



Disclosure and Barring Service Policy

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| Version | 4.0 |
| Review Date | October 2026 |

Policy Statement

Play Inclusion Project uses the Disclosure and Barring Service (DBS) checking service to assess the suitability of applicants for positions of trust, particularly where they have access to children, young people, or vulnerable adults.

This policy sets out how Play Inclusion Project ensures that DBS checks are requested, handled, stored, used, retained, and disposed of in accordance with:

- The Police Act 1997
- The DBS Code of Practice (as amended)
- The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and amendments

The policy applies to all employees, volunteers, and trustees

Commitment to Fair Processing

Play Inclusion Project fully complies with the DBS Code of Practice regarding the correct handling, use, storage, retention, and disposal of certificate information. All DBS information is handled lawfully, fairly, and transparently. Personal data is used only for its intended safeguarding purpose, stored securely, and retained no longer than necessary.

Requirement for DBS Checks

- All staff and volunteers must complete an Enhanced Level DBS check prior to appointment.
- All Management Committee Members must complete a Standard Level DBS check.
- All roles are conditional upon satisfactory clearance.
- Any individual refusing to undergo the required check will be unable to take part in Play Inclusion Project activities.

Updated October 2025
By Joanne Barnes

- Existing staff and volunteers must complete a new DBS check every two years or maintain continuous coverage via the DBS Update Service, which may be verified online.

Handling, Storage and Access

Certificate information is never stored within an individual's main personnel file.

All DBS certificate data is stored digitally on the Care Check platform, accessible to the Recruitment & Training officer and the Chief Executive Officer (CEO).

A minimal paper record (applicant's name, certificate number, and issue date) is kept in a locked cabinet for audit purposes.

Access is restricted to authorised staff only (CEO, Recruitment and Training Officer).

Certificate information will only be shared with funders on request.

It is a criminal offence to pass DBS information to anyone not entitled to receive it.

Usage of Certificate Information

Certificate information is used only for the specific purpose for which it was requested: assessing suitability for work or volunteering with children, young people, or vulnerable adults.

Applicants are informed of this purpose and their data rights at the time of application through a privacy notice.

Retention and Disposal

Full DBS certificate information will be retained for a maximum of 12 months following receipt. This allows time to resolve disputes, complaints, or recruitment decisions.

In exceptional cases, information may be retained longer only after consultation with the DBS and in accordance with the Data Protection Act 2018 and the individual's rights.

Once the retention period has elapsed, Play Inclusion Project will ensure that any DBS certificate information is immediately destroyed by placing it in the Shred-It bin (further information can be found in the Shred-It Policy).

Play Inclusion Project retains only the following data indefinitely:

- Applicant's name
- Certificate number
- Date of issue
- Type of check and outcome (clear or information disclosed)

Procedure for Requesting Checks

Interview Stage

The Recruitment and Training Officer will complete an ID Verification Form with the applicant during or immediately after interview.

Online Application

The applicant's name and email are entered into the Care Check system, which sends a secure invitation to complete the DBS application online.

Self-Disclosure

Applicants must complete a Self-Disclosure Form detailing any convictions, cautions, reprimands, warnings, or relevant police enquiries. These will be open when a conditional job offer is being made.

Identity Verification

Identity is verified in line with the DBS ID Checking Guidelines (effective 22 April 2025).

Care Check's digital ID verification service (DVS) may be used for eligible applicants.

Where physical documents are used, only valid, current, original documents are accepted.

Verification rules include:

- Photographic ID is to be used wherever possible.
- All documents must show the applicant's current name.
- At least one document must confirm the date of birth.
- At least one document must confirm the applicant's address
- Name changes must be supported by documentation (e.g. marriage certificate, deed poll).

- Only original documents can be accepted – photocopies are not acceptable form of identification
- Non-UK residents or those with limited residence may be required to undertake fingerprinting if identity cannot otherwise be verified.
- A record of the documents used to verify identity will be retained securely for two years, as required by DBS audit guidance.

Payment and Recording

Once all identity checks have been completed the signatory will arrange payment for the DBS and record the date, name of applicant and the reference number in the DBS file.

Receiving and Citing the Certificate

The applicant receives their own DBS certificate directly from the DBS.

The Lead Signatory is informed by Care Check via email when a disclosure result is available.

The signatory (CEO or Recruitment & Training Officer) will check the DBS certificate information on Care Check's platform and assess suitability.

The signatory will record the certificate number, issue date, and verification date of all certificates containing no information in the DBS file.

If the applicant is registered with the DBS Update Service, consent will be obtained to carry out online status checks.

Rehabilitation of Offenders Act and Disclosure

As Play Inclusion Project works with children and vulnerable groups, it is exempt from the Rehabilitation of Offenders Act 1974.

Applicants must disclose all spent and unspent convictions, cautions, reprimands, and final warnings that are not "protected" under the Rehabilitation of Offenders (Exceptions) Order 1975 (as amended in 2013, 2020 and 2023).

Current staff or volunteers must inform the CEO immediately of:

- Any new convictions, cautions, or police investigations; or
- Any change that may affect their suitability for their role.

Failure to do so may result in disciplinary action.

Updated October 2025
By Joanne Barnes

Dealing with Convictions

When a DBS check reveals information, Play Inclusion Project will conduct a fair and transparent assessment before making a decision. The following factors will be considered:

- Nature, seriousness, and relevance of the offence
- How long ago the offence occurred
- Whether the offence was a one-off or part of a pattern
- Any evidence of rehabilitation or changed circumstances
- Role applied for and level of supervision
- A formal meeting will be held with the applicant and CEO to discuss the disclosure before any decision is made.

Examples:

- Fraud/Theft: May not preclude volunteering where no financial responsibility exists.
- Driving Offences: Not automatically disqualifying unless driving is a key role element.
- Violence or Threatening Behaviour: Each case considered individually.
- Sexual Offences: Automatically disqualify applicants.

Individuals appearing on the Children's Barred List, Adults' Barred List, or other statutory barred lists are legally prohibited from working or volunteering in relevant roles and will not be considered.

All records relating to these decisions are stored securely alongside DBS information and destroyed under the same conditions.

Data Protection and Privacy

Under the UK GDPR and Data Protection Act 2018, individuals have the right to:

- Be informed about how their data is used (privacy notice)
- Access their personal data
- Request rectification or erasure (where lawful)
- Restrict or object to processing (where lawful)
- Lodge complaints with the Information Commissioner's Office (ICO)

Play Inclusion Project's lawful basis for processing DBS data is a legal obligation and safeguarding public interest.

Updated October 2025
By Joanne Barnes

Related Documents

- Safer Recruitment Policy
- Safeguarding and Child Protection Policy
- Recruitment of Ex-Offenders Policy
- Data Protection Policy
- Shred-It Policy