



## **Staff and Trustee Vetting Policy**

## 1 Introduction

- 1.1 All IWF staff and Board appointments will be subject to a DBS Enhanced Disclosure.
- 1.2 An organisation which makes use of DBS disclosures as part of its appointments process must adhere to the DBS Code of Practice and have a policy statement on appointing ex-offenders.
- 1.3 IWF policy on vetting procedures and the appointment of staff and Board members with criminal convictions is below.

## 2 Scope and Purpose

- 2.1 This document outlines IWF's policy on the use of DBS checks, the storage and use of information which has been disclosed by the DBS and the recruitment of staff and Board Members with criminal convictions. It should be read in conjunction with IWF's policy on staff recruitment and selection in the Staff Handbook and the IWF Board Members Handbook.
- 2.2 This policy applies to all staff and Board Members and will be given to applicants at the outset of the selection process.

## 3 Introduction

- 3.1 IWF will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily bar an applicant from working for IWF or from Board membership; the nature of a disclosed conviction, its relevance to the post in question and the length of time since the offence occurred, will be considered. Any conviction of a sexual offence, however, is likely to be incompatible with working for IWF or for being a Board member. The Rehabilitation of Offenders Act 1974 provides that ex-offenders are not required to disclose to prospective employers, convictions defined as spent under the Act. Given the nature of the work undertaken by the IWF, applicants for employment and Board positions must disclose any conviction, caution or inappropriate behaviour that could bring their personal and professional suitability for the appointment into question.
- 3.2 Where a conviction or caution has been disclosed in an individual's application for a post at IWF, a discussion will take place at the end of the interview regarding the offence and its relevance to the position. Failure to reveal information relating to any conviction of a sexual offence could lead to withdrawal of an offer of employment or Board appointment.
- 3.3 IWF uses the DBS to obtain information which enables the assessment of an applicant's suitability for employment or Board membership. IWF complies fully with the DBS code of practice and does not discriminate unfairly against any subject of a DBS disclosure on the basis of conviction or other information revealed.
- 3.4 IWF complies with the DBS code regarding the secure storage, handling, use, retention and disposal of DBS disclosures, disclosure information and with its obligations under the Data Protection Act.
- 3.5 In addition to the formal vetting procedures, all candidates for appointment to roles within the IWF must provide a minimum of two referees. IWF treats all information gained from referees,

both previous employers and personal, as private and confidential. All responses from referees are stored in the candidates file for the retention period.

- 3.6 IWF's appointments procedures will follow the relevant principles set out within the recommendations of the Bichard report relating to recruitment and selection.

## 4. Appointments requiring a DBS disclosure

- 4.1 An appointee will be requested to submit to a DBS disclosure request when they are seeking appointment as either a member of staff, Board Member. The further particulars of a post or Board appointment will contain an indication that a DBS disclosure will be requested in the event of the individual being offered the position. All subjects of a DBS disclosure request will be made aware of the DBS Code of Practice. Any information revealed in a disclosure that is likely to lead to the withdrawal of a job offer or Board appointment will be discussed with the applicant before the offer is withdrawn. Contractors employed by the IWF will be covered by the Procurement and Vetting Policy

### 4.2 DBS Update Service

- 4.2.1 An appointee either a Member of staff or, Board Member are required to join the DBS Update Service within 19 calendar days of the DBS certificate being issued. Once your certificate has been returned, you agree to provide the original certificate for viewing and copying (within the data protection guidelines). You further agree to provide your DBS unique reference number, date of birth and any other information necessary to allow IWF to access your online record as and when it sees fit to ensure the DBS check remains clear. You are then to annually renew your registration with the DBS update service. IWF reserve the right to terminate employment should the DBS Update service reveal any convictions which contravene this policy.

### 4.3 Storage and Access

- 4.3.1 DBS disclosure information will not be stored on an employee's personnel file but will be stored separately in lockable storage with access limited to those who are entitled to see it as part of their duties. A record will be maintained of all those to whom disclosure information has been revealed as it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### 4.4 Usage

- 4.4.1 DBS disclosure information will only be used for the specific purpose for which it was requested and for which the applicant's full consent will have been obtained.

### 4.5 Retention

- 4.5.1 Once a recruitment (or other relevant) decision has been made, DBS disclosure information will not be stored for longer than is necessary. This is generally for a period of up to six months to allow for consideration and resolution of any disputes or complaints. If, in exceptional circumstances, it is considered necessary to keep such information for longer than six months, consideration will be given to the Data Protection rights of the individual.

## 4.6 Disposal

- 4.6.1 Once the retention period has elapsed, IWF will ensure that any DBS disclosure information is destroyed and while awaiting destruction, the information will be kept securely. A record of the date of issue of a disclosure, the name of the subject, the type of disclosure, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken, will however be securely stored for monitoring purposes.