

Procedures for Recruitment of Ex-Offenders (Blemished DBS)

Approved by SEG July 2024

(Review to be undertaken in July 2026)

The procedures have been developed as part of the Diocese of Canterbury's Safer Recruitment and is aligned to the requirements of the House of Bishop's Guidance 'Safer Recruitment and People Management' (2022). The Diocese has a duty to ensure fair and equal practice for any applicant who may have a criminal record, including no automatic discrimination. In the event that the Diocese's is notified that an applicant's DBS certificate has information which needs to be viewed (a blemish) the procedures outlined will be followed so that the information can be risk assessed in light of the regulated role that is being applied for. For a full outline of the roles eligible for a DBS check please see the House of Bishop's Guidance 'Safer Recruitment and People Management (2022)' or the DBS government website.

These procedures comprise of 5 stages, which collectively seek to ensure that a proportionate risk assessment and recommendation is made from the diocese's Safeguarding Executive Group to the relevant PCC as to whether it is appropriate (from a safeguarding perspective) for the subject of the blemished DBS to take up the role they are being recruited to. This is undertaken through communication with the incumbent, or church warden if in interregnum,

The procedures are applied in accordance with GDPR / data protection legislation and detailed information obtained through a risk assessment, beyond just a recommendation, is shared when it is deemed legitimate for safeguarding purposes. This will usually mean only sharing this information with the incumbent or another member of the PCC, e.g. church warden, who represent the PCC for the purposes of these protocols.

Please contact the DSO or Safeguarding Administrator if you have any queries.

The following stages are applied whenever a notification of information on a DBS certificate (blemish) is reported on a DBS check:

Stage 1 (Initial Checks and information collection) – undertaken by Diocesan Safeguarding Administrator.

1. Check Safeguarding system for any previous DBS checks and recommendations.

2. Contact the incumbent, or Church Warden¹ in case of interregnum, so they can ask the applicant if they can look at the certificate and send a copy of the certificate to Diocese's Safeguarding Administrator.

Stage 2 (Initial Assessment Report)

1. Diocesan Safeguarding Administrator, on behalf of the Diocese's Safeguarding Executive Group, emails a blank Pro-forma report template (appendix 1) with a copy of the Procedures for Responding to a Blemished DBS/Recruitment of Ex-Offenders on behalf of the Safeguarding Executive Group (SEG) to the incumbent. Where the parish is in interregnum this is sent to the Church Warden or after consulting with the Area Dean / Archdeacon, the PCC chair.
2. The recipient (i.e. incumbent, church warden or PCC chair) is asked to fill in section 1 of the proforma report template and return this to the Diocesan Safeguarding Administrator along with a copy of the blemished DBS certificate so this can be viewed by the DSO.
3. The Diocesan Safeguarding Administrator sends the completed proforma report to the relevant Diocesan Safeguarding Officer (DSO) for them to complete section 2 of the report. The DSO ensures that the report does not include the name of the individual and that they are identified by a case number only. The DSO makes a recommendation to the Diocese's Safeguarding Executive Group in how they should respond to the application of appointment (whether paid or unpaid/volunteer roles).
4. To complete this section, the DSO may contact the incumbent/church warden/PCC chair for more information.
5. Prior to the Safeguarding Executive Group making its recommendation, they may request a full DSA report. This decision would be relayed to the incumbent/church warden/PCC chair by the DSO.

Stage 3 (SEG Recommendation)

1. The Diocesan Safeguarding Administrator writes to the incumbent/church warden/PCC chair advising them of the Safeguarding Executive Group's recommendation.
 - a. *The name of the individual as well as the case number can be used in this final correspondence.*
2. The relevant DSO records the SEG recommendation on section 3 of the Proforma report.
3. The incumbent/church warden/PCC chair will notify the DSO whether they plan to action the SEG recommendation or not.

¹*In exceptional circumstances the Area Dean or Archdeacon may need to be contacted where contacting the Church Warden would not be appropriate.*

4. It is for the Incumbent/church warden/PCC chair to decide whether the Parrish Disclosure Officer is informed of this decision.
5. In making this decision they can also seek advice from the DSO.

Stage 4 (Case Recording)

1. The Diocese Safeguarding Administrator will open a case file on the diocese's safeguarding case management system (currently Safebase) – allocating the case to SEG (formerly RAG) and ensure that copies of reports etc. are scanned and added to the file.
2. If any further safeguarding incidents involving the individual person occurs the case file should be re-allocated to the relevant DSO

Stage 5 (Appeals)

1. If the subject of the blemished disclosure challenges the decision made by the PCC it will be for the PCC to initiate and undertake an appeals process
2. Additional advice and support on this process can be obtained from the Diocese's HR Manager
3. In the event that the recommendation by SEG is challenged as part of the appeals process – SEG will meet to review their recommendation and to consider whether an independent peer review of their recommendation is required
4. If a peer review is considered necessary, initial advice will be sought from the National Safeguarding Team
5. Any information for this independent review will be anonymised – just using the case reference number.

Appendix 1:

PROFORMA for Blemished DBS Risk Assessment process

Case Number:

Gender: **Age: (DOB)**

Details of post applied for:

Short description of parish:

Details of offences disclosed by DBS

Date of Conviction 1:

Offence:

Court:

Disposal:

Date of Conviction 2:

Offence:

Court:

Disposal:

(Etc.)

SECTION 1

Full details of the incident(s) and the background:

Information about the applicant's lifestyle, and his/her attitude to the offences:

Details about the applicant's present domestic and employment circumstances:

Full details of the post involved with reference to contact with children i.e. those under 18 and or vulnerable adults:

Your reasoned assessment of the applicant's suitability for the post in question – xxx:

Your recommendation about whether the applicant should be allowed to operate in the role in the light of this information:

Did the Appointing Officer know about the offence disclosed by the DBS?

If NO, had the applicant been asked a direct question about any criminal record?

What is your attitude regarding the offence and its relevance to the post applied for?

Signed:

Please type name and role in Parish

Date:

Report to be received by email to Safeguarding Administrator , Diocesan Safeguarding Administrator safeguarding@diocant.org

SECTION 2 – TO BE COMPLETED BY DSO

Recommendation of Diocesan Safeguarding Officer and indicative risk analysis to the Safeguarding Executive Group (SEG) following review of DBS Certificate and information received:

Matrix for assessment of risk based on analysis

LIKELIHOOD	IMPACT					
		Negligible	Minor	Moderate	Major	Severe
	Very likely					
	Likely					
	Possible					
	Unlikely					
	Rare					

DSO:

DATE:

SECTION 3

Recommendation of Safeguarding Executive Group to the PCC (TO BE COMPLETED BY DSO):