

Employment Safeguarding Policy



Reference:	HS_POL_HR_ES_2.0	Author:	Caroline Hempstead, Head of HR
Scope:	Job applicants, Employees, Workers and Volunteers of Housing Solutions	Approved by:	Executive Team
Legislation:	Rehabilitation of Offender Act 1974 (exceptions order 1975) amended 2013 & 2020 Care Act 2014 Safeguarding Vulnerable Groups Act 2006 Protection of Freedoms Act 2012	Date of approval:	20 July 2021
Related Policies:	Safeguarding Recruitment Equality, Diversity and Inclusion Professional Boundaries Code of Conduct Disciplinary Whistleblowing Data Retention	Date of next review:	20 July 2024

This policy is for guidance only and does not form part of your contract of employment

1. Policy Statement

- 1.1 Housing Solutions is committed to protecting the safety of colleagues, residents and stakeholders and will ensure that safeguards are in place to assess the suitability of those working with or have access to children or vulnerable adults as part of their role – both during recruitment/selection and during employment.
- 1.2 Housing Solutions is committed to equality of opportunity for all job applicants and employees and holding a criminal record does not automatically preclude an individual from employment with Housing Solutions. However, when working with or having access to children or vulnerable adults as part the role, Housing Solutions must be able to assess suitability for the role, including the relevance of any criminal record and the level of risk to our residents, employees and stakeholders
- 1.3 The Employment Safeguarding policy provides a framework to achieve the following aims:
 - To provide measures to assess during recruitment and selection, the suitability of people to work with or have access to children and/or vulnerable adults.

- To ensure compliance with the Rehabilitation of Offenders Act 1974, relevant amendments and the Exceptions Order 1975 (2013 & 2020)
- To provide clear guidance on the positions that are eligible for a Disclosure and Barring Service check.
- To provide a fair procedure for assessing the relevance of any criminal record – both during recruitment and employment.
- To support Housing Solutions in making informed decisions during recruitment and on an ongoing basis for current employees, therefore protecting all of our residents, colleagues and stakeholders.

2. Scope

- 2.1 This policy applies to candidates applying for jobs at Housing Solutions, employees and workers of Housing Solutions. This will include temporary staff supplied by Recruitment Agencies.
- 2.2 This policy will also apply to volunteers if appropriate.
- 2.3 The policy specifically covers how the suitability of prospective and current employees for working with and/or having access to children and vulnerable adults will be assessed, and should be read in conjunction with the Safeguarding Policy.

3. Roles and Responsibilities

The key roles and responsibilities are outlined below:

Role/Team	Responsibilities
Board	<ul style="list-style-type: none"> • Support the organisation in the delivery of this policy and the safeguarding of residents, colleagues and stakeholders.
Chief Executive	<ul style="list-style-type: none"> • Consideration of DBS risk assessments and approval or rejection of the recommendation proposed by the HR Team – for both new employees and current employees following disclosure of a change of circumstances or the renewal of the DBS disclosure. • Approval of a new employee joining ahead of a DBS disclosure being received in exceptional circumstances and with adequate control measures in place.
Head of HR	<ul style="list-style-type: none"> • Oversees the implementation and operation of the Employment Safeguarding Policy. • Review of the policy as required. • Ensure that all processes are legally compliant. • Approves eligibility for DBS checks. • Jointly complete the DBS risk assessment and agree the recommendation to be presented to the Chief Executive. • Oversees and ensures the timely completion of renewals for existing employees.
Recruiting Managers	<ul style="list-style-type: none"> • Consider suitability of applicants for working with and/or having access to children and/or vulnerable adults through inclusion of safeguarding questions in the selection process.

HR Team	<ul style="list-style-type: none"> • Communication of the policy and procedures to employees and job applicants. • Completion of pre-employment checks, including coordination of all DBS checks, both applications for new employees and renewals as required. • Jointly complete the DBS risk assessment and agree the recommendation to be presented to the Chief Executive. • Monitoring compliance with the policy and procedures. • Coordination of induction and refresher safeguarding and professional boundaries training.
Employees	<ul style="list-style-type: none"> • Responsible for complying with this policy at all times. • In line with the Code of Conduct, employees must disclose any information that is relevant to their capability, capacity and suitability to carry out their role, which will include the following: <ul style="list-style-type: none"> a) Advised that they are under investigation for a criminal act (including road traffic offences) b) Arrested in connection with a criminal act c) Notified that criminal charges are being considered against them d) In receipt of a summons to appear before a Court of Law for an alleged offence e) Given a police caution f) Found guilty and convicted of any offence
Job Applicants	<ul style="list-style-type: none"> • Responsible for providing accurate and honest disclosures of criminal records as required by legislation and outlined within this policy.

4. Definitions

- 4.1 **Disclosure and Barring Service (DBS)** – the body that process applications for checks on criminal records in line with the relevant legislation.
- 4.2 **DBS Disclosure/Certificate** – the document that provides details of a criminal record, subject to the requirements of the level of check completed.
- 4.3 **Barred Lists** – a list held by the Police and Disclosure and Barring Service which details individuals who are not permitted to work in a regulated activity with children and/or vulnerable adults.
- 4.4 **Regulated Activity** - refers to certain job functions carried out by an employee, defined by the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012, which are used to determine eligibility for enhanced level DBS checks and a check of the barred lists.

5. Legislation

- 5.1 Housing Solutions will ensure legal compliance with relevant legislation, including the Care Act 2014 and the Rehabilitation of Offenders Act 1974. Housing Solutions will only ask for information about criminal records where it is legal to do so.
- 5.2 The Rehabilitation of Offenders Act 1974 was introduced to prevent individuals being rejected from employment on account of a criminal offence committed in their past. Under the Act, a conviction becomes "spent" after a defined period of time known as the rehabilitation period. The rehabilitation period depends on the sentence given or disposal administered as a result of a conviction, and the age of the individual on the date they were convicted. Some convictions can never become spent.
- 5.3 If a prospective employer asks, unspent convictions must be disclosed. Spent convictions do not need to be disclosed to a prospective employer, unless the position is exempt from the Rehabilitation of Offenders Act and the conviction is not 'filtered'.
- 5.4 Where a position is exempt from the Rehabilitation of Offenders Act 1974, an employer may lawfully decide to reject the individual for employment on the grounds of a conviction, whether spent or unspent. Under the amendments to the Rehabilitation Act 1974- Exceptions Order 1975 (2013 and 2020), some spent convictions for minor offences are considered protected (filtered) and do not need to be disclosed to potential employers. Employers cannot take these offences into account.
- 5.5 More information and advice is available from Unlock, <https://www.unlock.org.uk/> or NACRO 0300 123 1999 www.nacro.org.uk.

6. Assessing Suitability to work with and/or have access to Children and Vulnerable Adults

- 6.1 A key part of safeguarding children and vulnerable adults is ensuring that those providing services or who will have access to those groups in the course of their duties are suitable to complete such work.
- 6.2 Assessment of criminal records, when legally permitted to do so, is one tool available to Housing Solutions, and will form part of the safer employment model as detailed below.

Safer Employment Stage	Practices in Place to Prevent Unsuitable Appointments
Deter Practices to deter unsuitable candidates from applying for roles working with or that provide access to children and/or vulnerable adults	DBS requirements will be stated on job adverts. The Employment Safeguarding Policy will be shared with job applicants. All job applicants are asked to declare if they have been convicted of any criminal offences which are not yet spent. Only HR will have access to the information provided.

<p>Reject</p> <p>Practices to provide Housing Solutions the opportunity to consider suitability for working with and/or having access to children or vulnerable adults, and therefore providing the opportunity to reject the candidate from the selection process or withdraw an offer of employment.</p>	<p>Candidates shortlisted for interview for a role eligible for a standard or enhanced DBS disclosure will be required to complete a preliminary disclosure of their criminal record to HR in advance of the interview, in line with the legal framework outlined in section 5.</p> <p>Safeguarding questions will be included at interview stage to help assess attitudes, experience and suitability.</p> <p>Offers of employment will be subject to a satisfactory DBS disclosure where required for the role.</p> <p>Offers of employment will be subject to satisfactory references, and specifically request information in relation to working with children and/or vulnerable adults when required for the role.</p> <p>A full career history will be obtained for candidates offered a position, with explanations for any gaps in employment.</p> <p>New employees including those placed by Recruitment Agencies will not begin employment until the DBS disclosure has been received and confirmed as satisfactory, unless approved by the Chief Executive in exceptional circumstances with adequate control measures in place.</p>
<p>Prevent and Detect</p> <p>Practices to allow Housing Solutions to consider suitability for working with and/or having access to children or vulnerable adults on an ongoing basis throughout employment, and to support the safeguarding culture.</p>	<p>Safeguarding and professional boundaries training are a core part of the induction programme for all employees, and refreshed every two years.</p> <p>DBS checks are repeated at least once every three years.</p> <p>The Code of Conduct requires that employees immediately disclose any information that is relevant to their capability, capacity and suitability to carry out their role.</p> <p>Housing Solutions Whistleblowing Policy is in place for confidential and protected disclosures relating to any safeguarding concerns relating to employees or others acting on behalf of Housing Solutions.</p>

7. Disclosure & Barring Service (DBS) Disclosures

- 7.1 Requesting a DBS disclosure is a means for an organisation to verify the criminal record information disclosed by an applicant or employee.
- 7.2 There are four levels of DBS disclosure available as summarised below;

Basic DBS Disclosure

A basic DBS disclosure can be requested for any position or purpose. A basic certificate will contain details of convictions and cautions from the Police National

Computer (PNC) that are considered to be unspent under the terms of the Rehabilitation of Offenders Act (ROA) 1974.

Standard DBS Disclosure

A standard DBS disclosure can be requested for duties, positions and licences included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. A standard level certificate contains details of all spent and unspent convictions, cautions, reprimands and final warnings from the Police National Computer (PNC) which have not been filtered in line with legislation.

Enhanced DBS Disclosure

An enhanced DBS disclosure can be requested for specific duties, positions and licences included in both the Rehabilitation of Offenders Act 1974 (Exceptions Order 1975) and the Police Act 1997 (Criminal Records) regulations, for example, regularly caring for, training, supervising or being solely in charge of children, specified activities with adults in receipt of health care or social care services, as previously defined by the Safeguarding Vulnerable Groups Act 2006 – appendix 1. An enhanced level certificate contains the same PNC information as the standard level certificate but also includes a check of information held by police forces.

Enhanced DBS Disclosure with Barred List Check

The enhanced check with barred list check(s) is only available for those individuals who are carrying out regulated activity working with children or vulnerable adults under the Protection of Freedoms Act 2012 (appendix 2), and a small number of positions listed in Police Act 1997 (Criminal Records) regulations. An enhanced level certificate with barred list check(s) contains the same PNC information and check of information held by police forces as an enhanced level check but in addition will check against the children's and/or adult's barred lists.

- 7.3 The information provided on a DBS disclosure is accurate as at the time it is issued. Individuals can join the Update Service which allows them to reuse their DBS certificates when applying for similar jobs. The Update Service is only available for standard and enhanced checks.

8. Positions Eligible for a DBS Check

- 8.1 Each position will be assessed on an individual basis. The positions that are currently eligible for a DBS check are listed in Appendix 3 along with details of the level of DBS disclosure required. This will apply to both employees directly employed by Housing Solutions, and those supplied through Recruitment Agencies. Housing Solutions will review this list regularly and reserves the right to complete a DBS check on any employee in a position that becomes eligible.
- 8.2 Employees within positions that require a DBS check will be required to apply for another DBS disclosure at least every three years, or will be required to share the Update Service information to allow Housing Solutions to check for any change to the most recent certificate. This is necessary to ensure that any convictions that have occurred since the original DBS disclosure that have not been disclosed by the employee are assessed.
- 8.3 HR will keep a record of when the DBS disclosures should be reapplied for and will contact the relevant employees at the appropriate time to complete the application process. Housing Solutions will pay for DBS disclosures.

8.4 In line with the Code of Conduct, all employees must disclose information which is relevant to their capability, capacity and suitability to carry out the duties and responsibilities for which they are employed. In order to safeguard both the employee and Housing Solutions, an employee must immediately inform their manager in writing if, during their employment with Housing Solutions, they are subject to any of the following which it would be reasonable to understand may impact upon their role, professional standing or the reputation of Housing Solutions:

- a) Advised that they are under investigation for a criminal act (including road traffic offences)
- b) Arrested in connection with a criminal act
- c) Notified that criminal charges are being considered against them
- d) In receipt of a summons to appear before a Court of Law for an alleged offence
- e) Given a police caution
- f) Found guilty and convicted of any offence

8.5 Following any disclosure under 8.4, employees within positions that require a DBS check will be required to reapply for a DBS check to allow the conviction or caution to be fully and fairly assessed by the procedure outlined in appendix 4. Housing Solutions reserve the right to limit the duties of that employee pending the DBS disclosure if there is a perceived risk to our customers or employees.

9. DBS Procedure

9.1 The procedure for preliminary disclosures, applying for DBS checks, and risk assessing any content revealed on a DBS disclosure is outlined in appendix 4.

9.2 Where an applicant has worked or been resident overseas in recent years, Housing Solutions reserves the right to obtain a check of the applicant's criminal record from the relevant authority in that country, and make this a condition of the offer of employment.

9.3 Offers of employment, including for existing employees moving roles internally, or agency temporary placements, are subject to a satisfactory DBS disclosure if the role is eligible. Housing Solutions reserves the right to withdraw an offer by providing any notice required if this or any other condition of the offer is not met.

9.4 Where new content arises on a DBS check as part of a renewal or disclosure of a change from an existing employee, and the risk assessment concludes that there is a risk presented to residents, employees or stakeholders of continuing employment in the same position, the matter will be investigated and managed through the Disciplinary Policy.

10. Equality & Diversity

10.1 Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality and Diversity Policy and Equalities Act 2010. Housing Solutions works closely with its partners to ensure it has a clear understanding of its resident community with clear regularly updated service user profiles. Housing Solutions will record, analyse and monitor information on ethnicity, vulnerability and disability.

11. Confidentiality

11.1 Under the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) 2021, all personal and sensitive organisational information, however received, is treated as confidential. This includes:

- anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff or board member
- sensitive organisational information.

11.2 Housing Solutions employees will ensure that they only involve other agencies and share information where there is a legal basis for processing the information.

11.3 Digital copies of the required documentation obtained as part of the DBS application process will be filed securely on the HR Filing System, to which only HR have access.

11.4 In line with the Data Retention Policy and the DBS Code of Practice, information relating to the DBS disclosure application, the disclosure itself and any risk assessment completed will be removed and deleted after a period of six months from the date of clearance,

11.5 A factual record of the date of issue, the name of the subject, the level of disclosure, the unique reference number of the disclosure and the disclosure date is also recorded on the HR database and the secure Umbrella Body website.

12. Review

12.1 This policy will be reviewed on a three yearly basis or more frequently in response to changes in legislation, regulatory guidance, good practice or changes in other relevant Housing Solutions' policy.

13. Appendices

Appendix 1 – Definition of Regulated Activities and Vulnerable Adults/Children under the Safeguarding Vulnerable Groups Act 2006

Appendix 2 - Definition of Regulated Activities and Vulnerable Adults/Children under the Protection of Freedoms Act 2012

Appendix 3 – Positions Eligible for a DBS Check (as at July 2021)

Appendix 4 – DBS Procedure

Appendix 5 - Preliminary Disclosure Form

Appendix 6 – DBS Applicant Guidance

Appendix 7 – DBS Risk Assessment Form

Appendix 1 – Definition of Regulated Activities and Vulnerable Adults/Children under the Safeguarding Vulnerable Groups Act 2006

Regulated Activity relating to Vulnerable Adults

Vulnerable Adults – People with disabilities, elderly people, people housed in residential/sheltered accommodation, people in receipt of domiciliary care or any form of healthcare, and those detained in lawful custody.

Regulated activity – In relation to adults, this includes training, teaching, care, supervision, assistance, advice, driving, treatment and therapy. It has to be carried out frequently by the same person (once a week or more) or intensively (on more than three days in any period of 30 days or any time between 2am and 6am)

Regulated Activity Relating to Children

Children – People under the age of 18.

Regulated activity - In relation to children includes the teaching, training or instruction of children; care for or supervision of children; advice and guidance for children relating to their physical, emotional or educational wellbeing; and the driving of children in prescribed circumstances. It has to be carried out frequently by the same person (once a week or more) or intensively (on more than three days in any period of 30 days, or any time between 2am and 6am).

Appendix 2 - Definition of Regulated Activities and Vulnerable Adults/Children under the Protection of Freedoms Act 2012

Regulated Activity relating to Vulnerable Adults

Vulnerable adult – any adult that requires regulated activities to be provided on their behalf at that particular time.

Regulated activity -

- The provision of health care by, or under the direct supervision of a health care professional.
- The provision of relevant personal care which is required by reason of age, illness or disability, i.e. physical assistance in connection with eating or drinking, toileting, washing or bathing, dressing, oral care or care of skin, hair or nails.
- A social workers provision of relevant social work to a client or potential client.
- Assistance in relation to general household matters which is required by reason of age, illness or disability, e.g. managing cash, paying bills or shopping.
- Assistance in the conduct of an adults own affairs. Anything done on behalf of the person by virtue of a power of attorney, order of the court, an independent advocate etc.
- The conveying of adults who need to be transported by reason of age, illness or disability by prescribed people in prescribed circumstances (excluding family and taxi drivers)
- Any activity which consists of or involves the day-to-day management or supervision of a person carrying out an activity in the list above.

Regulated Activity Relating to Children

Children – People under the age of 18.

Regulated activity – In relation individuals who teach, train and instruct children, only **unsupervised** workers or volunteers are carrying out regulated activity. The activity has to be carried out frequently by the same person (once a week or more) or intensively (on more than three days in any period of 30 days, or any time between 2am and 6am).

The requirement for an activity to be carried out frequently or intensively does not apply to the provision personal care of healthcare, provided by or supervised by a healthcare professional.

Appendix 3 – Positions Eligible for DBS Check (as at July 2021)

Dept	Job Title	Level	Barred List Check?
AssetMgt	Commercial & Contracts Transformation Manager	Basic	No
AssetMgt	Voids Coordinator	Basic	No
AssetMgt	Head Of Asset Management	Basic	No
AssetMgt	Compliance Manager	Basic	No
AssetMgt	Operations Manager	Basic	No
AssetMgt	Fire, Health & Satefy Manager	Basic	No
AssetMgt	Stock Condition Surveyor	Basic	No
AssetMgt	Surveying Services Manager	Basic	No
AssetMgt	Void Surveyor	Basic	No
AssetMgt	Community Maintenance Supervisor (Responsive)	Basic	No
AssetMgt	Electrical Qualifying Supervisor	Basic	No
AssetMgt	Gas & Plumbing Trades Supervisor	Basic	No
AssetMgt	Grounds & Cleaning Supervisor	Basic	No
AssetMgt	Multi Trades Supervisor	Basic	No
AssetMgt	Responsive Suveyor	Basic	No
AssetMgt	Repairs Suveyor	Basic	No
AssetMgt	Fire Project Suveyor	Basic	No
AssetMgt	Surveyor	Basic	No
Customer	Customer Services Manager	Basic	No
Customer	Community Engagement Officer	Enhanced	No
DEVEL	Head of Development	Basic	No
DEVEL	Shared Ownership Sales Manager	Basic	No
DEVEL	Shared Ownership Sales Coordinator	Basic	No
DLO	Caretaker The Birches	Enhanced	No
DLO	CLEANER THE BIRCHES	Enhanced	No
DLO	Sheltered Housing Cleaner	Enhanced	No
DLO	Community Maintenance Engineer	Enhanced	No
DLO	CMT Caretaking & Grounds (Evenlode)	Basic	No
DLO	Community Maintenance Team (Caretaking)	Basic	No
DLO	Community Maintenance Team (Grounds)	Basic	No
DLO	Electrician	Enhanced	No
DLO	Estate Services Team Leader	Basic	No
DLO	Gas Service Engineer	Enhanced	No
DLO	Ground Worker	Enhanced	No
DLO	Multi Trades Person	Enhanced	No
DLO	Gas Engineer Apprentice	Enhanced	No
DLO	Plumber	Enhanced	No
Housing	Community Services Manager	Enhanced	Yes

Housing	Floating Support Worker	Enhanced	Yes
Housing	Head of Housing	Enhanced	No
Housing	Home Ownership & Lettings Manager	Enhanced	No
Housing	Neighbourhood Team Manager	Enhanced	No
Housing	Income Team Manager	Enhanced	No
Housing	Specialist Housing Manager	Enhanced	No
Housing	Major Works Project Manager	Enhanced	No
Housing	Welfare & Benefits Team Leader	Enhanced	No
Housing	Homeownership Officer	Enhanced	No
Housing	Lettings and Allocation Officer	Enhanced	No
Housing	Anti-Social Behaviour Officer	Enhanced	No
Housing	Sheltered Housing Officer	Enhanced	No
Housing	Supported Housing Officer	Enhanced	No
Housing	Telecare Coordinator	Enhanced	No
Housing	Resident Liaison Officer	Enhanced	No
Housing	Income Officer	Enhanced	No
Housing	Welfare & Benefits Officer	Enhanced	No
Housing	Tenancy Audit & Fraud Investigation Officer	Enhanced	No

Appendix 4 – DBS Procedure

Recruitment and Selection

If a vacant position is eligible for a DBS check, this requirement will be stated in the advert.

The standard application form used for all vacancies will ask the following mandatory question: *Have you been convicted of any criminal offences, which are not yet 'spent' under the Rehabilitation of Offenders Act 1974? The amendments to the Exceptions Order 1975 (2013&2020) advise that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers and cannot be taken into account. If you are unsure whether you need to disclose any information please seek legal advice or contact either Nacro or Unlock for impartial advice*

Shortlisting Managers are unable to view candidates' responses to the question asked through the application stage, access will be restricted to members of the HR team. Candidates for positions eligible for a standard or enhanced DBS disclosure invited to interview will also be sent a copy of this policy and will be required to complete a Preliminary Disclosure Form (Appendix 5). This form will be returned to HR and will be kept confidential. It will not be given to the interview panel.

Applying for a DBS Disclosure – New Employees or Renewals for Existing Employees

DBS Applicant Guidance (appendix 6) will be sent to existing employees going through the renewal process, or to new employees with their conditional offer of employment. Existing or new employees will be required to complete the DBS disclosure application process with a member of HR. The application will be processed via an Umbrella Body and the necessary documentation checks will be completed by a member of HR.

If the employee/new employee has subscribed to the Update Service they will be required to provide the access details to a member of HR along with the original DBS certificate for the update check to be completed.

The disclosure certificate will be sent to the applicant. The HR Team will check for Disclosure progress on the Umbrella Body website and will be notified via email if there is any content on a Disclosure.

Risk Assessment of Content

If content is shown on the disclosure, the employee/new employee must present the original certificate to a member of HR, who will discuss the nature and circumstances of the content with the individual.

The HR Coordinator, HR Advisor, and Head of HR will consider the circumstances and relevance of the content, and complete the DBS Risk Assessment (appendix 7), agreeing on a recommendation to be presented to the Chief Executive. The Chief Executive will have the final decision on the suitability of the candidate for the role given the content on the disclosure.

Following the risk assessment, the applicant will be advised of the outcome.

Appendix 5 – Preliminary Disclosure Form

Congratulations on being shortlisted for an interview with Housing Solutions. Please return this disclosure **at least one day prior to you interview**. If we have not received this, we reserve the right to withdraw the offer of interview. If you have any questions regarding this disclosure form, please contact a member of the HR team on 01628 543158.

Surname:	Forename(s):
Previous Names:	Post applied for:

The post you have applied for falls under the exceptions of the Rehabilitation of Offenders Act 1974, and therefore any offer of employment will be subject to a satisfactory Disclosure & Barring Service disclosure (DBS) the level of which will be inline with the post requirements. In addition, full pre-employment checks, including references will be completed.

We comply with the Disclosure & Barring Service (DBS) code of practice, a copy of the code can be accessed here: <https://www.gov.uk/government/publications/dbs-code-of-practice>
 A copy of our Employment Safeguarding Policy has been provided with this disclosure document. As you have been shortlisted, you are required to declare any relevant convictions, adult cautions or other matters which may affect your suitability to work with vulnerable groups.

As a result of the amendment to the Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and do not need to be disclosed to potential employers, and employers cannot take these offences into account.

If you are unsure whether you need to disclose criminal information, you should seek legal advice, or you may wish to contact Nacro or Unlock for impartial advice.

Information on filtering and protected offences is on the Ministry of Justice Website.

Nacro - <https://www.nacro.org.uk/criminal-record-support-service/> or email helpline@nacro.org.uk or phone 0300 123 1999

Unlock - <https://hub.unlock.org.uk/contact/> phone 01634 247350 or text 07824 113848

<p>1. Do you have any convictions or adult cautions that are unspent? <input type="checkbox"/> Yes / <input type="checkbox"/> No</p>
<p>If yes, please provide details here:</p>
<p>2. Do you have any other cautions or convictions that would not be filtered? <input type="checkbox"/> Yes / <input type="checkbox"/> No</p>
<p>If yes, please provide details here:</p>
<p>3. Have you lived or worked outside of the UK for more than 3 months in the last 5 years? <input type="checkbox"/> Yes / <input type="checkbox"/> No</p>
<p>If yes, please provide details here:</p>

4. Are you subject to any sanctions relating to work with adults at risk in any country outside of the UK? <input type="checkbox"/> Yes / <input type="checkbox"/> No
If yes, please provide details here:
<p>Please complete the declaration below:</p> <p>I declare that all the information I have provided in this disclosure is full and correct at the time of application and that I have not omitted anything that could be relevant to the appointment of someone who will work with vulnerable groups. I understand that the recruitment panel may be made aware of any relevant information that I have disclosed in order to discuss the matter(s) with me as part of the recruitment process, and that if my applications is successful, a risk assessment of the disclosed information will be completed and held securely on my personnel file. I understand that the declaration of a criminal record will not necessarily prevent me from being offered this role.</p> <p>Signed: _____ Date: _____</p>

Please return the completed and signed form to the HR Team, at jobs@housingsolutions.co.uk

Appendix 6 – Applicant DBS Guidance

DBS APPLICATION GUIDANCE

Please book a 30 minute appointment with the HR Advisor, to process your DBS application:
XXXXXXXX

The application process requires that you produce a number of **ORIGINAL** documents to support the data you have provided on your application form. These must all be in your current name (apart from a UK Birth Certificate). The acceptable documents are divided into the three groups shown below.

If you have a valid passport and/or UK photocard drivers licence (including the paper counterpart):

You must produce these, plus one or two other documents from any group to make three documents in total.

If you do not have a valid passport and/or UK photocard drivers licence:

A UK original birth certificate or, for non-UK citizens, a biometric residence permit can be accepted as an alternative, plus another two documents from any group to make three documents in total.

UK and EEA citizens who cannot produce any Group 1 document:

Can provide one or two documents from Group 2a plus two or three documents from Group 2b AND consent to DDC (our CRB check supplier) undertaking an Identity Validation Check with Experian Ltd

Group1

- Valid Passport (UK or foreign)
- Original UK Birth Certificate
- UK Biometric Residence Permit
- Current UK Photocard Drivers Licence

Group 2A

- Current UK Drivers Licence (old paper style)
- Marriage/Civil Partnership Certificate
- UK Firearms Licence
- Non-Original UK Birth Certificate
- HM Forces ID Card
- Adoption Certificate

Group 2B

Less than three months old	<ul style="list-style-type: none">• Bank or Building Society Statement• Utility Bill• Land-line Telephone Bill or Contract• Credit Card Statement• Correspondence from a Government agency or local authority giving entitlement• Benefits Statement
Less than 12 months old	<ul style="list-style-type: none">• P45• P60• Council Tax Statement• Financial Statement

	<ul style="list-style-type: none">• Mortgage Statement
No date restriction	<ul style="list-style-type: none">• Current Work Permit/Visa• EU National ID Card• Cards carrying the PASS accreditation logo (UK & Channel Islands)

Appendix 7 – Risk Assessment Form

DBS Risk Assessment Form

Where a criminal record has been disclosed the following must be considered and completed by a member of HR and the Chief Executive when deciding on the relevance of offences to particular posts.

Whilst it will not be possible to carry out a thorough risk assessment on each individual, the following issues must be taken into account as a minimum requirement:

Name:		
Post Applied for:		
Is the offence an Auto-bar Offence? <input type="checkbox"/> Yes <input type="checkbox"/> No	The country in which the offence was committed; <i>some activities are offences in Scotland and not in England and Wales and vice versa</i>	
Where DBS Disclosure has revealed criminal conviction is this consistent with disclosure made when preliminary declaration requested prior to interview? <input type="checkbox"/> Yes <input type="checkbox"/> No		

Does the post involve one-to-one contact with children or other vulnerable groups as employees, customers and clients? <input type="checkbox"/> Yes <input type="checkbox"/> No
How?
What level of supervision will the post holder receive?
Does the post involve any direct responsibility for finance or items of value? <input type="checkbox"/> Yes <input type="checkbox"/> No
Details;
Does the post involve direct contact with the public? <input type="checkbox"/> Yes <input type="checkbox"/> No
Details;
Will the nature of the job present any opportunities for the post holder to re-offend in the place of work? <input type="checkbox"/> Yes <input type="checkbox"/> No
How?

The seriousness of the offence and its relevance to the safety of other employees, customers, clients and property:

The length of time since the offence occurred:
Any relevant information offered by the applicant about the circumstances which led to the offence being committed, for example the influence of domestics or financial difficulties:
Was the offence a one-off, or part of a history of offending?
Have the applicant's circumstances have changed since the offence was committed, making re-offending less likely?
The degree of remorse, or otherwise, expressed by the applicant and their motivation to change:

Outcome of Risk Assessment

HR Recommendation and reasons		
HR Signatures		
HR Coordinator	HR Advisor	Head of HR
Chief Executive Review		
Comments;		
HR Recommendation approved:	Signature of Chief Executive	
<input type="checkbox"/> Yes <input type="checkbox"/> No		
	Date	

This form, when completed is to be stored in accordance with the Housing Solutions Employment Safeguarding Policy