

Policy regarding Disclosure and Barring Service (DBS) checks for applicants and students

Purpose and Context

The Disclosure and Barring Service (DBS) is a non-departmental public body of the Home Office. Its purpose is to help organisations make safer recruitment decisions by processing and issuing DBS checks. The DBS also maintains the Adults' and Children's Barred Lists and makes considered decisions as to whether an individual should be included on one or both lists and barred from engaging in regulated activity.

Scope

This policy relates to applicants and students only and relates purely to the DBS checks process within the University. It does not cover DBS checks for members of university staff, nor does it cover the Statement of Good Character process for current students on professional courses, where relevant disclosures go through the Fitness to Practise route. For specific details about the DBS processes, please refer to the DBS procedure document.

1.0 Introduction

- 1.1 This policy sets out the circumstances in which a DBS check will be required and indicates when checks need to have been completed. It should be read in conjunction with the following documents:
 - Admissions Policy (Taught Courses).
 - Policy Statement on Student Admissions where Applicants are Ex-Offenders.
 - Policy statement on the secure storage, handling, use, retention & disposal of disclosure and barring services (DBS) certificates and certificate information.
 - DBS Procedure document.
- 1.2 If a DBS check highlights an issue, the University will convene a DBS panel to consider the suitability of an applicant to join a course. If a matter comes to light pertaining to a current student, "Fitness to Practise" has been identified as the route to pursue this.
- 1.3 The University's DBS Procedure document provides the detail about how the checks take place and the details of the delivery of a DBS Panel. For University staff, this policy document should be read in conjunction with that procedure document.

2.0 DBS checking of applicants

2.1 Disclosure checks are required for all applicants joining courses which lead to employment in areas involving contact with children and/or vulnerable adults, for example courses which are governed by professional bodies such as The National College for Teaching and Leadership, The Nursing and Midwifery Council, Health and Care Professions Council, Social Work England and the Department for Education.

Courses that require a DBS check have that information included in the Entry requirements section of Course Finder on the University web site.

The Student Recruitment Team will administer the DBS checking process for applicants as part of the routine admissions processes.

The University reserves the right to exclude an applicant from their course should information come to light, through these processes, declares that they are not suitable. This may be, for example, because they have omitted to declare relevant information on a DBS application, or they have withheld information from their Rehabilitation of Offenders Form.

2.2 Disclosure checks are undertaken as part of the admissions process for specified courses (as shown on the University's course finder pages). Checks would normally be completed before enrolment takes place. However, there are occasions where this is not possible because of timing issues for example where applicants come through Clearing. In this situation, a Registration Disclaimer may be used to allow enrolment pending the completion of the DBS check. The details of the Disclaimer can be found in the procedure document.

2.3 If an applicant's DBS certificate contains information relating to an offence, or if additional information is disclosed, the details will be reviewed in line with the DBS procedure document, which includes the circumstances for which a DBS Panel will be convened that will assess an applicant's suitability to keep their offer of a place on the course.

3.0 DBS checks for students

- 3.1 In some circumstances, students who are on courses that do not require DBS checks for admission may need to be checked before they can go out on placement, where they choose a placement in a regulated area. When this happens, the University Employability and Placement Services Team, in conjunction with relevant academic staff, will advise the student on what steps need to be taken.

Normally in this situation, it is expected that the placement provider would undertake the DBS check, this is because they know precisely about what is involved in the regulated activity for their area of work. The University would cover the cost of this check and reimburse the provider. The University undertakes that a smooth and efficient mechanism for reimbursement is in place. The only current exception to this relates to placements on optional modules for Education students, where the check is undertaken by the University Employability and Placement Services Team.

- 3.2 If the placement provider reasonably states that they cannot undertake the DBS check for the student to undertake a placement, in the interests of supporting the student experience, a member of the University Employability and Placement Services Team will undertake the check. This staff must have significant experience and knowledge in the DBS regulatory requirements. The reason for this is that these checks must be processed by staff who have a detailed understanding of the DBS requirements / regulations. For example, to be able to determine if a placement was eligible for the Adult Workforce and Adult Barred Lists to be checked. It is recognised that the associated details for students requiring bespoke DBS checks for placements can be extremely complex and the time associated with this work can be substantial, at least ten times that of the routine course admissions checks.
- 3.3 If all avenues have been exhausted, and students are unfortunately not able to secure this clearance, then an alternative placement in a non-regulated area should be sought.
- 3.4 Recognition should be made in respect of the time required for checks to be undertaken and clearances confirmed, which is normally approximately four to six weeks turnaround. This factor may prohibit short ad hoc bespoke placements in regulated areas.

4.0 Change in students' circumstances

- 4.1 If a student who had secured a successful DBS clearance to join a course chooses to interrupt their studies there will be no requirement to undertake a new DBS check before they rejoin the course. Checks regarding their suitability to continue would be covered by the Statement of Good Character process / University's Fitness to Practise regulations.
- 4.2 If a student loses their clearance certificate and requires a new one, or if a student changes their name and needs an updated certificate then a new DBS check will be required. This will be undertaken by the University Student Recruitment Team, with the student details being provided by the Course Administration Team. Where DBS checks arise from these circumstances, then students would normally be asked to cover the costs.

5.0 International Applicants

- 5.1 For courses that require a DBS check, overseas applicants are required to secure an Overseas Police Check Certificate which would identify any criminal offences in lieu of the DBS check at this initial stage. Applicants are required to obtain the overseas police check certificate from their relevant policing authority in their home country.
- 5.2 The Overseas Police Check Certificate is required for applicants that have lived in a country outside of the UK for 6 months or more (whether continuously or in total) in the last 10 years before applying to the University, and whilst aged 18 or over. This is a condition of the applicants offer and must be met before the International Office can proceed in allocating a Confirmation of Acceptance for Studies (CAS). This is fully undertaken as part of the admissions process by the International Office.
- 5.3 Any criminal offences disclosed on the Overseas Police Check Certificate are immediately referred to colleagues in the Student Recruitment team to be considered at a DBS panel.
- 5.4 Once in the UK, the applicant can complete their UK DBS which is managed by the Admissions staff in the University Student Recruitment Team. However, a UK DBS check will only be applicable if the applicant has resided in the UK prior to starting the course OR a UK DBS check is required by the professional body regardless of prior residency.
- 5.5 There are occasions where international applicants are already in the UK and the DBS check can be undertaken prior to enrolment on their chosen course. This would include new direct applicants and students currently studying a pre-degree programme in the International Study Centre. An Overseas Police Check Certificate is still normally required when an applicant is in the UK but will be determined by the criteria as outlined in point 5.2 above.

- 5.6 When required, a UK DBS check will be set up on the First Advantage system, by the Admissions staff in the University Student Recruitment Team, and this will send an individual an activation link to complete a DBS application.
- 5.7 On arrival in the UK, the applicant would normally be required to present the original Overseas Police Check Certificate to the International Office and, if required, produce their ID documents.
- 5.8 On receipt of the documents, if any criminal offences are disclosed, a DBS panel will be held to consider the applicant's suitability.

6.0 Overseas Criminal Records Check: Home Applicants

- 6.1 Where an applicant has been assessed as having a 'Home' status, and, based on the criteria in point 5.2 above, they require an Overseas Police Check Certificate in addition to the UK DBS Check, this is undertaken by the Admissions staff in the University Student Recruitment Team and will be conducted via the First Advantage system where possible. If First Advantage do not offer the service for the particular country required, the applicant will be asked to obtain an Overseas Police Check Certificate as per the guidelines of the Disclosure and Barring Service.

7.0 Staffing

- 7.1 Staff in the Student Recruitment Team, and the Employability and Placement Services Team, that are responsible for supporting applicants / students through the DBS process should undertake relevant training and be supported via any appropriate staff development activities. It will be essential that these duties are identified as part of the job description of staff in these areas, and that they are supported in this work by their line managers and by the University Champion.

8.0 University Champion

8.1 A senior member of university management (Director level or above) would act as champion for the DBS processes. This would involve championing the process throughout the institution, particularly with regards to matters of compliance. The champion would provide high level support in securing horizon scanning for new training or legislation relevant to staff. The champion would also undertake an arbitration role for situations where there is no obvious resolution. The champion would also act as Chair for the DBS Activities Steering Group (see 11.0 below).

9.0 Relevant Legislation

9.1 It is important that the University keeps abreast of new legislation and regulatory requirements with regards to the DBS process. As part of its routine horizon scanning activities for changes in legislation etc., the University Legal Office would also look out for changes affecting the DBS process and update university colleagues, including the champion, accordingly.

10.0 Training and Support

10.1 All staff who are involved in the DBS process at whatever level and in all relevant areas should undertake at least a minimum level of training, this would include academic staff who are asked to participate in DBS panels. This training can be provided by the DBS Regional Outreach Adviser for Yorkshire and the Humber. It would be advisable for training to be made available at least every term, so that all staff have an opportunity to access it. For those involved routinely in DBS processing it would be recognised as mandatory training for these staff.

10.2 Staff who are required to support bespoke DBS checks that are recognised as being significantly more complex should undergo an advanced level of training as advised by, and in consultation with, the DBS Regional Outreach Adviser for Yorkshire and the Humber. This should be supported through the PDPR process and reasonable time allowed for staff to engage with this type of training.

11.0 DBS Formal Support Framework

11.1 It is important that there is a clear support framework for Services that conduct DBS related activities. The framework is aimed to be robust, sustainable, fair and transparent and is designed to provide confidence to all those involved in DBS activities that there is support available to them in the execution of their duties but also an escalation route for issues to be forwarded, discussed and resolved. This framework does not rely on one single person, thus providing a sustainable model that can become established and stay relevant long term.

- 11.2 As with other key university activities that require formal support, this framework starts with a Steering Group for oversight. The Steering Group would be chaired by the DBS Institutional Senior Champion (currently the Deputy Vice-Chancellor) and would have a membership that includes the Service Directors / Heads of the areas with related DBS activities. This group would provide governance and a high-level decision-making mechanism for DBS activities. This group would normally meet annually (but there is capacity for ad hoc meetings if needed), have formal minutes and report through to SLT. This group would agree the University DBS policy and review it annually.
- 11.3 Underneath the steering group, is a DBS operations group. This group includes staff from all relevant areas that operate DBS activities and provides those staff with a place to discuss operational issues, share information and best practice. They would also discuss and agree the local procedural documentation, and any documentation that is shared with students and applicants. Notes from this operations group will be provided to the steering group, where issues that the operations group were unable to resolve locally could be addressed. The other important element for both groups would be the inclusion of legal representation so that sufficient horizon scanning and information cascading could take place. It would also allow both managers and operators to ask for points of law / issues to be discussed.
- 11.4 Terms of Reference are provided in Appendix One.

APPENDIX ONE

University of Huddersfield

DBS Activities Steering Group

Terms of Reference

1. Purpose

The DBS Activities Steering Group provides strategic oversight, direction, and assurance for all Disclosure and Barring Service (DBS)–related activity across the institution. The group ensures that the DBS policy and associated processes are robust, compliant, efficient, and aligned with institutional priorities, safeguarding obligations, and relevant legislation.

The Steering Group acts as the authoritative body for decision-making on DBS policy, operational standards, risk management, and resource allocation.

2. Objectives

The Steering Group will:

- **Ensure compliance** with statutory requirements, sector guidance, and internal safeguarding policies.
- **Set strategic direction** for DBS operations, including policy development, process improvement, and digital transformation.
- **Oversee risk management**, ensuring that DBS-related risks are identified, monitored, and mitigated.
- **Promote consistency** in DBS practice across all relevant services.
- **Support operational teams** by removing barriers, approving changes, and ensuring adequate resources.
- **Provide institutional assurance** to senior leadership, audit committees, and safeguarding governance structures.
- **Review and approve** major changes to DBS-related systems, workflows, and training requirements.
- **Support training and development**, approve training needs and authorise appropriate training providers.

3. Scope

The Steering Group's remit includes:

- All DBS checks undertaken for staff, students, applicants, and placement-related activity.
- Policies, procedures, and guidance relating to DBS eligibility, risk assessment, and decision-making.
- Oversight of the institution's relationship with external DBS umbrella bodies or service providers.
- Monitoring compliance with safeguarding legislation and internal safeguarding frameworks.
- Approval of major operational or system changes affecting DBS processes.
- Oversight of training, communication, and awareness-raising related to DBS responsibilities.

The group does **not** manage individual DBS cases or make suitability decisions; these remain the responsibility of designated operational teams and safeguarding leads.

The group does not routinely discuss operational matters and best practice. This falls within the remit of the Operations Group.

4. Membership

Membership will include senior representatives with strategic responsibility for safeguarding, HR, student services, compliance, and operational delivery.

Core Members:

- Chair: DBS Institutional Senior Champion (currently the Deputy Vice-Chancellor)
- Head of Human Resources
- Director of Student Services
- University Secretary
- Director of Marketing, Communications and Student Recruitment
- Director of International Development
- Director of Registry and Academic Development
- Faculty/School Representatives (as appropriate)

In Attendance (as required):

- University Solicitor
- Director of Human Resources
- POD - Training and Development staff
- External DBS Regional Co-ordinator
- Staff undertaking operational activities from the services, as required for specific discussion items

- A member of professional services staff to act as secretary

Quorum:

A minimum of 50% of core members, including the Chair.

5. Roles and Responsibilities

Chair

- Provides strategic leadership and ensures the group fulfils its purpose.
- Approves agendas and ensures effective meeting management.
- Escalates key issues to senior leadership or safeguarding governance boards as required.

Members

- Contribute expertise and represent their area's interests.
- Ensure decisions are communicated and implemented within their services.
- Review papers in advance and participate actively in discussions.

Secretariat

- Coordinates meetings, agendas, minutes, and action tracking.
- Maintains documentation and supports reporting requirements.

6. Meeting Arrangements

- Meetings will take place **annually**, with additional meetings scheduled as required.
- Papers will be circulated at least **five working days** in advance.
- Minutes and action logs will be maintained and shared with relevant staff.
- Sub-groups or task-and-finish groups may be established to address specific issues.

7. Decision-Making

- Decisions will normally be made by consensus.
- Where consensus cannot be reached, the Chair may make a final determination or escalate the issue.
- Decisions with significant institutional impact may require approval from senior leadership or governance committees.

8. Reporting and Accountability

The Steering Group will report to:

- Senior Leadership Team (SLT)

9. Oversight

The Steering Group will oversee and receive reports and matters from:

- The DBS Activities Operations Group.

10. Review of Terms of Reference

These Terms of Reference will be reviewed **annually** or sooner if required due to legislative, organisational, or operational changes.

University of Huddersfield

DBS Activities Operations Group

Terms of Reference

1. Purpose

The DBS Activities Operations Group provides a collaborative, practitioner-focused forum for staff involved in the delivery of Disclosure and Barring Service (DBS) processes across the institution. The group focuses on operational consistency, procedural improvement, and the sharing of best practice. It also acts as an early-warning and escalation mechanism, raising issues, risks, and recommendations to the DBS Activities Steering Group.

2. Objectives

The Operations Group will:

- **Review and refine operational procedures**, ensuring they are efficient, consistent, and compliant.
- **Share best practice**, case studies, and lessons learned across departments and Services.
- **Identify operational challenges**, bottlenecks, and risks, and escalate them to the Steering Group where strategic decisions are required.
- **Act as a communication channel** between operational teams and the Steering Group.
- **Receive and interpret legal updates**, ensuring operational processes reflect current legislation and guidance. And to ask for clarification on legal aspects of DBS processes.
- **Support training and development**, identifying gaps in knowledge and request training appropriate for the needs of operational staff.
- **Contribute to policy implementation**, ensuring that changes approved by the Steering Group are embedded effectively.

3. Scope

The group's remit includes:

- Operational guidance, workflows, documentation, and standard operating procedures.
- Sharing of best practice in teams across Services.
- Consideration on the operational impacts of DBS legislative or regulatory changes.
- A safe space to discuss any operational issues with colleagues from other services.
- Cross-service coordination to ensure consistency of practice.
- The development of materials that are made public for the benefit of students or applicants.
- This group would also discuss DBS related issues, such as overseas police clearance checks, statements of good character

The group does **not** make strategic decisions or approve policy changes; these remain the responsibility of the Steering Group.

4. Membership

Membership consists of operational staff and managers directly involved in DBS processes.

Core Members:

- Chair: On a rotational basis, one of the Service Directors (or a relevant Head of Service)
- Representatives from Human Resources (covering staff related DBS processes)
- Representatives from Student Services - Placements Service (covering placement related DBS processes)
- Representatives from Director of Marketing, Communications and Student Recruitment – Student Recruitment Team (covering applicant / admissions related DBS processes)
- Representatives from Registry and Academic Development (covering student related DBS processes)
- Representatives from the International Office (covering related international requirements e.g. overseas police clearance checks)

In Attendance (as required):

- Legal Services representative or relevant representative as assigned by the University Secretary to cover DBS legal matters
- Relevant School Operations Manager(s)
- POD - Training and Development staff
- External DBS Regional Co-ordinator

Quorum:

At least 50% of core members, including the Chair.

5. Roles and Responsibilities

Chair (rotational – on an academic year basis)

- Leads the group and ensures meetings are productive and focused.
- Ensures issues and recommendations are escalated to the Steering Group.
- Oversees the development and maintenance of operational procedures.

Members

- Bring forward operational issues, challenges, and examples of best practice.
- Share updates from their areas and ensure consistent implementation of agreed processes.
- Review papers in advance and contribute actively to discussions.
- Cascade information and decisions back to their teams.

Secretariat (rotational – on an academic year basis and from the service that the Chair for that year belongs to)

- Organises meetings, agendas, minutes, and action logs.
- Ensures timely communication of updates and decisions.
- Coordinates the flow of information to the Steering Group.

6. Meeting Arrangements

- Meetings will take place **termly** (or at a frequency agreed by the group).
- Papers will be circulated at least **three working days** in advance.
- Minutes and relevant action logs will be shared with the Steering Group.
- Task-and-finish groups may be formed to address specific operational issues.

7. Decision-Making

- Decisions will be made by consensus where possible.
- Operational decisions within the group's remit may be agreed and implemented directly.
- Issues requiring strategic direction, policy change, or resource allocation will be escalated to the Steering Group.

8. Reporting and Escalation

The Operations Group reports directly to the DBS Activities Steering Group.

Regular reporting will include:

- Summary of operational issues and risks
- Recommendations for policy or procedural changes
- Legal and regulatory updates
- Performance trends and audit findings
- Training needs and resource implications

Equally the Steering Group would provide relevant policy, resources, legal and training updates to the Operations Group.

9. Oversight

Members of the Operations Group would be expected to represent the interests of their teams in their own service and represent colleagues' issues at the Operations Group meetings, and naturally then report back to the team.

10. Review of Terms of Reference

These Terms of Reference will be reviewed **annually**, or earlier if required due to operational, legislative, or organisational changes.

POLICY SIGN-OFF AND OWNERSHIP DETAILS	
Document name:	University DBS Policy
Version Number:	Revised Policy V3.0
Equality Impact Assessment:	28/04/2026 – checked for accessibility.
Privacy Impact Assessment:	November 2024 (no changes subsequently that alter the results of this assessment)
Approved by	For SLT Approval in May 2026
Date Approved:	14/05/2026
Date for Review:	May 2027
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Author:	Head of Schools' Administration
Owner (if different from above):	As above
Document Location:	This should be the link to the policy on the main policies and procedures home page.
Compliance Measures:	Policy owner to ensure compliance checks identified at the outset are still fit for purpose.
Related Policies/Procedures:	<ul style="list-style-type: none"> • Admissions Policy (Taught Courses); • Policy Statement on Student Admissions where Applicants are Ex-Offenders; • Policy statement on the secure storage, handling, use, retention & disposal of disclosure and barring services (dbs) certificates and certificate information; • DBS Procedure document.

REVISION HISTORY			
Version	Date	Revision description/Summary of changes	Author
V3.0	28/04/2026	One year review – updated to include the newly approved framework (approved at SLT on 16/04/26)	Gill Firth
V2.0	05/02/2025	Updated following consideration at SLT and discussions with colleagues.	Gill Firth
V1.5	11/12/24	Updated following relevant feedback	Gill Firth
V1.4	05/11/24	Updated following relevant feedback	Gill Firth
V1.3	21/10/24	Updated following relevant feedback	Gill Firth
V1.2	24/09/24	Updated following relevant feedback	Gill Firth
V1.1	29/08/24	Minor updates	Gill Firth
V1.0	19/08/24	First draft of new policy	Jenny Grainger