



POLICY

● Policy Name	Recruitment of Ex-Offenders Policy
● Date of Publication	May 2018
● Superseded Policy	March 2018
● Review Date	May 2019
● Senior Responsible Officer	Director of People and Culture

BITC Policy on the Recruitment of Ex-offenders

Policy Statement

BITC uses the Disclosure and Barring Service when assessing applicants' suitability for positions of trust. In doing so, we will comply fully with the DBS of Practice and treat all applicants for positions fairly. We undertake not to discriminate unfairly against anyone who is the subject of a Disclosure on the basis of a conviction or any other information revealed. We actively promote equality of opportunity for all those with the required experience, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

This policy statement will be made available to all applicants in the early stage of the recruitment process for posts where Disclosure is required.

A Disclosure is only requested after a thorough risk assessment has indicated that one is relevant and proportionate for the position concerned. For those positions where a Disclosure is required, the recruitment material will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.

Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. Please send this information under separate confidential cover to Sandra Knowles, Director of People and Culture at BITC's London offices in Shepherdess Walk and we guarantee that this information will be seen only by those who need to see it as part of the recruitment process.

We ensure that all those in BITC who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the vacancy could lead to a withdrawal of an offer of employment.





Having a criminal record will not necessarily be a bar from working for us. This will depend on the nature of the position and the circumstances and background of the offences.

A Disclosure will only be requested for the successful applicant for a position.

We undertake to discuss any matter revealed in a Disclosure with the applicant before withdrawing a conditional offer of employment.

The Disclosure and Barring Service, Code of Practice and other relevant information can be found on <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Policy and Procedure

A risk assessment will be undertaken for all positions which involve working with vulnerable people, as defined by legislation, in order to ensure that the use of DBS check is appropriate in each case. This assessment will be arranged by the designated Safeguarding Officer or HR.

HR staff will always be involved in selection process for posts requiring DBS checks to ensure that any questioning about past offences is appropriate and conforms to legal requirements and DBS guidelines.

The BITC policy statement on the Recruitment of Ex-Offenders will be given to all applicants for positions where the nature of the work is assessed as justifying the use of Disclosure, at the early stage in a recruitment exercise. Wherever possible, the intention to ask for Disclosure will be shown in the job advert.

Disclosure will only be requested for the successful applicant. Offers of employment, including verbal offers, must therefore be made on a conditional basis.

BITC undertakes to discuss anything revealed in the Disclosure with the successful applicant before withdrawing a conditional offer.

BITC believes that its present need for Disclosure in connection with working with vulnerable adults requires the use of an Enhanced Disclosure. This contains details of both spent and unspent convictions as well as cautions, reprimands and warnings, and therefore contains information which is highly sensitive.

All information from the Disclosure will be stored, handled and used securely and safely

Policy and Procedure on the Storage, Handling, Use and Retention of Disclosure Information

BITC complies fully with the DBS code of Practice and with its obligations under the Data Protection Act regarding the correct handling, use, storage, retention and disposal of Disclosure information and any related information that may have been voluntarily under confidential cover by the candidate.

All Disclosure information will held by the HR team which ensures that the information is kept safely in lockable cabinets with access strictly controlled and limited only to those entitled to see it as part of their duties. Cabinet keys are available only to nominated HR staff.





Disclosure information will only be used for the specific purpose for which it was requested. A record will be kept of those individuals outside HR who have had access to the information as part of their responsibilities for recruitment.

Once a recruitment decision has been made, the Disclosure information will be destroyed by shredding as soon as possible and within a maximum period of six months. Only if there is a dispute about the information will BITC retain the information for longer, having consulted the DBS on the matter. Where BITC use a registered agency (an 'Umbrella Body') to obtain Disclosure information, it may return the information to that organisation within the timescales above.

A brief record will be retained in confidential personnel files showing the date of the Disclosure, its unique reference number. This record will be treated as sensitive personal information within the meaning of the Data Protection Act.

