

**Disclosure and Barring Service Certification
School of Medicine Policy and Procedure**

1. Introduction and Background

- 1.1 Admission to and continuation on the MBBS/BSc and MBBS programme(s) at Imperial College London is subject to the Rehabilitation of Offenders Act (1974) Section 4(2) (Exemption) Order 1975 and DHSS Circular HC (88)9 guidelines regarding child protection and police checks. As a condition of acceptance/continuation, all applicants and continuing students are required to have completed an enhanced Disclosure and Barring Service (DBS) check (formerly known as a Criminal Records Bureau [CRB] Disclosure) by a given deadline.
- 1.2 A DBS Certificate is a document containing information held by the police and government departments. The DBS, an executive agency of the Home Office, provides these Certificates. An enhanced DBS Certificate contains details of:
- 1.2.1 All convictions held on the Police National Computer (PNC) including current and “spent” convictions as well as details of any cautions, reprimands or final warnings; and in some cases, Fixed Penalty Notices. (It is a commonly held misbelief that all criminal records are wiped from police records when a person reaches the age of 21. This is not the case).
 - 1.2.2 As the MBBS programme involves working with children and vulnerable adults, the certificate will indicate whether information is held on DBS lists of those who are barred from working with children or are unsuitable to work with vulnerable adults.
 - 1.2.3 Any additional local police records. If local police records contain information the Chief Officer of police may release information for inclusion in an Enhanced Certificate. Exceptionally, and in a very small number of circumstances (typically to preserve the integrity of current police investigations), additional information may be sent separately to the University that cannot be revealed to the applicant.
- 1.3 The College does not wish to debar individuals with criminal records and Fixed Penalty Notices from taking advantage of the opportunities provided by Higher Education. In general, a criminal record is not to be regarded as an obstacle to studying at Imperial. However, the College must also balance its responsibilities to provide a safe and secure environment for its staff, students, visitors, patients and others. In addition, it must consider the demands of various professional bodies and requirements under the law as detailed above.
- 1.4 In assessing criminal records, the College will balance the interest of the applicant with its duty of care to special categories of people. The College does reserve the right to refuse to admit applicants where their criminal record makes it inappropriate for them to be admitted. The College also reserves the right to refer existing students to a Fitness to Practise Panel upon the disclosure of a positive DBS Certificate, the outcome of which could lead to a student being asked to withdraw from the College where their criminal record makes it inappropriate for them to continue with their programme of study.

- 1.5 The test which will be applied when deciding whether the criminal record of an applicant/existing student gives reasonable grounds for refusing admission or continuation of study is whether the student:
 - 1.5.1 Poses a real threat to the safety or property of staff, students, visitors, patients in the Trusts with whom we work and those coming into contact with the student during their studies; or
 - 1.5.2 Would be contrary to the law or to the requirements of any relevant professional or other regulatory body.

2. Assessment of New Applicants

- 2.1 A statement about criminal records disclosure is published on the College website and in the information sent to applicants when they are made an offer. This states that a criminal record may not necessarily be a bar to being accepted onto the programme of their choice. The College Policy on the Recruitment of Ex-Offenders and the Criminal Records Policy Statement Relating to Students are available at <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/registry/academic-governance/public/academic-policy/admissions/Disclosure-and-barring-service-policy-statement.pdf> and <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/registry/academic-governance/public/academic-policy/admissions/Policy-on-the-recruitment-of-ex-offenders.pdf> and copies of both are attached (Appendices 2 and 3).
- 2.2 The UCAS application form prompts applicants to declare any criminal record.
- 2.3 All applicants are required to disclose spent and unspent offences when submitting information to the Admissions Office in accordance with paragraph 2.2 above. This includes reporting the receipt of any Fixed Penalty Notices or fines. At this stage, all applications, whether or not any criminal record information has been revealed by the applicant, will be considered in the normal way alongside all other applications.
- 2.4 Applicants will be asked to complete their application forms for enhanced with lists DBS checks by a deadline, usually by 30 April (for A300) or 30 June (A100 and A109) respectively of the year of the admissions cycle. Candidates are notified that the offer will be withdrawn if they fail to meet this deadline. The School will review cases on an individual basis. A conditional offer holder is requested to complete the DBS application form, the DBS completion guidelines and Registry guidelines. Copies of the DBS guidelines are available at <https://www.gov.uk/government/collections/dbs-checking-service-guidance--2>
A copy of the Registry guidelines is attached (Appendix 4).
- 2.5 The completed DBS Certificate application is forwarded to the DBS for immediate processing and prior to fulfilment of any other offer conditions. Applicants who have revealed criminal records to the Registry, in accordance with paragraphs 2.2 and 2.3 above, will be asked to complete and return their DBS application forms at that stage and they will be submitted immediately to the DBS for processing. Candidates will be advised that no formal decision will be made on any disclosed offences until the Certificate has been received from the DBS. In the event that a Certificate is not received from the DBS prior to the start of the academic year, it may be necessary to defer a candidate's offer for the coming year. The School will review cases on an individual basis.
- 2.6 Candidates who have never lived in the UK will not be required to complete a DBS application prior to entry but are required to provide a Certificate of Good Conduct from their government or police force by the above deadline. Prior to entry

into Year 5 of the programme, they will be required to complete an enhanced disclosure.

- 2.7 If information relating to offences is withheld, erroneous, or is given in an incomplete form by the applicant, then the College reserves the right at any stage to reject their application. All positive DBS Certificates are considered by a minimum of two senior members of the Faculty of Medicine or its associated Trust e.g. a senior member of clinical staff and a senior member of the Faculty forming a DBS Review panel, supported by the Faculty Education Office (FEO):
 - 2.7.1 The DBS Review panel members will review the criminal record and the applicant may be asked to submit his or her own statement;
 - 2.7.2 The applicant may then be called for interview and seek additional background information on the circumstances surrounding the criminal record;
 - 2.7.3 The DBS Review panel may, for example, require the applicant to provide information from third parties who may have a view on the above matters;
 - 2.7.4 These parties may include probation officers and others who are professionally or personally involved in the rehabilitation of, or are familiar with, the applicant;
 - 2.7.5 The DBS Review panel may also seek specialist advice.
- 2.8. In reaching their decision the panel may consider one or more of the following:
 - 2.8.1 Whether the criminal record or other matter revealed is relevant to the programme on offer (including any secondments or placements);
 - 2.8.2 The seriousness, frequency and pattern of any offences;
 - 2.8.3 Whether the offences were premeditated;
 - 2.8.4 Whether the offences involved violence or threats of violence;
 - 2.8.5 Whether the circumstances surrounding the offences were unique;
 - 2.8.6 Whether the student's circumstances have now changed;
 - 2.8.7 Whether the applicant has adequately taken responsibility for his/her actions and shown remorse;
 - 2.8.8 What evidence the applicant produces to support the view that he/she is unlikely to offend again;
 - 2.8.9 How recently the offence was committed;
 - 2.8.10 The implications of any lack of appropriate judgement on their future medical career.
- 2.9. It is the responsibility of the Student Services Manager within the School of Medicine to keep the Student Monitoring Group informed of each case under review.
- 2.10. The decision of the DBS Review panel is forwarded to the School of Medicine Student Monitoring Group for ratification. The outcome of this process will be either:
 - 2.10.1 Admission of the applicant is permitted (subject to the meeting of all other requirements of admission). In these circumstances, at the start of the academic year the Chair of the Student Monitoring Group will send the newly-admitted student a formal written warning noting the seriousness and possible repercussions (including referral to a Fitness to Practise Panel) of any further breaches of the standard of behaviour required in the medical profession, or
 - 2.10.2 A recommendation is made to the College Registry that the student's application for admission to the MBBS/BSc or MBBS programme be rejected.
- 2.11. The Chair of the Student Monitoring Group should notify the College Registry normally within 5 days of its recommendation.
- 2.12. The decision is then communicated to the applicant in writing, normally within 14 days of the Student Monitoring Group meeting. If a conditional offer is withdrawn

because of the decision, then the notification should provide a summary of the reasons (if not precluded under DBS regulations). An opportunity to discuss alternative career/programme options within the College with a senior member of the School /College should be offered and details of the appeal process included.

- 2.13. Appeals to the Academic Registrar should be made in writing within 28 days of the date of the notification. Appeals are considered by a panel comprised of a lay member of the Imperial College Court, the Clinical Dean and a further experienced clinician who is the Vice Dean of the Faculty of Medicine or his/her nominee. The decision of this panel is final.

Appeals can only be considered on the following grounds:

2.13.1 Where there is new evidence which was not previously considered or could not previously have been provided and is deemed to have a direct impact on the student's case; and/or

2.13.2 Where due process was not followed.

2 Assessment Procedure for Current Students

- 2.1. All existing registered students are responsible for reporting the receipt of any Fixed Penalty Notices or fines, police cautions, convictions or where a case is pending with the police, to the relevant year School of Medicine Senior Tutor in a timely manner. Please note that whilst a Fixed Penalty Notice may not always appear on a DBS Certificate, students are required to declare this information to the GMC prior to registration and any non-declarations to the School of Medicine will be investigated by the GMC.
- 2.2 All existing registered students due to progress to Year 5 in July of each year are required to complete a DBS self-declaration form in January/February noting if they have received any Fixed Penalty Notices, police cautions, convictions or have a case pending with the police. (Appendix 6).
- 2.3 A small number of existing students are exempt from completing an Enhanced DBS Certificate on entry to the programme (appendix 5). This exemption no longer applies on progression to Year 5; therefore, these students should complete an Enhanced DBS Certificate, and not a self-declaration form (section 3.2).
- 2.4 Students who declare any notification (including Fixed Penalty Notice) on their self-declaration form will be reviewed by the Year 5 Senior Tutor. A meeting may be required in some cases.
- 2.5 Where a positive declaration is made, or case is pending, the student will be notified that they are required to complete an Enhanced DBS Certificate within 10 days of the notification.
- 2.6 A decision on whether to temporarily suspend the student during part or all of the investigation processes will depend on the nature of the offence in question. The decision will be made by the Head of Undergraduate Medicine or their designated deputy in consultation with the College Registry and other parties.
- 2.7 It is the responsibility of the Student Services Manager to keep the Student Monitoring Group informed of each case under review. Any positive declarations must be referred to the DBS Panel for review.
- 2.8 The decision of the panel is forwarded to the School of Medicine Student Monitoring Group for ratification. The outcome of this process will result in one or more of the

following:

- 2.8.1 No action required as the nature of the positive disclosure has already been dealt with.
- 2.8.2 The student is required to meet with the Head of Undergraduate Medicine or their designated deputy to receive a formal written warning. They are advised that any further transgressions of a similar nature may result in a referral to a Fitness to Practise Panel. Written notification of this warning is filed on the student's Registry and FEO personal file;
- 2.8.3 The student is required to meet with the Head of Undergraduate Medicine or their designated deputy to receive a final written warning. They are advised that any further transgressions will result in referral to a Fitness to Practise Panel. Written notification of this warning is filed on the student's Registry and FEO personal file;
- 2.8.4 Referral to a Fitness to Practise Panel. The chair of the Student Monitoring Group should notify the College's Head of Central Secretariat of the referral normally within 5 College working days.
- 2.8.5 In addition, the panel can require a student to undertake and complete formal treatment and/or appropriate counselling to deal with issues of alcohol/substance abuse, anger management etc.

3 Management of DBS related documentation

- 3.1. The College Registry notifies the Student Services Manager as to the nature of the positive DBS Certificate via email. This refers to students upon entry to the programme. No copies of the actual DBS document are made.
- 3.2 The Student Services Manager liaises directly with the DBS Review panel members communicating the nature of the offence, the status of the recipient (applicant or existing student) and the student's name and contact details.
- 3.3 The DBS Review panel may request further information from the student as a written testimonial. The student may then be required to meet with the panel in a face-to-face meeting to discuss the offense and actions.
- 3.4 Once the panel have completed their deliberations and made a decision, this should be communicated to the Student Services Manager in writing for the attention of the Chair of the Student Monitoring Group. This decision should then be communicated to the next Student Monitoring Group meeting.
- 3.5 For reference the School Senior Tutor should retain a record of all positive DBS cases and their decisions. These should be available to the panel, anonymised for reference information only.
- 3.6 Unless a case is referred to a Fitness to Practise Panel, all related documentation should be destroyed 6 months following the completion of the positive DBS Review panel process.

**School of Medicine
February 2019**

Submitted to and agreed by:

- **Student Monitoring Group – 11 September 2013**
- **Student Services Committee – 9 October 2013**
- **Medical Studies Committee – 27 November 2013**
- **Student Monitoring Group – 14 February 2019**

Appendix 1.

Glossary of Terms used in DBS Certification

Enhanced DBS checks may contain 'additional' information. Occasionally the Chief Police Officer may when necessary in the interests of prevention or detection of crime, release 'additional' information only to the Counter signatory in the form of a separate letter that should not be revealed to the applicant or candidate.

Approved Information

Enhanced DBS checks may contain 'approved' information. This is non-conviction information provided by the police from their local records. The Chief Police Officer in each force will decide what, if any, information to provide. Disclosure & Barring Service (DBS), previously called Criminal Records Bureau (CRB) will print this information on both the applicant's and the Counter signatory's copy (until provided) of the DBS certificate.

Caution

A caution is a formal warning about future conduct given by a senior police officer, usually in a police station, after an individual has committed a criminal offence. This procedure is used as an alternative to a criminal charge and subsequent possible prosecution.

Counter signatory

An individual within a Registered Body who is registered with either the DBS or Disclosure Scotland or Access NI to countersign applications and receive Disclosures, this is usually an authorised individual at United Medicare Limited.

Counter signatory reference number

The specific reference number allocated to each individual Counter signatory by the DBS and the same applies to Disclosure Scotland and Access NI.

Criminal Record

A record of convictions held on the Police National Computer for individuals convicted of crimes.

Disclosure Application Reference Number

The specific reference number allocated to each Disclosure application form by the DBS that applies to both paper and online or electronic DBS applications. The same applies to Disclosure Scotland and Access NI.

Disclosure & Barring Service (DBS)

Disclosure & Barring Service (DBS) is the new name for the organisation that was previously called Criminal Records Bureau (CRB).

Department for Children, Schools and Families (DCSF)

The government department responsible for improving the focus on all aspects of policy affecting children and young people, as part of the government's aim to deliver educational excellence (formerly the Department for Education and Skills).

Disclosure or DBS Checks

The term that is used to describe the service provided by the Disclosure & Barring Service (DBS) which was previously called the Criminal Records Bureau (CRB) and the document

issued to the applicant and Registered Body when a DBS check has been completed. The cost of a DBS or Disclosure Scotland or Access NI check is described as a Disclosure Fee.

Each disclosure has a "Disclosure Application Reference Number", which is a specific reference number allocated to each Disclosure application by the DBS. This is equivalent of the Disclosure & Barring Service (DBS) but for Scotland. This is provided for both paper and online or electronic DBS applications.

Enforced Subject Access

Under current legislation, individuals can exercise their right to apply for access to information held on them including criminal record information under the 'subject access' provisions of the Data Protection Act 1998. Currently, some employers seek to obtain this information about employees and potential employees by compelling them to exercise their rights under the Data Protection Act. This process is known as 'Enforced Subject Access' and is undesirable because details of all convictions are revealed. Most employers are not entitled to ask for this information under the Rehabilitation of Offenders Act 1974.

Enhanced DBS checks

Enhanced DBS checks are for posts involving greater contact with children or other vulnerable adults. Such work involves regularly caring for, supervising, training or being in sole charge of these people. As well as all the information contained in a Standard Disclosure, Enhanced DBS checks may also contain information that is held locally by the police. Most healthcare workers and other Care Workers and those in care of Children would need this level of check. The same applies to Disclosure Scotland and Access NI.

Ex-Offender

This is an individual who has been convicted of a criminal offence and whose crime is now "spent" under the Rehabilitation of Offenders Act (ROA) 1974.

Exceptions Order

The Exceptions Order to the Rehabilitation of Offenders Act (ROA) 1974 sets out those occupations and positions exempt from the provisions of the ROA. These are generally positions of trust; where there is a valid need to see an individual's full criminal history to assess their suitability for a position. This information is intended as general guidance only. It must not be regarded as a definitive interpretation of the Act. Any person requiring further guidance should seek legal counsel.

Exempted Question

An exempted question is a valid request for any individual to reveal their full criminal history (including spent convictions) and is made possible by the Exceptions Order to the Rehabilitation of Offenders Act (ROA) 1974.

Fast Track POCA

The Fast Track POCA service was withdrawn on the 1st October 2007. This service was available to those clients within the NHS who were entitled to check the POCA list and who requested a POCA check on the Disclosure application form.

How long will DBS checks be valid?

Each DBS Disclosure or check will show the date on which it was issued. DBS checks do not carry a pre-determined period of validity because a conviction or other matter could be recorded against the subject of the Disclosure at any time after it is issued. This similarly applies to Disclosure Scotland and Access NI.

Lead Counter signatory

A senior figure within a Registered Body who has overall responsibility for the use of the DBS or Access Ni or Disclosure Scotland checks in their organisation.

Local Police Records

Police records, not held on the Police National Computer, containing non-conviction information.

NACRO

A crime reduction charity whose aim is to make society safer by finding practical solutions to reducing crime. NACRO has worked to give ex-offenders, disadvantaged people and deprived communities the help they need to build a better future since 1966. They are committed to reducing crime by helping ex-offenders back into society since there are many disadvantages acting as a barrier.

POCA List

POCA is the Protection of Children Act List and is managed by the Department for Children, Schools and Families (DCSF) on behalf of the Department of Health, of individuals banned from working with children.

Police Act 1997

The piece of legislation that brought about by the Criminal Records Bureau (CRB) originally, which is now called the Disclosure & Barring Service (DBS).

Police National Computer (PNC)

A national police database that contains information about criminal records that include convictions, cautions, reprimands and warnings.

Portability

Portability refers to the re-use of a Disclosure & Barring Service (DBS) check, previously called the Criminal Records Bureau (CRB) Disclosure, obtained for a position in one organisation and later used for another position in another organisation. This practice will be made available by the DBS from mid-June 2013 for an annual change or subscription that is the responsibility of the candidate or applicant.

POVA (Protection of Vulnerable Adults)

POVAFirst, now called ISA AdultFirst, is a service available to those customers who are entitled to check the POVA list and who have requested a POVA check on the Disclosure application form. It allows those customers to see the result of the POVA check as soon as possible and before the full Disclosure is received. POVAFirst, now called ISA AdultFirst, will benefit those customers who are required by law to undertake a POVA check before a care worker can start working.

POVAFirst

POVAFirst, now called ISA AdultFirst, is a service available to those customers who are entitled to check the POVA list and who have requested a POVA check on the Disclosure application form. It allows those customers to see the result of the POVA check usually within a few days and before the full Disclosure is received. POVAFirst, now called ISA AdultFirst, will benefit those customers who are required by law to undertake a POVA check before a care worker can start work. This is now called AdultFirst.

POVA List

Protection of Vulnerable Adult List is now called ISA AdultFirst and is a list, managed by the Department for Education and Skills on behalf of the Department of Health, of persons banned from working with vulnerable adults.

Registered Bodies

Organisations that have registered directly with the DBS and/or Disclosure Scotland and/or Access NI to use their services. There is a lower DBS criteria limit for the minimum number of DBS checks required from an organisation to continue as a registered body.

Rehabilitation of Offenders Act (ROA) 1974

The Rehabilitation of Offenders Act (ROA) 1974 enables some criminal convictions to become 'spent' after a 'rehabilitation period', that is a set length of time from the date of conviction. After this period, with certain exceptions, an ex-offender is not normally obliged to mention the conviction when applying for a job or obtaining insurance or when involved in criminal or civil proceedings.

Rehabilitation Period for DBS purposes

A rehabilitation period is a set length of time from the date of conviction. After this period, with certain exceptions, an ex-offender is not normally obliged to mention the conviction when applying for a job or obtaining insurance or when involved in criminal or civil proceedings.

Reprimand

A reprimand has replaced the caution for young persons aged less than eighteen years of age. A young individual given a second formal warning about future conduct is then given a final warning.

Standard DBS Check

These are primarily for posts that involve working with children or vulnerable adults. Standard DBS checks may also be issued for persons entering certain professions, such as members of the legal and accountancy professions. The Standard check contains details of all convictions held on the Police National Computer (PNC) including current and 'spent' convictions as well as details of any cautions, reprimands or final warnings. If a position involves working with children, the DBS check will indicate whether information is held on three government lists of those who are banned from working with children or the vulnerable. They are also referred to as a Standard Disclosure or Standard Check. The same applies to Disclosure Scotland and Access NI.

Subject Access

Under current legislation, individuals can exercise their right to apply for access to information held on them including criminal record information under the 'subject access' provisions of the Data Protection Act 1998.

Volunteer

The DBS defines a volunteer to be an individual who performs any activity which involves spending time, unpaid (except for travelling and other approved out-of-pocket expenses), doing something which aims to benefit someone (individuals or groups) other than or in addition to close relatives'.

What is an 'unspent conviction'?

A conviction is described as unspent if the associated rehabilitation period has not yet lapsed. A rehabilitation period is a set length of time from the date of conviction, according to the sentence imposed.

Working with children

The definition of this term is in two parts:

- 1) A child care position within the meaning of the Protection of Children Act. The Criminal Justice and Court Services Act (CJCSA) 2000 replaces the original definition in the Protection of Children Act with 'regulated position' for the purposes of Part II of the 2000 Act. Within the 2000 Act, section 36 sets out what the regulated positions are for the purposes of Part II of the Act;
- 2) A position in which employment or further employment is prohibited or restricted by regulations made under section 218 of the Education Reform Act 1988.
- 3) regulations made under section 218 of the Education Reform Act 1988.

Appendix 2.

Imperial College London Disclosure and Barring Service Policy Statement, Relating to Students

As an institution using the Disclosure and Barring Service (DBS) to assess an applicant's and student's suitability for positions of trust, Imperial College London complies fully with the DBS Code of Practice and undertakes to treat all applicants for a programme of study at the College and all students on a programme of study at the College fairly. It undertakes not to discriminate unfairly against any subject of a Certificate based on conviction or other information revealed.

Imperial College London is committed to the fair treatment of its students and potential students regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Unless the nature of the position allows Imperial College London to ask questions about your entire criminal record we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Imperial College London who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

We make every subject of a DBS Certificate aware of the existence of the DBS Code of Practice and make a copy available on request.

Appendix 3.

Imperial College London 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, Imperial College London 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 based on a conviction or other information revealed.

Imperial College London is committed to the fair treatment of its students, potential students or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

We have a written policy on the recruitment of ex-offenders, which 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 and recruitment information will contain a statement that a Disclosure will be requested in the event of the 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 is sent under separate, confidential cover, to a designated person within Imperial College London and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows Imperial College London to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Imperial College London 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, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that Page 2 of 2 is directly relevant to the position sought could lead to withdrawal of an offer for a place on a programme of study at Imperial College London.

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.

Having a criminal record will not necessarily bar you from studying with us.

This will depend on the nature of the programme of study and the circumstances and background of your offences.

Appendix 4

Imperial College London Disclosure and Barring Service

On your proposed programme of study at Imperial College London you will be required to work with children and vulnerable adults. Under the Protection of Children Act (1999) the College has a duty of care to ensure that these groups of people are protected from harm. To comply with this duty of care we must gain access to information that is only available through the Disclosure and Barring Service (DBS).

Imperial College London does not wish to deter individuals with criminal records from taking advantage of the benefits of higher education. However, the College must balance its responsibilities to provide a safe and secure environment for staff, students, visitors, patients and others. Consequently, the College reserves the right to terminate the registration of any student whose criminal record makes it inappropriate for them to continue with their degree programme.

The DBS has introduced a Certificate document, which provides information on a person's criminal record, including cautions and 'spent' convictions.

If you decide to firmly accept your offer of admission to the School of Medicine – for year of entry x - you must apply by 30 April 200x (for A300 programme) or 30 June 200x (for A100 and A109 programmes) in the same admissions cycle to obtain an Enhanced Disclosure. Imperial College London will withdraw this offer if you fail to meet this deadline.

How to Obtain a DBS Certificate – New Applicants

You should complete the enclosed application and submit it with **original** proof of identity by **30 June 20xx**. Please refer to the information overleaf regarding acceptable identity documents. This information is also available on the DBS website at <https://www.gov.uk/crb-criminal-records-bureau-check/documents-the-applicant-must-provide->

Details on how to complete the application are provided on the front of the form. Please ensure that you read this information carefully before you begin.

Please leave Section D blank. It is not necessary to complete this section.

Top tips for completing the application

About a quarter of the DBS Certificate applications we receive from MBBS candidates cannot initially be processed as they are incomplete or incorrectly completed. The following tips are based on the most common reasons why we may be unable to process DBS Certificate applications.

- Ensure that you include a full, five-year address history. If necessary use the continuation sheet available at <http://www.homeoffice.gov.uk/publications/agencies-public-bodies/dbs/dbs-checking-service-guidance/cont-sheet>
- In Section B please provide your permanent home address. If you have a university or school correspondence address, include this address in Section C or on a continuation sheet.
- Ensure that you write in black ink
- Don't forget to sign the Declaration by the Applicant box!

Submitting the application

Your application and documentation should be submitted to:

Registry: Medicine Admissions
Imperial College London
Level 3 Sherfield Building
South Kensington Campus
London SW7 2AZ

If you can come in person your documentation will be photocopied and returned to you immediately. You should go the Student Hub, Level 3 Sherfield Building. We are open every weekday between 9.30 and 17.00 (Wednesdays 10.00 to 17.00).

If you send your documentation to us, you are strongly advised to use **registered post**. We will also return your documents by registered post.

Applicants from outside the UK

If you have lived in the United Kingdom at any time (including for educational purposes) you must obtain an Enhanced DBS Certificate. If you have never resided in the UK, you should obtain a Certificate of Good Conduct.

Admissions can provide information regarding the documentation available in many EU and Overseas countries. Please contact Admissions by email on medicine.ug.admissions@imperial.ac.uk.

Acceptable Identity Documents

You must provide **three original documents** with your DBS Certificate application; one document must be from Group 1 plus any two from Groups 2a or 2b.

At least one document must confirm your **current address** and at least one document must confirm your **date of birth**.

If the document is denoted with * then it must be less than 3 months old.

If the document is denoted with ** then it must be issued within the past 12 months.

If the document is not denoted it can be more than 12 months old.

Acceptable Identity Documents

You must provide **three original documents** with your DBS Certificate application; one document must be from Group 1 plus any two from Groups 2a or 2b.

At least one document must confirm your **current address** and at least one document must confirm your **date of birth**.

If the document is denoted with * then it must be less than 3 months old.

If the document is denoted with ** then it must be issued within the past 12 months.

If the document is not denoted it can be more than 12 months old.

Group 1 – Primary Trusted Identity Credentials

- Current valid Passport – UK or EEA
- Identity Card for Foreign Nationals (ICFN) / Biometric residence permit
- Driving License UK (Full or provisional) UK, Isle of Man, Channel Islands and EEA.
- Birth Certificate (UK and Channel Islands), issued within 12 months of date of birth
- Adoption Certificate (UK and Channel Islands)

Group 2a – Trusted Government/State Issued Documents

- Current valid Passport (UK, EEA or Non-EEA)
- Current UK Driving license – full or provisional (Photo card) - All countries outside the EEA (excluding Isle of Man and Channel Islands)
- Current driving license (full or provisional) - paper version (if issued before 1998) - UK, Isle of Man, Channel Islands and EEA
- Biometric Residence Permit (UK)
- Birth Certificate (UK & Channel Islands) – issued any time after birth
- Certified copy of Birth Certificate (UK and Channel Islands) – issued after 12 months of date of birth
- Marriage/Civil Partnership Certificate (UK and Channel Islands)
- Immigration document, visa or work permit (Issued by a country outside the EEA. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non-EEA country in which the role is based)
- Adoption Certificate (UK and Channel Islands)
- HM Forces ID Card (UK)
- Fire Arms License (UK, Channel Islands and Isle of Man)

All driving licences must be [valid](#).

Group 2b – Financial/Social History Documents

- Mortgage statement (UK or EEA) **
- Bank/building society statement (UK) *
- Bank or building society statement (Countries outside the EEA | branch must be in the country where the applicant lives and works) *
- Bank or building society account opening confirmation letter (UK)*
- Credit card statement (UK or EEA) *
- Financial statement, e.g. pension, endowment, ISA (UK)**
- P45/P60 statement (UK and Channel Islands) **
- Council Tax statement (UK and Channel Islands) **
- Work Permit/Visa (UK) (UK Residence Permit) **
- Utility bill (UK), not a mobile telephone bill *
- Benefit statement (UK), e.g. Child Allowance, Pension *
- Letter of sponsorship from future employment provider (Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application)
- A document from central/local government authority or agency giving entitlement, e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue and Customs, Job Centre, Job Centre Plus, Social Security (UK and Channel Islands) *
- EU National ID Card (must be valid)
- EEA National ID Card (must be valid)
- Irish Passport Card (cannot be used with an Irish passport) (must be valid)
- Cards carrying the PASS accreditation logo (UK)*

Criminal Record Self-Declaration Form

Medical students are exempt from the provisions of the Rehabilitation of Offenders Act (1974; 1975). As a result, the medical school is required to ensure that all medical students undergo an enhanced Disclosure and Barring Service check (formerly known as a CRB check) on entry to the medical school, and subsequently to complete a criminal record self-declaration form in January/February of the year preceding entry to Year 5 (Disclosure and Barring Service Policy, [Medlearn A-Z](#)). This means that you must declare all Fixed Penalty Fines or Notices, police convictions, cautions, reprimands or warnings; even if you think that they have been removed from the records (spent or filtered). This includes any road traffic convictions or convictions from a military court or tribunal.

Where a positive declaration is made, this will be reviewed, and the student may be required to complete a new DBS check application within 10 days of the FEO notification. Details of how to apply for a DBS Enhanced check are available via [Medlearn A-Z](#). Entry to Year 5 is dependent upon the completion of this declaration and where necessary, completion and receipt of a DBS certificate. In the event that a positive DBS certificate is received, a decision on whether to temporarily suspend the student during part or all of the investigation processes will depend on the nature of the offence in question. The decision will be made by the Head of Undergraduate Medicine or their designated deputy in consultation with the College Registry and other parties.

Note:

Any information disclosed in this declaration will be treated as strictly confidential. This information will be retained by the University under secure conditions and is not disclosed to any third party outside the University (other than in pursuance of a legal obligation).

If information relating to offences is withheld, erroneous, or is given in an incomplete form by the student, then the Faculty reserves the right take disciplinary action against the student.

| | | |
|--|-----------------|-------------------------------------|
| CID: | Title: | Surname: |
| Forename(s): | | Date of Birth:/...../..... |
| Declaration: Date of last CRB/DBS disclosure certificate/...../..... (*DD/MM/Year) | | |

As a result of this certificate, were you required to appear before a DBS Review Panel, or to meet with the Senior Tutor

....YES../.....NO.....
(circle appropriate response)

Since this date, have you:

Received a Fixed Penalty Fine or Penalty Notice, police caution, warning or reprimand, either in the UK or overseas? If No, please write Not Applicable; if yes, please give brief details including dates*:

Received a criminal conviction, either in the UK or overseas? If No, please write Not Applicable; if yes, please give brief details including dates*:

Have a case pending with the police, either in the UK or overseas? If No, please write Not Applicable; if yes, please give brief details including dates*:

Continue on a separate sheet if necessary and attach it to this form.

I (signature) confirm that the information provided above is accurate and has been completed and submitted via my College email account Full Name:

What is a DBS disclosure Certificate?

A disclosure is a document containing information held by the police and government departments. The Disclosure and Barring Service (DBS), an executive agency of the Home Office and provides these Certificates.

The DBS offers organisations a means of checking the background of students to ensure that they do not have a history that would make them unsuitable to work in a healthcare environment. The DBS Certificate will provide details of a person's criminal record including convictions, cautions, reprimands and warnings held by the Police National Computer (PNC). It also includes information held by local police forces and details from lists held by the Department of Health (DH) and the Department for Education and Skills (DfES) of those considered unsuitable to work with children or vulnerable adults.

As your programme of study involves contact with children and vulnerable adults you will need an

Enhanced Disclosure Certificate. This certificate contains details of:

- All convictions held on the PNC including current and 'spent' convictions as well as details of any cautions, reprimands or final warnings. Fixed Penalty Notices and fines
- As the programme involves working with children the Certificate will indicate whether information is held on government department lists, held by the DfES and DH of those who are barred from working with children or are unsuitable to work with vulnerable adults. The Certificate also includes information held by the DH of those considered unsuitable to work with vulnerable adults.
- A check on local police records. Where local police records contain additional information that might be relevant to study on the MBBS programme, the Chief Officer of police may release information for inclusion in an Enhanced DBS Certificate. Exceptionally, and in a very small number of circumstances (typically to protect the integrity of current police investigations), additional information may be sent separately to the Counter signatory and should not be revealed to the applicant.

Why do I need to apply for a DBS Certificate?

It is a requirement that all candidates admitted to the MBBS programme must complete an application for an enhanced DBS Certificate.

What if I already have a DBS Certificate?

The School of Medicine will not accept DBS Certificates which you have obtained for other institutions. It will be necessary for you complete a new DBS Certificate application.

My offer is for 200x. When do I need to apply?

All conditions of your offer must be satisfied in the current admissions cycle.

I intend to accept Imperial as my Insurance choice. Do I need to apply?

If you accept Imperial as your insurance medical school, it is not necessary to complete a DBS Certificate application for the School of Medicine by 30 June. If you are subsequently accepted on to the programme at Imperial, we will write to you regarding the DBS application procedures at that time.

What if I live outside the UK?

If you have ever lived in the UK (even if this was to attend school) you must obtain a DBS Certificate. If you have never lived in the UK, you will be required to provide a Certificate of Good Conduct. Please contact Admissions if you experience problems in obtaining documentation.

How much does the Disclosure cost?

The current (February 2019) cost of the DBS Enhanced Certificate is £44. However, Imperial College London has secured funding so that students currently will not be required to pay this fee. This may however change in the future.

How do I apply for a DBS Certificate?

Please refer to the enclosed How to Obtain a Disclosure document above.

Who will receive my DBS Certificate?

You will receive your Certificate in the post. A copy of the Certificate will also be sent to one of the counter-signatories at Imperial College London, all of whom have been registered with the DBS and have agreed to comply with the DBS's Code of Practice. We strongly advise you to keep your copy of the Certificate in a safe place since photocopies are not acceptable. Imperial is not allowed to keep your Certificate for more than six months. However, during your programme you might be asked by one of the NHS Trusts at which you have a placement to present this information.

When will I receive my Disclosure?

The DBS claims that 90% of all Enhanced Certificates are processed within four weeks of receipt. Please note that some disclosures take significantly longer than this to be processed and as such we strongly recommend that you complete your application **as soon as possible**.

According to our own practice, the final decision regarding admission will be made only when the School of Medicine has received a completed enhanced DBS Certificate. In the situation where the School of Medicine is not in receipt of a completed enhanced DBS Certificate prior to the beginning of term, it may be necessary to defer your admission for the coming year.

How do I know that the information contained in my DBS Certificate will be kept confidential?

Imperial complies with the DBS's Code of Practice, which is available on the DBS website at www.homeoffice.gov.uk/dbs. Sensitive personal information about students at Imperial is stored securely. Your DBS Certificate will be stored separately from your other student records.

The Certificate will be kept for no longer than six months after receipt from the DBS. Once you are registered as a student you have a duty to report to the Faculty Senior Tutor any police cautions, convictions or where a case is pending with the police.

What if I have a positive DBS Certificate?

Imperial has a policy of dealing with this information that ensures that criminal record information is not misused and that ex-offenders are not treated unfairly. It is not possible to provide a list of the types of convictions, cautions or reprimands which would cause the withdrawal of your place at the College. Each case will be considered on an individual basis by a specially convened panel.

Can I challenge the information on my DBS Certificate if it is incorrect?

Yes. If you think that the information contained in your Certificate is incorrect, please contact the DBS dispute line on 0870 9090 811 immediately to ask about dispute procedures.

Further Information

If you have further questions regarding your DBS check application please contact Admissions at the above address or by email on medicine.uq.admissions@imperial.ac.uk. The DBS website is <http://www.homeoffice.gov.uk/agencies-public-bodies/dbs/>