

Hallam Volunteering takes all necessary measures to ensure the health and safety of everyone involved in its activities. These measures are taken in accordance with Hallam Union's Health and Safety Policy.

Only staff who are approved CRB Countersignatories, or those specifically trained for the purpose, will process CRB Disclosure applications and have access to Disclosure information.

Compliance

Applications for CRB Disclosures will comply with guidance contained in the CRB Code of Practice, Explanatory guidelines and Disclosure Information Pack. Copies are available in the Hallam Volunteering office.

Staff will be expected to familiarise themselves with this information and keep abreast of any updates. Queries or problems should be directed in the first instance to the Hallam Volunteering Manager or Union General Manager otherwise to the Criminal Records Bureau on 0870 90 90 811.

Applicants will be told: what a CRB Disclosure is, why the project requires the Disclosures, what types of ID can be used (see appendix I).

Service standards

Volunteer applications will be completed in the Hallam Volunteering office. This service will be available during project meetings and by arrangement with the relevant Counter signatory.

All staff involved in the processing of CRB Disclosures will ensure that other duties are put aside so that applications can be completed and information can be processed securely.

Staff will treat all information confidentially and will exercise discretion when clarifying particulars with the applicant. Staff will be aware of the implications for confidentiality whilst working in an open plan environment and where possible, will try to minimise discussion of personal information through the use of best practice.

Usage

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

Volunteers will be students, staff members or graduates of Sheffield Hallam University.

Under CRB guidelines, a volunteer is defined as:

“...a person who is engaged in any activity which involves spending time, unpaid (*except for travelling and other approved out of pocket expenses*), doing something which aims to benefit a third party other than or in addition to a close relative.”

Hallam Volunteering will undertake an enhanced CRB check for all those who apply to volunteer with children or vulnerable adults on specified projects and who have been resident in the UK for at least 5 years unless the applicant can provide their own CRB Disclosure (refer to 'Guidance on Portability').

Enhanced Disclosures are primarily for posts that involve working with children or vulnerable people and contain the following:

- Details of all convictions, cautions, reprimands and warnings held on the Police National Computer (PNC)
- Information from the Independent Safeguarding Authority's barred lists (which include the POVA, POCA and List 99).
- local police force information considered relevant by Chief Police Officer(s).

All projects where volunteers are in contact with children or vulnerable people once or twice will be subject to an Enhanced Level check. One off events may not require a Disclosure. Committee members will be checked at Enhanced Level.

If an acceptable Disclosure is not received prior to volunteering, some volunteers may engage in activities providing that written consent is obtained in advance from partnership organisations. Volunteers working with participants on a one to one basis must have an appropriate Disclosure prior to contact with the participant.

Hallam Volunteering will accept a Disclosure conducted by another registered body if:

- The CRB check was carried out by Sheffield Hallam University (valid from the beginning of the student's course)
- The level and content of the CRB check is suitable for the position
- The original, untampered copy to be seen by a member of Hallam Volunteering staff

Each Disclosure shows the date on which it was printed. Disclosures do not carry a pre-determined period of validity and once the Disclosure is accepted by Hallam Volunteering students will not have to apply again to volunteer in subsequent years (unless the level of check has changed.)

Complete address histories and acceptable original identification documents must be produced. Volunteers who have not been resident in the country for the previous 5 years will not be eligible for a Disclosure.

Handling

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.

Information obtained through CRB Disclosures will be only be available to staff members who require access for the purposes of administration and screening.

It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Storage

All information pertaining to CRB Disclosures will be stored securely and all work which requires access to this information will be restricted to the office.

Staff members should particularly note that this precludes them from undertaking this work in any other campus location or at home.

CRB Disclosures are delivered by post. On arrival into the office, these will be dealt with immediately by the relevant staff member and information filed securely in the volunteer records cupboards / on the volunteer database. This will include: copies of 'Additional Information' provided to the CRB and 'Disclosure Records'.

For **paper based information**, secure storage will be the volunteer record cupboard in the office. This will include: partially completed applications and records of applications made correspondence with the CRB and Disclosures (kept in the 'CRB Disclosures' File). This information will be filed separately from the applicant's volunteer form and other personal information.

Information will be kept locked in the cabinet unless it is required for a specific task or job. Whilst working, staff members will keep files/documents near to hand and out of the sight of others.

Information will be returned to secure storage as soon as the task is complete.

Other than IT departmental staff (who require access for essential maintenance), the persons authorised to access electronic information will be Hallam Volunteering staff and information held on databases will also be password protected.

Retention

Once a recruitment (or other relevant) decision has been made, The Union will not keep Disclosure information for any longer than necessary. This is generally for up to 5 years to allow for the consideration and resolution of any disputes or complaints.

Once a record has been taken (see 'Disposal'), the original Disclosure will be destroyed by secure means. Photocopies will not be kept.

Where it is necessary to send '**Additional information**' (section H) to the CRB this will include ; the full name of the applicant, the form reference number, the registered body number, what documents have been seen and a complete address history. This information will be provided to the CRB on a standard template.

Any other written information which has been provided will be returned to the volunteer or destroyed by secure means.

Incomplete applications

If an application cannot be completed in the same day for any reason then partially completed forms will be stored securely in the CRB file along with a note of what documentation has been seen already (for example, type of bank statement, date of issue). Once the application is complete, this note will be destroyed by secure means.

Disposal

Once the retention period has elapsed, Hallam Union will destroy any Disclosure information by secure means (i.e. shredding).

However, Hallam Union will keep a record of: the date of issue, the name of the subject, the type of Disclosure requested, the unique reference number and details of the recruitment decision taken. This information will be stored electronically.

Whilst awaiting destruction Disclosures will be stored securely and treated in accordance with normal procedures.

Portability

Requests from applicants to see or duplicate a CRB Disclosure will be refused. Under CRB guidelines, information on a Disclosure **will be shared with another organisation** once the following criteria are fulfilled:

The organisation concerned (i) can show the request and the person seeking the information is genuine (ii) is seeking to employ the individual as a volunteer or paid employee, (iii) provides a written request to Hallam and (iv) provides signed statement from the applicant authorising the release of the information.

Once all four criteria are satisfied, Hallam Volunteering will confirm whether or not the information provided by the organisation reflects what is on our copy of the Disclosure and if the police did or did not issue additional information issued under separate documents.

No other information relating to the individual (e.g. address, date of birth etc) and their record (e.g. criminal convictions etc) will be shared.

Under CRB guidelines, **if the applicant can provide their own CRB Disclosure**, staff will ensure that the document:

- is the applicant's own copy (request to see other identification),
- is original (not photocopied or duplicated),
- has not been tampered with (check security features),
- has been issued within last 12 months (check date of issue)

and also that:

- the level is at least that required (see 'Project List')

If the Disclosure is enhanced, the Registered Body who requested the check will need to be contacted or a new CRB Disclosure taken up. If all checks are satisfied, a copy will be taken for the purposes of making the recruitment decision with the permission of the applicant.

CRB Disclosures and International Students (or others who have lived outside of the UK for long periods)

Hallam Volunteering recognises that a criminal record check is one of many measures at its disposal which it can use to protect client welfare and as such, its requirement must be properly justified within a framework of equal opportunities. We are unable to obtain criminal record checks for International students simply because there is no facility to do so.

In accordance with the Union's Equal Opportunities Policy, Hallam Volunteering will ensure that its volunteer opportunities are open to all students wherever possible.

CRB Disclosures will be taken up for all those who have lived in the UK for at least 5 years. In the case of International students or those who have lived outside of the UK for more

than 3 months during the past 5 years, the host organisation will be informed that this is the case.

Activities or roles which offer volunteers regular access to children or vulnerable adults (e.g. 1 to 1 mentoring, leadership roles etc) will not be open to volunteers for whom we cannot obtain a meaningful criminal record check.

Parents / carers and partnership organisations will be informed that this is our policy before they make a decision about the involvement of their child / client.

Recruitment of ex-offenders

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to assess applicants' suitability, Hallam Volunteering complies with the CRB Code of Practice and undertakes to treat all applicants for positions fairly and undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

Hallam Volunteering is committed to upholding the Union's Equal Opportunities policy. We actively promote equality of opportunity for all and welcome applications from a wide range of candidates, including those with criminal records.

For roles where a Disclosure is required, applicants will be informed at the outset and will be encouraged to provide details of their criminal record at the start of the application process. We request that this information is sent under separate, confidential cover, to the Hallam Volunteering Manager and or Lead Signatory (as appropriate) and we guarantee that this information will only be seen by those who need to as part of the recruitment process.

Failure to reveal information that is relevant to the position sought or making a false declaration could lead to the withdrawal of the conditional offer of a voluntary placement.

Unless the nature of the position allows Hallam Volunteering to ask questions about an applicant's entire record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We make every subject of a CRB Disclosure aware of the CRB Code of Practice and make a copy available on request.

If a conviction has already been revealed a meeting may take place when the disclosure is received.

If a Disclosure reveals a conviction and it has not previously been revealed by the applicant to the Hallam Volunteering Manager or Lead Signatory the following will take place.

The applicant will be invited in for a meeting. They will be asked why they did not initially disclose the conviction. The nature of the offence and the suitability of the role will be discussed. A decision will be made on a case-by-case basis by the Hallam Volunteering Manager and relevant Co-ordinator and/or the Lead Signatory if felt necessary.

This will be done before withdrawing a conditional offer of a voluntary placement.

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

As a general rule, we will only withdraw a conditional offer of a voluntary placement or employment if an offence is revealed that is directly relevant to the position.

If the applicant does not agree with the decision, the Union Complaints Procedure should be followed, which can be found in the Constitution.

Updated July 2009

Needs review **before July 2010** for next stage of new Vetting and Barring Scheme