

CLASP DISCLOSURE AND BARRING SERVICE CHECKS (DBS) POLICY

1. Approach

This policy sets out the CLASP approach when recruiting in roles involving work directly or indirectly with children, young people or vulnerable adults.

We will comply with the DBS code of practice at all times.

Anyone involved in DBS checking or decision making will have received the necessary training in the relevant legislation.

The Board of Trustees will appoint a DBS Officer who will be responsible to the Board of Trustees Chairman for the DBS application process.

2. What checks will be carried out?

We will only carry out DBS checks where needed in accordance with the law. Having a criminal conviction will not necessarily bar you from working with us and each case will be looked at on an individual basis.

However, safeguarding the people that we work with is our primary concern.

3. Who requires a DBS check?

All trustees, Car Aid drivers, minibus drivers and assistants are to have the enhanced DBS check which is to include the children option for minibus volunteers.

Any volunteers who may be required to interact alone with service users may require a DBS check. This will be risk assessed on a case-by-case basis.

4. Offers of employment as a volunteer

All offers of employment, as a volunteer, will be conditional on the candidate satisfying our usual background checking procedures and, where required, on satisfactory completion of DBS checks.

Where the job applicant refuses to agree to the DBS application or a DBS check is completed but the job applicant refuses to allow the charity to review their certificate, they will be treated as not having satisfactorily completed the DBS check.

5. Process for DBS checks

The Board of Trustees Chairman carries full responsibility to ensure that no 'regulated activity' can be carried out until the volunteer has received a certificate, a copy of it has been sent to the Secretary and a satisfactory risk assessment carried out.

The CLASP Secretary is responsible for maintaining DBS check records, including date of application, when they are to be renewed and monitoring the results of the checks.

The Car Aid Co-ordinator and the Minibus Co-ordinator will advise the DBS Officer of any new volunteers requiring a check. The DBS Officer is responsible for making the DBS application and will copy all communications to the Secretary. Once the certificate has been received by the volunteer, they must let the Secretary have sight of the certificate so that the relevant details can be recorded on the master list.

6. Payment for DBS Checks

CLASP is a charity so does not have to pay for new DBS checks although an administration fee may need to be paid to any third party assisting in the process. Should any payment be required, these will be paid by CLASP rather than the individual.

7. What is the process if a conviction appears on the certificate received?

If a conviction appears on a certificate, then it will appear on the portal of our umbrella checking service. It is extremely important that if this should arise, the amount of people notified and informed should be kept to the 'need to know' minimum. It should not be discussed in group emails or with anyone outside of the following processes:

Process for volunteers or Trustees:

1. A certificate containing a disclosure is flagged on the portal.
2. The DBS Officer will then notify the Chairman of Trustees or the Deputy in their absence who will agree the next steps. The Secretary must be informed.
3. The relevant Manager will ask the person to provide the certificate for review by the Chairman.
4. Following this, a decision will be made as to the person's suitability for the role.
5. The individual will be informed of the result.

8. Disclosure of criminal convictions

We can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. We cannot ask an individual about convictions and cautions that are protected.

9. Renewals

When volunteers receive their certificate (or is it when the application is made – to be checked?), they should sign up for automatic renewal. This must be done within 28 days. Checks must be renewed every three years. This will necessitate a new application if the volunteer has not signed up for automatic renewal.

If you leave your employment as a volunteer and then return, we will get a new check for you, even if the break is less than three years (but not less than three months).

For the avoidance of doubt, maternity leave/shared parental leave is not considered to be a break in employment and, should a DBS require renewal during a period of leave, it will be renewed at the point of return to volunteering.

10. Handling of data

We are committed to ensuring that all information provided about an individual's criminal convictions, including any information released in disclosures, is used fairly and is stored and handled appropriately and in accordance with the provisions of the Data Protection Act 2018 (and any subsequent legislation which replaces or amends this Act). In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it. Data held on file about an individual's criminal convictions will be held only for as long as is required for employment purposes and will not be disclosed to any unauthorised person.

11. Storage and retention

Certificates (or copies) of documentation relating to a decision made MUST be destroyed after six months. Any documentation kept for this six-month period must be in a locked cabinet or in a password protected document. Notes relating to decisions can be kept but should be kept locked away and only the minimum amount of people should be able to access them.

If someone is deemed suitable and cleared, then their check must be recorded in the same way as someone with no convictions. Cleared is cleared and no extra notes should be kept. If someone is deemed not suitable, then this should not be recorded on a database to which multiple people have access. These notes can be kept privately as long as they are locked away.

Once a recruitment or other relevant decision has been made, we will not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be the purpose of completing safeguarding audits. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

12. Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we will keep a record of the date of issue for a certificate, the name of the subject, the type of check requested, the position for which the certificate was requested, the unique disclosure number of the certificates and the details of the recruitment decision taken.

12. Further information

We have a safeguarding policy which every volunteer or trustee is required to read and comply with in any interactions they have with children or vulnerable adults in relation to their engagement with us. This policy applies to all even if their role does not require a DBS check.

If you have any questions or concerns regarding this policy, then please contact the Chairman of the Board of Trustees.

13. Review

This document will be reviewed by the Management Committee annually and endorsed by the Board of Trustees.

Approved by the Management Committee: 14 August 2025

Approved by the Board of Trustees: 8 January 2026