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| THIS POLICY IS FOR:           | All Staff including Agency Workers (temporary workers), Commissioners and Service Users |

## DBS / DISCLOSURE

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# DBS / DISCLOSURE POLICY AND PROCEDURE

This policy outlines the procedures that Nursing Direct Healthcare Limited (hereinafter referred to as "Nursing Direct") must follow to conduct criminal record checks for new candidates applying to work as Agency Workers. It also details the ongoing DBS (Disclosure and Barring Service) checks required for compliance.

Conducting DBS checks is a key element of a robust compliance strategy aligned with the standards set by the Care Quality Commission (CQC) and government regulations. With the support of the Government Criminal Records Bureau, Nursing Direct ensures the completion of DBS checks to assess the suitability of candidates for the role of Agency Worker.

A DBS (Disclosure and Barring Service) check provides a record of a candidate's criminal convictions and cautions. It includes details of all spent and unspent convictions, cautions, reprimands, and final warnings listed in central police records (excluding protected convictions and cautions). Additionally, it may contain relevant information from local police records deemed reasonably necessary.

The DBS (Disclosure and Barring Service) is responsible for maintaining the Adults' and Children's Barred Lists, which identify individuals prohibited from engaging in regulated activities. As Nursing Direct is involved in providing regulated activities for children and/or adults, it may request a check of one or both barred lists, depending on the service user or the specific package the candidate will be working with.

## POLICY AIMS

To prioritise DBS checks as an integral part of its compliance strategy. This approach is implemented within the framework of safer recruitment assessments, reflecting Nursing Direct's commitment as a responsible, regulated employer and care provider. By conducting these checks, Nursing Direct ensures the safety and well-being of its vulnerable service user groups while delivering regulated care and support services.

Nursing Direct conducts DBS checks to ensure safe recruitment decisions regarding its applicants and candidates, with a primary focus on:

- Preventing unsuitable candidates from working with vulnerable service users and maintaining records to support this effort.
- Verifying whether there are any reasons a prospective or potential candidate may be inappropriate for the role for which they have applied.

To ensure that all recruitment processes, including those involving third-party recruitment agencies, are conducted in accordance with Nursing Direct's DBS and disclosure requirements. When outsourcing staffing solutions, recruitment agencies must adhere to our policies and procedures to ensure that all candidates meet the necessary DBS checks and compliance standards.

## 1. PURPOSE

- 1.1 To ensure that the Agency Workers who are engaged in regulated activities with vulnerable adults and/or children are subject to a DBS check of the appropriate level and that Nursing Direct complies with its duties under the Rehabilitation of Offenders Act 1974 (Exceptions) Order.
- 1.2 To ensure that Nursing Direct is fully informed of the regulatory requirements set by the Care Quality Commission (CQC) and the Government, as well as the consequences of non-compliance with these standards. This includes adhering to procedures established by the Government to safeguard vulnerable service users. Nursing Direct, as an employer and care provider, must ensure that no Agency Workers with DBS issues or those listed on the DBS barred lists are employed in regulated activities.
- 1.3 To support Nursing Direct to meet regulatory requirements and Key Lines Of Enquiry (KLOE) and Quality Statements that are outlined by the CQC.
- 1.4 To establish a robust governance framework ensuring that Nursing Direct fulfils its responsibilities in monitoring compliance with DBS check requirements. This framework aims to mitigate the risks of non-compliance with Government and Care Quality Commission (CQC) standards regarding DBS clearance for its workers. It also ensures the implementation of safer recruitment practices, enabling the employment of suitable individuals to deliver effective care and support while prioritising the safety and safeguarding of service users at all times.
- 1.5 To establish clear guidelines for conducting DBS checks on all workers, including those provided by external recruitment agencies. Nursing Direct requires that any recruitment agency engaged to supply staff including Agency Workers fully complies with our DBS procedures and policies to safeguard the safety of our vulnerable service users.
- 1.6 To meet the legal and regulatory requirements and to fulfil Nursing Direct's compliance responsibilities regarding recruitment, it has taken into consideration the following legislations;
  - Serious Organised Crime and Police Act 2005 (commencement No.16) Order 2020
  - Police Act 1997 (Criminal Records) (Amendment) Regulations 2020
  - The Police Act 1997
  - Rehabilitation of Offenders Act 1974 (Exceptions) Order
  - The Care Act 2014
  - Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015
  - Safeguarding Vulnerable Groups Act 2006
  - Data Protection Act 2018
  - Coronavirus Act 2020
  - UK GDPR

## 2. SCOPE

2.1 The following roles may be affected by this policy:

- All staff including Agency Workers

2.2 The following Service Users may be affected by this policy:

- Service Users

2.3 The following stakeholders may be affected by this policy:

- Service Users / Next of Kin / Family
- Power of Attorney / Advocates
- Recruitment Agencies
- Commissioners
- External health professionals
- Local Authority
- NHS

## 3. OBJECTIVES

3.1 To ensure that Nursing Direct upholds effective and safe recruitment practices, supported by a clear and straightforward policy outlining the importance of conducting DBS checks for Agency Workers. The primary objective is to safeguard service users by preventing individuals known to pose a risk from working with those who rely on Nursing Direct's healthcare services. As a CQC-regulated care provider, Nursing Direct prioritises the safety and well-being of its vulnerable service users.

3.2 To ensure that those individuals carrying out regulated activities are aware of the requirement to hold a valid and current DBS check.

3.3 To ensure that there is a clear understanding at the recruitment stage regarding the information Nursing Direct is entitled to request about convictions and ask for further evidence on any notifiable remark on the DBS certificate.

3.4 To determine when a DBS check is required, at what level, and how it will be maintained and ensured in compliance with regulatory requirements on an ongoing basis.

3.5 To ensure that workers of Nursing Direct who are carrying out regulated activities for which they involve working with children, and vulnerable adults, should be subject to an Enhanced Disclosure regime and they are aware of the requirement to hold a valid and current DBS check.

3.6 To ensure that Nursing Direct follows the most up-to-date guidance from the CQC and the Government on DBS and that the safety of Service Users is promoted.

3.7 To ensure that all DBS checks and relevant declarations and documents are stored in accordance with the laws on Data Protection.

3.8 To ensure that all candidates supplied by recruitment agencies undergo thorough DBS checks and meet our regulatory compliance standards. Nursing Direct will work closely with recruitment agencies to ensure they are fully aware of and adhere to our policies and procedures regarding safer recruitment practices.

## 4. POLICY

4.1 Nursing Direct is committed to safer recruitment practices and conducts DBS checks as a key risk mitigation measure. This ensures the protection and safeguarding of vulnerable service users. By implementing and adhering to a comprehensive DBS Policy, Nursing Direct reinforces its commitment to compliance and safeguarding standards.

4.2 Nursing Direct is committed to the fair treatment of its staff including Agency Workers, potential staff including Agency Workers or Service Users, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability, or offending background.

4.3 Nursing Direct actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records. Nursing Direct selects all candidates for interviews based on their skills, qualifications, and experience.

4.4 As an organisation using the DBS service to assess applicants' suitability for positions of trust, Nursing Direct complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and information.

4.5 Nursing Direct undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

4.6 Nursing Direct complies fully with its obligations under the Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention, and disposal of disclosure information.

4.7 Nursing Direct takes its duties to protect Service Users from unsuitable people gaining access to them very seriously. Nursing Direct balances this duty with respect for human rights, privacy, and compliance with UK GDPR.

- 4.8 Prospective candidates are required to disclose any criminal convictions, warnings, or reprimands at all stages of the recruitment and selection process. This will include all spent (as well as unspent) convictions, cautions and reprimands. Candidates will be informed that failure to disclose could result in a conditional offer being withdrawn. Candidates will also be informed that any disclosure will be held in confidence and discussed only with the HR Team as appropriate.
- 4.9 Any data collected as part of this policy will be processed in accordance with current data protection legislation, the Privacy Notice issued to staff including Agency Workers and the Data Security and Data Retention Policy and Procedure at Nursing Direct. Nursing Direct appreciates that certain data related to criminal records will be special category data and Nursing Direct will process this data accordingly.
- 4.10 Nursing Direct considers that the roles below will fall within the groups requiring DBS checks and that are Excepted Roles, allowing Nursing Direct to ask questions about any spent convictions:
- Any work defined as regulated activity relating to children within the meaning of Schedule 4 Part 1 of the Safeguarding Vulnerable Groups Act 2006
  - Any work defined as “work with children” in regulation 5C of the Police Act 1997 (Criminal Records) Regulations 2002
  - Any work defined as regulated activity relating to adults within the meaning of Schedule 4 Part 2 of the Safeguarding Vulnerable Groups Act 2006
  - Any work defined as “work with adults” in regulation 5B of the Police Act 1997 (Criminal Records) Regulations 2002; and
  - Any office or employment which is concerned with:
    - The provision of care services to vulnerable adults; or
    - The representation of, or advocacy services for, vulnerable adults by a service that has been approved by the Secretary of State or created under any enactment
  - And which is of such a kind as to enable a person, in the course of his normal duties, to have access to vulnerable adults in receipt of such services
- 4.11 Nursing Direct will comply with the provisions of the Rehabilitation of Offenders Act 1974 (Exceptions) Order as set out in this policy.
- 4.12 This policy should be read alongside the Recruitment Policy and Procedure of Nursing Direct.
- 4.13 This policy does not form part of any contract of employment and may be amended at any time.
- 4.14 Nursing Direct’s DBS policy extends to all staff, including those sourced through recruitment agencies. Any agency supplying staff including Agency Workers to Nursing Direct must confirm that all candidates have undergone DBS checks in accordance with our policy, and that they fully comply with the disclosure requirements set out by Nursing Direct and regulatory bodies such as the CQC.

## 5. PROCEDURE

### 5.1 DBS Process

An Enhanced DBS certificate will be requested as part of the pre-recruitment checks at Nursing Direct, following an offer of employment, for all roles. This is in accordance with Nursing Direct’s involvement in regulated activities, ensuring compliance with safeguarding and regulatory requirements.

The Disclosure and Barring Service (DBS) offers three types of criminal record check:

- 1) **Basic DBS Checks** – contains details of unspent convictions, conditional and unconditional cautions, or a statement that the individual has no such convictions or cautions. An individual can apply directly to the Disclosure and Barring Service to obtain a basic check.
- 2) **Standard DBS Checks** – contains details of an individual’s convictions, cautions, reprimands, or warnings recorded on police central records and includes both ‘spent’ and ‘unspent’ convictions. These are shown on a criminal records check
- 3) **Enhanced DBS Checks** – contains the same details as a standard check, together with any information held locally by police forces that it is reasonably considered might be relevant to the post applied for. These can only be applied for in the event that the post is an excepted post included in both the Exceptions Order and the Police Act Regulations.

The Enhanced DBS check may also include checks of any information stored about the individual on any statutory lists as set out below:

- **Enhanced DBS and Barred List Check (Child)** – includes information from the DBS Children’s Barred List and is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act regulations, for example, prospective adoptive parents.
- **Enhanced DBS and Barred List Check (Adult)** – includes information from the DBS Adult’s Barred List and is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act regulations.

More information about which cautions are shown on a DBS check can be read from the Government website.

Each type of a DBS check results in a DBS certificate and the information shown on a certificate varies depending on the type of DBS Check that has been requested / applied for.

- 5.2 Nursing Direct expects all current and prospective staff including Agency Workers to voluntarily disclose any spent and unspent convictions. Nursing Direct is entitled to ask about spent convictions on the basis that the role is an Excepted Role as outlined above. For guidance on when a conviction will be unspent, please see the table that supports this policy.
- 5.3 As an organisation assessing an applicants’ suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Nursing Direct complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly.

Nursing Direct undertakes to not discriminate unfairly against any person who is the subject of a criminal record check on the basis of a conviction or other information revealed.

Nursing Direct can only ask an individual to provide details of convictions and cautions that it is legally entitled to know about.

A DBS Certificate at either standard or enhanced level can legally be requested where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and, where appropriate, Police Act Regulations as amended. It is the view of Nursing Direct that most of the job roles provided by Nursing Direct will be excepted roles and Nursing Direct will be entitled to request details of any spent convictions.

- 5.4 Nursing Direct can only ask an individual about convictions and cautions that are not protected.
- 5.5 Nursing Direct ensures from the recruitment stage that those who are involved in the recruitment process have been suitably trained to recognise when a DBS/Disclosure requires escalation for further review before granting clearance to work.
- 5.6 Nursing Direct also ensures that they have received appropriate guidance in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- 5.7 An Enhanced DBS Certificate will be required as a condition of employment if the individual is authorised to work as an Agency Worker.
- 5.8 At the recruitment stage, candidates are required to declare any convictions or cautions within the application pack. If there is a declaration, Nursing Direct will ensure that a confidential discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of employment or, if the employment has commenced, dismissal from that employment. Nursing Direct considers that failure to reveal information that is directly relevant to the position sought would be an act of gross misconduct.
- 5.9 **DBS Update Service**  
Nursing Direct may require candidates and staff including Agency Workers who already have existing DBS Certificates to sign up to the DBS Update Service and consent to Nursing Direct having access to it. This allows Nursing Direct to carry out checks to see if any new information has come to light since the date of the original check. It is the decision of Nursing Direct as to whether it will pay this fee on behalf of the candidate.
- 5.10 **Handling and Disposal of Disclosure Information**  
Nursing Direct will take the following steps when handling and disposing of disclosure information:
- Ensure that disclosures are available only to those who need to have access to them in the course of their duties relevant to recruitment and vetting. The DBS maintains a record of all those to whom certificates and certificate information has been revealed. It is a criminal offence to pass disclosure information to anyone who is not entitled to receive it
  - Ensure that disclosure information is kept in secure conditions in a locked, non-portable container (wherever possible, in rooms to which access is limited to staff including Agency Workers engaged in recruitment work). Keys or combinations to the container must not be freely available within Nursing Direct and access must be restricted to named individuals who are entitled to see it as part of their duties.
  - Use certificate information only for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- 5.11 **Positive Disclosure**  
If there is a positive disclosure in any returned DBS check then this does not automatically mean that the person should not be employed. Nursing Direct should review the nature of the information disclosed against the role the person will be undertaking and make a decision on the suitability of employment. Any decision should be based upon a robust, fair, transparent, and equitable risk assessment process that is specific to the content of the disclosure and the role to be undertaken. Any decision made regarding the person's employment should be recorded and be able to be justified. The actual DBS disclosure should be held in line with data protection Laws and the process highlighted above.
- 5.12 **Overseas Criminal Records Checks**  
The application process for criminal records checks or 'Certificates of Good Character' for a candidate from overseas varies from country to country. Staff, including agency workers, can apply for these certificates through the relevant embassy in the UK where this is required. All certificates must be provided in English, and any associated costs will be the responsibility of the applicant. A certificate is required for all candidates to Nursing Direct who have lived outside of the UK for 12 months or more (whether continuously or in total) in the last ten years, while aged 18 or over.
- 5.12.1 **Getting a criminal records check for time spent abroad**  
Details of how to obtain a criminal records check from the relevant authorities abroad are available at GOV.UK. If the country concerned is not listed, Nursing Direct will contact the relevant embassy or consulate for further details.
- 5.12.2 **If Nursing Direct cannot obtain a criminal record certificate from the relevant country**  
It is not always possible to obtain a certificate from countries that do not have functioning criminal record regimes or refuse to provide these to anyone other than their own citizens. In the absence of available checks, Nursing Direct must obtain as much information as possible in the form of references before deciding whether to make an offer of employment.
- 5.13 **Rehabilitation of Ex-Offenders**  
Nursing Direct complies with The Rehabilitation of Offenders Act 1974 and seeks to ensure that past offence(s) do not impact on an individual's life after the offence(s), if they have continued to abide by the law. This usually means that Nursing Direct does not consider any spent conviction unless someone wants to work with children, young people, or adults at risk.
- 5.14 A person who has been convicted of a criminal offence but does not re-offend during a specific period will be entitled to treat themselves as having a clean record in certain circumstances. The effect is to treat this conviction as "spent", meaning that the person is not obliged to disclose it. This is unless the occupation for which they are employed is an "excepted occupation" or if the rehabilitation period has not yet expired. The individual will be told if the role they have applied for is an excepted occupation.
- 5.15 When a candidate is applying to work with children, young people, or adults at risk - regardless of whether a conviction is deemed spent - you are required by law to inform Nursing Direct. Failure to disclose this is a gross misconduct offence and may lead to summary dismissal or, if not yet employed, withdrawal of an offer of employment.

5.16 Having a criminal record will not necessarily bar a person from working with Nursing Direct. This will depend on the nature of the position and the circumstances and background of the offences.

#### 5.17 **Barring Referral**

It is a legal requirement that Nursing Direct must make a referral to the DBS to be added to the barred list where there is evidence that staff including Agency Workers are guilty of misconduct by harming a Service User or putting a Service User at risk of being harmed. As a result, staff including Agency Workers is dismissed or removed from their care role.

The DBS barred list makes sure that any person who has been guilty of misconduct by harming a Service User should not be able to get a new job elsewhere in a care position.

A referral must be made when Nursing Direct has dismissed or removed the individual from working in a care role because they have done at least one of the following:

- Engaged in relevant conduct that has harmed the Service User or put them at risk of harm
- Been cautioned or convicted for a relevant offence
- Satisfied the Harm Test (i.e. there has been no relevant conduct, but the risk of harm still exists) Harm can take many forms and includes sexual harm, physical harm, financial harm, neglect, emotional harm, psychological harm, and verbal harm. Referrals to DBS can be made online or by post.

5.18 The procedure for DBS checks applies equally to workers provided by recruitment agencies. Agencies are required to submit evidence that their candidates have undergone DBS checks in line with Nursing Direct's standards. Any agency found not to comply with these procedures may have their contract with Nursing Direct reviewed or terminated to ensure ongoing compliance with safeguarding regulations.

## 6. DEFINITIONS

### 6.1 **All staff including Agency Workers**

#### **Staff**

Denotes the employees of Nursing Direct Healthcare Limited.

#### **Agency Workers**

Refers to individuals who are contracted with Nursdoc Limited or another employment business as an Agency Worker (temporary worker) provided to Nursing Direct Healthcare Limited to perform care services under the direction of Nursing Direct.

### 6.2 **Nursing Direct**

Nursing Direct, also known as Nursing Direct Healthcare Limited, is the entity regulated by the CQC (Care Quality Commission) and responsible for the care service provision, contracted to provide homecare services to service users in their homes, in placements, essential healthcare facilities and in the community.

### 6.3 **Nursdoc Limited**

As the sister company to Nursing Direct Healthcare Limited, Nursdoc Limited acts as an employment business, specialising in providing staffing solutions to the healthcare sector.

### 6.4 **CQC (Care Quality Commission)**

CQC throughout this policy, the term "CQC" refers to the Care Quality Commission (CQC) which is the independent regulator of health and social care in England.

### 6.5 **Regulated Activities**

- **The Conveying of Adults** – A person who transports an adult because of their age, illness or disability either to or from their place of residence and a place where they have received, or will be receiving, health care, personal care or social care; or between places where they have received or will be receiving health care, personal care or social care. This will not include family and friends or taxi drivers
- **Provision of Assistance in the Conduct of a Person's Own Affairs** – Anyone who provides various forms of assistance in the conduct of an adult's own affairs, for example, by virtue of an enduring power of attorney. Please see the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, for the further categories which are covered here
- **Provision of Assistance in Relation to General Household Matters** – The provision of assistance to an adult because of their age, illness, or disability, in relation to managing the person's cash, paying their bills, or shopping on their behalf
- **Provision of Social Work** – The provision of social care by a social care worker which is required in connection with any health care or social services to an adult who is a client or potential client
- **Provision of Personal Care** – This means any of the following:
  - Providing physical assistance with eating or drinking including the administration of parenteral nutrition, going to the toilet, washing, or bathing, dressing, oral care, or the care of the skin, hair or nails because of an adult's age, illness, or disability
  - Prompting and supervising an adult in relation to the above activities who, because of their age, illness, or disability, would otherwise be unable to make a decision to perform the above
  - Training, instructing, or offering advice or guidance which relates to the performance of the above activities to an adult who requires it because of their age, illness, or disability
- **Provision of Health Care** – Any healthcare professional providing health care to an adult, or anyone who provides health care to an adult under the direction or supervision of a healthcare professional
- The definition of regulated activity relating to adults identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. There are six categories of regulated activity, and a broad outline of these categories is set out below:
  - In addition, any activity which consists of or involves the day-to-day management or supervision of a person carrying out a regulated activity on a regular basis is in itself a regulated activity

### 6.6 **Unspent Conviction**

A conviction which is sufficiently historical to fall outside the time periods where a conviction would be classed as unspent

6.7 **Spent Conviction**

A spent conviction is a conviction which, under the terms of the Rehabilitation of Offenders Act 1974, can be effectively ignored after a specified amount of time. The amount of time for rehabilitation depends on the sentence imposed, not on the offence

6.8 **Excepted Occupation**

A role that falls within the Rehabilitation of Offenders 1974 (Exceptions) Order and which entitles an employer to request a DBS check to reveal all spent and unspent convictions

6.9 **Child**

A person aged under 18.

6.10 **Caution**

A formal warning about future conduct given by a senior police officer, usually in a police station, after a person has admitted an offence. It is used as an alternative to a charge and possible prosecution, generally used for juvenile or first-time offences. Basically, there are two types of caution, which we have noted below:

- **Simple Caution** – Previously known as a formal caution - is used to deal quickly and simply with those who commit less serious crimes. It aims to divert offenders away from appearing in court and to reduce the likelihood of them offending again.
- **Conditional Caution** – Introduced by the Criminal Justice Act 2003, differs from a simple caution in that the offender must comply with certain conditions to receive the caution and to avoid prosecution for the offence they have committed. Like simple cautions, conditional cautions aim to keep lower-level offenders out of court. The conditions are usually in the form of rehabilitation or reparation where the offender is requested to repair/or make good the damage caused. The offender may be requested to pay financial compensation.

6.11 **Special Category Data**


Special Category Data is a category of data which is more sensitive than normal personal data. This includes data which relates to:

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Genetics
- Biometrics (where used for ID purposes)
- Health
- Sex life
- Sexual orientation

**OUTSTANDING PRACTICE**

To be 'outstanding' in this policy area you could provide evidence that:

- Nursing Direct carries out and retains records of assessments for each role regardless of level
- Nursing Direct follows best practice and carries out enhanced checks on all prospective members of staff
- Nursing Direct ensures, as far as is possible, that all members of staff including Agency Workers are signed up to the update service
- Nursing Direct ensures that a clear re-checking practice is established and maintained consistently without exception
- Nursing Direct is highly proactive in understanding the nature of convictions, supports applicants with convictions to apply, and treats applicants on an individual basis
- Nursing Direct can demonstrate a full understanding of whether a role is classed as "Excepted Occupation" or not, and applies the relevant criteria and processes for each

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| <b>COMPLETED DATE:</b> |   |
| <b>SIGN OFF DATE:</b>  |   |
| <b>REVIEW DATE:</b>    |   |
| <b>SIGNED:</b>         | <br>Marc Stiff – Group Managing Director |