



## **Disclosure and Barring Service (DBS) Policy**

**for applicants and students on programmes  
which require enhanced disclosure**

**Academic Registrar**

**September 2021**

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Review body University Management Group



## **1 INTRODUCTION**

- 1.1 The Disclosure and Barring Service (DBS), an executive non-departmental public body of the Home Office, provides access to criminal record information through its Disclosure service. This service enables organisations to make safer recruitment decisions by identifying applicants who may be unsuitable for certain work, especially that which involves children or vulnerable adults. The University complies fully with the DBS Code of Practice and undertakes to treat all applicants fairly:
- 1.2 <https://www.gov.uk/government/publications/dbs-code-of-practice>
- 1.3 Applicants and/or students who will be regularly caring for, supervising, training, or being in sole charge of children or supporting vulnerable adults, will be required to apply to the DBS via the University of Winchester for Enhanced Disclosure with a Barred List Check.
- 1.4 This will include applicants and/or students on programmes of Initial Teacher Education (including Early Years Initial Teacher Training – EYT), PGCE, Physiotherapy, Social Work and Nursing. See Appendix A for the full list of current programmes. It will also include certain other groups of students who, as part of their programme, will be required to work with children or vulnerable adults to gain work experience, undertake a placement or the Accredited Volunteering Module, complete extended independent study or conduct research.
- 1.5 Although applicants/students are informed that a criminal record will not necessarily be a bar to obtaining/retaining a place on a programme, some offences will not permit entry to, or continuation on a programme of study which involves contact with children or vulnerable adults.

## **2 APPLICANTS TO THE UNIVERISTY**

- 2.1 Only students on programmes with PSRB requirements for Criminal Record Checks will be asked to declare whether they have any spent or unspent convictions or other punishments that would display on a criminal records check. Where an applicant has indicated that they have a criminal conviction, the University's Policy and Procedures for Applicants with Criminal Convictions will be followed. The applicant will be invited to complete a Criminal Declaration Form to provide details of whether they have ever been convicted, or received a caution, warning or final reprimand, for an offence that will not be filtered from the Police National Computer when it is processed by the DBS.
- 2.2 Guidance on filtering, including which offences qualify for filtering, is provided on: <http://hub.unlock.org.uk/knowledgebase/filtering-cautions-convictions/>  
<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

- 2.3 The DBS application procedure is an online process under contract with Capita. The notes for guidance and the online link will be sent to all applicants holding firm places (CF or UF) at the University of Winchester on a course listed in Appendix A and any other programmes where they will be required to work with children or vulnerable adults within their first year of studies. Social Work applicants will be required to complete a Suitability Declaration at interview.
- 2.4 Trainees on the salaried School Direct programmes will be required to provide evidence of their DBS certificate to their employer as it is the employer that is responsible for ensuring that checks have been completed. The lead school within a School Direct partnership is responsible for providing confirmation to the University that checks have been carried out to a satisfactory level. Trainees on the School-Direct fee-paying route will be required to follow the same procedure as other ITE applicants to Winchester as the University is responsible for ensuring that checks have been completed.
- 2.5 A student will not normally be eligible to enrol on their course or to commence a placement until the University has been notified of an individual's DBS Enhanced Disclosure and it has been assessed and verified as satisfactory as outlined in this policy.

### **3 CURRENT STUDENTS**

- 3.1 Programmes are required to notify Registry of any students who will be working with children or vulnerable adults (e.g. as part of work experience, placements, extended independent study or research) at least 12 weeks in advance of the commencement of that activity. Registry will email details of the DBS application procedure, the online link and notes for guidance to the student(s). Careers will send the above information to students taking the Accredited Volunteering Module.
- 3.2 Students should obtain the online link and notes for guidance from Registry at least 12 weeks in advance of the activity start date. They should discuss the nature of the role/work they will be undertaking with Registry so the level of check and payment required can be agreed. Students must then take their supporting documentation and evidence of payment to Registry for verification at least 8 weeks before the activity start date. Where appropriate, programmes may arrange for groups of students to attend a verification session specific to their module/placement. If a student does not meet these deadlines it may be decided, by the module leader, that the student cannot undertake the activity.

- 3.3 Before the start of each Academic Year, continuing students on programmes whose regulatory bodies require it, will be required to sign a declaration verifying that there has been no change to the information previously supplied in their DBS application. These programmes include Foundation Degree in Childhood Studies, Social Work, Nursing and Physiotherapy. Students will also sign to confirm their understanding that failure to disclose all relevant information could result in exclusion from the institution. The form will advise that any change of status throughout a programme of study must be reported to the Academic Registrar (see Appendix B). Any students who are undertaking placements in settings which provide care for children under the age of 8 must also complete a declaration under the Childcare (Disqualification) Regulations 2009. (See Appendix C).

#### **4 DBS Application procedure**

- 4.1 Identity documents and proof of payment will be checked by authorised staff of the University and the ID section and section Y of the online application will be completed. The countersignatory from Capita Resourcing Ltd., will then check and approve the application. Any queries will be emailed to the ID checker. Details of staff roles with administrative responsibilities relating to the process are provided in Appendix D.
- 4.2 In cases where the DBS online application cannot be completed, due to presentation of insufficient identity documents, the applicant will be required to provide the necessary information within a period of two weeks in order to continue with their application/programme. If the applicant does not have the required identity documents, Capita Resourcing Ltd will be contacted to instigate the 'fingerprinting route.' It can take several months for a DBS certificate to be issued if this route is used.
- 4.3 The University is able to access an overview of all applications, which includes the DBS certificate number, the date of issue and the level of the check (standard or enhanced.) The professional service that completed the check (Communications & External Relations, Registry or Careers) is responsible for ensuring that there is no relevant information contained on the certificate and recording the certificate number and the date of issue in line with the DBS code of practice.
- 4.4 The DBS checks should be completed to allow sufficient time for the disclosure to be received by the applicant and verified by the University before any placement or research commences.

- 4.5 Where DBS registration has been applied for and the certificate has not yet been issued by the time the student is due to begin the programme, the student's enrolment status will remain provisional until a satisfactory disclosure and confirmation of monitoring under DBS is received. Such students may be required to complete a statutory declaration as testimony to their good conduct and/or the University may undertake any other safeguarding checks it believes are necessary to ascertain the good character of the applicant/student, until such time as the authorised officer is notified that the certificate has been issued. Under no circumstances may the student commence any assessed placement that involves Regulated Activity, where an Enhanced Disclosure with a Barred List Check has not been applied for and received by the applicant/student and verified by the University.
- 4.6 The authorised officer(s) only will hold an electronic spreadsheet containing the following details:
- Student number; full name; programme; Capita Resourcing Ltd. reference number and date approved by the countersignatory. When the Enhanced Disclosure is available online, the DBS Disclosure numbers and date of issue will be recorded.
- 4.7 In cases where a Disclosure reveals that there has been a caution, warning or conviction the disclosure procedure outlined in section 6 of this document will apply.

## **5 INTERNATIONAL APPLICANTS/STUDENTS**

International applicants/students will be required to provide a police report from their home country for programmes which require a DBS check. Applicants/students who have not lived in the UK (including British students who have spent 6 months or more abroad in the last five years) will be required to obtain a police report or criminal record check (in some countries this is called a Certificate of Good Conduct) from any country in which they have lived since the age of 13. If the report is not in English then it must be accompanied by an official translation into English. Submission of these documents will form a condition of the offer made to international students. Applicants who have been resident in multiple countries, for example while travelling on a gap year, should contact the University and provide dates for the length of time they have spent in each country. For any period 2-6 months in duration an overseas criminal records check may be required. For periods 1 month or less, an overseas check is not normally required.

- 5.1 International applicants/students who are unsure how to obtain a police report are advised to contact their local police station for guidance. If no longer residing in the relevant country, the nearest Embassy of that country may be able to advise on the procedure.
- 5.2 The application process for criminal records checks or 'Certificates of Good Character' for someone from overseas varies from country to country. A country by country guide on criminal records checks for overseas applicants is provided by the Home Office:

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

## **6 DISCLOSURE PROCEDURE**

- 6.1 In the event that a Disclosure has not received clearance, or an applicant has indicated a criminal conviction, the following Disclosure Procedure will apply.
- 6.2 If a warning or caution is recorded which was not previously considered under the Applicants with Criminal Convictions Policy, further information will be requested from the individual to determine whether it affects their application to study (applicants) or their enrolment (students) at the University.
- 6.3 Where a criminal conviction is recorded (or the warning/caution is for an act which is considered to be sufficiently serious to possibly prevent acceptance of a temporary or permanent position involving work with children or vulnerable adults), the relevant Dean of Faculty (or nominee), Director of Student Support and Success and Head of Admissions (applicants) or the Academic Registrar (students) will be notified.
- 6.4 Normally, within a period of two working days a decision will be made as to whether the warning/caution/conviction necessitates further consideration by a Disclosure and Fitness to Practise Panel who will decide whether an applicant can be offered a place on a programme/the student can remain on his/her programme of study, or whether no further action is necessary. All considerations by the panel regarding disclosures detailing convictions will be considered in a redacted form so as to protect the identity of the individual applicant.
- 6.5 The Disclosure and Fitness to Practise Panel will normally meet within a period of seven working days to consider the disclosure and will consist of the relevant Dean of Faculty (or nominee), Director of Student Support and Success and Head of Admissions (applicants) or the Academic Registrar (students) and, where appropriate, a representative of a relevant outside agency or professional body.
- 6.6 Where the offer of a place is rescinded or it is decided that the student must withdraw, this will be notified in writing to the person concerned within a period of five working days by either the Head of Admissions for applicants or the Academic Registrar for students.

- 6.7 The applicant/student will normally be informed that they have the right to appeal against the decision in writing within a period of ten working days from the date the decision was sent to them.
- 6.8 Appeals will be considered by the Assistant Vice-Chancellor on the grounds that:
- a) there exists new evidence, which can be corroborated and could not have been brought to the attention of the University prior to the selection decision
  - b) there is evidence of a procedural irregularity connected directly with the selection decision undertaken by the University
  - c) the decision of the University is, on the basis of the information available, unreasonable
  - d) there is evidence of prejudice or bias on the part of those involved in the selection decision.

A final decision will normally be communicated to the applicant within fifteen working days.

## **7 ANNUAL DECLARATION**

- 7.1 A number of regulatory bodies have introduced a requirement that all students undertaking programmes of study that lead to registration with the body should declare on an annual basis that they have not received any (further) criminal convictions since their initial registration and Enhanced Disclosure with a Barred List Check for entry to the programme. In view of this requirement the University has introduced an annual declaration for students on programmes of study whose regulatory body requires it. These programmes include Nursing, Physiotherapy and Social Work. All students enrolled on ITE programmes will be checked against the list of teachers and others prohibited from teaching. A copy of the Annual Declaration Form is included in Appendix B. Once completed Registry will record on a spreadsheet the student's name, number, and programme and the date the declaration was signed. Where a student declares that they have received a conviction since initial enrolment on the programme of study, the Academic Registrar will be notified and the student will be interviewed by the relevant Dean, or nominee, who will make a decision as to whether the Student Disciplinary or the Disclosure and Fitness to Practise Procedures should be invoked.
- 7.2 Additionally, any students who are undertaking placements in settings which provide care for children under the age of 8 must also complete a declaration under the Childcare (Disqualification) Regulations 2009 (Appendix C). If a student answers yes to any question the Academic Registrar will be notified and the student will be interviewed by the relevant Dean, or nominee, who will make a decision as to whether the Student Disciplinary or the Disclosure and Fitness to Practise Procedures should be invoked.

## **8 PORTABILITY**

- 8.1 Portability refers to the re-use of an Enhanced Check for Regulated Activity (Disclosure), obtained for a position in one organisation and later used for another position in another organisation.
- 8.2 Using a previously issued Enhanced Check for Regulated Activity does not constitute a fresh Enhanced Check for Regulated Activity – the person's criminal record or other relevant information may have changed since its issue.
- 8.3 Registered Bodies are responsible for the accuracy of the information provided to the DBS and on which it carries out its checks. By accepting a previously issued Enhanced Check for Regulated Activity the University would be accepting the risk that the previous Registered Body provided the DBS with a fully validated applicant's identity on which to carry out its checks.
- 8.4 Due to the above associated risk with portability, the University of Winchester does not accept portability from other organisations nor does the University feel that it is appropriate to port disclosures signed by countersignatories from the University.



- 8.5 However, where a candidate does present an existing disclosure the University may accept it on a temporary basis pending clearance against the disclosure applied for through the University as a registered body.

## **9 UPDATE SERVICE**

- 9.1 Applicants are advised they should subscribe to the DBS Update Service as part of their application for a DBS check (applicants will need to register for the Update Service within 30 days from the date that their DBS Certificate is issued). This will allow the University and other organisations (with the permission of the student) to check whether there have been any changes to an applicant's DBS certificate since it was issued. The applicant must provide their permission in writing to the University to use their certificate number, name and date of birth to access the applicant's online record. Further details are provided by the Government on the website below:

<https://www.gov.uk/dbs-update-service>

## **10 COSTS**

- 10.1 The Disclosure and Barring Service determines the cost of the enhanced check for regulated activity, the standard check and the Update Service. Prospective and/or current students on programmes for which a DBS is required, or who take an optional module that requires a DBS, are expected to meet the cost of this service and additional administration costs as appropriate. The requirement to pay for a DBS for optional modules that require a DBS check will not apply to students who enrolled on their programme in 2021/22 or earlier. Students facing financial hardship may be considered for a cost waiver and should contact [registry.enquiries@winchester.ac.uk](mailto:registry.enquiries@winchester.ac.uk) in the first instance for advice.

## **11 REFUNDS**

- 11.1 Refunds will only be considered if the application has not been submitted to Capita Resourcing Limited for a clearance check and current students have sought advice from Registry regarding the level of check required.

## **APPENDIX A**

List of programmes offered by the University of Winchester where applicants are required to be issued with a DBS certificate as part of the Admissions process. This list of programmes may increase as the university offers more programmes in the Faculties of Education and Health & Wellbeing.

BA (Hons) Childhood Studies  
BA (Hons) Primary Education with QTS  
BN (Hons) Nursing (Adult)  
BN (Hons) Nursing (Child)  
BN (Hons) Nursing (Learning Disabilities)  
BN (Hons) Nursing (Mental Health)  
BSc (Hons) Nutrition and Dietetics  
BSc (Hons) Physiotherapy  
BSc (Hons) Sports Therapy  
BSc (Hons) Social Work  
MSc Social Work  
MSc Occupational Therapy (Pre-Registration)  
PGCE Primary  
PGCE Secondary  
School Direct (non-salaried)



ANNUAL DECLARATION: CRIMINAL CONVICTIONS

The regulatory body for the programme requires us to seek written confirmation annually from continuing students about whether or not there have been changes to their Enhanced DBS Certificate.

Please complete the details below before dating and signing the form. Please note that completion of this form is mandatory for continuing students on programmes whose regulatory bodies require this. These include programmes which involve regularly caring for, supervising, training, or being in sole charge of children or vulnerable adults.

FULL NAME (please print):

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PROGRAMME OF STUDY:

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STUDENT ID No.: ----- YEAR OF STUDY 1 / 2 / 3 / 4

(please delete as appropriate)

Have you (a) conviction(s) for (a) criminal offence(s) committed YES / NO since completing the application for Enhanced Disclosure from the Disclosure and Barring Service?

Are there one or more cases pending against you in respect of the YES / NO alleged commission of a criminal offence?

Are you under report for consideration of possible prosecution of YES / NO alleged commission of a criminal offence?

As indicated when you first sought clearance, having a criminal record will not necessarily bar you from your programme of study but this will depend on the circumstances and background of the offence(s). So if you answer 'Yes' to any of the questions above, you will be required to meet with the Dean of Faculty and the Academic Registrar (or their nominees) to discuss your situation by 5pm Friday of Week 1 of Semester 1.

The information you give may be shared with relevant third parties prior to a placement. This requirement applies throughout the duration of the programme.

DECLARATION

I declare that the information given above is complete and accurate to the best of my knowledge and I agree to inform the Academic Registrar immediately should there be any change in the information given in the above declaration.

Signature: -----

Date: -----

## APPENDIX C Childcare Disqualification Regulations: Declaration

In July 2018, the Department for Education issued new statutory guidance on the application of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (now referred to as 2018 Regulations) and related obligations under the Childcare Act 2006 in schools:

[www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006](http://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006)

It requires that the University is responsible for ensuring that students undertaking placements in settings which provide care for children under the age of 8 are not disqualified from doing so under the 2018 Regulations:

[www.legislation.gov.uk/ukxi/2009/1547/made](http://www.legislation.gov.uk/ukxi/2009/1547/made)

A person may be disqualified through:

1. inclusion on the Disclosure and Barring Service (DBS) Children's Barred List
2. having certain orders or other restrictions placed upon them
3. having committed certain offences or been given a caution for a relevant offence.

A disqualified person is not permitted to continue to work in a setting providing care for children under the age of 8, unless they apply for and are granted a waiver from OFSTED:

[www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers](http://www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers)

These regulations will apply when you undertake your placement and you are therefore required to complete this form so that the University can consider your suitability. Any false declaration may affect your eligibility to complete your programme.

Please note that if you fail to complete and return the form, you will be unable to undertake your placement and accordingly unable to remain on the course.

Please ensure that you return the completed declaration to Registry.

If you have any queries, then please contact Registry in the first instance on **01962 827210** or email **Registry.Enquiries@winchester.ac.uk**

Thank you for your co-operation.



FULL NAME: .....

STUDENT NO.: .....

Please read the statements carefully before responding YES or NO. You do not need to provide details about any convictions that are not relevant to the childcare disqualification legislation.

	Delete as appropriate
Have any orders or other determinations related to childcare been made in respect of you?	YES / NO
Have any orders or other determinations related to childcare been made in respect of a child in your care?	YES / NO
Have any orders or other determinations been made which prevents you from being registered in relation to child care, children's homes or fostering?	YES / NO
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Regulations? Available from the link below: <a href="http://www.legislation.gov.uk/uksi/2009/1547/schedule/1/made">www.legislation.gov.uk/uksi/2009/1547/schedule/1/made</a>	YES / NO
Are you barred from working with Children by the Disclosure and Barring Service (DBS)?	YES / NO
Have you been cautioned (including a reprimand or warning) since 6 April 2007 or have you ever been convicted of:	
• Any offence against or involving a child? (A child is a person under the age of 18)?	YES / NO
• Any violent* or sexual offence against a child or an adult? *a violent offence in this context is murder, manslaughter, kidnapping, false imprisonment, ABH, GBH	YES / NO
• Any offence under the Sexual Offences Act?	YES / NO
• Any other relevant offence? Available from the links below: <a href="http://www.legislation.gov.uk/uksi/2009/1547/schedule/2/made">www.legislation.gov.uk/uksi/2009/1547/schedule/2/made</a> <a href="http://www.legislation.gov.uk/uksi/2009/1547/schedule/3/made">www.legislation.gov.uk/uksi/2009/1547/schedule/3/made</a>	YES / NO
Have you ever been cautioned, reprimanded, given a warning for or convicted of any similar offence in another country?	YES / NO

Please **delete as appropriate** below and then sign and date the form.

In signing this form I confirm that I am not disqualified under the 2018 Regulations.

**OR**

I have answered YES to at least one question above. I understand that the university may contact me about my declaration and seek further information from relevant agencies.

All of the information I have provided on this form is complete and correct to the best of my knowledge and belief.

Signature: .....

Date: .....

## Please read this carefully

**All offers of a place at the University of Winchester remain provisional pending a receipt of both satisfactory DBS (including any necessary conviction checks from overseas) and occupational health clearance through the University. These conditions remain in place irrespective of whether you have enrolled or commenced studies. The University may withdraw the offer of a place, or terminate studies, if information comes to light that may have a bearing on your suitability to work with children or vulnerable adults or you fail to meet the necessary suitability requirements for admission.**

### **Candidates who have previously been convicted of a criminal offence.**

1. Any details that you provide will be treated in the strictest confidence and will not automatically exclude you from being considered for this or any other programme of study.
2. Any programme of study that contains a placement whereby students come into contact with children or vulnerable adults are exempt from the Rehabilitation of Offenders Act 1974. As a student enrolling for such a programme you **MUST** declare all cautions, bind-overs, reprimands, convictions that are not "protected"\* or any other relevant information that may prevent you from working with children or vulnerable adults in any regulated activity before commencing training.
3. You must provide the information as requested overleaf including any convictions within the armed services, or outwith the United Kingdom, disciplinary action by professional or regulatory bodies and any relevant disqualifications under the 2018 Regulations.
4. You must notify the University immediately should there be any change in the information given in the above declaration.

### **Data Protection Statement**

1. The information which you provide on this form will be used by the University in the decision making process which will include a criminal records disclosure, and any other checks (including criminal checks from overseas) as to your suitability to work with the vulnerable as necessary.
2. In gathering information to make these decisions, the University will ensure that the information is handled fairly and lawfully in accordance with:

- Data Protection Act 2018 (DPA)
- UK GDPR
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013 (the Exceptions Order)
- Rehabilitation of Offenders Act 1974 (ROA); and
- Human Rights Act 1998

Information supplied on this form may be shared with other relevant professional, statutory and regulatory bodies or any other persons deemed necessary by the University to assess your suitability for registration and training

3. In line with the DBS Code of Practice, this form is held until such time as the University of Winchester receives a DBS Disclosure Certificate (and where necessary overseas check) and may be held for the duration of your studies. If you are unsuccessful, the form will be retained securely and will be destroyed in a secure manner no later than six months following the start of the academic year for which you applied.

\* [www.gov.uk/government/publications/dbs-filtering-guidance](http://www.gov.uk/government/publications/dbs-filtering-guidance)

**Please return this completed form to Registry,  
University of Winchester, Sparkford Road, Winchester, SO22 4NR**

## APPENDIX D

### ADMINISTRATIVE RESPONSIBILITIES

The DBS procedure is confidential and only the staff who have responsibility for administering the DBS procedure, and members of the Fitness to Practise and Disclosure panel, and the Assistant Vice-Chancellor for appeals have authority to see DBS applications, disclosures and supporting documentation.

The Head of Admissions will ensure that appropriate information is sent to applicants prior to enrolment. The Academic Registrar will monitor and evaluate the service provided by Capita Resourcing Ltd and ensure that disclosure information is kept in accordance with the University of Winchester records policy and the security and storage of DBS information as detailed in Appendix E of this document.

Staff with particular administrative responsibilities are as follows:

- i) **Authorised Officer(s)**  
The authorised officer(s) will be members of Communications and External Relations (applicants) or Registry and Careers (students) and will have responsibility for ensuring that programme leaders are informed of University deadlines as appropriate and liaising with Faculties as required. The authorised officer(s) will also check certificates online in order to maintain the computer database, ensure that paper application forms are sent to DBS if required, and that Self-Disclosures are kept in accordance with Appendix E of this document.
- ii) **ID Checkers**  
These checkers verify original ID documents and complete the 'ID checked' section of the online application and determine the level of check the student is eligible for. ID checkers will be designated members of staff who have undergone the appropriate training.
- iii) **Primary Applicant Manager**  
As well as undertaking the duties of an ID checker, Primary Applicant Managers complete section Y of the online application which confirms the level of check required and the appropriate workforce. All Primary Applicant Managers are able to track the progress of applications and have access to the certificates online.
- iv) **Countersignatories**  
Capita Resourcing Ltd. act as the countersignatory for our online applications. For paper applications countersignatories will be designated members of staff, approved by the DBS, who have responsibility for checking that DBS forms have been completed correctly and for signing Section Y of the DBS application.
- v) **Lead Signatory: Assistant Vice-Chancellor**  
The Assistant Vice-Chancellor will oversee the efficient administration of DBS policy, and will consider any Appeals. It will be the Assistant Vice-Chancellor's responsibility to ensure that panels meet and decisions are communicated to applicants/students within the aforementioned time limits

## **APPENDIX E**

### **SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION**

It is a requirement of the DBS's Code of Practice that all Registered Bodies have a written policy on the correct handling and safekeeping of Disclosure Information.

The University of Winchester complies with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure and Disclosure information. The University also complies with its obligations under the UK GDPR which has Data Protection Act 2018 pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

#### **Access**

Access to this information is strictly controlled and limited to those who are entitled to see it as part of their duties.

#### **Handling and Usage**

Disclosure information is only passed to those who are authorised to receive it in the course of their duties and must never be passed on to anyone who is not entitled to receive it.

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Under the S124 of the Police Act 1997 and the DBS Code of Practice the University, as a Registered Body, may not share information contained on a disclosure with any third party; to do so constitutes a criminal offence. Therefore, the University is unable to divulge the contents of a DBS disclosure, whether it lists a conviction or not, to placement providers.

#### **Retention and Disposal**

The University no longer has DBS certificates. Disclosure information will be held electronically for the period of student registration. If, in exceptional circumstances, it is considered necessary to keep Disclosure information for longer than this period, the University will consult with the DBS. The Disclosure information is available online for 180 days from the issue of the certificate.

Any copy or representation of the contents of a Disclosure will not be kept. However, the University will keep a record of student number; full name; programme; Capita Resourcing Ltd. reference number, disclosure numbers and date Disclosure was issued for the duration of the period of study. The University will also keep a record of Annual Declarations and Childcare Disqualification Declarations for the same duration which includes the student number, full name, programme and the date the declaration was signed. The signed declarations themselves will be kept for a period of six months and then disposed of as confidential waste.