

## RED SECTOR RECRUITMENT DBS POLICY

This document forms part of Red Sector Recruitment's procedure for the identification, monitoring and upholding of Compliant Agency Workers. The processes outlined operate in conjunction with our Compliance Process and Internal Audit Process to ensure that Red Sector Recruitment provide a continuous high standard of service to our Clients and Candidates alike. The process is applied at pre and post-assignment stage and maintained throughout the duration of an Agency Workers registration with the organisation.

Any areas of uncertainty in relation to the implementation of these processes should be raised with the Senior Management team immediately.

### **Disclosure & Barring Service Checks**

Upon satisfying the pre-qualifying screening questions, the applicant is invited to undertake and complete a mandatory registration process, comprising information and documentation submission as a base for shortlisting the applicant. A registration meeting will be arranged with the applicant and either the Consultant or Compliance Officer to gather information, including current DBS status.

Those registered on the DBS Update Service are accepted. Where the DBS is not currently registered with the Update Service, a new enhanced DBS Check is required annually, whilst sign-up to the Update Service is promoted. DBS applications are escalated to fast track after 60 days if no response received. Enhanced DBS checks are carried out for each applicant as standard.

**The link below allows to check if an applicant's DBS is with the update service:**

<https://secure.crbonline.gov.uk/crsc/check?execution=e1s1>

**If the applicant is not with the update service, a new DBS will be processed with link below:**

<http://www.carecheck.co.uk/index.php?node=organisations>

All DBS information to be stored via CRM accessible via multifactor authentication. Access restricted to relevant compliance and divisional personnel, and DBS information to be retained for 6 years from date of last worked day in line with framework contractual requirements. Where any data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it is securely deleted

and disposed of. Disposal of DBS data requests to be made to CTO for action in accordance with GDPR / IT Security protocol.

**OVERSEAS DBS** – Required from the relevant country/countries for applicants who

- Have lived overseas for a period of 6+ months in the past 5 years
- A foreign national from a non-EEA country
- Have declared that they have lived overseas in a non-EEA country for a period of 12 months or more in the last 10 years
- EEA nationals who declare that they have lived overseas in an EEA country for 6+ months in the last 5 years
- EEA nationals will need to provide copies of police check(s) from all relevant country(ies)

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

The process is for checking and maintaining an applicant DBS status is applied at pre and post-assignment stage and maintained throughout the duration of an Agency Workers registration with the organisation.

**NB: The recording and subsequent input accuracy of information relating to time-dependent documents holds paramount importance;** all Compliance Staff are reminded of the required due-diligence at the point of obtaining and checking original documents and updates. Any areas of uncertainty in relation to the implementation of these processes should be raised with the Senior Management team immediately.

## **DBS CHECKS**

### **DBS - Update Service**

To be checked at the beginning of each month. Use the link <https://secure.crbonline.gov.uk/crsc/check?execution=e1s1> → require Disclosure Number; Candidate Surname and DOB. Input details and the results should confirm whether they are still registered or if they haven't renewed.

Still Registered on Update → will come up with their Full Name and the information that you have inputted (should state 'This certificate did not reveal any information and remains current as no further information has been identified since its issue') → Update Candidate file and system

Not On Update Service → results will come up with only the information that you have inputted and state 'The details entered do not match those held on our system' → If no longer on Update service, inform consultant → consultant to inform candidate and find out if they have another on update service & to view original certificate → Consultant to pass information to Compliance Manager who will check online and update file.

Candidate does not have one on Update Service → Consultant to send form to Candidate and stop them from working → Consultant to arrange meeting with Candidate to obtain form and verify supporting documentation → Form sent off → Unable to work until new DBS received, candidate informed → update file and system

If consultant has not received any response from candidate, escalate to Compliance Manager to chase and make contact → if still no response, Compliance Manager and Director make decision on when the candidate can work (not able to work without DBS in place).

### **DBS - Not on Update Service**

Check 2 months prior to expiry. Compliance Manager to advise consultant and candidate that it is due to expire. Consultant to check with candidate when have external DBS on update service → NO → Consultant to arrange meeting with Candidate to obtain DBS application form and verify supporting documentation → New DBS application put in place for candidate using the link:

<https://disclosure.capitarvs.co.uk/care/applicantLogin.do;jsessionid=0C25FD3B1E3E6BA705A00EB6B510B5A2?event=check&applicationType=dbs>

Consultant to inform Compliance Manager who will then check documents and approve → DBS sent off for checking process → Compliance Manager to update Consultant on status of DBS - Results will be issued to Candidate and online for employer to check → results will either be Positive (with convictions) or Negative (without convictions).

### **DBS Disclosure**

**Positive DBS** – Compliance Manager to inform consultant → Consultant to request statement from candidate (if we do not already have one) about the conviction → Candidate to bring DBS into office and a copy to be taken → statement and DBS to be passed over to Compliance Manager to review and complete Risk Assessment → Compliance Manager to reference NHS Employers Standards:

<https://www.nhsemployers.org/publications/criminal-record-checks-standard>

Depending on conviction, client to be informed by consultant → File and system to be updated OR disclosure information satisfies criteria for direct referral → Compliance Manager to contact DBS and operate in line with Gov.uk DBS Protocol to make referral:

[https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#help-with-referrals?utm\\_source=Google&utm\\_medium=Ppc&utm\\_campaign=Barring&utm\\_content=Making%20Barring%20Referrals](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#help-with-referrals?utm_source=Google&utm_medium=Ppc&utm_campaign=Barring&utm_content=Making%20Barring%20Referrals)

**Negative DBS** – clear with no convictions → Candidate able to continue working → File and System updated

If candidate does not get back to consultant within 3 weeks, escalate to Compliance Manager to chase → If candidate still does not respond, Compliance Manager and Director to make decision on whether candidate continues to work. Once DBS expires consultant will be informed → Consultant to inform candidate and Client → Candidate stopped from working until New DBS Issued. File and System to be updated.

All DBS information to be stored via CRM accessible via multifactor authentication. DBS information to be retained for 6 years from date of last worked day in line with framework contractual requirements. Disposal of DBS data requests to be made to CTO for action in accordance with GDPR / IT Security protocol.

**Overseas Police Checks** (*usually occurs during the recruitment process*)

These can be obtained by the candidate and employers. Some countries do not accept requests from Third Parties, including agencies. For more information and clarification, the link below shows the requirements for each country <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> → generally require authorisation from candidate to obtain check (in form of signed declaration or letter); Copies of Passport; Visa; Photos – for specific requirements check link above → either have to go through Country's High Commission within UK or if currently overseas, through the Central Criminal Registry → Confirmations/Responses usually take between 3-15 days (depending on country, but sometimes longer)

If a country does/is not able to provide a check to either the company or candidate, must obtain copy of letter confirming the check is unable to be provided (candidate to bring in

original) → as much information must be obtained if the form of references from the country/countries do determine suitability of whether to offer employment.

Candidate Application → required to update consultant on progress of application/check → details updated on file and system → once check received, original to be brought in to office and copies to be taken → Update file and System

If candidate does not provide updates within two weeks of last contact, consultant to inform Compliance Manager → Compliance Manager to make contact with candidate → Failure in candidate response, Compliance Manager and Director to make decision on whether to continue recruitment process with candidate → Candidate to be informed for decision (via phone/email/formal letter)

Company put Application forward → submit information to required government department/high commission → Update file and System → Receive confirmation of application from department/high commission and update file and system → Consultant to inform candidate application in process → Response/certificate to be issued to candidate or company → Consultant to inform candidate of outcome → If issued to candidate, required to bring original in to office and copies taken → File and System updated → Candidate does not provide certificate or responds to consultant within two weeks of issue, consultant to escalate to Compliance Manager → Compliance Manager to make contact with candidate → Failure of candidate to respond or bring certificate in, Compliance Manager and Director to make decision on whether to continue to recruit/place candidate → Candidate to be informed of decision (via phone/email/formal letter) → File and System updated

## **RESPONSIBILITIES**

Red Sector Recruitment retain a duty of care to minimise risks and take all reasonable means to ensure candidates, clients, patients and others associated with Red Sector Recruitment are protected from risk, exposure, harm and unsafe situations.

It is the clinical resourcing team's responsibility to ensure the candidate has undertaken the appropriate training and induction prior to their placement.

All Red Sector Recruitment employees are responsible for ensuring candidates complete an induction with the hiring client on their first shift to minimise risks for when they start shifts with the client. Our candidates have the responsibility to expand their knowledge when participating on Mandatory and statutory training days set out by the government,

and to engage fully on their inductions to utilise all information being facilitated to minimise risk when they start shifts with the client.

All policies will be reviewed regularly and monitored periodically by Red Sector Recruitment to judge the effectiveness and will be kept up to date with any changes in the law.

### **COMPLAINTS PROCEDURE**

Red Sector Recruitment is committed to delivering an excellent service to our clients and candidates. All complaints are handled in accordance with the Recruitment & Employment Confederation' (REC) Code of Professional Practice and in line with our Internal Complaints Procedure. Red Sector Recruitment treat all complaints seriously and endeavour to address them in a prompt and professional manner. The necessary steps are taken to ensure that patterns are noted and mapped in the following categories: candidate involved, area of prevalence and skill or personality. This creates a framework for addressing complaints by identifying specific issues. Red Sector Recruitment's Complaints Policy & Procedure is available upon request.

**Name:** Sonny Cooper-Sutton  
**Position:** Managing Director  
**Date:** 31<sup>st</sup> July 2023  
**Due for Review by:** 29<sup>th</sup> July 2024