

Disclosure and Barring Service (DBS) Policy

SUMMARY & AIM

This document outlines the criminal record and barring checks that Airedale NHS Foundation Trust is required to undertake in the appointment and on-going employment of individuals in eligible positions in the NHS as required by the Criminal Record and Barring Checks Standard which is one of a set of six standards that make up the [NHS Employment Check Standards](#).

Airedale NHS Foundation Trust is registered to use the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of employment within the Trust and the checks are designed to help prevent unsuitable people from entering the NHS workforce and gaining access to vulnerable groups. Carrying out a criminal record check helps employers prevent unsuitable people from entering the workforce and accessing adults, young people and children who are considered vulnerable because they are receiving health or care services.

TARGET AUDIENCE

Airedale NHS Foundation Trust (ANHSFT)
AGH Solutions Ltd
Immedicare
Integrated Pathology Solutions LLP
Integrated Laboratory Solutions LLP

All applications for NHS positions (prospective employees) and staff in on-going NHS employment. This includes permanent staff, staff on fixed-term contracts, volunteers, students, trainees, contractors, highly mobile staff, temporary workers, bank and agency staff

TRAINING REQUIREMENTS

Training and awareness is included as part of the recruitment and selection training. All managers/staff will continue to be supported and advised by the Recruitment and HR Business Partner team.

EVIDENCE OF IMPLEMENTATION

All relevant staff will receive a DBS check at appointment.

All managers/staff will be made aware of the policy and revisions to the process through e-mail and staff briefings. Prior to recruitment episodes all managers will be reminded of their responsibilities in relation to DBS checks.

KEY REQUIREMENTS

- This document provides clarity on the legislation which permits employers to obtain criminal record checks
- How checks can be obtained
- The application and portability of disclosure information provided by the Disclosure and Barring Service (DBS)
- Use of the DBS Update Service
- Duties to refer information to the DBS
- The handling and retention of information

DOCUMENT CONTROL

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Approved Documents Relating to This Policy

Document name	Document reference / hyperlink
Recruitment & Resourcing Policy	Recruitment & Resourcing Policy
Control of Contractors Policy	Control of Contractors Policy
Safeguarding Adults & Children Policy	Safeguarding Adults & Children Policy
Information Governance Policy	Information Governance Policy
Freedom to Speak Up & Whistleblowing Policy	Freedom to Speak Up & Whistleblowing Policy

Statement of changes made from version 4

Version	Date	Section & description
4	24.12.2024	Removed DBS Risk Assessment Element – no longer in use

List of stakeholders who have been asked to review this document

(list each person, a department or head of department with responsibilities)

Name	Title	Date
People & Organisational Development		19.05.2026
APG Working Group		20.05.2026

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TABLE OF CONTENTS

CONTENTS

1.	INTRODUCTION	4
2.	PURPOSE	4
3.	SCOPE	4
4.	POLICY	5
4.1	THE DBS PROCESS	5
5.	TRAINING & SUPPORT	9
6.	PROCESS FOR MONITORING COMPLIANCE	9
7.	ABBREVIATIONS & TERMS USED	10
8.	DUTIES (ROLES & RESPONSIBILITIES)	10
9.	REFERENCES	11
10.	APPENDICES	11
11.		
	EQIA	14

1. INTRODUCTION

The Foundation Trust complies fully with the [DBS Code of Practice](#) and undertakes to treat all applicants for positions fairly when the Disclosure service has been used to assess suitability. In line with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013 we will not discriminate against any individual on the basis of a conviction or other information revealed in a disclosure.

The Trust will also comply fully with our obligations under the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) the Code of Practice for registered persons and other recipients of disclosure information (April 2009) and section 124 of the Police Act 1997 pertaining to the safe handling, use, storage, retention and disposal of certificate information.

All NHS providers are required to be registered with the Care Quality Commission (CQC) and, as part of this registration are required to comply with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010 and the Care Quality Commission (Registration) Regulations 2009. NHS providers are required to provide evidence of compliance with the NHS Employment Check Standards as part of the CQC's annual regulatory framework.

2. PURPOSE

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).

This document outlines the Trust's policy on the use of Criminal Record Checks and recruitment of staff and professional visitors including volunteers with criminal convictions or those who are barred from working with vulnerable groups.

It is the responsibility of this Trust to ensure that staff employed by us are suitable and do not pose a threat to our service users. For this reason we access the services of the Disclosure and Barring Service (DBS).

In the UK, criminal record checks should be obtained through the Disclosure and Barring Service (England and Wales). This document specifically focuses on the criminal record checking requirements which apply to NHS positions in England. Where an individual has lived or worked overseas, the Trust may also request appropriate overseas police check or certificate of good conduct in line with NHS Employment Check Standards.

Further information on how to obtain a criminal record check can be found on the [.gov website](#).

This policy refers to vulnerable groups including children and adults. A child is anybody under the age of 18. An adult is considered vulnerable during the time which they require services including; health care; personal care; social care; assistance with cash, bills and shopping; assistance with the conduct of their affairs and conveying (transport in relation to health, personal or social care provision).

3. SCOPE

This policy applies to all individuals undertaking work with this Trust. This includes permanent staff, staff on fixed-term contracts, volunteers, students, trainees, contractors, professional visitors, temporary workers, bank and agency staff.

This policy will be made available to applicants at the outset of the recruitment process where a DBS request for disclosure of their criminal record will be required as part of the application/tendering process.

4. POLICY

4.1 THE DBS PROCESS

Airedale NHS Foundation Trust adheres to the national [Criminal Record Check NHS Mandatory Employment Check standard](#). Not all individuals being appointed into positions within the NHS are eligible for criminal record or barring checks. The need for a check and the level of check is determined by the activities and the type of access to patients they will have as part of a particular role. The eligibility and application process is governed by the Trust's Recruitment Team within the People and Organisational Development directorate as described under the Criminal Record Check NHS Employment Check Standards. The Trusts recruitment team refer to the [DBS Eligibility Tool](#).

Carrying out a criminal record check helps employers prevent unsuitable people from entering the workforce and accessing adults, young people and children who are considered vulnerable because they are receiving health or care services. Although important a DBS check is only one element of the recruitment process therefore Recruiting Manager's must ensure that any recruitment decision is made on the balance of what a criminal record check provides against all other evidence presented during the application, interview and employment check stages.

The disclosure certificates will be sent directly to the individual the check relates to. The Trust will receive an update directly from e-DBS confirming the DBS certificate status. If it is a positive disclosure the Trust will request a copy of the certificate from the individual as part of the pre-employment check process. Anyone that is subscribed to the update service will also be required to evidence their original disclosure.

Under this policy all staff have a duty to notify the Trust if they subsequently become subject to any convictions, police cautions, conditional cautions or other similar offences, at any point during their term of appointment. This includes volunteers and temporary/contracted workers.

The Trust will only ask for information that is strictly necessary to gain assurance of an individual's suitability for the role they are recruiting to. This is to ensure that we comply with the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). This is made clear within the Trusts advertising documentation to ensure applicants understand what information may be sought about them.

All new starters that require a DBS check for the role they are appointed to will not be permitted to start work until the DBS check is received as part of the pre-employment check process. A risk assessment cannot be used to negate the need for a DBS check.

LEVELS OF DISCLOSURE

The service manager is responsible for identifying whether the position requires a DBS check and, where a check is required, determining the appropriate level of check for the position. Advice should be sought from the recruitment team where required. The level of check identified by the service manager will be checked against a list held centrally to ensure consistency across the Trust. DBS check levels are: Basic, Standard, Enhanced and Enhanced with barred list check(s) (for eligible roles, including those involving regulated activity). The Trust will ensure it acts in accordance with the appropriate legislation and NHS Employers' guidance on DBS checks.

- **Basic Disclosure**
A basic DBS check shows unspent convictions and conditional cautions.
- **Standard Disclosure**
Is available for positions and licensing applications listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. Standard DBS checks show details of

spent and unspent convictions, cautions, reprimands and final warnings held on the Police National Computer, subject to the DBS filtering rules.

- **Enhanced Disclosure**

An enhanced DBS check contains the same information as a standard check but may also include any relevant information held by local police.

- **Enhanced Disclosure with barred list check(s)**

An enhanced DBS check with barred list check(s) can only be requested for eligible roles. Where a role involves regulated activity with children and/or adults, the Trust must request the appropriate barred list check(s) as defined under the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

DBS Eligibility Guidance can be found on the gov.uk website - [DBS eligibility guidance - GOV.UK](https://www.gov.uk/guidance/db-checks-eligibility)

REGULATED ACTIVITY

A 'regulated activity' is defined under the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, and covers certain activities involving working or volunteering with children and/or adults that meet specific criteria. Reference should be made to Appendix 1 for further information about 'regulated activity'. Either one or both barred lists may be checked depending on the responsibilities of the post.

It is illegal for an employer to knowingly employ someone in a regulated activity when the employer knows that the person is barred from that regulated activity.

It is also an offence for a barred person to work or seek to work in regulated activity within a sector from which they are barred. In the event a prospective employee appears on the Barred List guidance should be sought from DBS.

Where it is indicated on a DBS application form that the prospective employee will be working or volunteering with adults or children within a regulated activity, an enhanced level disclosure will be required with reference to the appropriate barred list (s).

- **Barred Lists**

There are two barred lists maintained by the Disclosure and Barring Service (DBS): the Children's Barred List and the Adults' Barred List. Checks against these lists can only be undertaken where the role is eligible and involves regulated activity with children and/or adults.

PAYMENT OF DBS CHECKS FOR SUBSTANTIVE AND BANK STAFF

DBS Checks are paid for by the Trust and then recharged to the new starter. On applying for a post at Airedale NHS Foundation Trust/AGH Solutions it is detailed in the advert that the full cost of the DBS check required for the post applied for would be payable by the appointed candidate. As part of the pre-employment check paperwork the candidates are asked to sign a form to confirm that they are happy for the full cost of the DBS check required as part of the role to be deducted from their first full months' salary.

PAYMENT OF DBS CHECKS FOR AGENCY AND CONTRACTORS

As the Trust does not employ these individuals directly, DBS checks are undertaken by the employing organisation who hold their own policies and process for the payment of DBS checks. The Trust will seek assurance of completion of a DBS check at the appropriate level before the individual completes an assignment.

DBS RE-CHECKS

There is no legal requirement for employers to undertake periodic DBS checks. The Trust will not undertake periodic DBS checks. However, if an individual declares a conviction or similar during the course of their employment a check will be undertaken, with the cost borne by the individual. See section below in relation to role changes and the requirement for rechecks.

EXISTING STAFF CHANGING ROLES WITHIN THE TRUST

If an existing member of staff has had a DBS check for their current position and they apply for a new role within the Trust which has the same or similar responsibilities, then a new DBS check will not be required unless their original check was issued more than 3 years ago.

A new check will always be required if the member of staff is moving to a new role which requires a different level of check or clearance against a barred list. The Trust's recruitment team will advise on the level of check required.

THE DBS UPDATE SERVICE

The DBS update service is available for prospective and current employees to subscribe to when they apply for a DBS check. Subscription to the service enables the portability of a previously issued disclosure certificate where individuals are changing roles and the new position does not alter the level of check required. The service allows for a subscribed person's criminal record information to be regularly updated. It therefore enables employers to manage risk more effectively where a worker's criminal record status subsequently changes while employed or volunteering.

The Trust encourages all prospective and current employees who require a DBS check for the type of role they work in to subscribe to the Update Service.

PORTABILITY

The DBS define 'portability' as meaning the re-use of a disclosure obtained for a position in one organisation and later used for another position in another organisation.

A new DBS disclosure is always needed for a new employee unless otherwise specified by this policy. The Trust will not accept DBS disclosures completed for/by another organisation unless they are on the DBS Update service or the transfer is covered within an existing agreed memorandum of understanding (MOU). The recruitment team must approve any such transfer.

Where accepting pre-disclosed information, the Recruitment team must be satisfied that they can evidence that a check has been done. On receipt of pre-disclosed information, the recruitment team must be satisfied that information can be authenticated and is genuine.

Information included as part of a DBS disclosure certificate reflects information known about the individual at the point of issue and has no term of validity. The Trust will therefore recommend the benefits of subscribing to the Update Service to all prospective employees.

Where a new position requires a different level of clearance i.e. they are moving into regulated activity for the first time, or where they were previously working with a different vulnerable group, then a new DBS check must always be undertaken.

The Trust will only accept original copies of the DBS certificate. Photocopies will not be accepted.

A portability agreement is currently agreed across WYAAT which applies to staff moving between Trust's for the purpose of an honorary contract. For this purpose only all pre-employment checks will be portable subject to satisfactory evidence which must be provided by the host employer and authorised by the recruitment team.

TEMPORARY WORKERS AND CONTRACTORS

Not all temporary workers and contractors are eligible for DBS checks. The Trust is responsible for ensuring that the appropriate level of check is in place for all temporary workers and contractors. The Temporary Staffing team will ensure the appropriate DBS checks are in place for all temporary workers. Service Managers, including AGH Solutions, are responsible for ensuring the appropriate DBS checks are in place for all contractors.

Resident Doctors

Doctors on educationally-approved rotational training are regarded as being in continuous employment during the full term of their training and are therefore required to have a DBS check, as a minimum, once every three years rather than each time they change rotation unless they are subscribed to the Update Service.

SELF-DISCLOSURE

Where the position is listed as exempt under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, the Trust makes it clear to applicants that we are entitled to seek information about all spent and unspent convictions that are not subject to the filtering rules introduced on the 29 May 2013 and that any information disclosed will be verified by obtaining a standard or enhanced check through the DBS.

Applicants are asked to self-declare on the application form and on the Model Declaration Form issued by the Recruitment team as part of the pre-employment check process. A self-declaration relies on the honesty of the individual to provide complete and accurate information.

The Recruitment Team obtains self-disclosures via Trac for anyone going through a recruitment process. Current employees wishing to declare can do so using the following forms available on the NHS Employers website: [Model DBS Declaration Form A](#) (Basic or No DBS Check) or [Model DBS Declaration Form B](#) (Standard or Enhanced DBS Check)

CHECKS THAT REVEAL A POSITIVE DISCLOSURE

Having a criminal record does not automatically mean that an individual cannot work or volunteer in this Trust or the NHS.

If a positive disclosure is received the Recruitment team will notify the Recruiting Manager and a HR Business Partner, ensuring they are provided with the following information.

- Application form
- Model declaration form
- DBS Certificate (original certificate not a photocopy)
- Positive disclosure risk assessment form

The Recruiting Manager and HR Business Partner will meet either face to face or virtually to review the information obtained. They will work through the Positive Disclosure Risk Assessment form to support them in making a fair, balanced and non-discriminatory decision as to the individuals' suitability for the role. It is important to ensure that we do not unfairly rule out individuals who are the best candidate for the role, meet all other necessary check criteria and no risks have been identified against the duties they would be required to perform.

As part of the process the Trust will take into consideration whether or not the content was disclosed at an appropriate point in the process.

The recruitment decision rests with the HR Business Partner following completion of the Positive Disclosure Risk Assessment with the Recruiting Manager.

If the DBS disclosure certificate simply reaffirms what the applicant has already disclosed to the Trust and that information has already been considered then we may issue an unconditional offer of employment.

Where the disclosure indicates that the DBS has made a barring decision against one or both of the barred lists, it is illegal for an employer to allow that person to engage in regulated activity from which they are barred. It is also a criminal offence for a barred person to apply for work or to engage in a regulated activity.

The same process will be followed when an existing member of staff has an updated DBS check or declares a caution or conviction. Action may involve invoking the Trusts Disciplinary procedure which may include termination of employment where appropriate.

Please access the Trusts Positive DBS Disclosure SOP available on Airesshare and the [NHS Employers Positive Disclosure Discussion Guide](#) for further support.

DUTIES TO REFER TO THE DBS

Under the Safeguarding Vulnerable Groups Act, the Trust has a legal duty to refer information to the Disclosure and Barring Service if an employee or volunteer has harmed or poses a risk of harm to vulnerable groups and, where they have dismissed them or removed them from working in a regulated activity with children or adults. This duty equally applies where an individual has resigned before a formal decision to dismiss or remove them from regulated activity has been made. This applies where the worker has been supplied by a third-party staffing provider for example and agency or contractor. The duty to refer also applies even when a report has already been made to another body, such as a professional regulatory or licensing body. Referrals should be made by the relevant senior manager supported by a HR Business Partner.

Further detailed information is available on the [NHS Employers website](#)

5. TRAINING & SUPPORT

Training and awareness is included as part of the recruitment and selection training. All managers/staff will continue to be supported and advised by the Recruitment team and HR Business Partner team as appropriate.

6. PROCESS FOR MONITORING COMPLIANCE

The Trusts pre employment check process is monitored via Trac (Trusts recruitment system). Each of the 6 NHS Pre-Employment check standards have to be completed before an applicant can commence work. The system will not allow candidates to progress until each check has been completed and all checks approved by the recruitment team.

Standard to be monitored	Process for monitoring	Frequency	Person responsible	Assurance Group
All new staff that are eligible for a DBS check receive one at recruitment stage / following an internal move	DBS Assurance Report	Monthly	Recruitment & Learning Service Manager	POD Governance Group
All staff in post that are eligible for a DBS have the correct level of check recorded in ESR	DBS Assurance Report	Quarterly	Recruitment & Learning Service Manager	POD Governance Group

Pre-employment Check Audit	DBS Process	In line with Audit Programme	Recruitment & Learning Service Manager	POD Governance Group
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7.ABBREVIATIONS & TERMS USED

Term	Meaning
CQC	Care Quality Commission
DBS	Disclosure & Barring Service
ESR	Electronic Staff Record
POD	People and Organisational Development
MOU	Memorandum of Understanding

8. DUTIES (ROLES & RESPONSIBILITIES)

Role	Duty
<i>Director of People and Organisational Development</i>	Has the delegated responsibility for providing assurance to the Board of Directors for them to discharge their duties in relation to this Policy.
<i>HR Responsibilities</i>	<p>The HR Team will provide advice and guidance to Managers on the implementation of the policy.</p> <p>Maintain the list of positions to determine the appropriate level of check, reviewing at least annually or when updated guidance is received.</p> <p>The Recruitment Team have responsibility for managing the DBS application process and treating disclosures according to DBS regulations.</p> <p>Undertake risk assessments for positive disclosures, including appropriate record keeping.</p> <p>Ensure all DBS checks are recorded on ESR.</p> <p>HR Business Partners must notify the Trust's safeguarding teams if they become aware of a member of staff that has been prosecuted for offence.</p> <p>The Recruitment Team and HR Business Partner Team will ensure secure handling, storage, retention and disposal of disclosure information in line with the Police Act 1997 and the DBS Code of Practice.</p>
<i>Manager's Responsibilities</i>	<p>If a manager becomes aware that a member of staff has committed an offence they are responsible for notifying their HR Business Partner. Managers must ensure that all applicants/new employees that are required to work in regulated activity with Children are not permitted by the Trust to commence employment until the outcome of a DBS check has been received.</p> <p>Consult HR Business Partners if they wish to employ an applicant with a criminal record.</p>

	Ensure that staff are aware that should they gain a conviction or caution after commencing employment, they must inform their manager immediately.
<i>Applicants Responsibilities</i>	<p>Individuals should complete job application form, declaration form and DBS application form accurately and honestly. Comply with the ID check and DBS check process and provide genuine and valid documentation.</p> <p>Individuals will be required to produce their original DBS disclosure upon receipt to the Recruitment team in an efficient manner prior to an unconditional job offer where requested.</p> <p>Any individual that unreasonably refuses to apply for a disclosure will have their conditional offer withdrawn.</p>
<i>Employees Responsibilities</i>	<p>Employees, Volunteers and Temporary Workers are to complete DBS application forms when requested as a condition of their employment.</p> <p>Employees have a contractual obligation to disclose any criminal convictions, cautions, reprimands and warnings that are subsequently acquired during their employment at the earliest opportunity. The disclosure should be made in confidence to their Line Manager who will be supported by HR Business Partner to consider the effect of the offence against the position held. Existing staff may be subject to Disciplinary action and possible dismissal if they knowingly fail to disclose relevant information in relation to their criminal record or barred list status.</p> <p>The Trust retains the right to request that a further disclosure is sought at any time regardless of the length of time elapsed since the last check.</p>
Assurance Group	POD Governance
Trust staff	Employees and other workers are responsible for of all applicable procedural documents as stated within individual job descriptions

9. REFERENCES

NHS Employment Check Standards:
 Criminal Record and Barring Checks
 The Protection of Freedoms Act 2012
 The Police Act 1997
 Rehabilitation of Offenders Act 1974
 The Safeguarding Vulnerable Groups Act 2006

10. APPENDICES

10.1 Appendix A POLICY STATEMENT ON THE RECRUITMENT OF EX-OFFENDERS

10.1 APPENDIX A - POLICY STATEMENT ON THE RECRUITMENT OF EX-OFFENDERS

1. As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Airedale NHS Foundation Trust complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly.
2. Airedale NHS Foundation Trust undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.
3. Airedale NHS Foundation Trust can only ask an individual to provide details of convictions and cautions that Airedale NHS Foundation Trust are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).
4. Airedale NHS Foundation Trust can only ask an individual about convictions and cautions that are not protected or filtered.
5. Airedale NHS Foundation Trust is committed to 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.
6. Please see Appendix A for Airedale NHS Foundation Trust written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.
7. Airedale NHS Foundation Trust actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.
8. Airedale NHS Foundation Trust select all candidates for interview based on their skills, qualifications and experience.
9. An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
10. Airedale NHS Foundation Trust ensures that all those in Airedale NHS Foundation Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
11. Airedale NHS Foundation Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
12. At interview, or in a separate discussion, Airedale NHS Foundation Trust ensures that an open and measured discussion takes 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.

13. Airedale NHS Foundation Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request.
14. Airedale NHS Foundation Trust undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

Equality Impact Assessment Form

Department/ Function:	People & OD Directorate		
Completed by:	Kelly Baxter, Recruitment and Learning Services Manager		
Assessment Completion Date:	19.05.2026		
Which groups have you consulted with?	Patients/Relatives/Public	N	<p>Please give details here: <i>(ie, what information have you considered as part of the EIA process?)</i></p> <p>The assessment has been informed by review of relevant safeguarding duties, the NHS Employment Check Standards, the DBS Code of Practice, the Rehabilitation of Offenders Act provisions, and the Trust's commitment to fair treatment and non-discrimination. Consideration has also been given through consultation with People & OD colleagues and staff side colleagues.</p>
	Departmental Colleagues	Y	
	Staff side colleagues	Y	
	Staff Networks	N	
	Other (inc external organisations)	N	
1) What is the impact on the following equality groups?			
Positive: <ul style="list-style-type: none"> • Advance Equality of opportunity • Foster good relations between different groups • Address explicit needs of Equality target groups 	Negative: <ul style="list-style-type: none"> • Unlawful discrimination, harassment and victimisation • Failure to address explicit needs of Equality target groups 	Neutral: <ul style="list-style-type: none"> • It is quite acceptable for the assessment to come out as Neutral Impact. • Be sure you can justify this decision with clear reasons and evidence if you are challenged 	
Equality Groups	Impact (Positive/ Negative/ Neutral)	Comments Provide brief description of the impact identified	
Race (all ethnic groups)	Neutral	The policy applies DBS and recruitment requirements consistently across all ethnic groups and includes an explicit commitment to fair treatment and non-discrimination. Individual decisions must continue to be made on a case-by-case basis to minimise the risk of disproportionate impact.	
Disability	Neutral	The policy is concerned with lawful safeguarding and recruitment requirements rather than disability status. Reasonable adjustments may be required in practice during recruitment and onboarding; however, no adverse impact arises from the policy wording itself.	
Sex	Neutral	DBS requirements and recruitment decisions under this policy are not determined by sex and apply consistently across all staff groups.	
Gender Reassignment	Neutral	DBS requirements and recruitment decisions under this policy are not determined by gender and apply consistently across all staff groups.	

Religion or belief	Neutral	The policy is based on statutory employment checks and safeguarding requirements and is not influenced by religion or belief.
Sexual Orientation	Neutral	The policy applies consistently regardless of sexual orientation and includes a clear commitment to fair treatment.
Age	Neutral	The policy applies to role requirements and legal eligibility for checks rather than age. References to children are included solely for safeguarding purposes.
Marriage and Civil Partnership	Neutral	Marital or civil partnership status is not relevant to DBS eligibility or recruitment decisions under this policy.
Pregnancy and Maternity	Neutral	The policy does not distinguish on the grounds of pregnancy or maternity and applies the same statutory checking requirements to all relevant roles.
Carers	Neutral	Carer status is not a factor in DBS eligibility or decision-making under this policy. Any practical support requirements would be managed operationally rather than through the policy itself.

If your assessment identifies a negative impact on equality groups you must develop an action plan to avoid discrimination and ensure opportunities for promoting equality, diversity and inclusion are maximised. This should include where it has been identified that further work will be undertaken to further explore the impact on equality groups. This plan should be reviewed annually.