

# **Lighthouse Thame & Villages**

## **DBS Policy**

**(revised July 2014)**

Lighthouse will observe guidance issued or supported by the Disclosure and Barring Service (DBS) and will comply fully with the DBS Code of Practice and Explanatory Guide.

We will not unfairly discriminate against the subject of Disclosure information on the basis of conviction or other details revealed in accordance with our policy on the recruitment of ex-offenders (see below).

We will handle, use, store, retain and dispose of Disclosure information in full compliance with the DBS Code and in full accordance with our policy on the handling and safe keeping of Disclosure information (see below). To this end we will not copy any completed application forms.

Lighthouse Thame & Villages will appoint a DBS administrator who will ensure that all persons involved in checking DBS applications for their Lighthouse are trained in and kept up to date on changes to DBS requirements. We are aware of the potential pitfalls of identity checks being carried out by connected persons and ensures that DBS identity checks are not undertaken by any such connected persons.

An Enhanced DBS check is required for all volunteers, including all committee members.

All volunteers (aged of 18 or over during a Lighthouse Event) who apply to be a Team Member will be subject to a DBS check. If the applicant refuses to complete a DBS application, we will not proceed further with the applicant. In addition if an applicant fails to complete a DBS after having a Chairman sign-off the previous year Lighthouse will be unable to proceed further with this applicant.

In exceptional circumstances e.g. where the applicant has applied too late or is unable to provide the appropriate supporting documentation Lighthouse may still offer the applicant a volunteer position but only after a careful risk assessment. This is entirely at the discretion of the Chairman.

Volunteer positions will be conditional upon satisfactory DBS check having been received.

Lighthouse accept existing DBS disclosures from other organisations provided the applicant is still with this organisation and it is less than 3 years old in addition two references are required.

Disclosures and the information they contain will only be available to those who need to have access in the course of their duties.

DBS applications will be processed through Soapbox trust (a "Registered Body" for this purpose). Soapbox trust and the DBS charge £3 for each Lighthouse volunteer position.

We will issue to the applicant guidance notes and DBS application forms as provided by Soapbox. We will also advise each applicant of the existence of the DBS Code of Practice and make a copy available upon request.

All applications are managed in line with the guidelines provided by DBS. All relevant details will be recorded on the application form and where necessary on an additional information sheet.

No copies of application forms will be kept.

On reviewing the applicant's DBS the Lighthouse DBS administrator will update the LH database to show that the DBS is satisfactory. In the event of it not being satisfactory the Lighthouse DBS administrator will contact the Lighthouse chairman who will then review the volunteer's application to see if the information on the DBS is in line with the information supplied at the time of application. If not, the Lighthouse chairman will contact the applicant to provide them with a final opportunity to supply information about any un-declared convictions. The Lighthouse chairman, in consultation with other committee members if appropriate, will make the decision as to whether or not the applicant may be accepted. If full information has not been provided, the applicant will be refused automatically.

No copies of DBS disclosures will be kept.

## **Lighthouse Policy Statement on the Recruitment of Ex-offenders**

As an organisation using the DBS Disclosure service to assess applicants' suitability for positions of trust, Lighthouse complies fully with the DBS 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 a conviction or other information revealed.

Lighthouse 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, physical/mental disability or offending background.

This policy statement on the recruitment of ex-offenders is made available to all Disclosure applicants at the outset of the recruitment process (advertised as available from [www.lighthousehame.org.uk](http://www.lighthousehame.org.uk) 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 based on their skills, qualifications and experience.

A Disclosure is always requested as Lighthouse is working with children and young people. All application forms will contain a statement that a Disclosure will be requested. We ask all applicants to provide details of their criminal record on the application form provided. This form will only be seen by those who need to see it as part of the recruitment process.

As a position with Lighthouse may lead to having sole charge of children, applicants are exempt from the "Rehabilitation of Offenders Act 1974". We therefore require details of both "spent" and "unspent" convictions as defined in the act.

We will ensure that all those in Lighthouse who are involved in the recruitment process fully understand how to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

In any interview, we will 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 invitation to participate.

We make every subject of a DBS Disclosure aware of the existence of the [DBS Code of Practice](#) and make a copy available on request.

We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before declining the applicant a position at Lighthouse.

Having a criminal record will not necessarily bar an applicant from working with Lighthouse. This will depend on the nature of the position and the circumstances and background of the applicant's offences.

# **Lighthouse Policy Statement on the Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information**

## **General Principles**

As an organisation using the Criminal Records Bureau (DBS) Disclosure service to help assess the suitability of applicants for positions of trust, Lighthouse complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

## **Storage and access**

Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see 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 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 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 DBS about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

## **Disposal**

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately 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 will 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.