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DISCLOSURE AND BARRING SERVICE (DBS) POLICY

Policy Statement

This policy outlines the procedures and responsibilities for managing Disclosure and Barring Service (DBS) checks and barring referrals within Public Health Wales. It supports the organisation's duty to ensure a safe and secure working environment, particularly for roles involving access to children and adults at risk.

This includes ensuring appropriate criminal record checks are carried out for eligible roles, and that the organisation complies with its legal duty to make a referral to the DBS when a person poses a safeguarding risk and meets the referral criteria.

Policy Commitment

The purpose of this policy is to ensure that Public Health Wales meets its legal, safeguarding, and employment obligations by clearly outlining the procedures and responsibilities for managing Disclosure and Barring Service (DBS) checks.

The policy aims to:

- Safeguard children, adults at risk, staff, and the public by ensuring staff in relevant roles are subject to appropriate criminal record checks.
- Ensure compliance with legal and regulatory requirements relating to safe recruitment and employment.
- Promote fairness, consistency, and transparency in how DBS checks are carried out and used within the organisation.
- Support applicants and staff to engage with the DBS process confidently, including those with accessibility needs or who require additional privacy (e.g. trans and non-binary people).
- Ensure staff maintain up-to-date DBS clearance where required, through subscription to and monitoring of the DBS Update Service.

Public Health Wales is committed to applying this policy in a way that is proportionate, inclusive, and aligned with our organisational values. Decisions about suitability for roles will be based on structured risk assessments, considering the nature of any disclosure, its relevance to the role, and safeguarding obligations. This approach supports and aligns with the organisation's Safeguarding Strategy and workforce wellbeing strategies, reinforcing our commitment to creating a safe, inclusive, and supportive environment.

We also recognise that how we apply policies and processes shapes the experiences of our people and influences how we are perceived as an employer. By embedding trust, fairness, and respect throughout the DBS process, we aim to foster a workplace where colleagues feel valued and supported, and where safeguarding responsibilities are met in a way that strengthens our culture and commitment to being an employer of choice.

This policy is informed by and compliant with the following legislation and statutory guidance:

- Safeguarding Vulnerable Groups Act 2006
- Rehabilitation of Offenders Act 1974
- Police Act 1997
- Protection of Freedoms Act 2012
- Data Protection Act 2018 and UK GDPR
- Equality Act 2010
- NHS Employment Check Standards
- Disclosure and Barring Service (DBS) Code of Practice, including guidance on the barred lists for working with children and/or adults at risk

The policy applies to all DBS checks carried out for employment or engagement with Public Health Wales, including roles requiring checks against the DBS barred lists. It supports safe recruitment and employment practices by ensuring people who are barred from working with vulnerable groups are not placed in roles where they would pose a safeguarding risk.

Supporting Procedures and Written Control Documents

[All corporate policies and procedures are available on the Public Health Wales website](#)

- [All Wales Disciplinary Policy](#)
- [All Wales Information Governance Policy](#)
- [All Wales Procedure for NHS Staff to Raise Concerns](#)
- [Check someone's criminal record as an employer: Checks you can make on someone's record | GOV.UK](#)
- [DBS Code of Practice | GOV.UK](#)
- [DBS guidance leaflets - GOV.UK](#)
- [Eligibility guidance for standard DBS checks | GOV.UK](#)
- [Eligibility guidance for enhanced DBS checks | GOV.UK](#)
- [Recruitment and Selection Policy](#)
- [Redeployment Policy](#)
- [Safeguarding Policy](#)

Other related documents are:

- [DBS Update Service | GOV.UK](#)
- [Role eligibility for DBS checks | NHS Employers](#)
- Honorary Contract process
- Work Experience process

Scope

This policy applies to all those whose role requires a DBS disclosure certificate. For the purposes of this policy, this includes permanent, temporary, bank and agency staff; fixed-term contract holders; honorary contract holders; secondees; apprentices (aged 16 and over); locums; work experience participants; and volunteers. Agency staff are included within the scope of this policy, although the DBS check may be undertaken by the

supplying agency. The organisation remains responsible for ensuring that appropriate clearance has been obtained prior to engagement.

Contractors and commissioned service providers are not directly covered by this policy but are expected to comply with equivalent DBS requirements under the terms of their service agreement or contract. Where there is a requirement to carry out regulated activity on behalf of Public Health Wales, contract managers must ensure that appropriate DBS checks have been completed by the employing organisation or agency.

Equality and Health Impact Assessment	An Equality, Welsh Language and Health Impact Assessment has been completed and can be viewed on the policy webpages.
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Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or [Board Business Unit](#)

Summary of reviews/amendments				
Version number	Date of Review	Date of Approval	Date published	Summary of Amendments
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1. Roles and Responsibilities

1.1 The Organisation

The organisation is responsible for:

- Reimbursing the cost of DBS Update Service subscriptions and renewals, in line with the organisation's confirmed reimbursement process.
- Providing guidance and support to managers regarding the DBS process, DBS eligibility and this policy.
- Storing and managing DBS information securely in compliance with data protection laws.

1.2 NHS Wales Shared Services Partnership (NWSSP) Recruitment Service

The Recruitment Service is responsible for:

- Processing DBS applications and results for both recruitment and ad hoc DBS checks through the electronic recruitment system
- Ensuring DBS results are recorded in the Electronic Staff Record (ESR) system
- Storing and managing DBS information securely in compliance with data protection laws.

1.3 Managers

Managers are responsible for:

- Identifying roles requiring a DBS check and checking the level of DBS check is correct
- Ensuring staff and prospective staff complete the necessary DBS checks for their roles.
- Ensuring pre-employment checks including the DBS check are completed before employment commences.
- Monitoring compliance with the DBS Update Service subscription requirement.
- Responding appropriately if a member of staff reports a caution, arrest, or conviction.
- Ensuring the confidentiality of DBS information and limiting access to authorised people.

1.4 Staff

Staff are responsible for:

- Subscribing to the DBS Update Service within 30 days of their certificate being issued and maintaining their subscription annually. Further information is provided in Appendix 1.
- Notifying their manager immediately if they are arrested, charged, cautioned, or convicted of a criminal offence during their employment.
- Reclaiming DBS-related expenses promptly in line with the organisation's confirmed subscription reimbursement process.
- Cooperating fully with DBS checks and any related investigations.

1.5 Job Applicants

Job applicants are responsible for:

- Disclosing all information that would appear on a DBS certificate, except for filtered offences, where a role requires a DBS check.
- Comply with the requirements of the DBS application process, as part of the pre-employment checks, in a timely manner.
- Understanding that subscribing to the Update Service for status checks is a condition of employment/engagement for eligible roles.
- Notifying the manager immediately if they are arrested, charged, or convicted of a criminal offence during the recruitment process.

If these steps are not followed, the job offer may be withdrawn.

2. DBS Checks and Eligibility

2.1 Types of DBS Checks

- **Basic Check:** Details of unspent convictions.
- **Standard Check:** Details of spent and unspent convictions, cautions, reprimands, and final warnings.
- **Enhanced Check:** Details of spent and unspent convictions, cautions, reprimands, and final warnings, plus relevant Police intelligence.
- **Enhanced Check with Children and/or Adults Barred List Check:** As Enhanced, with additional checks against the DBS barred lists for working with vulnerable groups.

2.2 DBS Eligibility

Determining eligibility for a DBS check involves carefully assessing the role's responsibilities against legal requirements outlined in the Rehabilitation of Offenders Act 1974 and relevant safeguarding legislation.

Only roles that involve regulated activities with children or vulnerable adults, or are listed in specific laws, qualify for DBS checks.

Over-checking can breach legal obligations, infringing on a person's rights to privacy and potentially exposing the organisation to legal challenges. Conversely, under-checking can result in inadequate safeguarding measures, putting children and adults at risk.

Ensuring the correct level of DBS check is vital to maintain compliance and provide appropriate safeguarding measures.

Basic DBS checks do not have any eligibility criteria. However, this type of check is only used for roles requiring a Fit and Proper Persons Check in addition to usual pre-employment checks, e.g. Executive or Non-Executive Director appointments, or for any roles that require additional security clearance for access to Government or Civil Service systems or sites, or as part of certain training programmes.

For more detailed guidance on DBS eligibility please visit:
<https://www.gov.uk/government/publications/dbs-workforce-guidance>
<https://www.gov.uk/government/publications/dbs-check-eligible-positions-guidance>

3. Filtering of Convictions and Cautions

Certain convictions and cautions are filtered (not disclosed) in DBS certificates after a specific period, provided they meet eligibility criteria.

Filtering applies to:

- Convictions after 11 years (5.5 years if under 18 at the time of conviction) for non-violent, non-sexual offences that did not result in a custodial sentence.
- Cautions after 6 years (2 years if under 18).

Filtering does not apply to serious offences, sexual offences, or those involving children and vulnerable adults. For further information on filtering rules, please seek advice from the registered charity, [Unlock](#).

4. DBS Checks and Recruitment

4.1 Advertising

It is a legal requirement to identify the appropriate level of DBS check at the point of advertising a vacancy to ensure transparency and avoid requesting disclosure of information that the organisation is not entitled to receive. This protects candidates from unnecessary disclosure of sensitive personal information and upholds the integrity of the recruitment process.

Managers are responsible for identifying if a post requires a DBS check as part of the Vacancy Authorisation process on the Trac Recruitment system. This will also include whether the post holder will have access to children or adults or both groups.

Managers should approach [People Support](#) for advice if required.

4.2 Interviewing When a DBS Check is Required

The interview panel should remind candidates during the interview process that appointment to the post is subject to a satisfactory

Disclosure Check. They should also, as part of the interview, ask candidates if they are aware of any legal reason they cannot undertake the role, e.g. have any criminal convictions, cautions, reprimands or other disposals that would be disclosed on a DBS certificate. It should be emphasised that this includes spent convictions which would not be filtered from the DBS certificate.

Interviewers should offer candidates the opportunity to disclose any information in private, outside the panel setting, if they prefer. This is particularly important for sensitive disclosures and helps to create a safe space for openness. Managers are encouraged to approach these conversations with empathy and objectivity, emphasising that such disclosures will be handled confidentially and assessed fairly in line with safeguarding and employment obligations.

5. Starting Work Prior to Receipt of a DBS Check

In exceptional circumstances, such as a critical risk to safe staffing levels, an appointee may be permitted to commence employment prior to the receipt of their DBS check. This must only occur following a documented risk assessment, signed off by a senior manager within the Directorate and the Deputy Director of People and OD, and arranged in consultation with People and OD.

However, staff must not undertake any form of regulated activity with children or adults at risk until a satisfactory DBS certificate has been received. This applies even if supervision or safeguarding controls are in place.

Where regulated activity forms part of the role, any delay in receiving DBS clearance may impact the ability to commence employment or carry out full duties. Managers must plan accordingly to prevent risk and ensure compliance.

6. Ongoing Disclosure and Reporting of Arrests or Charges

Staff must inform their manager immediately if they are:

- arrested, charged, or convicted of an offence during their employment or the recruitment process.
- Subject to an investigation that could result in legal action.

Failure to disclose this information may result in disciplinary action, up to and including dismissal or withdrawal of an offer of employment.

7. DBS Update Service Subscription

All staff in roles requiring a DBS check must subscribe to the DBS Update Service and maintain their subscription annually. The cost of this subscription will be reimbursed by the organisation.

The organisation understands that paying for the DBS Update Service subscription fee upfront may not be possible for everyone. If this presents a

financial difficulty, please contact [People Support](#) in confidence to discuss the available options for support.

All those in a role that requires a DBS check are responsible for:

- Ensuring their subscription is active and renewed annually.
- Following the organisation's process to reclaim the cost of the subscription.

Further information on the process can be found in Appendix 1.

7.1 Data Protection and DBS Update Service Status Checks

Status checks of the DBS Update Service will be carried out under the following lawful bases, as set out in the organisation's Staff Privacy Notice and specifically :

- Entering into and/or managing an employment contract (UK GDPR Article 6(1)(b))
- Employment obligations (UK GDPR Article 9(2)(b))

Status checks will be completed:

- During the recruitment process for roles requiring a DBS check
- When a new DBS certificate is obtained (except for Basic DBS checks, where the Update Service is not currently supported)
- When moving into a role requiring a DBS check and Update Service subscription during employment/engagement

The date and outcome of the status check will be recorded in ESR, and this information will be retained for audit and compliance purposes in line with the organisation's information governance policy and records retention schedule.

7.2 DBS Update Service Renewal Reminders

To support subscribers in maintaining their annual subscription to the DBS Update Service, the DBS issues reminders prior to the subscription expiry date:

- An **email reminder** will be sent **30 calendar days** before expiry to the email address registered with the DBS Update Service.
- If the subscription is not renewed, a **postal reminder letter** will be issued **14 calendar days** before expiry.

Where staff have opted for automatic renewal, payment will be taken from the card on file **14 days before the subscription expires**. Staff are responsible for ensuring their payment details remain up to date and for confirming successful renewal.

7.3 Failure to subscribe to the DBS Update Service

Failure to subscribe within the required timescale after receiving a new DBS certificate, or failure to renew the annual subscription on time, will result in the need for a new DBS check. This may delay the ability to start or continue in a role if the organisation is unable to identify their DBS status.

It is therefore essential that applicants and staff take personal responsibility for subscribing promptly and ensuring that annual renewals are completed before the subscription expiry date.

Persistent failure to comply with these requirements, or any resulting inability to undertake their role due to an invalid DBS status, may be managed in line with the All Wales Disciplinary Policy.

7.4 Automatic Monitoring through ESR

ESR automatically checks the Update Service every 60 days to identify any changes to a DBS certificate.

If ESR is notified by the DBS Update Service of a change:

1. A notification will be sent to People and OD, who will inform the manager.
2. The member of staff will be required to undertake a new DBS check, which will be paid for by Public Health Wales.

8. Disclosure of Criminal Offences and Risk Assessment Process

8.1 Disclosures During Application and Recruitment

Where the role requires a DBS check, applicants are asked during the application and interview process to disclose any relevant convictions, cautions, reprimands, or warnings that would be disclosed on a DBS certificate. This provides an opportunity for the applicant to be open and transparent and to explain the circumstances surrounding any offences at an early stage.

The organisation is committed to treating such disclosures fairly and will not automatically exclude the applicant from employment/engagement based on a declaration. Where information is declared during the recruitment process, a discussion will be held with the applicant to gather further context and ensure a fair assessment of the information provided.

8.2 Disclosures Identified on the DBS Certificate

Where a DBS certificate later reveals disclosed or undisclosed criminal history, even if already declared, a formal risk assessment will be undertaken to determine any potential implications for employment/engagement.

The applicant or staff member will meet with their manager and a representative from People and OD to discuss the disclosure in a confidential and sensitive manner.

A structured risk assessment will then take place, considering:

- The nature and seriousness of the offence(s)
- Relevance to the specific role and any safeguarding implications
- Time elapsed since the offence(s)
- Evidence of rehabilitation, references, and work conduct
- Whether the information had already been disclosed and discussed
- Any other mitigating factors

This ensures that all decisions are made proportionately, fairly, and in accordance with safeguarding obligations and employment law.

8.3 Outcomes of the Risk Assessment

Based on the findings of the risk assessment, one of the following outcomes may apply:

- Continue in post/proceed with appointment without any changes where the disclosure is not relevant or does not present a risk.
- Implementation of support measures, such as supervision, role adjustments, or training, to manage any identified risks.
- Review of suitability for the role, which may lead to redeployment, withdrawal of an offer, or termination of employment in accordance with the Disciplinary Policy and safeguarding procedures.
- Where a past criminal record is deemed suitable for employment/engagement, appropriate support and reassurance may be provided to help rebuild confidence and promote a positive experience in the workplace.

The organisation is committed to handling this process consistently, respectfully, and without discrimination. The aim is to protect vulnerable people while ensuring applicants/staff are not unfairly penalised for past behaviour that is no longer relevant to their role or risk profile.

9. Welsh Language Provision

Public Health Wales is committed to meeting the requirements of the Welsh Language Standards and providing services in Welsh.

9.1 Availability of DBS Applications in Welsh

Applicants who prefer to complete their DBS application in Welsh are supported to do so. The Disclosure and Barring Service (DBS), in line

with its own Welsh Language Scheme, provides Welsh-language guidance, support materials, and a dedicated Welsh-language helpline.

Public Health Wales and NWSSP will support applicants in accessing a Welsh language route.

9.2 Limitations

Due to legal requirements under the Police Act 1997, DBS certificates are issued in English only. While the application process and communications may be bilingual, the certificate itself cannot be provided in Welsh.

9.3 Communication and Support

Applicants are entitled to communicate with the DBS or Public Health Wales in Welsh at any stage of the process. Staff may:

- Request written communication in Welsh
- Contact the DBS Welsh-language helpline on 03000 200 191
- Request support from the Recruitment team to complete forms in Welsh

10. Accessibility During the DBS Application and Update Service Process

Public Health Wales is committed to ensuring that all staff and applicants can access and complete the DBS application process and register for the Update Service in an equitable and supported way. This includes recognising and addressing barriers experienced by people with disabilities, neurodivergent conditions, mental health issues, low digital literacy, limited access to technology, or who have specific privacy concerns, for example, related to gender identity and previous names.

10.1 Reasonable Adjustments and Support

Managers and recruitment teams must consider and, where appropriate, implement reasonable adjustments for those who may experience difficulty with the DBS application process. Examples of support include:

- Providing assistance with navigating the online application system or Update Service registration.
- Offering paper-based application alternatives where appropriate.
- Allowing additional time to complete the application or registration process.
- Providing guidance in plain English or offering additional explanation for complex parts of the process.
- Making information available in alternative formats, such as large print or audio, upon request.
- Offering private support to complete online registration in person or via supported video call.

10.2 Support with Accessibility Needs

Applicants and staff are encouraged to inform their manager or recruiting contact if they require additional support. Managers must seek advice from People Support if unsure how to respond to a request for adjustment. People and OD can work with recruitment partners (e.g. NWSSP) to ensure a suitable arrangement is made.

10.3 Access to Technology

Where there is lack of access to digital devices or reliable internet for completing DBS tasks (e.g. Update Service registration), the manager should arrange access to the organisation's equipment or on-site facilities or coordinate a supported session to complete the requirement.

10.4 Mental Health and Emotional Support

Public Health Wales recognises that engaging with the DBS process may cause anxiety or distress, particularly for those with lived experience of the criminal justice system. In these cases, staff are encouraged to:

- Speak to their manager or People and OD for guidance.
- Access support through the [Employee Assistance Programme](#) (intranet access required) or wellbeing services.
- Request a private and confidential conversation with your manager or [People Support](#) regarding any concerns about disclosures.

The organisation is committed to applying trauma-informed approaches, which recognise the potential impact of past experiences on mental health, behaviour, and responses. This means offering empathy, choice, and a non-judgemental environment throughout the DBS process to help those affected feel safe, supported, and treated with dignity.

10.5 Privacy and Gender Reassignment – Sensitive Applications Team

Public Health Wales recognises that some DBS applicants, including those who have undergone or are undergoing gender reassignment, may not wish to disclose previous names during the DBS application process. In such cases, they can contact the DBS Sensitive Applications Team, a confidential service that allows applicants to submit previous identity details directly to the DBS without sharing them with their employer.

This ensures that the DBS check can be completed accurately and securely while respecting the applicant's right to privacy. All information is handled in the strictest confidence by the DBS.

Staff or applicants wishing to use this service should contact the DBS Sensitive Applications Team via email at sensitive@dbs.gov.uk or by

telephone on 0300 106 1452. Further guidance and support can be provided by contacting the Recruitment Help Desk on 02921 500200.

11. Barring Referrals

The organisation has a legal duty to make a referral to the Disclosure and Barring Service (DBS) in certain circumstances, to protect children and adults at risk from harm. This involves the DBS making considered decisions about whether somebody should be barred from engaging in Regulated Activity with children, adults or both in England, Wales and Northern Ireland. A referral must be made when an staff member has:

- Engaged in conduct that harmed, or may harm, a child or adult at risk
- Placed a child or adult at risk of harm
- Been dismissed or removed from working (paid or unpaid) in a regulated activity because they posed a risk to children and adults at risk or would have been had they not resigned, retired, left voluntarily or been redeployed
- Been cautioned or convicted of a relevant (Automatic Barring either with or without the right to make representations) offence

Referrals must also be made when concerns arise during Section 5 meetings of the Wales Safeguarding Procedures, or a disciplinary or professional concerns process, where the above threshold is met. It is not necessary to wait until all internal procedures or appeals are completed. Timely referral helps prevent those who pose a risk from working elsewhere with Children and Adults at risk.

The following pathway should be followed to ensure timely and lawful referral:

1. Safeguarding concern of incident identified (e.g. through a complaint, disciplinary investigation, safeguarding report).
2. Internal case review undertaken, led by the manager and supported by People and OD, Corporate Safeguarding, and where relevant, the Professional Standards Lead.
3. If the threshold for a barring referral is met, a discussion must take place with:
 - Named Lead for Safeguarding
 - Professional Standards Lead (where applicable)
 - Directorate Nurse/Clinical Lead (where relevant)
4. A formal referral is completed and submitted to the DBS by an agreed representative (e.g. Named Lead for Safeguarding, People and OD, the relevant manager or investigating officer), following legal advice where required.

Out-of-hours concerns that may warrant immediate escalation should be referred to a senior manager or the Executive Director on call, who will coordinate with relevant senior staff and safeguarding leads. Any urgent

actions must be documented and followed up during working hours in accordance with the trigger pathway above.

Timely referrals help prevent those who pose a risk from working elsewhere with children or adults at risk and ensure the organisation complies with its safeguarding duties.

Referrals to the DBS must be made as soon as the criteria are met. It is not necessary to wait until all internal procedures or appeals are completed.

Guidance on the Barring Referral process can be found on the Public Health Wales [intranet](#).

12. Role Changes and Emerging DBS Requirements

There may be occasions where a role that did not previously require a DBS check becomes eligible for one due to a change in responsibilities, due to reasons such as organisational change processes (OCP), temporary acting-up arrangements, or redeployment.

Where a change in duties results in new safeguarding responsibilities, for example, unsupervised contact with children or adults at risk, the manager must use the DBS Eligibility Tool to determine whether a DBS check is now legally required. People and OD must be consulted to confirm eligibility in line with DBS guidance, and the DBS level in the ESR Position Number amended if required.

If a DBS check is required, the manager should arrange for a new DBS check to be undertaken and the staff member will be required to subscribe to the DBS Update Service. In such cases, they may legitimately disclose information that was not previously required due to the original nature of their role. Public Health Wales is committed to managing this process fairly, consistently, and in line with employment law and safeguarding obligations. Where a disclosure is made, the process outlined in Section 8 (Disclosure of Criminal Offences and Risk Assessment Process) will apply. The disclosure will not automatically result in dismissal or redeployment. A structured risk assessment will consider the relevance of the offence to the new duties, whether support or adjustments can mitigate risk, and any evidence of rehabilitation.

If they cannot continue in the changed role due to safeguarding concerns, alternatives will be explored, such as redeployment to a suitable post, in consultation with the staff member, their manager, and People and OD.

Any changes to role requirements must be documented, and communication with the staff member concerned must be clear and supportive throughout the process.

13. Equality, Diversity and Inclusion Commitment

Public Health Wales is committed to promoting equality, diversity and inclusion in all aspects of employment and service delivery. We will not tolerate discrimination on the basis of any protected characteristic, including age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief (or lack thereof), sex, or sexual orientation.

All decisions relating to DBS checks and disclosures must be based on objective, role-related criteria and assessed fairly, without bias, stereotyping, or assumptions related to personal characteristics. DBS information must be handled sensitively and must never be used to make inferences about a person's identity, background or suitability unless strictly relevant to the role and assessed through the structured risk assessment process set out in this policy.

14. Confidentiality, Storage, and Use of DBS Information

Public Health Wales is committed to managing Disclosure and Barring Service (DBS) information in accordance with the DBS Code of Practice, the Data Protection Act 2018, and UK GDPR. This ensures all DBS data is accessed only when necessary, used appropriately, stored securely, and treated with the highest level of confidentiality.

14.1 Access and Confidentiality

Access to DBS certificate information is strictly limited to those who are authorised and directly involved in recruitment, placement, or ongoing employment decisions. Information will never be used for purposes unrelated to safeguarding or assessing suitability for a role.

DBS information will only be shared externally where legally required, such as in safeguarding investigations. Any breach of confidentiality will be treated as a disciplinary matter.

14.2 Use of DBS Information

Information from DBS checks will only be used for the specific purpose for which it was obtained, to assess suitability for employment or volunteering in a role involving regulated activity. The organisation will not retain or rely on this information beyond what is necessary to make a decision or to meet ongoing safeguarding requirements.

Where appropriate, the outcome of a risk assessment will support suitability decisions.

14.3 Secure Storage, Retention, and Disposal

DBS information will be stored securely and retained only for as long as necessary, in line with the DBS Code of Practice:

- Physical records will be kept in locked, non-portable filing cabinets.
- Electronic records will be stored on secure systems with restricted access.
- Only the minimum necessary information will be retained for audit and compliance purposes, such as:
 - Date the DBS check was obtained
 - Level of check requested (e.g., standard, enhanced, barred list)
 - Certificate reference number
 - Confirmation of Update Service subscription
 - Outcome of any risk assessment or suitability decision

The full content of a DBS certificate, including conviction information, will not be retained unless there is a clear safeguarding or legal justification. In such cases, the rationale must be documented, regularly reviewed, and retained only for as long as necessary.

DBS information will not be kept for longer than six months following a recruitment or placement decision, unless an exception applies.

Secure destruction methods must be used when information is no longer required:

- Paper records must be cross-shredded or incinerated.
- Electronic records must be permanently deleted from systems, including any backups, to prevent recovery.

This ensures compliance with data protection principles and protects the confidentiality of sensitive information.

All documents generated under this policy are official records of Public Health Wales and will be managed in accordance with the organisation's Records Retention and Destruction Guidance.

15. Monitoring and Compliance

Compliance with this policy will be monitored by the People and OD Directorate in collaboration with relevant functions such as Safeguarding, Workforce Systems, and Information Governance.

Monitoring will include:

- Ensuring that staff in eligible roles have the appropriate level of DBS check in place
- Tracking the status of DBS checks via ESR and other relevant systems

- Monitoring subscriptions to the DBS Update Service
- Identifying and addressing any gaps, lapsed checks, or inappropriate DBS levels
- Auditing how DBS information is accessed, retained, and securely disposed of
- Regular reports and dashboards will be produced and shared with the appropriate governance groups, such as the Safeguarding Group.

Where non-compliance or system issues are identified, these will be escalated to the relevant senior manager or business area and tracked through an agreed action plan. Themes or learning will be used to strengthen processes, training, and support for managers and staff.

16. Implementation

All staff need to be made aware of the existence of this procedure which can be obtained on the Public Health Wales Policies Internet page and will be publicised via the staff intranet.

Managers should bring the guidance to the attention of their staff for information only. Whilst specific training is not offered on this policy, guidance is provided on the Public Health Wales intranet. Further guidance and support can be requested from the People and OD team by contacting PeopleSupport.PHW@wales.nhs.uk.

17. Equality and Welsh Language

This policy is available in Welsh on the Public Health Wales Policies Internet page. Correspondence can be made available in Welsh should a colleague so request.

18. Audit

The named lead will monitor this policy to ensure it is compliant with current legislation, to ensure it is effectively implemented, and ensure that it is reviewed in accordance with the timetable for review.

19. Distribution

All staff will be made aware of this policy upon commencement with Public Health Wales and when approved. Copies can also be viewed on the Public Health Wales Internet or obtained via the People and OD department by contacting PeopleSupport.PHW@wales.nhs.uk

20. Review and Feedback

This policy will be reviewed in 3 years' time or sooner if required. We are continually looking to improve our employment practices and welcome any feedback you may have in relation to this policy.

We are continually looking to improve our employment practices and welcome any feedback you may have in relation to this policy. Feedback can be provided by emailing [People Support](#) or via your Trade Union representative.

These arrangements may be reviewed and updated in the event of an enhanced or emergency response, at which time local or national guidance may supersede these arrangements.

Disclosure and Barring Service (DBS) Policy

Appendix 1

Subscribing to the DBS Update Service

Purpose

This appendix provides staff with the information required to subscribe to, maintain, and notify Public Health Wales of their membership in the Disclosure and Barring Service (DBS) Update Service.

How to Subscribe

- Staff are required to subscribe to the DBS Update Service within 30 calendar days of their DBS certificate being issued.
 - To subscribe, visit <https://www.gov.uk/dbs-update-service> and select "Register for the Update Service."
 - You will need:
 - Your DBS application reference (found in your Trac email confirming the application has been submitted to the DBS) OR DBS certificate number (found on your certificate).
 - A valid debit or credit card to pay the annual subscription fee (£16).
-

DBS Update Service Subscription Notification

- Once you have subscribed, you must complete the **DBS Update Service Subscription Notification Form** (Microsoft Form).
 - The form will ask you for details, such as:
 - Your name.
 - Your National Insurance number.
 - Your DBS application or certificate number.
 - Your Update Service subscription reference.
 - Date of subscribing
 - A link to this form will be provided as part of the recruitment/renewal process and is available on the intranet [insert link once live].
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Reimbursement

- The annual subscription fee (£16) will be reimbursed through payroll.
 - Reimbursement will appear in your payslip on the next possible pay date following submission of your Notification Form.
 - The reimbursement will be clearly itemised on your payslip.
-

Maintaining Your Subscription

- Staff are responsible for ensuring their subscription is renewed annually.
- Each year, once renewal is completed, the Subscription Notification Form must be resubmitted to confirm continued membership and allow reimbursement of the renewal fee.
- Renewal reminders are issued by the DBS directly to the subscriber.
- Failure to maintain a valid subscription may result in additional DBS checks being required and may impact eligibility to continue in role.

Further Information

Full details are available on the UK Government website:
<https://www.gov.uk/dbs-update-service>