

Criminal Checks Policy



Verification of Criminal record and barring checks:

Xander Recruitment Group fully understands the necessity of a current and valid DBS when placing a worker into a clinical setting. As such, a robust process is in place which minimises the risks and the possibility of a candidate being placed into such a setting without the necessary documentation obtained.

Xander Recruitment Group will always comply with the latest NHS Employers Check Standards.

At point of recruitment, a candidate will be asked as to whether they have any criminal convictions (spent/unspent in line with the rehab of offenders' act). This will be checked over by the recruiter upon completion. If the candidate indicates that they do indeed have convictions/cautions – a full statement will be obtained, to include such information as:

- Date of Conviction/Caution
- Name/title/code of the conviction
- Fines
- Circumstances
- Outcomes

DBS Certificates with cautions and convictions:

Once the DBS application has been returned by our DBS provider, if any cautions, convictions, or reprimands have been advised, and we have not already received a statement in relation to the caution/conviction or reprimand (previously or in relation to this DBS renewal), one must be requested from the candidate.

Once the statement has been received if the information provided is unacceptable and we do not wish to proceed with the candidate, then they are advised that they have been unsuccessful in the process of joining the agency.

There are several opportunities for a candidate to inform Xander Recruitment Group of any convictions they have, whether 'spent' or 'unspent' under the Rehabilitation of Offenders Act.

Opportunities include:

- Application Form
- Interview
- DBS Disclosure Form

When a disclosure contains information that an employee is in possession of a conviction or indication of any other matter, Xander Recruitment Group will not automatically terminate an employee or applicant from the role. Xander Recruitment Group will take into consideration several factors before reaching a decision in respect of the disclosure such as:

- Whether the conviction or other matter revealed is relevant to the role applied for

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- The seriousness of any offence contained on the Disclosure
- The length of time since the offence or other matter occurred
- Whether the individual has a pattern of offending behaviour or other relevant matters
- Whether the individual's circumstances have changed since this date

Xander Recruitment Group undertakes to discuss any matter revealed in a disclosure with the individual prior to any decision being reached. In all cases, the Authority is notified and written sign off received of acceptance of candidate into booking. Our CRM is updated to which alerts internal staff as to whether there is any information that prevents the candidate working in particular settings or, requires further action before they can be deployed into the provision of the service.

Once written confirmation is received by the authority, these are uploaded to the CRM system to confirm that the information has been presented to the authority and signed-off.

The candidate will also be asked as to whether they hold a current Enhanced DBS. If so, the original copy will be obtained from the agency and scanned – signed and dated as original seen.

All information present on the certificate will be checked to ensure it reads true and correct against other documentation supplied throughout the recruitment process, including:

- Full Names checked (including any previous, maiden and/or middle names)
- Date of Birth
- Gender
- Place of Birth
- Relevant Checks completed against the Adults/Children's Barred Lists

(Any discrepancies will be followed up with the candidate and if necessary, a new DBS applied for).

Xander Recruitment Group will then establish as to whether the DBS can be used in conjunction with a placement. For a DBS issued by another body to be accepted by Xander Recruitment Group, the worker must have registered with the DBS Update Service within 30 days of the DBS Certificate being issued. If the candidate has indeed signed up to the DBS Update Service, Xander Recruitment Group will obtain written consent to complete an Update Service Check. Once in receipt of this, the disclosure number will be checked on the DBS Update Service website. A copy of the search and its results will be retained in the workers file.

There are 4 different status results and depending on this will depend on whether the DBS supplied by the candidate can be used.

These are:

1. This DBS certificate did not reveal any information and remains current as no further information has been identified since its issue.

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2. This DBS certificate remains current as no further information has been identified since its issue. 3. This DBS certificate is no longer current. Please apply for a new DBS check to get the most up-to-date information

4. The details entered do not match those held on our system. Please check and try again.

If result '1' is returned, the DBS can be used – evidence of DBS and Update Service Checks will be retained on file.

If result '2' is returned, Xander Recruitment Group will ensure that full details are held on file of the nature of the conviction/caution. Depending on the information obtained will affect whether the convictions get escalated to the client. Written client authorisation will be needed based on the information detailed on the DBS Certificate before a candidate can be deployed into the provision of the services. This information will be made readily available to the auditors during any audit undertaken.

If either result '3' or '4' are returned, then the DBS supplied cannot be used as part of the recruitment/placement process.

If a valid DBS is supplied, Xander Recruitment Group will complete an Update Service check prior to the assignment start date and every 6 months thereafter.

Example of a DBS Update Service Check:

5/3/23, 8:56 AM

DBS CRSC



Certificate check results

[Print this page](#)

Certificate for **BLESSING DSO**, Date of Birth: **05/08/1961**, Certificate Number **001539941114**
Certificate Print Date: **07/08/2016**

This Certificate did not reveal any information and remains current as no further information has been identified since its issue.

Check performed by **Colin Porter** at **08:54** on **03/05/2023**

This status only relates to the individual named on the Certificate. No checks have been made against any third parties associated to this individual. Please see our guidance for further information about what this could mean for you as an employer.

Please note: If the Status check has been carried out on an Enhanced Certificate in relation to a position which is a Regulated Activity you must satisfy yourself that the original Enhanced Certificate included checks of the relevant DBS Barred Lists (Children/Adult).

[Perform another check](#) or [Exit](#)

[Y Fersiwn Cymraeg](#) | [About the Update Service](#) | [Terms and Conditions](#)

In the case of a candidate not having a current/valid DBS, Xander recruitment Group will apply for a new Enhanced disclosure.

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The applicants are sent the necessary guidance in order to complete the application online and in order to understand what information is required by Xander Recruitment Group in order to ID verify their DBS application and complete the application process. Xander Recruitment Group will ensure that a satisfactory returned DBS is in place prior to the assignment start date, with a new DBS applied for annually thereafter (if the worker does not sign up to the update service).

Where information is present, Xander Recruitment Group will ensure that full details are obtained from the worker and retained on file in relation to the information observed on the DBS. All workers who obtain a DBS via Xander Recruitment Group are encouraged to sign up to the update service. A check will be carried out by Xander Recruitment Group within the first 2 weeks of a DBS being issued to ascertain as to whether the worker has indeed signed up the update service or not. Prompt will be provided where necessary.

Xander Recruitment group will ensure that <https://www.gov.uk/dbs-update-service> is followed for update and prompts for further information where necessary. All DBS certificates are retained on a secure online CRM system with access restricted to authorised personnel only.

All candidates will be required to provide consent for the following:

- Consent for Xander Recruitment Group to complete a DBS check
- Consent for Xander Recruitment Group to retain a copy of the DBS on file
- Consent to do DBS Update Service Checks
- Consent to share their DBS and information for recruitment and auditing purposes DBS information is detailed on Placement Checklists issued to our clients, to include the following information:
 - DBS Disclosure Number
 - DBS Name of Employer
 - DBS Disclosure Type
 - Date DBS issued

In order to ensure that a candidate's DBS remains current and valid throughout their recruitment and placement, our CRM is set up to track the validity of a candidate DBS. This in turn alerts the business of any documents nearing their expiry – where follow up action will be required (i.e., New DBS / Update Service Check).

Overseas Police Checks:

Where a worker has entered the UK or become resident in the previous 6 months prior to their registration or been outside of the UK for a period of 3 months or more in the last 5 years, Xander Recruitment Group will ensure that an Overseas Police Check is supplied by the worker and retained on file.

Xander Recruitment Group will obtain only original documentation relating to the worker's Overseas Police Check, signing, and dating the item to that effect and retaining it in the worker's file.

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Where the Overseas Police Check is not supplied within the English language, Xander Recruitment Group will ensure the document is sufficiently translated by a professional translation company.

Xander Recruitment Group will allow candidates to submit an application, before providing them with an Overseas Police Check (where applicable). This will enable Xander Recruitment Group to begin processing the application sooner; however, no decision will be made on the worker's application until a satisfactory Overseas Police Check has been received from the worker.

Xander Recruitment Group will ensure that all Overseas Police Checks are:

- Less than 3 months old at the point of recruitment
- Verified with originator
- Obtained in conjunction with an Enhanced DBS.

Regardless of the work history presented to Xander Recruitment Group, or the information supplied on the agency worker's application form, Xander Recruitment Group will ensure that an Enhanced DBS check is obtained for each agency worker prior to their deployment within the provision of the services.

If an unsatisfactory response is received for the Overseas Police Check, Xander Recruitment Group will refer a decision to be made on the applicant continuing with Xander Recruitment Group and if any relevant authority bodies need to be informed.

If information is present on an Overseas Police Check, Xander Recruitment Group will ensure that the worker has correctly completed the registration form, and furthermore – supplied a full statement detailing the circumstances leading up to the information provided on the Overseas Police Check.

Overview:

- There are several types of DBS Certificate available. Xander Recruitment Group always applies for Enhanced checks with POCA/ POVA checks
- All DBS Certificates expire after 12 months.
- All candidates that work for Xander Recruitment Group must have an Enhanced DBS Certificate, issued by Xander Recruitment Group and it must be less than 12 months old. Certificates are renewed annually, before the current certificate expires.
- It can take up to 90 days for an Enhanced DBS Certificate to be returned from the Bureau.
- Xander Recruitment Group are regularly asked to email candidate's DBS Certificates to clients – which Xander Recruitment Group can do with the candidate's permission.
- Xander Recruitment Group applies for all DBS Certificates via Zellis Background Checking online system. The candidates are sent a link to access the system and enter their details. Xander Recruitment Group then logs in to the Zellis online system and verifies the information given and performs the necessary I.D checks.
- Once completed, the DBS Certificates are sent via the post directly to the candidate. Once received, the candidate must produce the original, so that a verified copy can be taken and held securely on

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file. Xander Recruitment Group can download an online snapshot version of the certificate which is placed in the worker's file.

- Due to the confidentiality of the DBS information - only a limited number of personnel at Xander Recruitment Group have the permission to handle DBS applications and DBS Certificates.

DBS Update Service Overview:

For an annual subscription, candidates can have their DBS Certificate kept up-to-date and take it with them from role to role, within the same workforce, where the same type and level of check is required.

When candidates are recruited, they are asked if they are a member of the update service. If they are, Xander Recruitment Group can with their permission, use their current DBS Certificate and carry out a free, instant online Status Check to see if any new information has come to light since its issue.

By entering the organization name, employee's forename, and surname in conjunction with the DBS certificate number, current surname of DBS certificate holder and date of birth of DBS certificate holder, Xander Recruitment Group can obtain an instant Status Check.

This check must be printed off and held in addition to the DBS check it was performed on originally. The online check must be carried out every 6 months.

If the check shows that new information has been added to the certificate since the original DBS certificate was issued, a new DBS certificate will need to be applied for to receive the most up to date information.

Handling and retention of criminal record information:

Xander Recruitment Group has a written security policy covering the correct handling and safekeeping of criminal record information.

Xander recruitment Group ensures that original documentation is scanned and stored securely on our cloud-based system and any copies of documents made once uploaded to the cloud-based system are placed in a locked container to be destroyed by an appropriate body designated by Xander Recruitment Group in the disposal of confidential information. Access is strictly controlled and limited to persons who need to have access to this information in the course of their duties.

This information is only used for the specific purpose it was requested for and with the applicant's full consent. Section 124 of the Police Act 1997 makes clear that it is a criminal offence to share criminal record information with any individual who is not entitled to receive it. However, if the applicant freely gives their consent to the sharing of this information, then an offence has not been committed.

Xander Recruitment Group keeps an electronic version of each DBS. These are stored in PDF format so that they may not be altered. The top part of the DBS is kept as evidence for Audit purposes and may be kept indefinitely. If the Enhanced Disclosure contains an indication of "Additional Information" to follow or if convictional/non-convictional information has been deleted on the reverse side, the full Enhanced Disclosure is kept until an audit of such has been undertaken but is destroyed post audit or destroyed within 6 months of issue whichever is sooner.

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Criminal record information is not retained for any longer than necessary. Once a decision has been made as to whether to appoint or not, it should be kept for no longer than six months from appointment, and six months from where the applicant has been unsuccessful, to allow for the consideration and resolution of any disputes or complaints.

Xander Recruitment Group has a robust policy in place when recruiting people with convictions or offences in line with the Equality Act. This policy is outlined in Xander Recruitment Group application form and provides assurances to the applicant that fair consideration will be given against their skills and ability to do the job being offered.

Alex Stockley - Managing Director – XANDER RECRUITMENT GROUP LIMITED

A handwritten signature in black ink that reads "Alex Stockley".

Date: March 2024