



# The Switch Ex-Offenders Policy

Last Updated	March 2026
Next Review Due	March 2027
Responsible Officer	Angela Lattimore

## 1. Purpose and Principles

As an organisation assessing the suitability of applicants, staff and volunteers for roles that fall within the scope of the *Rehabilitation of Offenders Act 1974 (Exceptions) Order*, and which require criminal record checks processed by the Disclosure and Barring Service (DBS), The Switch complies fully with the DBS Code of Practice and undertakes to treat all applicants fairly.

The Switch does not discriminate unfairly against any individual who is the subject of a criminal record check, including on the basis of a conviction, caution, or other information revealed, and follows the Equality Act 2010 and sector best practice.

The Switch only requests information on convictions or cautions that we are legally entitled to receive, in accordance with the *Police Act 1997*, the *Rehabilitation of Offenders Act 1974 (Exceptions) Order*, and applicable Filtering Rules.

Where a standard or enhanced DBS certificate is legally permitted, The Switch may only ask applicants to disclose convictions or cautions that are not “protected” under the filtering rules. Processing of such information is undertaken in compliance with the *Data Protection Act 2018*, *UK GDPR*, and transparency obligations under the *Data (Use and Access) Act 2025*.

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## 2. Equality, Inclusion and Fair Treatment

The Switch is committed to the fair treatment of all staff, potential staff, volunteers, work experience hosts, mentors, and beneficiaries of its services, regardless of race, gender, religion or belief, sexual orientation, socio-economic background, age, disability, caring responsibilities, or offending history.

This policy is made available to all applicants requiring a DBS check at the start of the application or onboarding process.

The Switch welcomes applicants with a diverse range of backgrounds and experience, including individuals with criminal records, provided safeguarding standards can be met.

Applicants are selected for interview based on their skills, qualifications, experience, and suitability for working with children, young people, schools, volunteers, or other programme participants.

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## 3. Requests for DBS Checks

A DBS check will only be requested after a role-specific safeguarding and risk assessment concludes that it is proportionate and relevant to the role, in line with Charity Commission guidance and safer-recruitment expectations.

Where a DBS check is required, all application forms, role descriptions, volunteer briefs and recruitment materials will clearly state that a DBS certificate is required

before appointment. Applicants will also be informed about how their data will be used and stored, in line with the *Data (Use and Access) Act 2025*.

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#### 4. Recruitment, Interviewing and Assessment

The Switch ensures that all staff involved in recruitment or volunteer onboarding receive appropriate training in assessing the relevance of criminal-offence data, understanding the *Rehabilitation of Offenders Act 1974*, safer recruitment practices, equality and inclusion, and their responsibilities under UK GDPR and DUAA 2025.

During interviews or follow-up discussions, The Switch ensures an open, sensitive and proportionate conversation takes place regarding any disclosed information, to ensure risk is assessed fairly and respectfully.

Failure to disclose legally required information that is directly relevant to the role may result in the withdrawal of an employment or volunteer offer.

Before withdrawing any conditional offer, The Switch will ensure the applicant has an opportunity to discuss any information appearing on the DBS certificate.

If any matter relates to a complaint, safeguarding allegation or concern, procedures will be followed in line with The Switch Complaints Handling Policy.

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#### 5. Access to the DBS Code of Practice

The Switch ensures that every applicant undergoing a DBS check is informed of the DBS Code of Practice. A copy is available on request or via the DBS website.

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#### 6. Storage, Retention and Security of Criminal-Offence Data

The Switch retains the following information securely:

- applicant's name
- DBS certificate number
- date of issue
- role applied for
- suitability decision

- a summary of the risk-assessment outcome (not the full certificate)

Records are stored securely, encrypted, and accessible only to the DBS Administrator and the Designated Safeguarding Lead (DSL). Access logs are maintained in accordance with DUAA 2025 audit-trail requirements.

Criminal-offence data is retained only for as long as necessary, typically for the duration of an individual's engagement with The Switch and no more than 12 months afterwards, unless a longer period is legally required for safeguarding or regulatory purposes. The DBS certificate itself is not retained.

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## 7. Safeguarding Statement

The Switch is committed to safeguarding children, young people, volunteers, schools and community partners. All recruitment decisions prioritise the safety and welfare of beneficiaries, in line with *Working Together to Safeguard Children* and Charity Commission expectations for safer recruitment.

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## Policy Review

This policy will be reviewed at least every 12 months, or sooner if legislation, DBS guidance, DUAA 2025 requirements or safeguarding standards change.

The logo for 'the switch' is displayed in a bold, purple, lowercase sans-serif font. The word 'the' is positioned above 'switch', and the 'i' in 'switch' has a dot. The overall style is modern and clean.