

DBS Escalation Procedure Policy

Policy updated: 15.09.2026

This policy will be reviewed every 12 months.

1. Purpose

Dunbar Education is committed to safeguarding children and ensuring that all candidates are appropriately vetted before being cleared to work in education settings.

This policy sets out the process to follow when a candidate has information disclosed on their DBS that requires review.

2. Scope

This policy applies to all candidates registered with Dunbar Education who require a DBS check for work with children under the age of 18.

3. DBS Disclosure

Where a candidate's DBS contains a disclosure, the candidate must complete Dunbar Education's **DBS Self Declaration**.

The candidate must provide the information requested on the form, including details and circumstances of the conviction or caution, and sign the declaration. If information on the DBS certificate does not match the information provided by the candidate, the matter must be referred to Compliance and, where appropriate, the authorised Manager for further review. The candidate must remain on hold until the discrepancy has been resolved.

If the candidate does not complete the DBS Self Declaration or does not provide information reasonably requested as part of the review, the candidate must remain on hold and must not be placed until the required information has been received and reviewed.

4. Manager Review and Sign-Off

The completed DBS Self Declaration must be referred to an authorised Manager for review.

The Manager will review the information provided and consider:

- whether the candidate is suitable to work with children;
- whether there are any safeguarding concerns; and
- any other information relevant to the candidate's suitability.

If further information is required, the candidate will remain on hold until this has been obtained and reviewed.

The Manager must complete, sign and date the Manager section of the DBS Self Declaration to confirm their decision.

There are two outcomes:

Signed Off – The Manager is satisfied that the candidate can proceed through the compliance process.

Not Signed Off – The candidate cannot be cleared for placement.

No Manager sign-off = no placement.

Where the authorised Manager has a personal involvement in the recruitment or placement of the candidate, the DBS review must be completed by another authorised Manager.

5. Compliance Sign-Off

Following Manager approval, Compliance will check that:

- the DBS Self Declaration has been completed and signed by the candidate;
- the Manager review has been completed;
- the Manager has signed and dated the form; and
- there are no outstanding DBS actions.

Compliance will then complete the **Compliance Sign Off** section.

The candidate may only be fully cleared once all other required compliance checks have also been completed.

Where a candidate has a conviction or other relevant DBS disclosure, this must continue to be clearly stated on the candidate's **vetting form**, even where the candidate has been reviewed and signed off by a Manager.

Manager and Compliance sign-off confirms that Dunbar Education has completed its internal review and is satisfied that the candidate may proceed. **It does not remove or conceal the DBS disclosure from the candidate's vetting information.**

6. Client Notification

Where a candidate has a conviction or relevant DBS disclosure, the Recruitment Consultant must follow Dunbar Education's client notification procedure and ensure that any information that is required to be shared with the client is communicated before the candidate is placed or starts an assignment.

The Recruitment Consultant must not independently decide what DBS information should be disclosed to a client where guidance from Compliance or an authorised Manager is required.

The disclosure must also remain clearly identified on the candidate's vetting form so that the Consultant is aware of the requirement to discuss it with the client.

Manager sign-off does not remove the Consultant's responsibility to advise the client.

Any information shared must be handled appropriately, confidentially and in accordance with Dunbar Education's Data Protection and Safeguarding procedures.

7. Safeguarding Concerns

If the disclosure or information provided raises a safeguarding concern, the candidate must remain on hold and the matter must be immediately escalated to Dunbar Education's Designated Safeguarding Lead or other authorised safeguarding lead.

The candidate must not be placed or permitted to commence an assignment until the safeguarding concern has been reviewed and an appropriate decision has been recorded.

8. DBS Escalation Process

DBS disclosure identified



Candidate completes and signs DBS Self Declaration



Manager reviews declaration



Manager signs off?

YES → Manager signs form → Compliance signs off → Disclosure recorded on vetting form → Candidate continues through compliance process → Consultant advises client of conviction/disclosure before placement.

NO → Candidate is not cleared for placement.

Further information needed? → Candidate remains on hold until Manager review is complete.

9. Responsibilities

Candidate: Complete the DBS Self Declaration accurately and provide any further information requested.

Recruitment Consultant: Ensure DBS disclosures are referred to Compliance, do not place a candidate while sign-off is outstanding, check whether any client notification is required and, where required, ensure the client is appropriately informed before placement in accordance with Dunbar Education's procedures.

Manager: Review the disclosure and decide whether the candidate can be signed off.

Compliance: Ensure the required candidate and Manager sections are complete, complete Compliance sign-off, ensure the conviction/disclosure is stated on the vetting form and maintain the appropriate compliance record.

10. Record Keeping and Confidentiality

DBS declarations and associated information must be treated as confidential and only accessed by authorised personnel.

The completed DBS Self Declaration, Manager sign-off and Compliance sign-off must be retained in accordance with Dunbar Education's compliance and data protection procedures.

Any sharing of DBS information with a client must be appropriate, relevant and handled in accordance with Dunbar Education's data protection procedures.

11. Key Control

A candidate with a DBS disclosure must not be cleared for placement until the DBS Self Declaration has been reviewed and signed off by an authorised Manager and subsequently signed off by Compliance.

Where the candidate is signed off:

The conviction/disclosure must still be stated on the candidate's vetting form, and the Recruitment Consultant must advise the client of the conviction/disclosure before placement.

Manager sign-off means the candidate has been approved to proceed through Dunbar Education's compliance process. **It does not mean that the conviction or disclosure is removed from the candidate's record or does not need to be communicated to the client in accordance with Dunbar Education's procedures.**

Recruitment Consultants and Compliance staff cannot override these requirements.