

Guidance for the management of roles requiring DBS checks

1. Advertising

The Recruiting Manger (RM) will assess the proposed job description and indicate on e-recruiter if the position requires a DBS check. The Recruiting Department will endeavour to advertise all posts with a minimum of three months' notice before the requirement for an individual to commence in post. In the event that less than three months are provided the Recruiting Manager will be required to prepare appropriate safeguarding measures to accommodate a potential delay in the return of the DBS certificate once the recruitment stage has been completed.

The position will then be advertised and HR will ensure that the advert states where a DBS check is required using the wording contained in **Appendix A (i)**. The Human Resources Assistant (HRA) arranges for the position code to be created with the DBS Required Relation as a "Yes" on the ABW system by the HRA responsible for the advertisement.

2. Interviews & conducting the checks

The HRA will invite candidates to interview and candidates will be asked to bring all information that would be required to complete a DBS check that day. The interview invitation (**Appendix B**) will include details of the information required to complete the check. A list of documents can be found at <https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide-> and are included in the invitation to interview letter.

The HR department will verify all necessary documentation and where necessary will ask the candidate to complete the DBS form remotely. Items are photocopied, signed and dated and kept until the satisfactory certificate is received then shredded and any unsuccessful candidate's documentation will be shredded once the post has been filled.

Note: For candidates within the UK interviewed by SKYPE, arrangements should be made when the post is verbally offered for the individual to travel to AU to conduct the DBS check 6 weeks before the start date of the post, or within 5 working days where the post commences sooner.

For candidates being interviewed from outside the UK the individual; will be required to undertake an online DBS check. Where an individual has been a non-resident of the UK for 12 months or more an appropriate equivalent check will be conducted according to the country of origin Please refer to **Appendix C**.

The HRA will complete the position checklist once the DBS application is submitted and will then pass to the contractual team to chase the DBS and generate the offer letter and contract.

The applicant arrives on the day of interview to provide the documentation to the nominated HRA. The HRA will complete the checklist and verify the documentation. If the candidate has not brought their documentation they will need to return with it at a pre-arranged date.

The HRA will ensure the successful candidate's information is entered into ABW together with the requirement for the post to be DBS checked. (See section 4 - Recording)

All offers of employment will be made conditional upon the receipt of the appropriate DBS checks being satisfactorily confirmed and this will be made explicit in the offer letter sent to the chosen candidate by the Contractual team, copied to the Recruiting Manager.

The HRA will send a reminder e-mail to the candidate on the 5th working day following the verbal offer if the check has not been completed and will cc the Director of the Recruiting Department and the HR Quality & Compliance Manager. The e-mail will make it explicit that without this information the person cannot start work. Please refer to **Appendix D** for appropriate wording.

3. Completing & submitting the DBS paperwork

The nominated HRA will supervise the completion of the individuals DBS form in the HR Department and will thoroughly check that the information has been completed correctly before the candidate leaves the HR Department and completed the checklist. A second check will be done of the form by a HR colleague before the prospective employee leaves the building.

Once the form is completed the documents will be submitted to a Staff Counter-signatory (Director of Human Resources or Deputy Director of Human Resources or PVC and Chief Operating Officer) **the same day**.

The Counter-signatories will check and return the form within 24 hours of receipt. It is the HRA's responsibility to ensure that this happens. If the counter-signatory has not signed and returned the form within 24 hours the HR Quality & Compliance Manager should be advised by the HRA. The HR Quality & Compliance Manager will be responsible for investigating the reason for the delay and within 24 hours of identifying the cause and, where necessary, ask another counter-signatory to complete the check.

The nominated HRA will send the link to the online tracking portal by e-mail to the prospective member of staff to track and will include the application number. The Recruiting Manager will be copied into the e-mail.

4. Recording

The HRA will be responsible for creating the employee on ABW and the relevant line will be parked subject to the receipt of a satisfactory DBS check. All documents should be uploaded for payroll at this point.

The HRA will be responsible for recording the following information on the ABW system when the application has been completed on the "Right to Work" tab:

Please refer to inputting DBS information in the ABW manual.

5. Monitoring the progress of a submitted check

The HR Assistant will be responsible for checking the DBS portal on a weekly basis for the progress of the individual's application.

After two calendar weeks the ABW system will send daily e-mail reminders to the HR team at hr@aber.ac.uk and to the Director of the recruiting department to highlight that there is an outstanding DBS check. Please refer to **Appendix E** for the wording of these alerts.

6. Once a certificate has been issued

Once the Online portal indicates that a certificate has been issued, the contractual team will be responsible for contacting the successful candidate to ascertain whether the certificate has been received. The Director of the recruiting department will be copied into all correspondence of this nature. Please see **Appendix F** for the template wording.

The successful candidate will be responsible for informing HR on hr@aber.ac.uk within 24 hours upon receipt of the DBS certificate. It will be the responsibility of the Contractual team to then contact the individual immediately to arrange for the individual to bring the original certificate to the HR department to enable the certificate to be verified and to take a copy. The Contractual team will be responsible for recording all relevant information on the HR DBS Certificate Verification Sheet in **Appendix L** and this will be scanned and saved to the individual's ABW file.

On receipt of the certificate, the contractual team must check that the certificate is genuine (watermarked) and that it belongs to the certificate holder (check photo ID if you did not take the original documents). The "Right to Work Checks" tab on ABW will be completed to include the reference number of the check, date received, outcome (satisfactory or not satisfactory), valid from (date of certificate) and valid to (two years from date of certificate).

The Contractual team will be responsible for un-parking the individual on receipt of the satisfactory certificate **OR** on receipt of a satisfactory risk assessment on the safeguarding arrangements which has been verified by the Deputy Director of HR.

Where it becomes apparent to the Contractual team from the DBS portal that a certificate has been issued to the individual but the individual has not presented the certificate for the HR department to verify and note, the individual will be advised that failure to bring the certificate to HR within 48 hours will necessitate the imposition of a period of unpaid leave until such time as they comply or the withdrawal of the offer of employment. The Director of the recruiting department will be copied into the e-mail where this becomes necessary. Please refer to **Appendix H** for the appropriate template.

If the individual fails to respond to the e-mail as directed within the prescribed time period, the Contractual team will escalate the matter to the HR Quality & Compliance Manager for the matter to be addressed formally in writing and in consultation with the Director of the recruiting department.

7. When employment commences before a DBS check is received

The ABW system will alert the HR Assistant where an individual is due to commence employment and where the "DBS pending" tab is still selected 5 days before the proposed commencement of employment.

The Contractual team will be responsible for advising the Director of the recruiting department by e-mail that consideration should be given as to whether the employment start date should be delayed (preferable) or whether safeguarding measures should be put in place to enable the individual to start employment before the certificate is received. Please see **Appendix G** for the appropriate e-mail template.

The Director of the recruiting department will be required to respond in writing instructing either a change in employment commencement date or else confirming the safeguarding adjustments made to enable the individual to commence employment whilst the check is outstanding. This should be copied to the HR Quality & Compliance Manager for reporting at the weekly HR management team meeting.

Consideration will be given to an individual's pre-existing DBS certificate with regards to the safeguarding measures which can be put in place however the University will not accept DBS checks conducted by other employers as a suitable alternative to conducting the check by AU.

8. Checking the certificate

If the candidate's DBS is clear, their employment should begin in line with the request.

If the candidate's certificate includes cautions or convictions, the Director of the recruiting department should be informed. A meeting will be arranged with the candidate and Director of the recruiting department with HR in attendance if requested, to discuss the nature of the cautions/convictions.

If the cautions/convictions are deemed to be acceptable by the Director of the recruiting manager and one of the authorised counter-signatories, the person can be appointed, marking the DBS as satisfactory as above. A note of the discussion should be taken and uploaded to the individual's electronic file to show that the meeting took place and employment can commence.

If the cautions/convictions are deemed unacceptable, the conditional offer of employment may be withdrawn by formal letter from the HR Quality & Compliance Manager or nominee. Please refer to **Appendix I** for the template letter. The employment record should be closed and file moved to leavers. The certificate should be retained no longer than for the recruitment decision and possibility of appeal, and destroyed once complete (no longer than 6 months).

For guidance on acceptability of cautions/convictions, please speak with the HR Quality and Compliance Manager and/or Deputy Director of Human Resources. Employment should only be withdrawn if there is clear evidence of unsuitability. Unrelated or minor offences would not normally prevent employment from commencing/continuing.

9. DBS Renewals

All individuals in posts which require a DBS check will be flagged on monthly ABW reports where the individual is within 8, 6, 4 and 2 weeks of the expiration of their current check. The report will be sent to the HR Employee Services team and it will be the Contractual team's responsibility to ensure that the relevant individuals are contacted to chase the provision of this information, copying in the Director of the relevant department. Please refer to **Appendix J** for the template e-mail.

The Individual will receive automated reminders from the ABW system within the aforementioned period and will be required to present themselves to HR to renew their certificate in accordance with the university's Safeguarding Policy framework. The check will be conducted in accordance with sections 3 and 4 of these guidelines. The Director of the relevant department will be copied into all e-mails sent to the individual regarding this procedure.

In the event that an individual fails to comply with the Contractual team's request to renew their DBS certificate, they will receive formal notice that a period of unpaid leave will be enforced until they comply with the instruction three weeks before their current certificate expires. Please refer to **Appendix K** for the template letter. The Director of the relevant department will be consulted beforehand as to when it may be necessary to invoke this step.

Appendix A

This position will be subject to a satisfactory DBS check

Appendix D

Dear <name>

I am writing to remind you that you have not yet supplied us with the necessary information to complete the DBS check which is a mandatory requirement of your appointment.

Can you please contact me on hr@aber.ac.uk within the next 48 hours to confirm suitable arrangements for you to attend the HR Department with the necessary documentation to conduct the check.

The evidence required is as set out in your interview invitation letter however for ease of reference the list of evidence can also be found here: <https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide->

Please note that failure to comply with this requirement in a timely fashion may result in the withdrawal of the offer of employment.

Please do not hesitate to contact me on the aforementioned e-mail address or on 01970 628555 if you have any queries. I look forward to hearing from you.

Appendix E

Please note a DBS check has been submitted on behalf of <name / employee reference number> and a certificate has not yet been received. The individual's current employment start date is <date>.

Appendix F

Dear <name>

I have been advised through the DBS online portal for employers that a DBS certificate has been issued to you.

Can you please contact me on hr@aber.ac.uk within the next 48 hours to confirm suitable arrangements for you to attend the HR Department with the certificate to enable HR to verify and record that the check has been completed satisfactorily.

Please note that failure to comply with this requirement in a timely fashion may result in the withdrawal of the offer of employment.

Please do not hesitate to contact me on the aforementioned e-mail address or on 01970 628555 if you have any queries. I look forward to hearing from you.

Appendix G

Dear <name>

I am writing to advise you that the University has not yet verified the DBS certificate for <name>, which is part of the mandatory criteria for this post. As such consideration should be given to delaying the start date of the individual's commencement in post until this information has been received.

In the event that it is not possible to delay the start date of employment for operational reasons, you are required to ensure that appropriate safeguarding measures are put in place in accordance with the University's Safeguarding Policy, and that these arrangements are regularly reviewed until such time as the DBS certificate is recorded. You are also required to confirm the safeguarding arrangements in writing to the HR Quality & Compliance Manager by e-mail on hr@aber.ac.uk

Please confirm in writing by return whether you wish the employment start date to be delayed or if you intend to place safeguarding measures in place and, if so, outline what these arrangements entail.

Appendix H

Dear <name>

I am writing to advise you that it has come to our attention from the Employer's DBS portal that the DBS certificate which was requested pursuant to your role has now been returned to you.

As you will be aware, this post requires that all individuals successfully complete the DBS procedure.

Can you please contact me on hr@aber.ac.uk within the next 48 hours to confirm suitable arrangements for you to attend the HR Department with the certificate to enable HR to verify and record the check has been completed satisfactorily.

Please note that failure to comply with this requirement in a timely fashion may result in the withdrawal of the offer of employment or the imposition of a mandatory period of unpaid leave, as documented in your contract, until such time as the certificate is presented to the HR department for verification.

Please do not hesitate to contact me on the aforementioned e-mail address or on 01970 628555 if you have any queries. I look forward to hearing from you.

Appendix J

Alert from ABW

Please be advised that your current DBS check is due to expire in 8 weeks. Please contact me on hr@aber.ac.uk to make suitable arrangements to visit the HR department to present the necessary information to resubmit the DBS check within the next 5 working days.

A full list of valid documentation can be found here: <https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide->

Please note that failure to undertake the renewal of the DBS check by the time the current check expires may result in the university invoking a period of unpaid leave until a check is processed and noted as satisfactory.

E-mail to Individual

Dear <name>

I am writing to advise you that it has come to our attention that your current DBS check will expire in 8/6/4/2 weeks' time.

In accordance with the requirements of the University's Safeguarding Policy it is therefore imperative that a DBS check is resubmitted on your behalf to ensure that you may continue to be employed in this role.

Can you please contact me on hr@aber.ac.uk within the next 48 hours to confirm suitable arrangements for you to attend the HR department with the necessary documentation to enable HR resubmit the DBS check on your behalf.

Please note that failure to comply with this requirement in a timely fashion may result in the imposition of a mandatory period of unpaid leave until such time as the certificate is presented to the HR department for verification.

Please do not hesitate to contact me on the aforementioned e-mail address or on 01970 628555 if you have any queries. I look forward to hearing from you.

Appendix K

Dear <name>

Further to my recent e-mails concerning the provision of a satisfactory DBS check I am writing to advise you that the renewal of your DBS check remains outstanding and as such you cannot continue to attend work in this role.

I am therefore advising you that, in accordance with the appropriate contractual clause, a period of mandatory unpaid leave is being invoked with effect from the <date> until such time as the University is able to verify that a satisfactory DBS certificate has been obtained on your behalf.

Can you please contact me on hr@aber.ac.uk as a matter of urgency to confirm suitable arrangements for you to attend the HR department with the necessary documentation to enable HR to resubmit the DBS check on your behalf.

Please do not hesitate to contact me on the aforementioned e-mail address or on 01970 628555 if you have any queries. I look forward to hearing from you.