



Policy on recruiting ex-offenders

1. Introduction and scope

- 1.1 The University is committed to the fair treatment of staff and applicants, 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 To meet 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 Anyone employed to provide childcare for children under the age of eight, or who is directly involved in the management of such childcare, must sign a self-declaration of disqualification form to confirm that they have not been disqualified from this type of work, in accordance with the Childcare Act 2006.
- 1.4 In accordance with Child Safety in Education guidelines, Human Resources will conduct online searches via Google for all selected candidates and, if deemed necessary, may conduct these searches for shortlisted candidates. If any concerns are identified during these searches, the Human Resources Manager will ensure a confidential and measured discussion regarding any concerns relevant to the position.
- 1.5 In accordance with Child Protection in Education guidelines, shortlisted candidates will receive a link to a self-declaration form, which will ask them to disclose any additional information regarding criminal records or information that would disqualify them from working 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 employment.
paid or voluntary work in the Group and is made available to all
them 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., involving work 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, you are allowed to ask
if an applicant has unserved warnings or conditional sentences
according to the Rehabilitation of Offenders Act 1974, and/or if you have
adult warnings (simple or conditional) or completed sentences
who are not protected as defined in the Rehabilitation of Offenders Act 1974
(Exceptions) (England and Wales) (Amendment) Order 2020.

4. Beginning

- 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 Job advertisements, job descriptions, and Group websites contain a statement
that a disclosure will be requested if the individual is offered the position, so
that applicants are aware.
- 4.3 The Group'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 complete information, including the context of their criminal history, prior to the scheduled interview. The Group requests that this information be confidentially sent to the Human Resources Manager and ensures that it will only be seen by those who need it as part of the selection process. (See Appendix A for the procedure for managing disclosure.)
- 4.5 When appropriate, the Human Resources Manager will ensure a confidential and measured discussion regarding any crimes or other matters relevant to the position. Failure to disclose information directly relevant to the position applied for could result in the withdrawal of the job offer or termination of the contract if it has already commenced.

5. Confidentiality and data security

- 5.1 Disclosed information will only be shared with those authorized to view it and will be considered solely for the purpose for which it was obtained. Dō University will not retain any photocopies or images of the disclosure, or any representations of its contents, without the data subject's consent, in accordance with the DBS Code of Practice. For further information, please see 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 HR disclosing personal information to a third party for the purpose of conducting a criminal record check abroad.

6. DBS Code of Practice

- 6.1 Group undertakes to inform all subjects of a DBS Statement of the existence of the DBS Code of Practice and will make a copy available upon request. The Code of Practice can also be downloaded from the Group and DBS websites.

7. Status of this policy

7.1 The Human Resources Director will periodically review the operation of this procedure. The Human Resources Committee may review and amend it periodically. Its equality impact has been assessed to ensure it does not negatively affect staff. If you would like to review this policy in another format, please contact Human Resources.

Date of
revision:

March 2025

Next date
for review:

March 2030

Annex A

Procedure for responding to a disclosure

- Shortlisted candidates with criminal records, including convictions, cautions, reprimands, and final warnings, which will not be screened 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 Human Resources representative, will evaluate the information based on:
 - either Whether the position involves personal contact with children, students, or visitors;
 - either whether the position involves any direct responsibility for finance or cash management;
 - either The level of supervision the incumbent will receive; the
 - either seriousness and relevance of his or her criminal record;
 - either if the crimes suggest any security implications
 - staff, students or property;
 - either the time elapsed since the crime was committed; the
 - either applicant's age at the time; the history of the
 - either conviction;
 - either any change in the circumstances of the
 - applicant since the crime was committed;
 - either whether the offence has been decriminalised or, where the conviction was committed abroad or in Scotland, whether the action would constitute an offence in England and Wales;
 - either Any relevant information provided by the applicant in relation to the crime (e.g. domestic problems, financial difficulties, etc.).
- In exceptional circumstances, when the crime is considered serious enough serious enough to prevent a person from obtaining employment in the position for which he or she has applied (for example, if discovers that the applicant is on the Screening and Exclusion List), the Human Resources Manager or an appropriate representative will will inform you that CCG will not be able to process your request.

- When further information is required, the Human Resources Manager will contact the applicant directly and, where necessary, arrange a meeting to discuss the relevant conviction.
- 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 based on knowledge, skills, qualifications, and experience relevant to the position.
- When 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, CCG will undergo enhanced Disclosure and Barring Service screening (which may include a search of the 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 criminal record (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, CCG will arrange a meeting with the newly appointed person to discuss the information received.
- Lack of information or intentionally providing inaccurate information could result in Dō University withdrawing the job offer. The final decision will be made by a member of the Group Leadership Team.
- If a staff member receives a warning or conviction after their employment contract has been issued, they are contractually obliged to report details of the violation to the Human Resources Manager immediately.