## April 2019

# POLICY STATEMENT ON THE RECRUITMENT OF EX-OFFENDERS

As an organisation using the Disclosure & Barring Service (DBS) to assess applicants’ suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013), Pilkington Retirement Services Ltd (PRSL) complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly.

PRSL undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

PRSL can only ask an individual to provide details of convictions and cautions that are legally entitled to know about.

Where 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) PRSL can only ask an individual about convictions and cautions that are not protected.

PRSL is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

PRSL has a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process (this policy).

PRSL 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.

PRSL select all candidates for interview based on their skills, qualifications, and experience.

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

PRSL ensures that all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

PRSL also ensures 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 on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

PRSL makes every subject of a criminal record check submitted to DBS aware of the existence of the DBS [code of practice](https://www.gov.uk/government/publications/dbs-code-of-practice) and makes a copy available on request.

PRSL undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

**Having a criminal record will not necessarily bar you from working with us.** This willdepend on the nature of the position and the circumstances and background of your offences.

Where a criminal record check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their record at an early stage of the application process in line with whether the post is or is not exempt from the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) – \*see below. We request that this information is sent under separate, confidential, cover to a designated person within PRSL and we guarantee that this information is only seen by those who need to see it as part of the recruitment process.

\*This post is exempt from the Rehabilitation of Offenders Act 1974 and therefore applicants are required to declare any convictions, cautions, reprimands and final warnings that are not protected (i.e. that are not filtered out) as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013).

\*This post is not exempt from the Rehabilitation of Offenders Act 1974. We only ask applicants to disclose convictions which are not yet spent under the Rehabilitation of Offenders Act 1974.

Guidance and criteria on the filtering of cautions and convictions can be found at the Disclosure and Barring service website,

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>