



Vetting and DBS Policy

Part of the BYO Operations and Administration Policy Suite

Britannia Youth Organisation CIC is a Community Interest Company registered in England and Wales.
Company No. 12515346 | Registered Address: 36 St Joseph's Rd, Ward End, Birmingham, B8 2JU

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1. Introduction

Britannia Youth Organisation CIC (BYO) is committed to **safeguarding** all young people who access our services through effective use of the Disclosure and Barring Service (DBS) vetting process.

As an organisation using DBS checks to assess suitability for positions of trust, BYO complies fully with the DBS Code of Practice and treats all applicants fairly. We do not discriminate unfairly against anyone based on conviction or other information revealed, but we prioritise the safety of young people in our care.

This policy applies to:

- All staff (paid employees)
- All volunteers
- Student placements and work experience
- Contractors working with young people
- Agency workers
- Anyone in positions of trust with young people

2. Legal Framework

This policy operates under:

- **Safeguarding Vulnerable Groups Act 2006** (as amended by Protection of Freedoms Act 2012)
- **DBS Code of Practice**
- **Rehabilitation of Offenders Act 1974**
- **Care Act 2014**
- **Working Together to Safeguard Children 2024**

3. Our Approach

BYO recognises that criminal record checks must balance:

- Safeguarding children and young people
- Individual rights to privacy and rehabilitation
- Fair treatment of ex-offenders
- Proportionate assessment of risk

Key principle: We assess risk to young people rather than simply excluding people with criminal records.

See also: *[Recruitment of Ex-Offenders Policy]* for detailed risk assessment procedures and *[Safeguarding Policy Framework]* for overarching safeguarding principles.

4. Types of DBS Checks

4.1 Enhanced Check for Regulated Activity (Children)

Used for: All BYO roles involving contact with **children** and young people

Includes: Police National Computer check, police information, Children's Barred List

This applies to:

- All **staff** positions
- All **volunteers**
- Student placements with unsupervised contact
- Regular contractors

4.2 When Checks Are Required

- **Always required:** Any role involving direct contact with children/young people
- **Always required:** Any unsupervised access to BYO premises during activities
- **Not required:** One-off visitors, supervised **volunteers** for single events

4.3 Level of Check

All BYO roles require **Enhanced DBS with Children's Barred List** check because we work exclusively with children and young people under 24.

See also: *[Recruitment, Selection and Onboarding Policy]* for comprehensive recruitment procedures.

5. Recruitment Process

5.1 Before Advertising

The recruiting manager identifies that Enhanced DBS check is required for all roles and includes this in:

- Job advertisements
- Role descriptions
- Application packs

5.2 Application Stage

All applicants must:

- Complete application form including declaration of unspent convictions
- Provide details of spent convictions not protected by filtering rules
- Explain any gaps in employment history

5.3 Interview Stage

- Criminal history discussed confidentially if declared
- Candidates informed that conditional offers are subject to satisfactory DBS check
- No decisions made based on declared history until full assessment

5.4 Conditional Offer

- Offers are conditional on satisfactory DBS check
- No employment/volunteering begins until check completed
- Candidates required to register with DBS Update Service

See also: **[Recruitment, Selection and Onboarding Policy]** for complete recruitment procedures and **[Recruitment of Ex-Offenders Policy]** for specific guidance on assessing applications from ex-offenders.

6. DBS Application Process

6.1 Initial Check

For new appointments:

1. Check if candidate has current DBS certificate with Update Service registration
2. If yes: Verify certificate and conduct online status check
3. If no current certificate: Apply for new Enhanced DBS check
4. Candidate provides identity documents for verification

6.2 DBS Update Service

- All new staff/volunteers must register with Update Service as condition of appointment
- Allows us to check status online for future moves
- Reduces need for repeated applications

6.3 Processing

- Designated Safeguarding Lead (Joshua Hall) oversees all DBS processes
- Governor (Hassan Kingsley) authorises employment following satisfactory checks
- No employment begins until certificate seen and approved

7. Assessment of DBS Results

7.1 Clear Certificates

- Employment/volunteering can commence
- Certificate details recorded securely
- Copy not retained (follows DBS guidance)

7.2 Certificates with Information

If DBS certificate contains criminal record information:

Immediate action:

1. **Designated Safeguarding Lead** reviews immediately
2. **Governor** consulted before any decisions
3. Individual offered opportunity to discuss circumstances
4. Risk assessment conducted using **[Recruitment of Ex-Offenders Policy]** guidance

Assessment factors:

- Relevance to working with young people
- Nature and circumstances of offence(s)
- Time elapsed since conviction
- Pattern of behaviour vs isolated incident
- Steps taken towards rehabilitation
- References and other evidence of suitability

Decision process:

- Decisions based on risk to young people, not automatic exclusion
- All decisions documented with clear reasoning
- Individual informed of outcome and reasoning
- Right of appeal through **[Complaints Policy]**

See also: **[Recruitment of Ex-Offenders Policy]** for detailed risk assessment criteria and decision-making framework.

7.3 Barred List Information

- Anyone on Children's Barred List cannot be employed in any capacity
- This is a legal requirement with no exceptions
- Offer withdrawn immediately and DBS notified

Alternative Reporting Routes

If concerns arise about the DBS process or decision-making:

- Use [\[Complaints Policy\]](#) for appeals and disputes
- Access [\[Whistleblowing Policy\]](#) for serious concerns about recruitment practices
- Contact external agencies if appropriate

8. Ongoing Requirements

8.1 Re-checking Schedule

- All staff and volunteers: DBS rechecked every 3 years
- Update Service: Online status checked annually
- New disclosures: Required if Update Service shows change

8.2 Continuous Disclosure

All staff and volunteers must immediately report:

- Any new convictions, cautions, or charges
- Police investigations
- Any change in circumstances affecting suitability

This aligns with [Code of Conduct for Staff and Volunteers] requirements for ongoing disclosure.

8.3 Record Keeping

- Single Central Record maintained of all DBS checks
- Certificate numbers and dates recorded
- Review dates tracked
- Renewal reminders issued

All records maintained in accordance with [Data Protection Policy] requirements.

9. Special Circumstances

9.1 Overseas Applicants

- DBS cannot check overseas criminal records
- Additional checks required from relevant countries
- Embassy/consulate contacts for overseas certificates
- Risk assessment for periods living abroad

9.2 Emergency Situations

- **Governor** may authorise supervised start in exceptional circumstances
- Written supervision plan required
- No unsupervised contact with young people
- DBS check must be prioritised

9.3 Volunteers Under Supervision

- **Volunteers** under direct, day-to-day supervision may start before DBS completed
- Must be supervised by DBS-checked **staff** member at all times
- Cannot be left alone with young people
- DBS check still required within reasonable timeframe

See also: *[Volunteering and Placements Policy]* for specific volunteer supervision requirements.

10. Third Party Arrangements

10.1 Agency Workers

- Agency must provide evidence of satisfactory Enhanced DBS check
- Original certificate verified on first day
- Annual re-checking required
- Same standards as direct employees

10.2 Contractors

- Regular contractors require same DBS checks as staff
- One-off contractors risk assessed individually
- Contract clauses specify DBS requirements
- Verification of checks before work begins

10.3 Student Placements

- Students requiring unsupervised contact need Enhanced DBS
- Supervised placements may be exempt but assessed individually
- Educational institution arrangements considered
- Clear supervision arrangements documented

See also: [\[Volunteering and Placements Policy\]](#) for comprehensive placement procedures.

11. Data Protection and Confidentiality

11.1 Secure Handling

- DBS information stored securely with restricted access
- Shared only on need-to-know basis
- Electronic records password protected
- Physical records in locked storage

11.2 Retention and Disposal

- Certificate details recorded but copy not retained
- Assessment records kept for employment duration plus 6 years
- Secure disposal when no longer needed
- Individual data rights respected

11.3 Information Sharing

- Information only used to assess suitability for role
- Not shared outside recruitment/management team
- Confidentiality maintained throughout process
- Individual dignity and privacy respected

*All data handling follows **[Data Protection Policy]** procedures and principles.*

12. Quality Assurance

12.1 Monitoring

- **Designated Safeguarding Lead** monitors all DBS activity
- Regular audits of Single Central Record
- Compliance checking and quality reviews
- Annual reporting to Board

12.2 Training

- Decision-makers trained in fair assessment
- Regular updates on DBS procedures
- Understanding of legal requirements
- Bias awareness and mitigation

13. Reporting Requirements

13.1 Reporting to DBS

BYO will report to DBS when:

- Someone is dismissed or removed due to risk to young people
- Someone leaves before dismissal but would have been removed
- Criminal offences believed to have been committed

13.2 Other Reporting

- Police contacted for suspected criminal behaviour
- Local Authority Designated Officer (LADO) informed of allegations
- Regulatory bodies notified as required

Reporting procedures align with **[Child Protection Procedures]** and **[Managing Allegations about Staff and Volunteers]** policies.

13.3 Whistleblowing Protection

If **staff** or **volunteers** have concerns about DBS processes or decision-making:

- **[Whistleblowing Policy]** provides protection for raising concerns
- External reporting routes available if internal processes inadequate
- No detriment for raising legitimate concerns about **www** practices

14. Support and Guidance

14.1 Internal Contacts

- Designated Safeguarding Lead: Joshua William Hall (07925 328 728)
- Governor: Hassan Alexander Kingsley (07597 874 222)
- Main Office: 0121 448 7378

14.2 External Resources

- DBS Customer Services: 03000 200 190
- DBS helpline: customerservices@dbb.gov.uk
- Gov.uk DBS guidance: www.gov.uk/government/organisations/disclosure-and-barring-service

14.3 For Applicants

- Unlock (ex-offenders charity): www.unlock.org.uk
- Citizens Advice: www.citizensadvice.org.uk
- DBS disputes: Information on challenging certificate content

15. Exceptional Circumstances

15.1 Delays in Processing

- Track application progress with DBS
- Consider temporary supervised arrangements
- Prioritise applications where possible
- Communicate delays to all parties

15.2 Disputes and Appeals

- Support individuals challenging certificate accuracy
- Provide fair hearing for assessment decisions
- Independent review where appropriate
- External advice sought when needed

Appeals process detailed in [Complaints Policy].

16. Compliance Monitoring

16.1 Regular Reviews

- **Monthly:** Single Central Record updates
- **Quarterly:** Renewal tracking and reminders
- **Annually:** Full policy review and compliance audit
- **Ongoing:** Quality assurance of decision-making

16.2 Continuous Improvement

- Learn from experiences and decisions
- Update procedures based on best practice
- Staff feedback incorporated
- External guidance monitored

17. Related Policies

This policy works alongside:

- **[Safeguarding Policy Framework]** - overarching **safeguarding** principles
- **[Recruitment, Selection and Onboarding Policy]** - comprehensive recruitment procedures
- **[Recruitment of Ex-Offenders Policy]** - risk-based assessment guidance
- **[Child Protection Procedures]** - detailed protection procedures
- **[Managing Allegations about Staff and Volunteers]** - allegation management
- **[Code of Conduct for Staff and Volunteers]** - behavioural expectations
- **[Volunteering and Placements Policy]** - volunteer-specific procedures
- **[Data Protection Policy]** - information handling requirements
- **[Complaints Policy]** - appeals and dispute resolution
- **[Whistleblowing Policy]** - reporting concerns about practices

18. Commitment Statement

BYO is committed to:

- **Protecting young people** through effective vetting
- **Fair treatment** of all applicants regardless of background
- **Legal compliance** with all DBS requirements
- **Continuous improvement** of our **safeguarding** practices
- **Supporting rehabilitation** while prioritising safety

This policy reflects our duty to keep young people safe while providing opportunities for people from all backgrounds to contribute positively to their communities.

This policy is essential to our safeguarding arrangements and is fully supported by BYO leadership.

Document Control:

- This policy forms part of BYO's values-based approach to youth work
- All staff and volunteers receive training on equality and inclusion
- Regular monitoring ensures policy effectiveness and continuous improvement

Reviewed by:



Hassan Kingsley

Date: 08/08/2025

Next Review Date: 08/08/2026

This policy forms part of BYO's commitment to safeguarding and should be read alongside our complete Safeguarding Framework.

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