

Company Policy



Title	Safeguarding Policy				
Code	QA33	Date	Apr 21	Issue Number	4
Authorised By	Matthew Brabin	Signature			
Reason For Amendment	Appointment of new Chief Executive				

1.0 Purpose

This policy aims to ensure that employees and potential employees are treated fairly whilst ensuring the safety of children, vulnerable adults and the security obligations of PHS and our customers.

2.0 Responsibilities

This policy sets out the approach that PHS will take when we are recruiting employees who are required to work in high security areas such as the MOD, police authority premises or within our IT and Finance departments. It also applies where employees could come into contact with children or vulnerable adults.

PHS is committed to the equality of opportunity for all job applicants and aims to select people for employment on the basis of their skills, abilities, experience and knowledge. We also have to meet both our own and our customers' legal obligations and recruit people who are cleared to work in high security areas or with children or vulnerable adults.

3.0 Scope

3.1 Disclosure of criminal convictions

PHS requires job applicants for certain roles to disclose all criminal convictions, whether spent or unspent (other than roles where protected cautions and protected convictions do not need to be disclosed). Once an offer of employment is made, the applicant will be required to complete an online application form to seek evidence about their criminal record from the Disclosure and Barring Service (DBS).

PHS undertakes not to discriminate unfairly on the basis of a conviction or other information revealed as a result of a DBS check.

3.2 Offers of employment

An offer of employment for a role involving working at high security sites or which could involve contact with children or vulnerable adults, will be conditional on the job applicant satisfying the

usual requirements for employment e.g. providing satisfactory references and evidence of right to work in the UK.

In addition, the offer of employment will be conditional on satisfactory completion of DBS checks.

Where the job applicant refuses to agree to an application to the DBS or a DBS check is completed but the job applicant refuses to allow the organisation to see the DBS certificate or to keep a copy of it, they will be treated as not having satisfactorily completed the DBS check.

Not all criminal convictions will be a bar to employment. The results of a DBS check will be considered on an individual basis and PHS will act in a proportionate manner when deciding whether or not to proceed with the appointment to the role in question. PHS will take into account the relevance of any convictions to the role, however the protection of children, vulnerable adults and security is the primary concern.

3.3 Types of Disclosure and Barring Service check applicable to PHS

Of the four types of Disclosure only two are relevant to PHS. The Rehabilitation of Offenders Act identifies groups where it is appropriate to consider convictions for the safety and security of others. This includes professions such as accountancy and IT, those who work with children, vulnerable adults and also those whose work means they could pose a risk to security.

Basic disclosure certificate: Shows details of spent convictions, unspent convictions, reprimands, cautions and final warnings that have not been filtered. This certificate is required for employees identified as requiring a DBS check but who will not come into contact with children or vulnerable adults as part of their role.

Enhanced disclosure: Shows details of spent convictions, unspent convictions, reprimands, cautions and final warnings that have not been filtered and a check of local police records. This certificate is required for employees identified as requiring a DBS check because they could come into contact with children or vulnerable adults as part of their role.

3.4 Process for DBS checks

Job applicants who already have a DBS certificate that is less than 3 months old will not be required to complete a new application. They will however need to provide a copy of the certificate to their manager.

For job applicants who require a new DBS check, a request will be made to provide a personal email address so that an online application can be processed by the employee. The necessary documents proving their identity will need to be shown to the relevant Manager for verification.

Once the check has been carried out by the online provider, the DBS will send the certificate to the applicant. If there are any issues with the certificate, PHS will require the job applicant to show the DBS certificate to their manager and to give permission to provide a copy to the HR department.

PHS will pay the application fee however if the employee leaves within 6 months, the fee will be deducted from the final salary.

All job applicants will be required to disclose any unspent criminal convictions prior to being offered employment.

3.5 Further checks during employment

Further DBS checks will be required every 3 years or when an employee transfers to a new role identified as requiring a DBS check as a requirement of the role.

All employees have a responsibility to inform their line manager or HR department if they have been convicted of a criminal offence as it may affect their eligibility to carry out their role. Failure to do so may result in disciplinary action.

If any concerns are raised regarding a check for an existing employee PHS will discuss the information revealed on a DBS certificate with the employee before making any decision regarding their suitability to perform the role.

Additional security checks may be required by customers to satisfy their own safeguarding and security arrangements and these checks will be done as and when required to enable our staff to work on these specific sites.

3.6 Handling of employee data

PHS is 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 in accordance with the provisions of the Data Protection Act 1998.

PHS will only use the proper DBS channels to establish whether or not an individual has a criminal record with the HR department handling all DBS requests. 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.

The Senior HR Manager for PHS Group will be responsible for retaining and updating the categories of roles which require employees to undertake DBS checks.

4.0 Documents (required or produced by this process)

Online application form, DBS Check Certificate.

5.0 Effective date

February 2019.

6.0 Interaction with other policies

Disciplinary Policy.