



## Report of the Head of HR and Service Centre / Workforce and Helpdesk Manager

Governance and Audit Committee – 14 June 2023

### Disclosure and Barring Service (DBS) 2022/23

<b>Purpose:</b>	To provide an update on the Disclosure and Barring (DBS) 2022/23 internal audit report.
<b>Policy Framework:</b>	None.
<b>Consultation:</b>	Legal, Finance and Access to Services.
<b>Report Author:</b>	Rachael Davies & Emma Johnson
<b>Finance Officer:</b>	Jeff Dong (Deputy Chief Finance Officer & Deputy S151)
<b>Legal Officer:</b>	Debbie Smith (Deputy Chief Legal Officer)
<b>Access to Services Officer:</b>	Catherine Window (Equalities Policy Development Officer)
<b>For Information</b>	

#### Internal Audit on Disclosure and Barring Service (DBS) 2022/23

##### 1. Introduction

- 1.1 The Disclosure and Barring Service (DBS) 2022/23 Audit was carried out in Quarter 3 2022 and the Final report was issued in February 2023. An assurance level of Moderate was given. The detail below summarises the reasons and progress to date.
- 1.2 There are 2 High Risk and 1 Medium Risk action points, all of which have been reviewed and action taken to remedy where appropriate. In addition to the recommendations provided in the audit report, proactive work has been carried out with the Education service to increase awareness of the importance of the DBS process being completed in a timely manner, further detail of which is included later in this report. For clarity, the action points referred to in this report are:

Action point reference	Risk rating	Detail
2.5.1	HR	A robust process should be established to ensure that all employee(s) have a risk assessment (RA1) conducted and sent to the Service Centre in the interim period whilst awaiting receipt of the DBS.
2.7.2	MR	DBS returns should be updated on Oracle in a timely manner to ensure the correct status is held and to avoid employee details being listed on the renewal spreadsheet.  RA1 forms received from service departments should be uploaded to Oracle in a timely manner.
2.7.4	HR	A robust system should be put in place to ensure that DBS renewals are completed for all staff prior to expiry.  A full review of all school employees should be undertaken to ensure that all DBS' are current/renewed as soon as possible

## 2. Progress to date

### 2.1 Update on actions

**2.5.1** Risk assessments are approved by the Workforce and Helpdesk Manager upon receipt within the Service Centre. The monthly renewal report identifies any employees who are due to renew their current DBS in the next 120 days and those employees without a current DBS certificate. Action is taken to remind managers/Head teachers of the requirement to submit a risk assessment for those employees whose DBS has expired.

**2.7.2** A daily Certificate report is run from the Ebulk system and details entered onto Oracle. RA1 forms are uploaded to Oracle daily.

**2.7.4** The first notification of an upcoming DBS expiry date is 120 days ahead of the expiry date. Employees are emailed log in details and a link to complete their DBS renewal with continuing reminders every 5 calendar days if the renewal is not completed.

### 2.2 Policy and awareness raising

The DBS policy has been reviewed and updated, receiving approval at JCC on 11<sup>th</sup> May 2023.

The Service Centre Helpdesk Team Leader attended the School Admin Forum on 16<sup>th</sup> May 2023 to present changes to DBS policy and to remind Schools of the DBS process and their responsibilities.

The following actions have been completed by the Education service to promote awareness of the importance of DBS checks and risk assessments being completed in a timely manner:

- Advise Chair of Governors of their responsibility/accountability at Spring term meeting with Education Director – Completed 1<sup>st</sup> March 2023
- Repeat message in Spring term Governor newsletter (Safeguarding Governor focus) – Completed 24<sup>th</sup> March 2023
- Similar message in Education Department newsletter – HT and Business Mgr audience – Completed 27<sup>th</sup> March 2023
- Repeat message at Admin Forum - Completed 16<sup>th</sup> May 2023
- Include report from Service Centre on monthly School Issues meetings – first meeting completed 22<sup>nd</sup> March 2023

### **3. Future actions**

- 3.1 A review of the escalation route will be undertaken to query whether referral for escalation has the most appropriate impact.
- 3.2 Quarterly reporting to CMT will be provided on the risk assessment return compliance rate and any outstanding renewals.
- 3.2 Further work will be explored with the DBS umbrella body to ascertain whether automation between systems would be a future development opportunity to mitigate against human error when transferring data between the ebulk system and Oracle.
- 3.3 The Service Centre will investigate whether the DBS update service could provide an alternative route to the renewal process and the potential costs involved.

### **4. Integrated Assessment Implications**

- 4.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:
  - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
  - Advance equality of opportunity between people who share a protected characteristic and those who do not.
  - Foster good relations between people who share a protected characteristic and those who do not.
  - Deliver better outcomes for those people who experience socio-economic disadvantage
  - Consider opportunities for people to use the Welsh language
  - Treat the Welsh language no less favourably than English.
  - Ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

The Well-being of Future Generations (Wales) Act 2005 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language

4.2 An IIA screening has been undertaken which has identified minimal impacts in relation to this report (Appendix A).

## **5. Financial Implications**

5.1 There are no financial implications other than those set out in the body of the report.

## **6. Legal Implications**

6.1 There are no legal implications other than those set out in the body of the report.

**Background Papers:** None.

### **Appendices:**

Appendix A Integrated Impact Assessment Screening Form

Appendix B Final Audit Report - Disclosure and Barring Service (DBS) 2022/23

**Integrated Impact Assessment Screening Form**

Please ensure that you refer to the Screening Form Guidance while completing this form.

**Which service area and directorate are you from?**

Service Area: HR and Service centre

Directorate: Corporate Services

**Q1 (a) What are you screening for relevance?**

- New and revised policies, practices or procedures
- Service review, re-organisation or service changes/reductions, which affect the wider community, users and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings, moving to on-line services, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Services Board, which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other

**(b) Please name and fully describe initiative here:**

**The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions each year by processing and issuing DBS checks. DBS also maintains the Adults’ and Children’s Barred Lists, and makes considered decisions as to whether an individual should be included on one or both of these lists and barred from engaging in regulated activity. The DBS is a back office function within Swansea Council and there is no need for any consultation.**

**Q2 What is the potential impact on the following: the impacts below could be positive (+) or negative (-)**

Impact	High Impact		Medium Impact		Low Impact		Needs further No Investigation
	+	-	+	-	+	-	
Children/young people (0-18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Older people (50+)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Any other age group	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Future Generations (yet to be born)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Poverty/social exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Community cohesion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				
Human Rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>				

**Q3 What involvement has taken place/will you undertake e.g. engagement/consultation/co-productive approaches?  
Please provide details below – either of your activities or your reasons for not undertaking involvement**

Not applicable

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**Q4 Have you considered the Well-being of Future Generations Act (Wales) 2015 in the development of this initiative:**

a) Overall does the initiative support our Corporate Plan's Well-being Objectives when considered together?

Yes

No

- b) Does the initiative consider maximising contribution to each of the seven national well-being goals?  
Yes  No
- c) Does the initiative apply each of the five ways of working?  
Yes  No
- d) Does the initiative meet the needs of the present without compromising the ability of future generations to meet their own needs?  
Yes  No

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**Q5** What is the potential risk of the initiative? (*Consider the following impacts – equality, socio-economic, environmental, cultural, legal, financial, political, media, public perception etc...*)

High risk

Medium risk

Low risk

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**Q6** Will this initiative have an impact (however minor) on any other Council service?

Yes

No

If yes, please provide details below

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**Q7** Will this initiative result in any changes needed to the external or internal website?

Yes

No

If yes, please provide details below

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**Q8** What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the screening and any other key decisions affecting similar groups/ service users made by the organisation?

*(You may need to discuss this with your Service Head or Cabinet Member to consider more widely if this proposal will affect certain groups/ communities more adversely because of other decisions the organisation is making. For example, financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)*

#### Outcome of Screening

**Q9** Please describe the outcome of your screening using the headings below:

- Summary of impacts identified and mitigation needed (Q2)
- Summary of involvement (Q3)
- WFG considerations (Q4)
- Any risks identified (Q5)
- Cumulative impact (Q7)

There is no impact to the groups set out in Q2. All WFG considerations are met and all risks identified are low. There are no changes to the internal and external websites needed.

(NB: This summary paragraph should be used in the **‘Integrated Assessment Implications’** section of corporate report)

Full IIA to be completed

Do not complete IIA – please ensure you have provided the relevant information above to support this outcome

NB: Please email this completed form to the Access to Services Team for agreement before obtaining approval from your Head of Service. Head of Service approval is only required via email.

<b>Screening completed by:</b>
<b>Name:</b> Emma Johnson
<b>Job title:</b> Workforce and Helpdesk Manager
<b>Date:</b> 23/05/2023
<b>Approval by Head of Service:</b>
<b>Name:</b> Rachael Davies
<b>Position:</b> Head of HR and Service Centre
<b>Date:</b> 23/05/2023

Please return the completed form to [accesstoservices@swansea.gov.uk](mailto:accesstoservices@swansea.gov.uk)