



PRIFYSGOL
BANGOR
UNIVERSITY

Disclosure and Barring Checks (DBS) Policy

Rev	Date	Purpose of Issue/Description of Change		Review Date
1.	05/11/2018	Updated Policy and process		3 years
2.	05/06/2026	Cosmetic changes primarily reflecting umbrella service.		3 years
Policy Officer		Senior Responsible Officer	Approved By	Date
Chief People Officer		Senior HR Officer	Campus Unions Forum	05/11/2018
			HR Strategy Group	08/06/2026

Purpose of the Policy

The Disclosure and Barring Service (DBS) has been established under the Protection of Freedoms Act 2012 and merges functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

The purpose of this policy is to state the University's procedures on the use of Disclosure and Barring checks within the staff recruitment process.

The policy covers all staff DBS checks, including for students who are employed as staff by the University or undertaking volunteering roles at the University where a check is required and are managed centrally by Human Resources. The policy supports a process that enables the University to recruit based on objective criteria that is fair and equitable and free from bias.

Scope

This policy is applicable to all staff recruited both internally and externally to the University, on both permanent and fixed-term contracts, who require a DBS check as part of their employment at the University. It is also applicable to individuals undertaking volunteering roles on behalf of the University where a check is applicable.

Responsibility

It is the responsibility of the Chief People Officer, reporting to the EDI & Wellbeing Committee and the Executive to implement, monitor and review this Policy across the University.

Deans of College, Heads of School, and Heads of Professional Services are responsible for the implementation and dissemination of the Policy within Colleges and Professional Services ensuring compliance.

Core Principles

1. The University will use an Umbrella service provider to undertake Disclosure and Barring Service (DBS) checks in order to obtain information to enable it to assess the suitability of applicants for employment for posts working with vulnerable groups or in positions of trust, and the renewal of such checks every 3 years.
2. The University will remain mindful of its duty of care and other legal obligations such as those it owes under the Health and Safety at Work Act 1974, the General Data Protection Regulation (2016/679 EU), the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) and the Equality Act 2010.
3. The University acknowledges that while it is under an obligation to obtain disclosures from the DBS for some staff and students, it is important to achieve a balance based on the assessment of the risk involved in particular roles and activities being carried out and recognising the legal limits on the range of positions for which checks may be sought.

4. The University will ensure that DBS checks will be undertaken and processed in a professional, timely and responsive manner and in compliance with current employment legislation.
5. The University will comply with the principles of DBS code of practice when processing data as part of the DBS checking procedures including the secure storage, handling, use, retention & disposal of DBS disclosures and disclosure information and with its obligations under the General Data Protection Regulation (2016/679 EU).
6. The University will review the policy and accompanying procedures in response to changes in legislation or practice.

Supporting Policies and Procedures

- Staff Disciplinary & Grievance Policies
- Child Protection Policy
- Fixed-term Contract Policy
- Policy regarding the Security, Storage and Retention of Applicant/Staff Disclosure / Criminal Records Information
- Recruitment and Selection Policy - Accompanying Procedures
- Research Ethics Policy
- The University's Privacy policy
- DBS Policy and Procedures including Privacy Policy

Relevant Legislation/Government Process/Framework (Including, but not limited to)

- The Criminal Justice and Court Services Act 2000
- General Data Protection Regulation (2016/679 EU) (GDPR)
- The Equality Act 2010 and Statutory Duties (Wales) Regulations 2011(SI 2011/1064)
- The Police Act 1997
- The Protection of Children Act 1999 and The Children Act 2004
- The Protection of Freedoms Act 2012
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order
- The Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012
- The Sexual Offences (Amendment) Act 2000
- National Security Vetting (NSV)
- The Terrorism Act
- Counter-Terrorism and Security Act 2015
- Terrorism (Protection of Premises) Act 2025
- Care Standards Act 2000
- Social Services and well-being (Wales) Act 2014

Appendices

Appendix 1

Procedure for Disclosure & Barring Service (DBS) Checking

Appendix 2

Regulated Activity

Appendix 3

Policy Statement on the Recruitment of Ex-Offenders

Appendix 4

Policy regarding the Security, Storage and Retention of Applicant / Staff Disclosure / Criminal Records Information

Appendix 5

Disclosure and Barring Service (DBS) Check Procedure Flow Chart – New Appointments

Appendix 6

Roles and Responsibilities - HR Checkers