

# Disclosure & Barring Service (DBS) Policy

## 1. Introduction

Part V of the Police Act 1997, alongside the **Police Act 1997 (Part V) Code of Practice**, provides employers with access to criminal record information to make safer recruitment decisions for positions of trust involving vulnerable groups. This includes Basic, Standard and Enhanced DBS checks.

**This policy ensures that Disclosure Information** is used properly, fairly and in line with current UK legislation, including the **Rehabilitation of Offenders Act 1974 (Exceptions) Orders 2013–2023**, **KCSIE 2025** and **DBS Code of Practice**.

This policy applies to:

- Recruitment of all candidates by LTS Group
- Voluntary positions or other roles with access to children, young people, or vulnerable adults
- All LTS Group personnel who handle or have access to Disclosure Information.

## 2. Purpose

The purpose of this policy is to:

- Assist LTS Group in protecting vulnerable children and adults by making safer recruitment and employment decisions
- Ensure Disclosure Information is used properly, fairly and in compliance with legislation
- Provide assurance to applicants that their information will be handled confidentially and appropriately
- Outline procedures for the storage, access and disposal of Disclosure Information.

## 3. Basis for Requesting a Disclosure

- All candidates who successfully complete the recruitment process for roles involving regulated activity will be required to obtain an Enhanced DBS certificate
- For roles with children, the certificate must be valid for the Child Workforce. For roles with vulnerable adults, the certificate must cover both Child and Adult Workforce
- All applicants will be informed of the requirement for an Enhanced DBS and subscription to the DBS Update Service
- LTS Group will conduct Update Service checks **every 12 weeks** to ensure the continued validity of DBS certificates
- **Where candidates have prior overseas work with children, an overseas criminal record check will be requested. (Karen, please can you put the proper criteria in here – e.g. have worked out of the country etc etc)**
- LTS Group will accept Enhanced DBS certificates obtained by another employer if the applicant is subscribed to the DBS Update Service and the certificate is current
- Certificates become invalid if there is a **gap of three months or more** in child-related employment (excluding the 6-week summer break), unless the Update Service is maintained.



#### 4. Handling of DBS Checks

- LTS Group uses a certified external provider, Access Personal Checking Services, to process DBS checks
- Any DBS certificate containing cautions, reprimands or convictions triggers a robust risk assessment to determine suitability
- The client school will be informed if there are relevant entries, including issue date, reference number and necessary details, while maintaining confidentiality
- DBS information must only be accessed by authorised personnel and not shared with third parties without consent
- Candidates are encouraged to carry their DBS certificate to each assignment and to show it to the school as appropriate.

#### Verification of Original DBS Certificate

##### Original DBS Certificate – Conditional Placement

All candidates must present their original Enhanced DBS certificate to LTS Group's compliance team for in-person verification.

A candidate **may be permitted to commence placement before the original DBS certificate has been physically seen**, provided that:

- A valid Enhanced DBS certificate has been issued and received
- The certificate has been **verified via a clear digital copy or reference number**
- The candidate is registered on the DBS Update Service,
- A risk assessment has been completed and authorised by Compliance

**In such cases**, the original DBS certificate must be seen in person within 5 working days of the placement start date.

Failure to present the original DBS certificate within this timeframe will result in:

- Immediate **suspension from placement**, and
- Escalation in line with the DBS Escalation Policy.

Under no circumstances may a candidate continue working without the original DBS certificate being verified in person.

#### 5. Ex-Offenders

- LTS Group ensures that DBS information is not used to unfairly discriminate
- A criminal record does not automatically prevent employment; decisions are made based on relevance to the role
- Any DBS findings are discussed with the candidate prior to final employment decisions
- Decisions to decline a candidate due to DBS information are made at senior management level and are not the responsibility of individual consultants.

#### 6. Confidentiality and Record Keeping

- Disclosure Information is treated as highly confidential



- Certificates and related information are securely stored and disposed of following DBS Code of Practice guidance
- Only those with a legitimate need to know may access this information.

## 7. Policy Communication and Review

- This policy is communicated to all contractors during their initial interview and registration
- The policy is reviewed annually or whenever legislation changes
- The policy is available on the LTS Group website and internal secure systems for staff access.

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### This updated policy aligns with:

- Rehabilitation of Offenders Act 1974 (Exceptions Orders 2013–2023)
- Keeping Children Safe in Education (KCSIE) 2025
- DBS Code of Practice 2020
- Working Together to Safeguard Children 2018/23

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