessment is required by the Equality and Diversity group, as possible negative impacts have been identified for one or more of the Protected Characteristics groups as follows: | | | | |
| | <input type="checkbox"/> | Age | | | |
| | <input type="checkbox"/> | Disability | | | |
| | <input type="checkbox"/> | Gender Reassignment | | | |
| | <input type="checkbox"/> | Race | | | |
| | <input type="checkbox"/> | Religion or belief | | | |
| | <input type="checkbox"/> | Sex | | | |
| | <input type="checkbox"/> | Sexual orientation | | | |
| | <input type="checkbox"/> | Marriage & civil partnership | | | |
| | <input type="checkbox"/> | Pregnancy & maternity | | | |
| Completed by: | Rachel Gage | Position: | Head of HR | Date: | 23/05/2025 |
| <p>Reviewed by Equality & Diversity Group: NO If Yes:</p> <p>Date: I confirm that any recommended amendments have</p> <p>been made.</p> | | | | | |

| | | | | | |
|--|--|------------------|--|--------------|--|
| Summary of Comments including Recommendations from Equality & Diversity Group Review: | | | | | |
| Amended by Author: | | Position: | | Date: | |

Contents

| | | |
|-----|--|----|
| 1. | PURPOSE OF THE POLICY | 4 |
| 2. | SCOPE | 4 |
| 3. | RESPONSIBILITY AND AUTHORITY | 6 |
| 4. | DISCLOSURE AND BARRING SERVICE GUIDANCE..... | 7 |
| 5. | PROCEDURE – STAFF RECRUITMENT | 9 |
| 6. | RETENTION OF INFORMATION | 10 |
| 7. | USAGE OF INFORMATION | 10 |
| 8. | EXISTING STAFF | 11 |
| 9. | INTERNATIONALLY RECRUITED STAFF | 11 |
| 10. | LEARNER DBS PROCEDURE | 11 |
| 11. | CONFIDENTIALITY | 12 |
| 12. | CONTRACTORS PROCEDURE | 12 |
| 13. | ASSOCIATES OR VOLUNTEERS | 13 |

1. PURPOSE OF THE POLICY

- 1.1. As an organisation which uses the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust as well as associates of the college including some contractors that may in the course of work have unsupervised access to young people or vulnerable adults.
- 1.2. The policy also applies to students at the college who participate in work experience activities which involve children or vulnerable adults. The College has a responsibility to ensure that students who enrol on courses involving work with children and/or vulnerable adults are eligible to work in these sectors according to the conditions laid down by the Independent Safeguarding Authority.
- 1.3. Yeovil College complies 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 and our policy on these matters is detailed below.

2. SCOPE

- 2.1. This policy applies to the safe handling, use, storage, retention, and disposal of the DBS for applicants, staff members, students studying on programmes that require DBS for work experience elements of their study programme and for some associates of the college who require a DBS to enable them to conduct work for Yeovil College. The policy applies to all potential and current staff, including temporary workers; service providers; agency staff; and individuals engaged with Yeovil College on a self-employed contract basis.
- 2.2. **Students** - This policy also applies to students undertaking study programmes involving work with children and/or vulnerable adults. A child is defined as anyone who has not yet reached their 18th birthday. The term vulnerable adult refers to any person, over the age of 18, in need of community care or support services because of old age, mental health issues, physical disability, hearing, seeing and/or communication difficulties, learning

disabilities or the inability to protect themselves from significant harm or being taken advantage of.

- 2.3. **Contractors** - It is the contractor's responsibility to ensure staff working on college premises for more than 3 days in a 30-day period have a full Enhanced DBS or be supervised in their work by someone who does. Yeovil College have the responsibility to review and check the appropriate DBS are in place before allowing commencement of any works.
- 2.4. **Communication** - To ensure that applicants are aware of this policy, it is provided at the outset of the recruitment process for roles where a disclosure will be required as part of the pre-employment checks.
- 2.5. **Storage and Access** - Disclosure information is stored in line with the DBS guidance securely in lockable, non-portable drawer units with access strictly controlled and limited.
- 2.6. **Handling** - In accordance with section 124 of the Police Act 1977, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. The College recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.
- 2.7. Personal information obtained and stored either electronically or physically for the purposes of DBS disclosure will be handled in accordance with data protection regulations and the college's data protection policy.
- 2.8. **Usage** - Disclosure information is only used for the specific purpose for which it was requested.
- 2.9. **Retention** - Once a recruitment (or other relevant) decision has been made we do not keep Disclosure information for any longer than is necessary, in line with our Data Protection Policy. Throughout that time, the usual conditions regarding safe storage and strictly controlled access will prevail.
- 2.10. **Disposal** - Once the retention period has elapsed, we will ensure that any Disclosure information is immediately suitably destroyed by secure means.

3. RESPONSIBILITY AND AUTHORITY

- 3.1. The DBS helps employers make safer recruitment decisions and prevents unsuitable individuals from working with vulnerable groups, including children.
- 3.2. The Designated Senior Safeguarding Lead is responsible for deciding whether it is appropriate to recruit or engage an individual or allow a learner to be placed within a setting on work placement where DBS reports confirm a conviction or other related information.
- 3.3. The Head of Human Resources is accountable for ensuring compliance with the procedures for conducting DBS checks for staff. The responsibility for completing learner DBS checks and the procedure for these rests with the Head of Careers, Work Placement and Employability. The Nursery Manager has responsibility for ensuring nursery staff apply for a new check every 3 years.
- 3.4. The candidate, employee, learner, volunteer, or associate of the college is responsible for disclosing any cautions, convictions or pending prosecutions they may have even if they would otherwise be regarded as spent under The Police Act 1997, as they are exceptions of The Rehabilitation of Offenders Act 1974. Establishments use this to safeguard children and vulnerable adults as part of their engagement process. Where they are already employed or engaged, they are responsible for alerting the college to any new cautions, convictions or pending prosecutions and a new DBS may be requested.
- 3.5. The HR Team are responsible for keeping accurate records for college employees, associates and volunteers. The Careers, Work Placement and Employability team are responsible for keeping accurate records of learner DBS and the Estates and Facilities Manager is responsible for keeping accurate records of contractors EDBS.
- 3.6. The Head of HR and the DSL are responsible for reviewing this policy on a regular basis.

4. DISCLOSURE AND BARRING SERVICE GUIDANCE

- 4.1. The DBS provides two levels of “Disclosure” each representing a different level of checking Standard Disclosure and Enhanced Disclosure. The DBS will make a charge per disclosure. Standard Disclosures are for positions exempted from the provisions of the Reemployment of Offenders Act. They may also be issued for people entering certain professions that involve positions of trust, such as members of the legal and accountancy professions. A standard disclosure contains details of all convictions held on the Police National Computer including current and “spent” convictions, as well as details of any cautions, reprimands, or final warnings.
- 4.2. Enhanced Disclosures (including children’s barred list information or adult barred list information) are for positions involving regulated activity or activity in a specified place. Regulated Activity is a statutory term used to describe working or volunteering with children or vulnerable adults. It covers any work, whether paid or unpaid, which is conducted on a frequent, intensive, or overnight basis but does not include family or personal arrangements. There are particular roles that are deemed to be of a specified nature and as such are considered to be regulated activity; these include teaching, training, supervision, advice, treatment and transport. Specified places include Schools, Pupil referral units, childcare premises (including nurseries), residential children’s care homes, children’s hospitals, children’s detention centres, Children’s centres in England and Adult Care Homes. Although general FE Colleges are not included, a policy decision has been made by the College to consider the organisation to be counted as a specified place because of the number of children and vulnerable adults attending the college. This is the highest level of disclosure. In addition to listing convictions, cautions, reprimands or final warnings, an additional check is conducted with the Police. If the Police consider that they hold any additional relevant information on their records, then this will be flagged to the college.
- 4.3. The college will require successful applicants to apply for a “Disclosure”. All staff members, Governors, Learners on some work placements, temporary staff, associates, and volunteers will need to apply for the “enhanced child with barred list” check. For a limited number of roles at the college there will also be the need to apply at the same time for an “enhanced adult with barred list” check. There will be no charge by the DBS for checking Governors or any other volunteer. There will be a charge for volunteers where the purpose of the volunteering arrangement is to support the achievement of a qualification. Volunteers will be made aware of this. Any trainee teachers on placement will also be required to pay the DBS plus an administration charge. The College will pay for a DBS check to be conducted for any staff

member.

4.4. Contractors who work on college premises unsupervised will need to apply for an enhanced child DBS with barred list check through their own employer.

4.5. When employing a member of staff to work at Yeovil College or engaging with a volunteer, contractor or associate we must ensure that:

4.5.1. Disclosure information is fully considered for relevancy to the job/reason for engagement. Disclosure in itself does not automatically mean a person will not be able to work or be engaged by us.

4.5.2. Full consideration is given regarding 'spent convictions' (as laid down in the Rehabilitation of Offenders Act).

4.5.3. We encourage successful applicants/contractors, volunteers or associates to be honest

4.5.4. Shortlisted applicants are informed early in the recruitment process that a check will be required.

4.5.5. Successful applicants can freely discuss disclosures with a member of the HR team, in confidence.

4.6. Where a disclosure is requested either by statute or otherwise and offences are disclosed, the College will consider the following:

4.6.1. The level of contact with children (under 18) or vulnerable adults.

4.6.2. The level of close supervision the person will receive.

4.6.3. The responsibility for money or items of value.

4.6.4. Will there be opportunities to re-offend at work.

4.6.5. The seriousness of the offence.

4.6.6. The length of time since the offence was committed.

4.6.7. Whether the offence was a "one-off" and conducted when very young.

4.6.8. Whether the applicant's circumstances have changed.

4.6.9. Whether the offence has been decriminalised by Parliament.

4.6.10. Our setting in relation to the offence

4.6.11. Keeping Children Safe in Education Statutory Guidance.

4.7. Those in posts which may require them to provide a certain level of care for vulnerable adults will also be required to apply for an enhanced disclosure for both adult and child with barred list check for adult and barred list check for child. Those in posts in our children's nursery are required to apply for a new enhanced DBS with child barred list check every 3 years. We manage this process by asking individuals to sign up to the DBS update service so that checks can be verified easily and in a timely manner. The college will reimburse this expense to colleagues.

Any Associates, self-employed staff or contractors are required to provide evidence of or go through the college's checks including an enhanced level DBS with child barred list check if they are to be unsupervised on college premises or with access to learners remotely, on a regular basis. The College will request a disclosure alongside other pre-employment checks from any recruitment agency before contracting agency staff for work requiring a disclosure.

4.8. This information should be read in conjunction with our Recruitment Policy and procedure in relation to the recruitment of ex-offenders.

5. PROCEDURE – STAFF RECRUITMENT

5.1. Throughout the recruitment process there are statements of safeguarding, confirming and indicating to potential and shortlisted candidates that they will require an enhanced disclosure and barring check with child barred list check if they are successful.

5.2. At several stages throughout the recruitment process applicants are prompted to make disclosures which they can do confidentially.

5.3. Recruiting panels are made aware of disclosures on a need-to-know basis only.

5.4. Should an applicant indicate they have a prior conviction the applicant will be encouraged to make a self-disclosure. The College reserves the right to reject the applicant and withdraw the job offer on this basis.

5.5. Once an offer has been confirmed, the successful applicant is sent a secure link to complete their EDBS (Electronic Disclosure and Barring Service) application and invited into HR to provide evidence of their identity by producing original identity documents as prescribed by DBS. Once this evidence has been provided (and is deemed to be satisfactory) the HR team members will complete the relevant sections of the electronic application to initiate the process. The college

currently uses a company called UCheck to provide this service but reserves the right to change the service provider at any time, ensuring appropriate financial rules are followed and data protection assurances are met.

- 5.6. Offers of posts will be subject to satisfactory Disclosure. Staff will not normally be allowed to start work in any posts until a satisfactory disclosure has been received. Should a member of staff be urgently required before the DBS check has been returned to college, then a risk assessment form must be completed and authorised by the Senior Safeguarding lead prior to any commencement of work, and a barred list check will be completed. A member of the HR team will then advise if the person may start.

6. RETENTION OF INFORMATION

- 6.1. Once a recruitment (or other relevant) decision has been made we do not keep Disclosure information for any longer than is necessary for unsuccessful candidates. Throughout the retention period the usual conditions regarding safe storage and strictly controlled access will prevail.

7. USAGE OF INFORMATION

- 7.1. Disclosure information will be used only for the specific purpose it has been requested. Information enclosed in the disclosure will only be shared with the appropriate HR staff involved in the recruitment process, the Head of HR, Director for People and Compliance and the Senior Post holder responsible for safeguarding. The manager and senior manager involved in the recruitment process will be informed if the disclosure reveals a problem and then on a need-to-know basis only with information limited as appropriate. They will be bound by the college's data protection policy and procedure and their contract of employment. It will not be shared with students or colleagues. Any decision on appropriateness of continuing with any appointment will be made by the DSL and as appropriate in conjunction with senior management. This decision will be made in a fair and equitable way, considering any potential safeguarding risks.

8. EXISTING STAFF

- 8.1. The college reserves the right to carry out re-checking of DBS status at any time which will require the staff member to apply for new enhanced DBS with child (and if appropriate adult) barred list check. Usually, staff moving posts will be asked to apply for a new DBS. As previously noted, staff in the college nursery are required to apply for a new check every 3 years.

9. INTERNATIONALLY RECRUITED STAFF

- 9.1. Staff who are not from the United Kingdom will still be required to complete a DBS check before commencing work at the College (both paid staff associates and volunteers). Should the DBS check not be back before the planned start date, then a barred list check must be completed, and a risk assessment form authorised by Designated Safeguarding lead before the person may start. Additionally, the member of staff (including volunteers) will be asked to complete and sign a declaration indicating that they have nothing to declare on any safeguarding matter.
- 9.2. Following DBS guidance, the college may request the individual to gain further checks from the countries in which they have been residing.

10. LEARNER DBS PROCEDURE

- 10.1. Careers and Work Placement Coordinators in the Careers, Work Placement and Employability team are responsible for processing a learners DBS. Responsibility for identifying students who require a DBS check rests with the Curriculum Area Manager (CAM) who delivers the course or activity.
- 10.2. Concerns raised whilst completing the DBS process should be directed to the Head of Student Support. Ultimate responsibility lies with the Vice Principal Quality of Education who is the Senior Manager responsible for safeguarding.

- 10.3. This procedure applies to students undertaking courses involving work with children and/or vulnerable adults. A child is defined as anyone who has not yet reached their 18th birthday. The term vulnerable adult refers to any person, over the age of 18, in need of community care or support services because of old age, mental health issues, physical disability, hearing, seeing and/or communication difficulties, learning disabilities or the inability to protect themselves from significant harm or being taken advantage of.
- 10.4. Learners have a responsibility to self-declare any known or pending convictions on application and enrolment. Following any disclosure, students are to complete the Criminal Record Disclosure Form. Any disclosure from a learner must be referred immediately to the Head of student support, who will carry out a detailed risk assessment.

11. CONFIDENTIALITY

- 11.1. Designated Careers, Work Placement and Employability Co-Ordinators are counter signatories for the purpose of checking and completing DBS disclosure forms and any concerns on return of the DBS will be discussed with the relevant Curriculum Area Manager and Vice Principal Quality of Education (Designated Safeguarding Lead) as appropriate.
- 11.2. Appropriate colleagues and stakeholders involved in the placement (including employer) will be informed within the “need to know” appropriate boundaries and will be discussed with the student first. If the DBS disclosure is likely to impact on their chosen career path, then a further discussion is to be held with the student and parent as appropriate by the Curriculum Area Manager.
- 11.3. The Criminal Record Disclosure (Yeovil College internal form) will be kept by the Head of Student Support until the student has completed their course.
- 11.4. The DBS number will be kept until the student has completed their course.

12. CONTRACTORS PROCEDURE

- 12.1. A contractor from any business or company wishing to enter college premises to complete work must follow the procedure below.

12.2. Before attending site, Contractors must request to come to site by emailing facilities@yeovil.ac.uk at least 24 hours before said visit.

12.3 When requesting an on-site visit contractor must confirm:

12.3.1 Date and time of visit

12.3.2 Approximate time frame

12.3.3 Nature of work to be provided

12.3.4 Confirm whether they hold an Enhanced DBS

12.4 On permission to attend site contractor must:

12.4.1 Report to the facilities management office

12.4.2 Show Contractor ID

12.4.3 Read and sign Yeovil College term and conditions (including code of conduct, tool talk and mandatory safeguarding questions.

12.4.4 Collect Yeovil College lanyard.

12.4.5 Confirm vehicle details and location of parked vehicle.

12.4.6 Confirm location of work.

12.5 When the contractor is on College Premises they must:

12.5.1 Any contractors working on site for more than 3 days in any 30-day period require a full Enhanced disclosure and Barring service DBS or be supervised by a colleague who does hold a Full Enhanced DBS.

12.5.2 work on site is less than 3 days in any 30-day period, then contractors will need a Risk assessment completed prior to the start of any works it is the responsibility of the facilities team to ensure the risk assessment is completed and approved by the DSL prior to the commencement of works.

12.5.3 If Contractors require access to an area of the College not previously agreed, then express permission must be sought first by the (Head of Infrastructure or Facilities Manager) and then By the DSL if additional access increases any risk to learner safety.

13 ASSOCIATES OR VOLUNTEERS

Non employed associates or volunteers of Yeovil College must have an enhanced child DBS with barred list check in place before commencing work with the college. If appropriate they will also need an enhanced adult DBS with barred list check as well. In some instances, the college will fund the cost of DBS for associates, volunteers are normally free except in circumstances where the volunteering forms part of gaining a qualification. In which case the volunteer will be liable to pay the college the DBS fee plus an administrative fee.

The volunteers will need to follow the recruitment of staff procedure and complete all relevant documentation.

If a volunteer or Associate applicant indicates they have a prior conviction the applicant will be encouraged to make a self-disclosure. The College reserves the right to reject the applicant, volunteer or associate and withdraw any offer on this basis.