HR POLICIES & PROCEDURES
(HR/E02)

DBS POLICY & GUIDANCE

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<th>DOCUMENT INFORMATION</th>
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<tr>
<td><strong>Author:</strong> Valerie Zhande</td>
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<tr>
<td>Recruitment Manager</td>
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<tr>
<td>Reviewed and updated by Pamela Putt</td>
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<tr>
<td>CRB Protocol v1 Issued July 2008</td>
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<td>DBS Policy and Guidance 2016</td>
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<td><strong>Notification of Policy Release:</strong></td>
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<tr>
<td>&quot;All Recipients&quot; email</td>
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<td>Staff Notice Boards</td>
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## APPENDICES

1. DBS Disclosure/Police Check – when required
2. ID Checking Guidance
3. DBS Re-check Process Map

## EQUALITY IMPACT ASSESSMENT
1. INTRODUCTION & PURPOSE

1.1 This policy has been written to provide clarity and guidance to all those who are, or are planning to work with children or vulnerable adults and those recruiting them; it explains the processes necessary to protect them, these groups and the Trust.

1.2 To ensure the Trust complies with its obligations under the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and other relevant legislation in respect of the safe handling, use, storage, retention and disposal of disclosure information.

1.3 The Trust values of Teamwork, Caring, Professional and Innovation underpin everything we do to support our vision of saving lives and enabling patients to get the care they need. SCAS aims to nurture a healthy culture, based on all staff demonstrating their role-relevant values-based behaviours within their working lives. All staff are expected to model their behaviours to support SCAS with its strategic aims to become an Employer, Partner and Provider of Choice.

2. SCOPE

2.1 This policy and guidance applies to all employees, candidates to whom a conditional offer of employment has been made, and volunteers for roles in which they have direct access to patients, vulnerable adults and children which is deemed regulated activity.

- All front-line emergency staff;
- All frontline non-emergency Patient Transport Service staff (PTS);
- Managers undertaking emergency & non-emergency on-call duties;
- EOC and 111 staff;
- GP Drivers;
- Volunteer Community Responders;
- Co-responders;
- First responders;
- Staff Responders;
- Volunteer PTS Car Drivers;
- Students who, as part of their professional qualification are required to carry out clinical placements and staff who provide emergency cover to SCAS on an Honorary Contract, but hold a substantive post in another NHS organisation (refer to the Research Passport Procedures for Honorary Research Contracts).

2.2 This list is not exhaustive: for further guidance on eligible positions and DBS levels, refer to Appendices 1 and 2 of this policy.

3. EQUALITY STATEMENT

3.1 This procedure will be applied fairly to all employees regardless of race, ethnic or national origin, colour or nationality; gender (including marital status); age; disability; sexual orientation; religion or belief; length of service, whether full or part-time or employed under a permanent or a fixed-term contract or any other relevant factor. The Trust will therefore take every possible step to ensure that this procedure is applied fairly to all employees regardless of the afore mentioned protected characteristics.

3.2 By committing to a policy encouraging equality of opportunity and diversity, the Trust values differences between members of the community, within its existing workforce,
and actively seeks to benefit from their differing skills, knowledge, and experiences in order to provide an exemplary healthcare service. The Trust is committed to promoting equality and diversity best practice both within the workforce and in any other area where it has influence.

3.3 Where there are barriers to understanding, eg, an employee has difficulty in reading or writing or where English is not their first language additional support will be put in place wherever necessary to ensure that the process to be followed is understood and that the employee is not disadvantaged at any stage in the procedure. Further information on the support available can be sought from the HR Department.

3.4 Employees exercising their rights and entitlements under the regulations will suffer no detriment as a result.

4. DISCLOSURE AND BARRING SERVICE (DBS)

4.1 The Criminal Records Bureau (CRB), an Executive Agency of the Home Office and was established under part V of the Police Act 1997. The service was launched in March 2002 as a service for disclosure checks, replacing the old Police Check. The Independent Safeguarding Authority (ISA) was created to help prevent those with certain criminal records from working with children and vulnerable adults by working in partnership with the Criminal Records Bureau (CRB), and assess individuals working or wishing to work in regulated activities who are referred to them on the grounds that they have caused or incited harm, or pose a possible risk of harm to vulnerable groups in order to make independent barring decisions. On 1 December 2012 the CRB and the IAS merged to create the Disclosure and Barring Service (DBS) The DBS provides controlled access to criminal records and related information through its Disclosure Service, enabling employers to make safer recruitment decisions by identifying candidates who may be unsuitable for work involving direct contact with children and vulnerable adults, and/or have access to sensitive and/or confidential information about Children and Vulnerable Adults.

4.2 The DBS Code of Practice sets out the obligations that must be met by recipients of disclosure information, a copy of which is available on the home office website on the DBS homepage. https://www.gov.uk/government/organisations/disclosure-and-barring-service

4.3 There are three levels of DBS disclosure, basic, standard and enhanced:

- A basic check will contain details of convictions and conditional cautions considered to be unspent under the terms if the Rehabilitation of Offenders Act 1974.
- A Standard disclosure shows current and spent convictions, cautions, reprimands and warnings held on the Police National Computer;
- An Enhanced disclosure contains the same information as the Standard disclosure plus any relevant and proportionate information held by local police forces as well as a check of the new Children and / or Vulnerable Adults barred lists where requested.

4.4 The level at which a disclosure is processed depends on whether the individual is working in a “Regulated Activity” or not. The Trust pays for all eligible disclosures. Standard and enhanced disclosures for volunteers are processed free of charge. Basic disclosures for both employees and volunteers attract a fee.

4.5 Basic disclosures are only processed as agreed by the Trust. For the avoidance of doubt
the Trust DBS lead should be contacted for guidance in the first instance.

4.6 SCAS complies fully with the DBS Code of Practice regarding the fair use and handling of disclosure information in assessing applicants’ suitability for positions of trust.

5. **REFERALS AND BARRING**

5.1 The Trust has a legal duty to refer to the ISA individuals who have enhanced disclosures that have recorded offences that fall within the PoCA and PoVA sections and/or have current or pending cases under investigation for offences that fall within the PoCA and PoVA sections.

5.2 The DBS is responsible for decisions regarding the suitability or otherwise of such an individual to work with vulnerable groups or to be listed on one or both the PoCA and PoVA barred lists.

6. **DEFINITIONS**

6.1 **Regulated Activity** Work which involves close and unsupervised contact with vulnerable groups and children. This covers the provision of health and/or social care by or under the supervision of a health professional, including triage services and medical advice provided over the phone. It covers the provision of personal care and/or household assistance to an adult who needs it because of their age, illness and/or disability.

6.2 **Vulnerable Adult**  The new definition of regulated activity relating to adults no longer labels adults as vulnerable; instead the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.

6.3 **Disclosure** Describes the service provided by the DBS and the document issued to the applicant and Registered Body when a DBS check has been completed.

6.4 **Evidence Checker** A person within the Trust who is authorised to check original Identity documents and record on the online form that they have verified the original documents supplied by the DBS applicant.

6.5 **Countersignatory** A person within a Registered Body who is registered with the DBS to countersign paper applications.

6.6 **Lead Countersignatory** An appointed figure within a Registered Body who has overall responsibility for the use of the DBS checks in their organisation.

6.7 **PoCA** Protection of Children’s Act.

6.8 **PoVA** Protection of Vulnerable Adults.

6.9 **Registered Body** Organisations that have registered directly with the DBS to use its services.

7. **REGULATORY AND LEGISLATIVE FRAMEWORK**

7.1 The Department of Health has devolved responsibility for providing advice and guidance on safer recruitment to NHS Employers. This guidance covers all the pre- and post-employment checks that employers are required to make before appointing anyone – employees, volunteers, students, trainees – to a position in the NHS and is designed to prevent unsuitable people obtaining employment in the Trust.
7.2 It supersedes the Department of Health circular HSC 2002/008 (pre- and post-employment checks for all persons working in the NHS in England) and applies to all NHS organisations. The Trust complies fully with the recommendations which include DBS checks (see www.nhsemployers.org).

8. EMPLOYMENT CHECKS: process for posts subject to DBS checks

8.1 A disclosure carries no period of validity – disclosures are for use immediately after issue at the point of recruitment for a particular post. Recruitment will process an Enhanced Disclosure for existing staff already undertaking Regulated Activity, who move by secondment, promotion, or transfer to another Regulated Activity, and have never had a CRB/DBS disclosure carried out before, or has a disclosure that is more than five (5) years old. A new disclosure will also be processed where a previously issued disclosure does not contain a PoCA or PoVA check where one is required.

8.2 Pre-employment

8.2.1 All such job adverts and recruitment information contain a statement that a DBS disclosure at enhanced level will be sought if an offer of employment is made.

8.2.2 These candidates, if shortlisted and invited to interview will be required to complete a preliminary Declaration of Mandatory Criminal Convictions which they will be instructed to hand in to the Recruitment lead or the Chair of the interview panel. The information on the form is not to be discussed at interview stage and should be passed on to Recruitment.

8.2.3 All potential employees will be notified of the potential effect of a criminal record history on the recruitment and selection pre-employment process and subsequent recruitment decision as part of the Conditional Offer Letter.

8.2.4 All interviewees are required to bring in ID and address verification documents to their interviews as instructed in the invitation to interview email. The same will be checked for authenticity and then photocopies taken, verified and retained for filing.

8.2.5 Successful candidates will have their ID and address verification details keyed into the eDBS system. They will then be required to complete an on-line disclosure application form, which once processed they will receive a Disclosure and Barring Service Certificate to their home address.

8.2.6 Where there is information recorded on the Certificate, the candidate must present the original document to Recruitment for verification of the information recorded. In the event that a paper application has been processed, the candidate is required to present the Certificate to recruitment for verification, regardless of whether or not there is information recorded.

8.2.7 Correct identification of any job applicant is the cornerstone of the Disclosure and Barring Service. Evidence Checkers must ensure that the identity and current address of each disclosure applicant is verified beyond any doubt. In order to establish identity, applicants will be asked to produce documents from the List of Valid Identity Documents in the ID Checking Guidelines (see Appendix 2).

8.2.8 Where a potential new employee has signed up for the DBS Update Service they can provide their reference number and confirmation that they are happy for SCAS to carry out an update check. The Recruitment Team can then perform a free check to see the status of the certificate. When checking the details on the original certificate they need to verify the level of DBS check to ensure that it matches the requirement for the new role. The information from this update check is then recorded on ESR as per a new check.
8.2.9 The recruitment team follows the DBS process for confidential checking for transgender applicants in accordance with the Gender Recognition Act 2004.

8.2.10 A copy of the DBS Code of Practice for Registered Persons and other Recipients of Disclosure Information and the Trust's Policy Statement on the Secure Storage of disclosure information will be provided on request.

8.3 International Recruitment

8.3.1 Where a candidate is currently living overseas or has declared that they have spent a significant period of time outside the UK, then they will be asked to provide evidence of a police certificate or certificate of good conduct from the relevant country or countries. A DBS check will then be carried out as normal.

8.4 Existing Staff – new check

8.4.1 Staff who have never been DBS-checked will undergo the same process of going through identity and address verification and then having a DBS application processed as new employees.

8.4.2 DBS checks will be carried out every five (5) years for all eligible staff (with the exception of volunteers who will be required to submit a new DBS certificate every three (3) years. Volunteers should be encouraged to sign up to the free update service). Letters will be sent to employees advising that they are due to be re-checked, and are given instructions on documents to be brought in and where they are to be brought to for checking. See appendix 3.

8.4.3 If an existing employee has voluntarily signed up for the DBS Update Service then they can provide their reference number and confirm they are happy for SCAS to do an update check. A free check can then be completed to see the status of the certificate. When checking the details the level of DBS check needs to be verified to ensure that it matches the requirement for the role. The information from this update check is then recorded on ESR as per normal.

8.4.4 Where a disclosure application for an existing member of staff returns a recorded offence, which has not been previously declared, this will be considered on a risk assessment basis, and where appropriate be handled in accordance with the Trust's disciplinary procedure.

8.5 Internal job transfer/promotion/secondment

8.5.1 Where existing staff move into a post where they will have significant contact with children or vulnerable adults and they have not had an enhanced check done in the last five (5) years then a DBS check will be processed for them so they will need to provide ID and address verification documents as per the process above. If ESR records show that they have had an enhanced check in the last five (5) years then a new check is not required until the standard schedule as per 8.3.2.

8.6 Agency Workers, Contractors & Private Providers

8.6.1 To ensure that agency workers meet the requirements for DBS for relevant positions, Managers will only use Agencies that are approved under the Government Procurement Service (GPS) or Crown Commercial Services as they are required to meet the NHS requirements for standard pre-employment checks, including enhanced DBS checks where appropriate.

8.6.2 For agency workers, the agency must provide a Certificate of Completion which will confirm in writing that an enhanced DBS check has been completed. If anything is
declared by the agency worker prior to employment or comes up on the Certificate, then this must be declared by the agency to the Recruitment Manager and a risk assessment must be completed prior to the agency worker starting with SCAS.

8.6.3 Contract Managers shall ensure that private providers maintain the NHS standard checks for staff working within SCAS, and that relevant clauses are included in any contracts and/or Service Level Agreements such as; The private provider shall ensure that all DBS checks are carried out and are of a suitable level for relevant position, including staff employed or subcontracted to the provider, and that checks are up to date and that evidence (not content) shall be available on request by the Trust for audit purposes.

8.6.4 The Contractor or Private provider, must supply the Trust with a list of its direct employees (and that of any subcontractors where applicable).

8.6.5 The Contractor/Private provider must keep the Trust informed of any staff changes, throughout the duration of the contract.

8.7 Students, Research Contracts, & Honorary Contract Holders

8.7.1 Existing NHS employees requiring clinical placement or research with SCAS will be required to provide written assurance from their host/substantive Trust, confirming that the correct level disclosure check has been completed as appropriate for the activity they will be carrying out.

8.7.2 Recruitment or Placement Officers will request written confirmation from the Substantive Trust – confirmation should give assurance that all disclosure checks – where appropriate, have been completed in accordance with the NHS Pre-employment checks standards and providing the date of issue and the status, not content and the disclosure certificate number.

8.7.3 Researchers from outside the NHS will be required to complete the appropriate disclosure check with SCAS before permission can be granted to undertake any research in a role that is deemed Regulated Activity.

8.7.4 Researchers whose host/substantive employers are external to the NHS, who have already done part of their research in an NHS Trust can have their request for confirmation of appropriate DBS disclosure and other pre-engagement checks managed via the National Institute of Health Research (NIHR) Research Passport Scheme. (Further information regarding Research contractors is available in the Research Passport Procedures.)

8.7.5 Where SCAS is the first NHS Trust for their Research, a disclosure check will be completed by the SCAS HR Recruitment Team under the NIHR Research Passport procedure.

9. THE FAIR USE OF DISCLOSURE INFORMATION

9.1 The Trust recognises that candidates with convictions, cautions, reprimands and formal warnings can often find difficulty in obtaining employment and will only consider the relevance of these in the context of the post that is being applied for and candidates will not be rejected purely on this basis.

9.2 Disclosure of convictions, cautions, reprimands or formal warnings will be requested at the application stage and will be treated confidentially. The Recruitment Department will assess whether these have any relevance to the post the candidate is applying for. If there is any doubt, the matter be discussed with the recruiting manager and a decision made about the suitability of the candidate for the post using the criteria detailed in the
Trust’s Recruitment and Selection Policy and associated procedures and guidelines.

9.3 Individual staff have the responsibility for informing the Trust if they incur any convictions, cautions or investigations that would appear on an Enhanced Disclosure. Failure to declare such offences may constitute a disciplinary offence.

9.4 Any existing staff with new offences will be considered by the head of the appropriate department and HR and will be measured on the basis of a risk assessment and consideration given issues listed in s13.4.

9.5 The employment of ex-Offenders and the effect of the Rehabilitation of Offenders Act 1974 is covered in the Trust’s Recruitment and Selection Policy and associated procedures and guidelines and is also explained during Recruitment and Selection training. In addition, guidance and advice is readily available from the HR Department.

9.6 The Trust will ensure that all candidates are aware of the need for a disclosure in the event of a successful application and encourage candidates to declare convictions, cautions, reprimands and formal warnings before disclosure is requested. This requirement will be included within all relevant job descriptions and job advertisements.

9.7 The Trust has a duty to refer to the DBS any information about individuals who may pose a risk ensuring potential threats to vulnerable groups can be identified and dealt with.

9.8 Where an individual has been referred to the DBS due to harming; causing harm; putting at risk to harm; attempting to harm; or inciting another person to harm a child or vulnerable adult, the DBS will consider all relevant information in deciding if its appropriate to add that person to one or both the barred lists.

10. HANDLING DISCLOSURE INFORMATION FOR POTENTIAL NEW EMPLOYEES

10.1 Recruitment will request to have sight of the Disclosure certificate where the eDBS process reveals the certificate has information recorded. The Recruitment Department will not reveal the content of the disclosure to any other member of staff, including managers, unless a conviction, caution, reprimand, formal warning or other information is revealed that the employee has not previously disclosed. Disclosure information will only be shared with relevant persons in the course of specific duties relevant to recruitment, vetting processes, and appointment decisions.

10.2 Disclosure information must only be used for the specific purpose for which it was requested and for which the applicant’s full consent has been given.

10.3 Information relating to the DBS check will be recorded on the Electronic Staff Record (ESR).

Any positive disclosures will be noted and any discussions held with the employee around this will be recorded and filed on the individual’s personnel file. No other record of the DBS check will be held on the personnel file. If the candidate is on the update service, then the relevant information will be entered onto the staff record.

10.4 It should be noted that there are some offences which effectively ban individuals from working with children and/or vulnerable adults. It is a criminal offence to knowingly employ such individuals in such a role.

10.5 Where a disclosure is received which reveals convictions, caution, reprimand or warning under ISA PoCA or PoVA barred lists section of the DBS, such an individual should not be allowed to undertake Regulated Activity – it is a criminal offence to appoint such a
If any matters are revealed in disclosure information that have not been previously declared on application, the Trust will discuss these matters with the candidate before a decision is made about the job offer, this will be reviewed by the recruiting manager and Recruitment on a risk assessment basis (Appendix 1), with consideration being given to:

- The Trust’s legal responsibilities;
- The seriousness of the offence and its relevance to the safety of patients, other employees and property;
- The length of time since the offence occurred;
- Whether the offence was a one off, or part of a history of offending, and efforts to avoid re-offending;
- Any relevant information offered by the applicant about the circumstances which led to the offence being committed;
- The degree of remorse, or otherwise, expressed by the applicant and their motivation to change.

The applicant or employee must be given the opportunity to discuss the disclosure information before the final employment or volunteer decision is made.

The Trust will pay for all elements of the DBS process where costs are incurred.

The policy and guidance will be reviewed biannually and/or in the event of changes to DBS guidelines, NHS policy, employment legislation and/or NHS best practice guidance.

FURTHER READING/INFORMATION

- SCAS Protection of Vulnerable Adults & Children Policy
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions Order), as amended
- NHS Safer Recruitment Guide 2006
- NHS Employment Check Standards 2008, comprising: Employment history, Right to work, CRB, Occupational Health Checks, Registration and Qualification, Verification Checks
- Independent and Safeguarding Authority (ISA) Vetting and Barring Scheme (VBS) Guidelines
- Health and Social Care Act 2008 (Schedule1) – Regulated Activities.
- CQC Guide to regulated activities by service type.

Websites and Links:

- NHS Employers – [www.nhsemployers.org](http://www.nhsemployers.org)
- Information and access to services for DBS applicants and the general public – [www.direct.gov.uk/dbs](http://www.direct.gov.uk/dbs)
Information for registered bodies and other associated businesses and organisations using the DBS service – https://www.gov.uk/government/organisations/disclosure-and-barring-service

Corporate information and publications for particular interest groups and partners – www.homeoffice.gov.uk/dbs


Standards of quality and safety – www.cqc.org.uk/usingcareservices/essentialstandardsofqualityandsafety.cfm

Assessing the Job for Risk

Where the risk might lie in the job

- Will the nature of the job present any realistic opportunities for the applicant to reoffend at work?
- Does this job have exemption status under the ROA 1974, or duties under the Police Act 1997, the Children Act 2004 and the Criminal Justice and Court Services Act 2000?
- To what extent are you bound by other legal constraints?
- Does the job involve any direct responsibility for finance or items of value?
- Does the job involve direct contact with members of the public?
- Would the offence create unacceptable risks for other employees, customers, suppliers or clients?
- What could happen at work and how serious would that be?

Where the risk might lie with the candidate

- It is illegal to employ POCA/POVA offenders in positions that require direct contact with children or vulnerable adults.
- Exemption status for a particular job gives the employer the right to ask applicants about relevant spent convictions.
- For example, those with motoring convictions, employed as drivers.
- For example, those with convictions for theft employed looking after money.
- For example, those with convictions for assault or sexual offences required to visit people in their homes.
- Consider the factors that might decrease or increase the risk, such as supervision, working alone, etc.
All queries regarding suitability should be directed to the Recruitment Advisor and/or Recruitment Manager in the first instance, there is a tool on NHS Employers which gives guidance on whether a DBS check is required.

ID Checking Guidelines

Applicants provide a range of ID documents as part of the DBS application process. Only documents listed below are acceptable as valid ID documents – If it is not listed below, it is not acceptable. There are three groups of acceptable documents:

**Group 1 – Primary Identity Documents**

<table>
<thead>
<tr>
<th>Document</th>
<th>Notes</th>
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<tbody>
<tr>
<td>Passport</td>
<td>Any current and valid passport</td>
</tr>
<tr>
<td>Biometric residence permit</td>
<td>UK</td>
</tr>
<tr>
<td>Current driving licence photocard - (full or provisional)</td>
<td>UK, Isle of Man, Channel Islands and EEA</td>
</tr>
<tr>
<td>Birth certificate - issued within 12 months of birth</td>
<td>UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces</td>
</tr>
<tr>
<td>Adoption certificate</td>
<td>UK and Channel Islands</td>
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</tbody>
</table>

**Group 2a – Trusted Government/State Issued Documents**

<table>
<thead>
<tr>
<th>Document</th>
<th>Notes</th>
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<tbody>
<tr>
<td>Current driving licence photocard - (full or provisional)</td>
<td>All countries outside the EEA (excluding Isle of Man and Channel Islands)</td>
</tr>
<tr>
<td>Current driving licence (full or provisional) - paper version (if issued before 1998)</td>
<td>UK, Isle of Man, Channel Islands and EEA</td>
</tr>
<tr>
<td>Birth certificate - issued after time of birth</td>
<td>UK, Isle of Man and Channel Islands</td>
</tr>
<tr>
<td>Marriage or civil partnership certificate</td>
<td>UK and Channel Islands</td>
</tr>
<tr>
<td>Immigration document, visa or work permit</td>
<td>All countries outside the EEA - valid only if you’re working in the country that issued the document</td>
</tr>
<tr>
<td>HM Forces ID card</td>
<td>UK</td>
</tr>
<tr>
<td>Firearms licence</td>
<td>UK, Channel Islands and Isle of Man</td>
</tr>
</tbody>
</table>

All driving licences must be valid.

**Group 2b – Financial/Social History Documents**
<table>
<thead>
<tr>
<th>Document</th>
<th>Notes</th>
<th>Issue date and validity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mortgage statement</td>
<td>UK or EEA</td>
<td>Issued in last 12 months</td>
</tr>
<tr>
<td>Bank or building society statement</td>
<td>UK and Channel Islands or EEA</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>Bank or building society statement</td>
<td>Countries outside the EEA</td>
<td>Issued in last 3 months - branch must be in the country where the you live and work</td>
</tr>
<tr>
<td>Bank or building society account opening confirmation letter</td>
<td>UK</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>Credit card statement</td>
<td>UK or EEA</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>Financial statement, for example pension or endowment</td>
<td>UK</td>
<td>Issued in last 12 months</td>
</tr>
<tr>
<td>P45 or P60 statement</td>
<td>UK and Channel Islands</td>
<td>Issued in last 12 months</td>
</tr>
<tr>
<td>Council Tax statement</td>
<td>UK and Channel Islands</td>
<td>Issued in last 12 months</td>
</tr>
<tr>
<td>Letter of sponsorship from future employment provider</td>
<td>Non-UK or non-EEA only - valid only if you’re residing outside of the UK at time of application</td>
<td>Must still be valid</td>
</tr>
<tr>
<td>Utility bill</td>
<td>UK - not mobile telephone bill</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>Benefit statement, for example Child Benefit, Pension</td>
<td>UK</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC</td>
<td>UK and Channel Islands</td>
<td>Issued in last 3 months</td>
</tr>
<tr>
<td>EU National ID card</td>
<td>-</td>
<td>Must still be valid</td>
</tr>
<tr>
<td>Cards carrying the PASS accreditation logo</td>
<td>UK, Isle of Man and Channel Islands</td>
<td>Must still be valid</td>
</tr>
<tr>
<td>Letter from head teacher or college principal</td>
<td>UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided</td>
<td>Must still be valid</td>
</tr>
</tbody>
</table>
**Process to check an applicant’s ID**

**Route One**

If an applicant can produce a group 1 document, then they must produce 3 documents
- 1 document from Group one (refer to list of Valid Identity Documents above)
- 2 further documents from Group 1 or 2; one of which must verify their current address.

**Non-UK/Non EEA Nationals:**

All non-UK/Non-EEA Nationals should be validated via Route one by supplying the following combination of documents:
- Current Passport; and
- Biometric Residence Permit or Work Permit/Visa (UK); and
- 1 further document from Group 2a or 2b (refer to list of Valid Identity Documents above), which verifies their current address.

**Route Two**

The applicant must produce:
- 3 documents from Group 2 comprising of;
  - 1 document from Group 2a or 2b; one of which must verify their current address
  - 2 Further documents from Group 2a or 2b; one of which must verify their current address
Every 3 months i.e. Jan/Apr/July/Oct a report is requested and received from Workforce planning showing staff whose DBS is about to go out of date.

A letter requesting the staff member to present 3 items of ID to by verified by their HR Department/Line Manager/TL/ESM or AM and forwarded the verified copies to christine.barnes@scas.nhs.uk via scan or post by the date specified in the letter.

From the report an Excel spreadsheet is produced to keep track of staff whose ID has been requested and when their ID was received along with chase dates etc.(see example below).

Please Note: We need to receive the ID and the staff member completes the online application with 4 weeks of the request letter.

Verified ID received, Check to see if in date and accepted ID for the DBS https://southcentralambulance.disclosures.co.uk/php/index.php Enter information onto Atlantic Data website

An email is sent direct from Atlantic Data to staff member once the ID has been entered

If ID not in date or not valid an email is sent to staff member + TL requesting additional documentation, asking for the ID to be returned within 2 weeks.

Staff are required to logon to website using the unique password to complete the online application.

Website checked regularly to update spreadsheet accordingly.

When certificate issued update ESR with Certificate number and Date of issue.

If certificate is issued containing information email HR & Manager so that they can investigate.

Certificates containing information are logged in the spreadsheet & highlighted. Chase HR/Manager for an update after 2 weeks.

If no ID received from Managers after 2 weeks escalate to Victoria Dooley or Assistant Director of HR to enable escalation to Director of Operations.

If not received escalate to Line Mgr/ESM or AM, recording dates sent on spreadsheet.

Once notified that DBS is accepted update ESR record accordingly.
**SOUTH CENTRAL AMBULANCE NHS TRUST**

**Equality Impact Assessment Form Section One – Screening**

<table>
<thead>
<tr>
<th>Name of Function, Policy or Strategy:</th>
<th>DBS Policy &amp; Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Officer completing assessment:</td>
<td>Valerie Zhand</td>
</tr>
<tr>
<td>Telephone:</td>
<td>01869 365043</td>
</tr>
</tbody>
</table>

1. **What is the main purpose of the strategy, function or policy?**

To provide clarity and guidance on the required checks for individuals working with or planning to work with Children and/or vulnerable adults; information obtained from these check is handled and stored in accordance with the DBS protocol, and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

2. **List the main activities of the function or policy? (for strategies list the main policy areas)**

- Pre-employment checks for potential employees
- Pre-volunteering checks for volunteers
- Re-checking existing employees

3. **Who will be the main beneficiaries of the strategy/function/policy?**

- Recruiting Managers
- HR Team
- Potential Trust Employees
- Existing employees
- Volunteers
- Members of the public
- Patients
- Governors
- All other stakeholders

1. Use the table overleaf to indicate the following:-

   a. Where do you think that the strategy/function/policy could have an adverse impact on any equality group, i.e. it could disadvantage them?

   b. Where do you think that there could be a positive impact on any of the groups
or contribute to promoting equality, equal opportunities or improving relations within equality target groups?
<table>
<thead>
<tr>
<th>GENDER</th>
<th>Women</th>
<th>N/A</th>
<th>N/A</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Men</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>RACE</td>
<td>Asian or Asian British People</td>
<td>N/A</td>
<td>Yes</td>
<td>Language difficulties</td>
</tr>
<tr>
<td></td>
<td>Black or Black British People</td>
<td>N/A</td>
<td>Yes</td>
<td>Language difficulties</td>
</tr>
<tr>
<td></td>
<td>Chinese people and other people</td>
<td>N/A</td>
<td>Yes</td>
<td>Language difficulties</td>
</tr>
<tr>
<td></td>
<td>People of Mixed Race</td>
<td>N/A</td>
<td>Yes</td>
<td>Language difficulties</td>
</tr>
<tr>
<td></td>
<td>White (inc Irish) people</td>
<td>N/A</td>
<td>N/A</td>
<td>Language difficulties</td>
</tr>
<tr>
<td></td>
<td>Disabled People</td>
<td>N/A</td>
<td>Yes</td>
<td>Possible learning difficulties</td>
</tr>
<tr>
<td></td>
<td>Lesbians, gay men and bisexuals</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transgender</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>AGE</td>
<td>Older People (60+)</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Younger People (17 to 25) and children</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Faith Groups</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Equal Opportunities and/or improved relations</td>
<td>N/A</td>
<td>N/A</td>
<td>Yes – ensuring that a fair and consistent process is followed for all Trust staff.</td>
</tr>
</tbody>
</table>

**Notes:** Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs and Hindus. Consider faith categories individually and collectively when considering positive and negative impacts. 

The categories used in the race section refer to those used in the 2001 Census. Consideration should be given to the specific communities within the broad categories such as Bangladeshi people and to the needs of other communities that do not appear as separate categories in the Census, for example, Polish.
5. If you have indicated that there is a negative impact, is that impact:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Legal</strong> (it is not discriminatory under anti-discriminatory law)</td>
<td>✗</td>
<td></td>
</tr>
<tr>
<td><strong>Intended</strong></td>
<td></td>
<td>✗</td>
</tr>
</tbody>
</table>

**Level of Impact**

If the negative impact is possibly discriminatory and not intended and/or of high impact then please complete a thorough assessment after completing the rest of this form.

6(a). Could you minimise or remove any negative impact that is of low significance? Explain how below:

Clear, simple language used. Line managers support and guide their staff to understand what has been written in the policy and the impact/effect it would have on them.

6(b). Could you improve the strategy, function or policy positive impact? Explain how below:

By using clear and simple language.

7. If there is no evidence that the strategy, function or policy promotes equality, equal opportunities or improves relations – could it be adopted so it does? How?

N/A

Please sign and date this form, keep one copy and send one copy to the Trust’s Equality Lead.

Signed: .................................................................

Name: .................................................................

Date: .................................................................
Equality Impact Assessment Form Section Two – Full Assessment

Name of Function, Policy or Strategy: DBS Policy and Guidance

Officer completing assessment: Valerie Zhande

Telephone: 01869 365 043

Part A

1. Looking back at section one of the EqIA, in what areas are there concerns that the strategy, policy or project could have a negative impact?

   - Gender
   - Race
   - Disability
   - Sexuality/Transgender
   - Age
   - Faith

2. Summarise the likely negative impacts:

   - Possible difficulties with understanding relating to language problems and/or learning disabilities
   - No perceived issues relating to other groups.

3. Using the table below, give a summary of what previous or planned consultation on this topic, policy, function or strategy has or will take place with groups or individuals from the equality target groups and what has this consultation noted about the likely negative impact?

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Summary of consultation planned or taken place</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Race</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Disability</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Equality Target Groups</td>
<td>Summary of consultation planned or taken place</td>
</tr>
<tr>
<td>----------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Sexuality/Transsexuality</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Older People</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Younger People</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Faith</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
</tbody>
</table>

4. What consultation has taken place or is planned with Trust staff including staff that have or will have direct experience of implementing the strategy, policy or function?

   Policy being reviewed by Policy review group including staff side representatives

5. Check that any research, reports, studies concerning the equality target groups and the likely impact have been used to plan the project and guide or indicate what research you intend to carry out:

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Title/type of/details of research/report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Race</td>
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<tr>
<td>Younger People</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
<tr>
<td>Faith</td>
<td>Policy being reviewed by Policy review group including staff side representatives</td>
</tr>
</tbody>
</table>

6. If there are gaps in your previous or planned consultation and research, are there any experts/relevant groups that can be contacted to get further views or evidence on the issues?
Yes (Please list them and explain how you will obtain their views)

....................................................................................................................................................

....................................................................................................................................................

[ ] No

Part B
Complete this section when consultation and research has been carried out

7a. As a result of this assessment and available evidence collected, including consultation, state whether there will be a need to be any changes made/planned to the policy, strategy or function.

7b. As a result of this assessment and available evidence, is it important that the Trust commissions specific research on this issue or carries out monitoring/data collection?

(You may want to add this information directly on to the action plan at the end of this assessment form)

....................................................................................................................................................

....................................................................................................................................................

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....................................................................................................................................................

....................................................................................................................................................

8. Will the changes planned ensure that negative impact is:

   Legal? [ ]
   (not discriminatory, under anti-discriminatory legislation)

   Intended? [ ]

   Low impact? [X]

9a. Have you set up a monitoring/evaluation/review process to check the successful implementation of the strategy, function or policy?

   Yes [X] No [ ]

9b. How will this monitoring/evaluation further assess the impact on the equality target groups/ensure that the strategy/policy/function is non-discriminatory?
Details:

The policy will be reviewed and managed by the Recruitment team and any changes or amendments will be brought to the policy review groups.

Please complete the action plan overleaf, sign the EQIA, retain a copy and send a copy of the full EQIA and Action Plan to the Trust’s Equality Lead.

Signed: V.Zhande

Name: V.Zhande

Date: ____________________________
### 1.4 EQIA ACTION PLAN

<table>
<thead>
<tr>
<th>Issue</th>
<th>Action Required</th>
<th>Lead Officer</th>
<th>Timescale</th>
<th>Resource Implications</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Difficulties of understanding</td>
<td>Plain English, simple language</td>
<td></td>
<td>During drafting</td>
<td>Built into process</td>
<td></td>
</tr>
<tr>
<td>Difficulties of understanding</td>
<td>Managers to support staff to understand</td>
<td></td>
<td>In use, ongoing</td>
<td>Should not be any.</td>
<td></td>
</tr>
</tbody>
</table>

Please continue on another sheet if you need to.