

This policy was reviewed: July 2019
This policy will be reviewed: July 2022

This policy is owned by the Director of People



DISCLOSURE CHECKS POLICY

THE FRAMEWORK FOR ALL PEOPLE POLICIES

We proudly place our organisational values and behaviours, [the Unicef Way](#), at the heart of everything we do at Unicef UK. They shape the letter and spirit of our People policies and procedures and serve as guiding principles.

We are committed to creating policies which reflect and promote [equality, diversity and inclusion](#). We live this out through our values, working practices and through creating an organisation and culture that represent and embrace the world around us. We want you to feel safe to bring your unique and best self to work. We'll support you by making adjustments to suit your needs where feasible. Your uniqueness and authenticity matter to us.

WHAT IS THE PURPOSE OF THIS POLICY AND WHO DOES IT APPLY TO?

Our commitment to children's rights also means a commitment to safeguard the children with and for whom Unicef UK works. In order to meet this commitment, we will carry out background checks to the highest appropriate level – the minimum being a basic disclosure check – for all eligible employees, trustees, volunteers, agency workers, casual workers and consultants, or anyone working for or on behalf of Unicef UK.

WHAT TYPES OF CHECKS DO WE USE?

There are a range of checks available through the Disclosure and Barring Service (DBS). The People team will work with the Head of Safeguarding/Safeguarding Specialist and the line manager to determine the appropriate level of check for each role, seeking advice from the DBS when needed. The level will be stated in the job description, and the requirement for a check will be in our job adverts along with the sentence 'Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the role and the circumstances of your offences'.

It is unlawful to seek an enhanced level of criminal check without sufficient justification.

1. Where a role will not have regular contact with children, individuals will be subject to a **basic** disclosure. All our roles that do not require a higher level of check will be subject to this basic level. This check will only disclose any 'unspent' criminal convictions you may

have in the UK (under the Rehabilitation of Offenders Act 1974, some criminal convictions can be treated as 'spent' after a period of time, meaning they are not relevant to a basic disclosure).

2. Where a role requires contact with children, and depending on what the nature of that contact is, individuals will be subject to a higher level check. There are three types of check within this category, depending on the frequency and type of contact with children:
 - **Standard:** for roles where individuals will have contact with children, but their role doesn't require direct contact (e.g. BFI assessors). This checks for spent and unspent convictions, cautions, reprimands and final warnings
 - **Enhanced without barred list checks:** for roles where individuals have regular contact with children (e.g. Members of the CRP team who are regularly consulting with children and young people). This includes the same checks as the standard plus any additional information held by local police that is reasonably considered to be relevant to the role.
 - **Enhanced with barred list checks:** this is the highest level of check and is only appropriate for roles (e.g. RRSA assessors) classified as 'regulated activity' i.e. work involving regular unsupervised contact with children or work in a 'specified place' with opportunity for contact e.g. schools, children's homes, and childcare premises. This includes the same check levels as the above plus a check of the DBS barred lists (lists of individuals deemed unsuitable for working with children).

Individuals who have subscribed to the DBS Update Service will have a 'portable' DBS clearance and may not be required to undergo an additional check with Unicef UK if their existing check level is relevant and appropriate to the role. In these circumstances Unicef UK will confirm through the continuous updating service that the applicant's DBS status has not changed.

As an additional or alternative measure, Unicef UK may require an individual to complete a self-declaration and disclosure form (e.g. for short term volunteering positions where there is insufficient time to apply for a basic disclosure).

WHAT DO WE MEAN BY 'REGULATED ACTIVITY'?

The criteria for Regulated Activity are set out in legislation and is as follows:

- at least weekly,
- four times or more a month, or
- overnight (2am-6am)

WHAT DO WE MEAN BY 'REGULAR CONTACT'?

This is less frequent or intensive than Regulated Activity and, whilst there is no prescribed definition, we will decide on a case by case basis using the following as a guide:

- once per month
- six times a year
- every day for two weeks

All other contact with children will need to be supervised.

WHAT DO WE MEAN BY 'SUPERVISED CONTACT'?

At Unicef UK, we define supervised contact as meaning you'll be within ear-shot and eye-sight of a nominated person at all times when in contact with children. Consequently, contact is considered unsupervised if you're not within these bounds.

WHO WILL SEE MY DISCLOSURE CERTIFICATE?

We appreciate that confidentiality may be of concern to individuals in the disclosure checking process. The People team will ensure that disclosure information is shared with the minimum number of people necessary. Certificates are opened and viewed by a People Business Partner and will not be shared unless they contain content which requires further review (see section called "What happens if I have offences listed on my disclosure?"). Certificates remain the property of the individual and will be securely stored in locked cabinets until such time as you are able to collect them. The only information that will be retained by Unicef UK following the process will be the disclosure number.

WHAT HAPPENS IF I HAVE OFFENCES LISTED ON MY DISCLOSURE?

Unicef UK will treat all individuals who have a criminal record fairly, and will not discriminate unfairly against individuals on the grounds of a previous conviction which is not relevant to the role applied for. We can only ask you to provide details of convictions and cautions that we are legally entitled to know about, i.e. where a DBS certificate at either standard or enhanced level can legally be requested.

Having a criminal record will not necessarily mean that you will be unable to take up a role with Unicef UK. Any content of a safeguarding nature that is disclosed at any stage of the recruitment process will be risk-assessed by the [Unicef UK Safeguarding Group](#).

The People team is available to provide further information and guidance on this process. The EAP service is also available to employees needing personal support on sensitive issues.

WHEN WILL CHECKS BE CONDUCTED?

All offers to work or volunteer with us will be conditional upon satisfactory checks. The checks we use include a robust interview process, references and the relevant background check described above.

WHAT IF I LIVE OR HAVE LIVED OUTSIDE THE UK?

We will ask you to provide a police check or 'certificate of good character' for every country you have lived in for more than three months in the last five years, while aged 18 or over. Further information is available [here](#). We recognise that is not always possible to obtain a certificate e.g. from countries that do not have a system for criminal record checks or refuse to provide these to overseas employers. In such instances, we will ask you to sign a self-declaration form and we will request character references covering the relevant period(s) of residence outside the UK. For roles requiring a standard or enhanced check, we may additionally contact the embassy or High Commission of the country in question.

HOW LONG IS MY CERTIFICATE VALID?

Whilst there is no official expiry date on these certificates, we will ask for checks to be renewed every three years.