

Disclosure and Barring Service (DBS) checks for Applicants and Students Policy

Purpose and Context

The Disclosure and Barring Service (DBS) is a non-departmental public body of the Home Office. Its purpose is to help organisations make safer recruitment decisions by processing and issuing DBS checks. The DBS also maintains the Adults' and Children's Barred Lists and makes considered decisions as to whether an individual should be included on one or both lists and barred from engaging in regulated activity.

Scope

This policy relates to applicants and students only and relates purely to the DBS checks process within the University. It does not cover DBS checks for members of university staff, nor does it cover the Statement of Good Character process for current students on professional courses, where relevant disclosures go through the Fitness to Practise route. For specific details about the DBS processes, please refer to the DBS procedure document.

1.0 Introduction

1.1 This policy sets out the circumstances in which a DBS check will be required and indicates when checks need to have been completed. It should be read in conjunction with the following documents:

- Admissions Policy (Taught Courses).
- Policy Statement on Student Admissions where Applicants are Ex-Offenders.
- Policy statement on the secure storage, handling, use, retention & disposal of disclosure and barring services (DBS) certificates and certificate information.
- DBS Procedure document.

1.2 If a DBS check highlights an issue, the University will convene a DBS panel to consider the suitability of an applicant to join a course. If a matter comes to light pertaining to a current student, "Fitness to Practise" has been identified as the route to pursue this.

1.3 The University's DBS Procedure document provides the detail about how the checks take place and the details of the delivery of a DBS Panel. For University staff, this policy document should be read in conjunction with that procedure document.

2.0 DBS checking of applicants

2.1 Disclosure checks are required for all applicants joining courses which lead to employment in areas involving contact with children and/or vulnerable adults, for example courses which are governed by professional bodies such as The National College for Teaching and Leadership, The Nursing and Midwifery Council, Health and Care Professions Council, Social Work England and the Department for Education.

Courses that require a DBS check have that information included in the Entry requirements section of Course Finder on the University web site.

The Student Recruitment Team will administer the DBS checking process for applicants as part of the routine admissions processes.

The University reserves the right to exclude an applicant from their course should information come to light, through these processes, declares that they are not suitable. This may be, for example, because they have omitted to declare relevant information on a DBS application, or they have withheld information from their Rehabilitation of Offenders Form.

2.2 Disclosure checks are undertaken as part of the admissions process for specified courses (as shown on the University's course finder pages). Checks would normally be completed before enrolment takes place. However, there are occasions where this is not possible because of timing issues for example where applicants come through Clearing. In this situation, a Registration Disclaimer may be used to allow enrolment pending the completion of the DBS check. The details of the Disclaimer can be found in the procedure document.

2.3 If an applicant's DBS certificate contains information relating to an offence, or if additional information is disclosed, the details will be reviewed in line with the DBS procedure document, which includes the circumstances for which a DBS Panel will be convened that will assess an applicant's suitability to keep their offer of a place on the course.

3.0 DBS checks for students

- 3.1 In some circumstances, students who are on courses that do not require DBS checks for admission may need to be checked before they can go out on placement, where they choose a placement in a regulated area. When this happens, the University Employability and Placement Services Team, in conjunction with relevant academic staff, will advise the student on what steps need to be taken.

Normally in this situation, it is expected that the placement provider would undertake the DBS check, this is because they know precisely about what is involved in the regulated activity for their area of work. The University would cover the cost of this check and reimburse the provider. The University undertakes that a smooth and efficient mechanism for reimbursement is in place. The only current exception to this relates to placements on optional modules for Education students, where the check is undertaken by the University Employability and Placement Services Team.

- 3.2 If the placement provider reasonably states that they cannot undertake the DBS check for the student to undertake a placement, in the interests of supporting the student experience, a member of the University Employability and Placement Services Team will undertake the check. This staff must have significant experience and knowledge in the DBS regulatory requirements. The reason for this is that these checks must be processed by staff who have a detailed understanding of the DBS requirements / regulations. For example, to be able to determine if a placement was eligible for the Adult Workforce and Adult Barred Lists to be checked. It is recognised that the associated details for students requiring bespoke DBS checks for placements can be extremely complex and the time associated with this work can be substantial, at least ten times that of the routine course admissions checks.
- 3.3 If all avenues have been exhausted, and students are unfortunately not able to secure this clearance, then an alternative placement in a non-regulated area should be sought.
- 3.4 Recognition should be made in respect of the time required for checks to be undertaken and clearances confirmed, which is normally approximately four to six weeks turnaround. This factor may prohibit short ad hoc bespoke placements in regulated areas.

4.0 Change in students' circumstances

- 4.1 If a student who had secured a successful DBS clearance to join a course chooses to interrupt their studies there will be no requirement to undertake a new DBS check before they rejoin the course. Checks regarding their suitability to continue would be covered by the Statement of Good Character process / University's Fitness to Practise regulations.
- 4.2 If a student loses their clearance certificate and requires a new one, or if a student changes their name and needs an updated certificate then a new DBS check will be required. This will be undertaken by the University Student Recruitment Team, with the student details being provided by the Course Administration Team. Where DBS checks arise from these circumstances, then students would normally be asked to cover the costs.

5.0 International Applicants

- 5.1 For courses that require a DBS check, overseas applicants are required to secure an Overseas Police Check Certificate which would identify any criminal offences in lieu of the DBS check at this initial stage. Applicants are required to obtain the overseas police check certificate from their relevant policing authority in their home country.
- 5.2 The Overseas Police Check Certificate is required for applicants that have lived in a country outside of the UK for 6 months or more (whether continuously or in total) in the last 10 years before applying to the University, and whilst aged 18 or over. This is a condition of the applicants offer and must be met before the International Office can proceed in allocating a Confirmation of Acceptance for Studies (CAS). This is fully undertaken as part of the admissions process by the International Office.
- 5.3 Any criminal offences disclosed on the Overseas Police Check Certificate are immediately referred to colleagues in the Student Recruitment team to be considered at a DBS panel.
- 5.4 Once in the UK, the applicant can complete their UK DBS which is managed by the Admissions staff in the University Student Recruitment Team. However, a UK DBS check will only be applicable if the applicant has resided in the UK prior to starting the course OR a UK DBS check is required by the professional body regardless of prior residency.
- 5.5 There are occasions where international applicants are already in the UK and the DBS check can be undertaken prior to enrolment on their chosen course. This would include new direct applicants and students currently studying a pre-degree programme in the International Study Centre. An Overseas Police Check Certificate is still normally required when an applicant is in the UK but will be determined by the criteria as outlined in point 5.2 above.

- 5.6 When required, a UK DBS check will be set up on the First Advantage system, by the Admissions staff in the University Student Recruitment Team, and this will send an individual an activation link to complete a DBS application.
- 5.7 On arrival in the UK, the applicant would normally be required to present the original Overseas Police Check Certificate to the International Office and, if required, produce their ID documents.
- 5.8 On receipt of the documents, if any criminal offences are disclosed, a DBS panel will be held to consider the applicant's suitability.

6.0 Overseas Criminal Records Check: Home Applicants

- 6.1 Where an applicant has been assessed as having a 'Home' status, and, based on the criteria in point 5.2 above, they require an Overseas Police Check Certificate in addition to the UK DBS Check, this is undertaken by the Admissions staff in the University Student Recruitment Team and will be conducted via the First Advantage system where possible. If First Advantage do not offer the service for the particular country required, the applicant will be asked to obtain an Overseas Police Check Certificate as per the guidelines of the Disclosure and Barring Service.

7.0 Staffing

- 7.1 Staff in the Student Recruitment Team, and the Employability and Placement Services Team, that are responsible for supporting applicants / students through the DBS process should undertake relevant training and be supported via any appropriate staff development activities. It will be essential that these duties are identified as part of the job description of staff in these areas, and that they are supported in this work by their line managers and by the University Champion.

8.0 University Champion

8.1 A senior member of university management (Director level or above) would act as champion for the DBS processes. This would involve championing the process throughout the institution, particularly with regards to matters of compliance. The champion would provide high level support in securing horizon scanning for new training or legislation relevant to staff. The champion would also undertake an arbitration role for situations where there is no obvious resolution.

9.0 Relevant Legislation

9.1 It is important that the University keeps abreast of new legislation and regulatory requirements with regards to the DBS process. As part of its routine horizon scanning activities for changes in legislation etc., the University Legal Office would also look out for changes affecting the DBS process and update university colleagues, including the champion, accordingly.

10.0 Training and Support

10.1 All staff who are involved in the DBS process at whatever level and in all relevant areas should undertake at least a minimum level of training, this would include academic staff who are asked to participate in DBS panels. This training can be provided by the DBS Regional Outreach Adviser for Yorkshire and the Humber. It would be advisable for training to be made available at least every term, so that all staff have an opportunity to access it. For those involved routinely in DBS processing it would be recognised as mandatory training for these staff.

10.2 Staff who are required to support bespoke DBS checks that are recognised as being significantly more complex should undergo an advanced level of training as advised by, and in consultation with, the DBS Regional Outreach Adviser for Yorkshire and the Humber. This should be supported through the PDPR process and reasonable time allowed for staff to engage with this type of training.

POLICY SIGN-OFF AND OWNERSHIP DETAILS	
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Equality Impact Assessment:	24/09/24 – checked for accessibility.
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Consulted with (Departments / Area of Service / Job Title):	Professional Services staff with DBS expertise.
Author:	Director of MCR / Head of Schools' Administration
Owner (if different from above):	Head of Schools' Administration
Document Location:	This should be the link to the policy on the main policies and procedures home page.
Compliance Measures:	Policy owner to ensure compliance checks identified at the outset are still fit for purpose.
Related Policies/Procedures:	<ul style="list-style-type: none"> • Admissions Policy (Taught Courses); • Policy Statement on Student Admissions where Applicants are Ex-Offenders; • Policy statement on the secure storage, handling, use, retention & disposal of disclosure and barring services (dbs) certificates and certificate information; • DBS Procedure document.

REVISION HISTORY			
Version	Date	Revision description/Summary of changes	Author
V2.0	05/02/2025	Updated following consideration at SLT and discussions with colleagues.	Head of Schools' Administration
V1.5	11/12/24	Updated following relevant feedback	Head of Schools' Administration
V1.4	05/11/24	Updated following relevant feedback	Head of Schools' Administration
V1.3	21/10/24	Updated following relevant feedback	Head of Schools' Administration
V1.2	24/09/24	Updated following relevant feedback	Head of Schools' Administration
V1.1	29/08/24	Minor updates	Head of Schools' Administration
V1.0	19/08/24	First draft of new policy	Director of MCR