



## **Disclosure and Opt-Out Policy**

### **1. Background**

1.1 Dō University is committed to safeguarding and promoting the well-being of children, youth and adults at risk, and expects all staff, agency workers, contractors and volunteers to share this commitment.

1.2 As part of the recruitment process, a number of checks are carried out, including an enhanced Disclosure and Barring Service (DBS) check, a disqualification check (if applicable) and any relevant overseas criminal record checks.

### **2. Scope**

2.1 This policy applies to all staff, agency workers, volunteers, contractors and job applicants.

2.2 The policy should be read in conjunction with the recruitment and selection policy, the ex-offender recruitment policy and the employee data policy.

### **3. Principles**

3.1 Dō University uses the online umbrella company Care Check for all DBS checks. Individuals complete the DBS form online via the Care Check portal, and the relevant Group staff member conducts the identity checks. The form is then sent to Care Check for endorsement. Once endorsed, it is then sent to the DBS for processing. The Care Check portal will be updated once the DBS certificate has been issued.

3.2 All staff employed by Dō University will be subject to an advanced level DBS check, and this will include a check against the exclusion lists according to the type of workforce in which the staff member works.

3.3 Staff employed on fixed-term contracts of less than eight weeks will not automatically be subject to a DBS check, unless there is a specific reason why this is necessary and they have access without supervision of children, young people and/or adults at risk.

3.4 Volunteers may be subject to a criminal record check (DBS) if their traineeship period is eight weeks or more. It is the responsibility of the Head of Learning or Head of Business to identify such individuals and arrange for the completion of an online form, if necessary, at their own cost.

DBS payment will be made if applicable.



3.5 Trainee teachers who are assigned to Dou University to undertake teaching placements must have DBS clearance from their training organisation, but it is Dou University's responsibility to verify this. Training authorities who employ trainee teachers must verify that the trainees have the appropriate DBS clearance.

3.6 All host families hosting students at Dō University will undergo a criminal record check (DBS). This check is subject to a process independent of the Accommodation Service.

3.7 New employees will be subject to a criminal record check (DBS) once they have been offered a position with Dō University, unless they are registered with the Update Service, in which case proof of the check will be required. Any DBS linked to the Update Service must be in accordance with the staffing requirements of Dō University.

3.8 Students on specific courses, for example, in Care and Early Years, PGCE or Sports, require DBS checks and these will be coordinated through the Head of Learning and the relevant department.

3.9 If a DBS certificate has not been issued prior to a staff member's start date, the Pre-Clearance Risk Assessment process must be followed, which places the staff member under employment restrictions until such time as DBS clearances (including overseas checks) and references are received and checked. Human Resources. Once the DBS certificate has been issued, staff must submit their original DBS certificate to Dō University for verification on the day of their entry or within one week of receiving it.

3.10 Contractors who regularly work on Dō University premises (e.g. catering, security and cleaning) must have a DBS check to the level required by the employing company.

It is the responsibility of the designated Group staff member contacting the contractor (e.g. Real Estate, Hospitality, etc.) to request written confirmation that all staff are DBS checked and to record their DBS disclosure number and check level. This must be confirmed in writing annually. If contractors remain on the premises for a short period or do not have contact with students, a DBS check will not be required, but must be accompanied at all times by a member of staff. from Dō University with DBS check.

3.11 Dō University will request Agencies to provide evidence of DBS checks at the required level for any agency worker undertaking an assignment with the Group.



3.12 Governors of Dō University will be verified by DBS, which will be facilitated by the Secretary of the Governing Body.

3.13 In addition to the DBS checks described, any person who is employed to provide childcare for children under the age of eight, or who is directly involved in the management of that childcare, will be required to sign a self-declaration of disqualification form to confirm that they have not been disqualified from such work in accordance with the Childcare Act 2006.

3.14 Any person designated to perform teaching duties will require additional verification through the Employer Online Access Service to ensure that he or she is not subject to a prohibition order issued by the Secretary of State.

#### **4. DBS retention**

4.1 Pursuant to Section 124 of the Police Act 1997, disclosed information is only passed to those who are authorised to receive it in the course of their duties. It is an offence to pass such information on to any person who is not entitled to receive it.

4.2 The disclosed information is used only for the specific purpose for which it was requested and for which the requester's full consent has been given.

4.3 Dō University will not retain photocopies or images of the Declaration. However, Dō University will retain a record of the date the Declaration was issued, the level of the Declaration applied for, the position and staff for which it was applied for, and its unique reference number.

4.4 For unsuccessful job applicants, Human Resources will securely destroy all supporting DBS documentation following the interview/selection process.

4.5 For successful applicants, Human Resources will securely hold copies of DBS supporting documentation for the duration of the DBS check process, until the certificate has been issued and verified by Human Resources. Any documentation not required for other checks, such as eligibility to work in the UK, will be securely destroyed by Human Resources.



## 5. Criminal background check process for new staff

5.1 Job applicants who appear for an interview must present the corresponding identification. Original identification documents will be verified before submitting the Disclosure request.

5.2 All selected applicants must also read the Verification Privacy Policy

standard/improved.<https://www.gov.uk/government/publications/>

standardand-enhanced-dbs-check-privacy-policy before submitting your DBS form through Care Check, which describes how DBS will process your personal data and what options are available to them.

5.3 DBS has a confidentiality process specifically for trans applicants, who can contact the sensitive applicant line on 0151 676 1452 or by email at [sensitive@dbs.gsi.gov.uk](mailto:sensitive@dbs.gsi.gov.uk) for more advice on how to complete the online form.

5.4 If an applicant has resided outside the UK for 6 months or more within the last 5 years, they will be asked for a Certificate of Good Conduct (CGC) or equivalent corresponding to that period. If they are unable to produce this, the Group may be required to undertake relevant overseas checks as part of their appointment.

5.5 Care Check will contact the DBS to inform them of any disclosures that have not been received 60 days after submission. It is Human Resources' responsibility to ensure that the authorization has been issued, and it is the employee's responsibility to present the original certificate for verification. If the new employee has not received DBS clearance (including overseas checks) and references prior to joining, they will need to go through the Pre-Clearance Risk Assessment process, which will place work restrictions on them until these checks are received and verified by HR. The manager will need to conduct a risk assessment on their first day to agree any controls that will be in place in the meantime. Both the manager and the new employee must sign the Pre-Authorization Risk Assessment form and submit it to the Protection Manager, who will determine whether the agreed-upon control measures are adequate. This form must be submitted to Human Resources by noon on the first day of work.

Managers must implement control measures until Human Resources has received and verified all necessary verifications. Staff working in the Dōō University housing program for minors under 18 years of age at the university's branches may not

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tel. (secretariat) +34611951605  
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[www.universidad-do.com](http://www.universidad-do.com)



join the job until all the verifications have been received and verified.

5.6 Any reprimand, warning, or conviction identified in a criminal record check that has not been previously reported to Dō University will be discussed with the employee. The information will be assessed before a decision is made as to whether the employee should continue in employment. Termination of the contract due to lack of results in a verification may be the result of a meeting with a member of the Group Leadership Team, since all offers of employment are conditional on obtaining of a satisfactory DBS clearance for Dō University.

## **6 DBS Process for Continuing Staff**

6.1 Staff do not need to be reassessed following a satisfactory assessment at the start of their first employment, unless Dō University has concerns about an individual's suitability to work with children or adults at risk. However, staff have a contractual obligation to inform Human Resources if they receive a warning or conviction following the issuance of their employment contract.

6.2 Staff working at Dō University will undergo a DBS check every 3 years in accordance with the Disclosure and Barring Practice Code. Accommodation Guidance Document.

6.3 Staff who change roles within Dō University may be required to undergo a further DBS check.

## **7 Status of this policy**

7.1 The Director of Human Resources will periodically review the operation of this procedure. The Human Resources Committee may review and modify it from time to time. Its impact on equal opportunities has been assessed to ensure that it does not negatively affect staff. If you wish to review this policy in a different format, please contact Human Resources.

Reviewed in: September 2015

Next review date: September 2027