

## **Appendix 4      List of Policy Documents**

Diocesan and **Parish** Policy Statement on the recruitment of ex-offenders

The Policy Statement of the Bishop of Worcester in his corporate capacity in respect of Disclosures from the Criminal Records Bureau

**Parish** Policy Statement in respect of Disclosures from the Criminal Records Bureau

Diocesan Policy Statement on the handling, use, storage and disposal of Disclosures

**Parish** Policy Statement on the handling, use, storage and disposal of Disclosure information

## **Policy on the Recruitment of Ex-Offenders**

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to assess applicants' suitability for positions of trust, the Diocese of Worcester complies fully with the CRB Code 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 conviction or other information revealed.

This written policy on the recruitment of ex-offenders is made available to all Disclosure applicants at the outset of the recruitment process.

We actively promote 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. We select all candidates for interview based on their skills, qualifications and experience.

A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a disclosure is required all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of an individual being offered the position.

Where a Disclosure is to form part of the recruitment process we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information ('Confidential Self Declaration') is sent under separate, confidential cover to a designated person within the Diocese of Worcester and we guarantee that this information is only seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows the Diocese of Worcester to ask questions about an entire criminal record we only ask about "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in the Diocese of Worcester who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, eg the Rehabilitation of Offenders Act 1974.

At interview, or in separate discussion, we ensure 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.

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

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

**Parish Statement of policy in respect of Disclosures from the Criminal Records Bureau when using the facility offered by the Bishop of Worcester in his corporate capacity as an Umbrella Body registered with the Criminal Records Bureau.**

- I. The Parish of ..... is committed to complying with the CRB Code of Practice and committed to the fair and sensitive use of Disclosure information, and where an applicant feels that this has not happened an appeal process will be available, details of which can be obtained in writing from the PCC Secretary (or whoever) or from the Diocesan Secretary, The Old Palace, Deansway, Worcester WR1 2JE.
- II. The Parish of ..... is committed to the recognition of each individual's abilities, skills, experience and qualifications and will take every step to ensure that these are given appropriate weight and consideration in the appointment or recruitment process.
- III. The Parish of ..... will ensure that each paid post or volunteer position is assessed for the appropriateness of a CRB Disclosure, that any advertisement or other indication of a paid post or volunteer position will indicate the level of Disclosure to be sought, and that any offer of a paid post or volunteer position will be subject to the receipt of satisfactory Disclosure information. Every change in role or responsibilities will be regarded as a new post for CRB Disclosure, in line with recommendation from the House of Bishops.
- IV. The Parish of ..... will request candidates for a paid post or volunteer position to submit in writing any convictions or other disqualifying behaviour that might be revealed in the Disclosure process in order to assist the recruitment decision process. This information will only be taken into account when relevant to the post in question. It should be submitted in an envelope clearly marked 'Private and Confidential' and handed to the person specifically identified for this purpose in the recruitment process.
- V. The Parish of ..... is committed to encouraging the re-submission of applications for Disclosure in respect of all paid employees and volunteers for whom this is appropriate as part of its ongoing strategy for the protection of children and vulnerable adults, in line with recommendations from the House of Bishops.
- VI. The Parish of ..... will also encourage, for appropriate posts, the submission of applications for Disclosure in respect of paid employees and volunteers already in post before Disclosure was available. It will operate a timetable for these submissions to be completed.
- VII. The Parish of ..... is committed to the safe storage and disposal of disclosure outcome information in line with guidance from the Diocesan Office. Its policy is attached.

**Appeals and complaints procedure**

Every effort is made to ensure that all recruitment decisions involving Disclosure information are made sensitively and fairly. Should an applicant for a paid post or volunteer position feel that this has not happened in their case the matter can be referred to the Diocesan Secretary, The Old Palace, Deansway, Worcester WR1 2JE who will instigate an independent assessment of the issues in question.

The applicant should submit the appeal or complaint in writing within 6 months of the Disclosure, stating their name and address, the nature of the complaint or appeal, the date of the Disclosure document concerned, the identity of the person or appointing body responsible for making the appointment to the paid post or volunteer position, and any other relevant information.

Signed .....

(on behalf of the appointing body)

Date .....

(A signed copy of the policy should be returned to the diocesan Administrator for CRB)

# **Diocesan Policy on Handling, Storage and Disposal of Disclosures**

## **Storage**

Disclosure information is not kept on an applicant's personnel file. It, together with self declaration information, is always kept separately and securely in a locked filing cabinet in a locked room. The 'Verification of Identity' certificate, together with a photocopy of the completed application form for disclosure are kept similarly and destroyed in accordance with 'Disposal' as referred to below. Where information is kept electronically steps are taken to ensure it cannot be accessed by unauthorised persons. Access to this information is strictly controlled and limited to those who are entitled to see it as part of their duties (Administrator for CRB).

In accordance with the CRB Code of Practice the following information is kept securely:

the name of the subject of a disclosure, the position held, the type of disclosure, the unique number issued by the Bureau, the date of the disclosure and the recruitment decision taken.

## **Handling**

Disclosure information is only passed to those who are authorised to receive it in the course of their duties. A record is kept of all those to whom disclosures or disclosure information has been revealed. It is a criminal offence to pass this information to anyone not entitled to receive it.

## **Use**

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

## **Retention**

Disclosure information is kept for a maximum period of 6 months to allow for the consideration and resolution of any disputes or complaints. The CRB would be consulted if it were considered necessary to keep disclosure information any longer than 6 months.

## **Disposal**

Disclosure information is destroyed by secure means (shredding). Prior to this it is kept only in the locked filing cabinet. No photocopy or other image of the disclosure will be made or kept. A record of the name of the subject, the position for which the disclosure was requested, the unique reference number, the date of issue of the disclosure and any recruitment decision will be held in a locked filing cabinet in a locked room to which only the Bishop, Administrator for CRB, Bishop's Representative for Child Protection, Diocesan Secretary and other authorised countersignatories will have access.

As an umbrella body, all reasonable steps will be taken to ensure that other recruiting organisations (parishes) handle, use, store, retain and dispose of disclosure information in accordance with the CRB Code of Practice and full accordance with this policy.

## **Parish Policy on Handling, Use, Storage and Disposal of Disclosure Information in the Parish**

Disclosure information should not be stored in the parish. Only a log is kept, listing

- applications sent to the Diocesan Administrator for CRB, together with the reasons for requesting enhanced disclosure
- any posts for which it has not been deemed necessary to request a disclosure, together with the reasons for the decision

When the notification of the outcome of a disclosure is received, including any conditions, this is stored with the applicant's self declaration form in a locked cabinet under the control of the incumbent/priest in charge/team vicar, or during a clergy vacancy, in the care of the churchwardens.

Copies of application forms are not taken and parishes should not accept or hold copies of an applicant's copy of the disclosure.