RECRUITMENT OF EX-OFFENDERS POLICY

Fair assessment of criminal-record information and safe appointment

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027 | IMPACT AP

1 | PURPOSE AND FAIR OPPORTUNITY

Consider applicants on relevant skills, experience and suitability while protecting learners. A criminal record does not automatically prevent appointment unless a legal restriction applies. Make this policy available during recruitment. Use alongside Safer Recruitment, Staff Code of Conduct, Data Protection and applicable DBS guidance; fairness does not remove mandatory safeguarding checks.

2 | ROLE AND CHECK ELIGIBILITY

Assess actual duties, contact with children and regulated activity before requesting a check. Confirm the legally available DBS level and barred-list eligibility for the role, using the registered body or appropriate advice. Do not request an enhanced or barred-list check merely because Impact works with children. Explain required checks and conditional-offer arrangements in recruitment information.

3 | LAWFUL DISCLOSURE QUESTIONS

Ask only about convictions, cautions and other information that Impact is legally entitled to consider for the specific role. Apply current Rehabilitation of Offenders Act exceptions and DBS filtering rules. Protected matters must not be requested or used improperly. Give applicants clear wording and a confidential route to discuss uncertainty rather than inviting unrestricted disclosure.

4 | SECURE RECEIPT AND DISCUSSION

Keep disclosures separate from general application circulation and limit access to authorised decision makers. Offer an open, measured discussion of relevant information and allow the applicant to explain context, accuracy, rehabilitation and evidence. Do not make informal enquiries through social contacts or discuss a candidate's record with unrelated staff.

5 | INDIVIDUAL RISK ASSESSMENT

Assess relevance to the role, nature and seriousness, timing, pattern, circumstances, changed behaviour and the proposed access to learners or information. Consider safeguarding implications and any lawful controls. Record evidence, uncertainty and advice. Do not reduce the decision to the existence of a certificate entry or assume an old conviction has no relevance without assessment.

6 | LEGAL BARS AND SUITABILITY

A person barred from relevant regulated activity must not be appointed to it. Check other applicable prohibitions, disqualification or management restrictions for the role. Seek specialist advice if uncertain and do not deploy the person into prohibited duties while resolving the issue. An organisational risk assessment cannot override a statutory bar.

RECRUITMENT OF EX-OFFENDERS POLICY

Fair assessment of criminal-record information and safe appointment

EFFECTIVE: SEPTEMBER 2026 | REVIEW: SEPTEMBER 2027 | IMPACT AP

7 | DECISION AND INDEPENDENCE

Kate makes an appointment decision only when unconflicted, supported by the appropriate recruiting and safeguarding advice. Use an independent governance route for personal or family conflicts. Record the reasons, conditions, controls and review arrangements. Explain any adverse decision sensitively and give the applicant an opportunity to correct factual errors before finalisation where appropriate.

8 | ACCURACY AND DBS DISPUTES

Verify identity and certificate authenticity and discuss discrepancies. If the applicant disputes certificate information, explain the DBS dispute route and seek appropriate advice on safe recruitment timing. Do not record a disputed entry as an established fact without context. The Update Service requires correct consent and eligibility checks; a status result is not a substitute for all recruitment enquiries.

9 | INFORMATION HANDLING AND RETENTION

Store criminal-record information securely with restricted access and a lawful processing basis. Record check dates, level and decisions in the appropriate checks record without unnecessarily retaining certificate copies. Apply current DBS handling guidance and a documented retention schedule. Share only for a lawful purpose; do not place full disclosures in broad staff folders or Airtable views.

10 | AFTER APPOINTMENT AND REVIEW

Explain the duty to report relevant new restrictions or suitability concerns through agreed employment arrangements. Assess new information fairly and act immediately on safeguarding risk. Make statutory referrals where the conditions are met. Review this policy with recruitment practice and current DBS guidance; withdrawal of an applicant or resignation does not automatically end safeguarding responsibilities.

11 | POLICY CONTROL AND REVIEW

Policy owner: Kate Willis, Principal and Proprietor. Effective date: September 2026. Scheduled review: September 2027, or sooner after relevant changes, incidents or feedback. Record actual governance approval and implementation decisions and brief staff on their duties. These policy dates do not assert that approval, staff training or operational checks have already occurred. Use the Complaints or independent reporting route for concerns about implementation.

12 | SOURCES AND RELATED DOCUMENTS

DBS: Recruitment of ex-offenders guidance (January 2025); DBS filtering guide and Code of Practice.

gov.uk/government/publications/recruitment-of-ex-offenders-guidance;
gov.uk/government/publications/dbs-filtering-guidance

Check current versions and apply according to Impact's legal and commissioning status.