



Policy on recruiting ex-offenders

1. Introduction and scope

1.1 Dō University is committed to the fair treatment of staff and applicants for employment, in accordance with the Group's Equality, Diversity and Inclusion policy, and welcomes applications from a wide range of candidates, including those with criminal records.

1.2 In order to comply with our safeguarding obligations, enhanced Disclosure and Barring Service (DBS) checks (which may include a barred list check), including all relevant overseas checks, are carried out as part of the recruitment process for all new staff.

1.3 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, shall sign a self-declaration of disqualification form to confirm that they have not been disqualified from such employment in accordance with the Childcare Act 2006.

1.4 In accordance with the Child Safety in Education guidelines, Human Resources will conduct online searches through Google for all selected candidates and, if deemed necessary, may conduct these searches for shortlisted candidates. If any concerns are identified through these searches, the Human Resources Manager will ensure that a confidential and measured discussion takes place regarding any concerns relevant to the role.

1.5 In accordance with Child Protection in Education guidelines, shortlisted candidates will be sent a link to a self-declaration form, which will ask them to disclose any additional information regarding their criminal record or information that would make them unfit to work with children. The self-declaration must be completed before the interview date.

1.6 Dō University fully complies with the DBS Code of Practice and is committed to providing fair treatment to all applicants. Dō University will not unfairly discriminate against any individual on the basis of criminal record or other disclosed information.

1.7 This policy applies to all applicants seeking paid or voluntary employment at Dō University and is made available to all applicants from the beginning of the recruitment process.



1.8 It is a criminal offense for an excluded person to apply for a position that is classified as a regulated activity (i.e., one that involves working with children and/or adults at risk).

2. Related policies

2.1 This policy should be read in conjunction with the recruitment and selection policy, the disclosure and exclusion policy, the equality, diversity and inclusion policy and the employee data policy.

3. Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

3.1 As Dō University is an educational provider, it is permitted to inquire whether an applicant has any unspent cautions or conditional sentences under the Rehabilitation of Offenders Act 1974, and/or any unspent adult cautions (simple or conditional) or sentences which are not protected as defined by the Rehabilitation of Offenders Act 1974 (Amendment) (England and Wales) Order 2020.

4. Principles

4.1 Dō University actively promotes equal opportunities for all and selects all candidates for interview based on their skills, qualifications and experience.

4.2 The Dō Group University's employment advertisements, job descriptions, and websites contain a statement that disclosure will be requested in the event the individual is offered the position, so that applicants are aware.

4.3 Dō University's websites include a statement indicating that having a criminal record does not necessarily preclude a person from receiving a position. This will depend on the nature of the position, the circumstances, and the history of the offense(s).

4.4 Since disclosure may be part of the selection process, shortlisted candidates must provide full information, including background on their criminal record, prior to their scheduled interview. Dō University requests that this information be confidentially forwarded to the Human Resources Manager and ensures that it is seen only by those who need to see it as part of the selection process. (See Annex A for the procedure for managing a disclosure.)



4.5 When responding, the Human Resources Manager will ensure that the carry out a confidential and measured conversation about any crime or Other matters relevant to the position. Failure to disclose information directly relevant to the position applied for could lead to the withdrawal of the offer of employment or termination of the contract if it has already begun.

5. Confidentiality and data security

5.1 The information disclosed will only be shared with those authorized to see it and will be considered only for the purpose for which it was obtained. Dō University will not retain any photocopy or image of the disclosure, or any representation of its contents, without the consent of the data subject, in accordance with the DBS Code of Practice.

For more information, please refer to the Employee Data Policy.

5.2 Applicants who have resided outside the UK for a continuous period of 6 months or more within the last 5 years may be asked to complete a consent form, agreeing to Human Resources disclosing personal information to a third party for the purpose of obtaining an overseas criminal record check..

6. DBS Code of Practice

6.1 Dō University undertakes to inform all subjects of a DBS Declaration of the existence of the DBS Code of Practice and will make a copy available upon request. The Code of Practice may also be downloaded from the Dō University and DBS websites.

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 amend it from time to time. Its impact on equality has been assessed to ensure that it does not negatively affect staff. If you wish to review this policy in another format, please contact Human Resources.

Review date: September 2025

Next review date: September 2027



Annex A

Procedure for Responding to a Disclosure

Shortlisted candidates with criminal records, including convictions, reprimands, cautions and final warnings, which will not be leaked in accordance with current guidelines, must provide full information, including the context of the offenses. This information must be submitted to the Human Resources Manager prior to the scheduled interview and marked as confidential.

The Human Resources Manager, or an appropriate representative of Human Resources

Humans will evaluate the information based on:

ō Whether the position involves personal contact with children, students or visitors; whether the position involves any direct responsibility for finance or cash management; the level of supervision the position holder will receive; the seriousness and significance of their criminal record; whether the offenses suggest any implications for the safety of staff, students, or property; the time elapsed since the offense was committed; the applicant's age at the time; the background to the conviction; any change in the applicant's circumstances since the offence; whether the offence has been decriminalised or when the conviction was committed abroad or in Scotland; whether the action would constitute an offence in England and Wales; any relevant information provided by the applicant in relation to the offence (e.g., domestic problems, financial difficulties, etc.).

In exceptional circumstances, where the offense is deemed to be sufficiently serious to prevent an individual from obtaining employment in the position for which they have applied (for example, if the applicant is found to be on the Investigation and Exclusion List), the Human Resources Manager or an appropriate representative will inform you that Dō University will not be able to proceed with your application.

When further information is required, the Human Resources Manager will communicate directly with the applicant and, when necessary, arrange a meeting with him/her to discuss the relevant sentence.

Where the information is not considered serious enough to prevent a person from being employed in that position, their application will continue through the selection process and will be assessed on the basis of knowledge, skills, qualifications and experience relevant to the position.



Where the recruitment panel wishes to appoint an individual who has provided details of a criminal record, Human Resources will decide whether further action should be taken.

As with all new employees, Dō University will undergo enhanced Disclosure and Barring Service screening (which may include a query against barred lists), including any relevant overseas checks once the applicant has been appointed. All offers of appointment are conditional and subject to relevant employment checks, which will include a DBS check and an overseas check, if applicable.

When information is received from the DBS that has not been provided or that contradicts the information provided by the applicant, Dō University will arrange a meeting with the newly appointed person to discuss the information received.

Lack of information or the intentional provision of inaccurate information could result in Dō University withdrawing the employment offer. The final decision will be made by a member of the Dō University Leadership Team.

If a staff member receives a warning or sentence after the issuance of their employment contract, they are contractually obliged to submit details of the breach to the Human Resources Manager immediately.