DBS Checks for COBIS Schools

Contents

COBIS Policy on Disclosure & Barring Service Checks for Member Schools ................................................. 2

COBIS Policy on the Recruitment of Ex-Offenders ......................................................................................... 3

COBIS Policy on the Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information ...................................................................................................................... 5

Policy Statement: Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information ................................................................................................................................. 9

Policy Statement: Recruitment of Ex-Offenders ............................................................................................ 9

DBS Checks – User Agreement for COBIS Schools and Nominated Individuals ........................................... 13
COBIS Policy on Disclosure & Barring Service Checks for Member Schools

COBIS recommendation:
Member schools should ensure that all new staff have a valid DBS check or, where applicable, the local equivalent before taking up a post at the school.

Each school must nominate up to two individuals to have responsibility for administering DBS checks. Nominated individuals should normally be members of the senior management or the HR manager. COBIS will keep a database of nominated individuals from each school. Guidance notes for nominated individuals will be provided by COBIS. Schools must notify COBIS if the nominated individual needs to be changed.

Nominated individuals and the head teacher must sign the COBIS DBS check agreement before DBS checks can be processed.

Nominated individuals are responsible for ID verification and validation in accordance with DBS guidelines. COBIS will invoice schools an agreed amount for each DBS check. This fee reflects the amount charged by the Disclosure & Barring Service and is subject to change.

All material relating to DBS checks will be stored securely in the COBIS office and will be disposed of securely after 6 months.

COBIS Member schools must have a policy on the secure storage, handling, use, retention & disposal of disclosures and disclosure information, in accordance with DBS guidelines.

All recruitment decisions (including decisions about recruitment of ex-offenders) are at the discretion of the head or governing body or the school and will be made by schools in accordance with the school’s recruitment policy and practice.

Schools should have regard to the attached COBIS policy on the recruitment of ex-offenders, and all schools must have their own policy on the recruitment of ex-offenders.
COBIS Policy on the Recruitment of Ex-Offenders

As an organisation using the Disclosure & Barring Service (DBS) to assess applicants’ suitability for positions of trust, COBIS and its Member and Schools comply fully with the DBS Code of Practice and undertake to treat all applicants for positions fairly. COBIS and its Member schools undertake not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

COBIS and its Member and schools are committed to the fair treatment of staff and potential staff, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

All recruitment decisions are at the discretion of the school head or governing body and all COBIS Member schools must have a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.

COBIS Member schools should 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. Candidates should be selected for interview based on their skills, qualifications and experience.

A Disclosure should only be 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, all application forms, job adverts and recruitment briefs should 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, all applicants called for interview should be encouraged to provide details of their criminal record at an early stage in the application process. This information should be sent under separate, confidential cover, to the nominated individual within a COBIS Member school. Schools guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows a COBIS Member school to ask questions about your entire criminal record, we only ask about ‘unspent’ convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in COBIS Member schools who are involved in the recruitment process have been given suitable guidance 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, COBIS Member schools 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.

COBIS Member schools make every subject of a DBS check aware of the existence of the DBS Code of Practice and make a copy available on request.
COBIS Member schools should 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 a COBIS Member school.** This will depend on the nature of the position and the circumstances and background of your offences.
COBIS Policy on the Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information

General principles
As an organisation using the DBS service to help assess the suitability of applicants for positions of trust, COBIS 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 is kept 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 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 the 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 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.

**Acting as an Umbrella Body**

Before acting as an Umbrella Body (one which countersigns applications and receives Disclosure
information on behalf of other employers or recruiting organisations), we will take all reasonable steps
to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure information in
full compliance with the DBS Code and in full accordance with this policy. We will also ensure that
anybody or individual, at whose request applications for Disclosure are countersigned, has such a
written policy and, if necessary, will provide a model policy for that body or individual to use or adapt
for this purpose.
DBS Checks for COBIS Member Schools – Guidelines and Training

COBIS recommendation:
COBIS recommend that Member schools ensure that all new staff have a valid DBS check or, where applicable, the local equivalent before taking up a post at the school.
DBS checks will only provide information relating to an applicant's time in the UK. If a potential employee has been living abroad schools should consider equivalent checks from other countries.

Overview
DBS checks are designed to help organisations make safer recruitment decisions by identifying candidates who may be unsuitable for certain work, especially involving children or vulnerable adults.
All DBS checks submitted through COBIS are Enhanced Checks. This is the highest level of check available to anyone involved in regularly caring for, training, supervising or being in sole charge of children. An enhanced disclosure shows current and spent convictions, cautions, reprimands and warnings held on the Police National Computer along with any relevant and proportionate information held by the local police forces. Since COBIS submits checks for individuals working with the children the following will also usually be searched:
- Protection of Children Act (POCA) List
- Protection of Vulnerable Adults (POVA) List
- Information that is held under Section 142 of the Education Act 2002 (formerly known as List 99)

COBIS’ Role
- COBIS will act as the main point of contact with the DBS.
- COBIS will maintain a database of Member Schools along with details of the nominated individual(s), for DBS purposes, at each school.
- COBIS will provide guidelines for applicants and for the designated user to COBIS Member schools.
- COBIS can receive completed DBS checks from Member schools and will check that the forms have been completed correctly and ensure that the identity has been verified and validated according to the DBS’s guidance.
- COBIS can support schools and countersign completed DBS checks and submit them to the DBS for processing.
- COBIS will invoice schools £65 for each DBS check (£80 for non-COBIS schools).
- COBIS will forward DBS certificates to the nominated individual at the school. The certificates will be sent by post in an envelope marked ‘strictly confidential – for the addressee only’.
- COBIS will store material relating to DBS checks securely, in a lockable, non-portable, storage container with access strictly controlled and limited to those who are entitled to see it as part of their duties.
COBIS will store material relating to DBS checks for a period of no longer than 6 months and will then ensure that all disclosure material is destroyed by secure means (shredding).

The School’s Role
- The School will contact COBIS to request DBS registration and the applicant and user guidelines.
- The School will also draw the applicant’s attention to the DBS Code of Practice and the school’s policy on recruitment of ex-offenders.
- The nominated individual(s) at the school will manage the application process.
- The nominated individual will establish the true identity of the applicant through the examination of a range of documents as set out in the attached guidance and that the application is checked and authorised for disclosure processing.
- The School will have a policy on the secure storage, handling, use, retention & disposal of disclosures and disclosure information, in accordance with DBS guidelines, and will abide by this policy.

Dealing with disclosure information
When COBIS receives a DBS disclosure certificate it will be forwarded to the Member school by post in an envelope marked ‘strictly confidential – for the addressee only’.
The School must have a policy on the secure storage, handling, use, retention & disposal of disclosures and disclosure information. A sample policy is attached.
The Member school can use the DBS checks to help make recruitment decisions about the suitability of candidates. Schools must have a policy on the recruitment of ex-offenders. A sample policy is attached.

Further information is available at www.homeoffice.gov.uk/dbs.
Policy Statement: Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information

General principles
As an organisation using the DBS service to help assess the suitability of applicants for positions of trust, School X 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 should be kept 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 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 the 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 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.

By signing this form the school indicates that they are familiar and happy with the process of Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information.

Signature of Head Teacher
Policy Statement: Recruitment of Ex-Offenders

As an organisation using the DBS service to assess applicants’ suitability for positions of trust, School X 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.

School X 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.

We have a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.

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, all application forms, job adverts and recruitment briefs 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 a designated person within School X and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows School X to ask questions about your entire criminal record, we only ask about ‘unspent’ convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in School X 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.

We make every subject of a DBS check 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 withdrawing a conditional offer of employment.
By signing this form the school indicates that they understand the processes in relation to the Recruitment of Ex-Offenders

Signature of Headteacher
DBS Checks – User Agreement for COBIS Schools and Nominated Individuals

School name: School X

Address: __________________________________________________

Head teacher’s name: ____________________________________________

Email address: __________________________________________________

By signing this form the school indicates that they are familiar and happy with the process of applying for DBS checks through COBIS.

_________________________________ ____________________________
Headteacher’s signature Date

The school must nominate up to two individuals to have responsibility for administering DBS checks. Please list the names and contact details of these individuals below.

Nominated individual number 1
Name: ________________________________
Position at school: ______________________
Email: __________________________________
Phone number: __________________________

Nominated individual number 2
Name: ________________________________
Position at school: ______________________
Email: __________________________________
Phone number: __________________________

Each nominated individual must sign below to indicate that they are familiar and happy with the process of applying for DBS checks through COBIS including all of the information included in the Guidelines and Training Pack and the associated policies.

___________________________________ ____________________________
Nominated individual number 1 – signature Date

___________________________________ ____________________________
Nominated individual number 2 – signature Date

This form must be returned along with a copy of the school’s Child Protection Policy.