

## Headwise DBS and Recruitment of Ex-Offenders Policy Statement

Headwise Ltd uses the Criminal Records Bureau to help assess the suitability of applicants for positions within the organisation. Headwise Ltd fully complies with the DBS Codes of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

Headwise Ltd is committed to equality and the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background. There is a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.

He strive to promote equality and welcome applications from a wide range of candidates, including those with criminal records. Candidates for interview are selected on the basis of their skills, qualifications and experience.

All positions within Headwise Ltd require a Disclosure under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. Therefore, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.

Applicants are requested to declare if they have any convictions or have any alleged offences outstanding against them on the application. Applicants are requested to send details of these to a designated person within Headwise. We guarantee that this information will only be seen by those who need to see it as part of the recruitment process. Under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, the Company will ask questions about your entire criminal record, including 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974, if it deems the convictions to be relevant to the role.

At interview, or in a separate discussion, an open discussion will take 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 position sought could lead to withdrawal of an offer of employment.

We make every subject of a Disclosure aware of the existence of the DBS Codes of Practice and make a copy available upon request.

We will discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

## Handling, use, storage and access, retention and disposal

Headwise Ltd fully complies with the DBS Codes of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure information. In addition, the Headwise fully complies with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it upon request.

Disclosure information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Once a recruitment (or other relevant) decision has been made; we do not keep Disclosure information for any longer than is necessary. For DBS Disclosures this is for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than these periods, we will consult the DBS about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Once the retention period has elapsed, any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

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