



Sutherland Cranial College
OF OSTEOPATHY

Disclosure and Barring Service Policy

13th January 2016

To be reviewed annually on 1st August or sooner if required



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1. Policy

Although the SCCO does not have a direct duty of care for the patients of its students, it does have a duty of care for its own staff and students and for any children or young people who may visit, act as model patients or otherwise come in contact with the organisation. The SCCO also takes very seriously its responsibility for the appropriate training of osteopaths and other health professionals who will be responsible for a duty of care for their own patients.

One of the measures used to ensure greater protection is to use the Disclosure and Barring Service (formerly known as the Criminal Records Bureau (CRB) check).

All new students are required to have a current professional registration with GOsC in the UK or the equivalent registering body of their country of residence which carries with it the obligation for an enhanced DBS check and annual disclosure of any new criminal or civil proceedings (see Appendix 1). Furthermore, provision of a copy of a current Enhanced DBS check is a condition of enrolment and teaching on the SCCO Introduction to Paediatrics course, the SCCO Paediatric Osteopathy Diploma and any SCCO courses that involve children presenting as models.

For non GOsC registered students and tutors we require the provision of an additional police check in respect of the country in which they are resident (see International Students and Tutors section below). In this way the SCCO ensures that all new students and faculty on courses involving children or paediatric training have a current enhanced DBS or other relevant police check.

2. Scope

All applicants to pertinent courses will be informed that enrolment is subject to an Enhanced DBS Check and the potential outcomes should a conviction be revealed. A criminal conviction will not necessarily be a bar to a student obtaining a place on a course, although it should be noted that osteopathy is a regulated activity and therefore is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

1. This policy must be adhered to by all employees and contractors involved in recruitment of students onto SCCO courses.
2. In implementing this policy, SCCO staff and contractors must ensure that all applicants are treated fairly and equitably.
3. Special attention should be paid to ensuring the policy is understood when using it for students new to the SCCO and with those whose literacy or knowledge of English or the foreign language in which a course is run is weak.

3. Responsibilities

The Board of Trustees has responsibility for the oversight and approval of this policy.

The CEO has responsibility for:

- overseeing the correct application of this policy and, where applicable, will have responsibility for approving the risk assessments.
- monitoring compliance and providing advice and guidance in the application of the DBS policy.
- ensuring adequate training for staff and contractors in the enrolment process and providing relevant advice.
- reviewing and maintaining this policy and ensuring that the policy is able to be approved by the Board of Trustees

College staff members and contractors have the responsibility to ensure that they abide by and reinforce this policy and that they attend relevant training.

4. Definition of posts requiring disclosure

1. Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
 1. In order to protect certain vulnerable groups within society, there are a number of posts and professions that are exempt from the provisions of the Rehabilitation of Offenders Act 1974. This includes osteopathy and students training to become osteopaths.
 2. Applicants are therefore not entitled to withhold any information about convictions which for other purposes are 'Spent' under the provisions of the Act and in the event of enrolment; any failure to disclose such convictions could result in withdrawal from the SCCO or disciplinary action.
2. Enhanced Disclosures
 1. An Enhanced Disclosure reveals all convictions (spent and unspent) plus any cautions, reprimands or warnings. In relevant cases it will reveal if the applicant is on any of the lists held by the Department of Health and the Department for Education and Skills (DfES) which lists those considered unsuitable to work with children or vulnerable adults. In addition it will reveal any non-conviction information held locally by the Police which is considered relevant in connection with the matter in question or capacity in which the individual will be employed.
3. SCCO Courses
 1. Students are required to provide proof of a satisfactory enhanced DBS to be able to study Paediatrics with the SCCO. Failure to provide a satisfactory disclosure will lead to an investigation with the possible outcome of being asked to withdraw from study with the SCCO. UK students can apply for an enhanced DBS check via GOsC. Students from other countries must provide proof of a satisfactory police check via services of their own osteopathic registering body, or another appropriate service.

4.4. Eligibility for Enhanced Disclosures

In order to be able to request an Enhanced Disclosure, the SCCO applies the following 'access' test.:

"Any employment or other work which is concerned with the provision of health services AND which is of such a kind as to enable the holder of that employment or the person engaged in that work to have access to persons in receipt of such services in the course of their normal duties"

All students will have access to patients in the course of their own normal practice duties and thus will be subject to an Enhanced Disclosure.

5. Processing disclosures

1. Prospective students will be notified that they must confirm the holding of a current enhanced DBS disclosure in order to be accepted onto relevant SCCO courses. They will be notified that confirmation of a current registration with GOsC in the UK is sufficient proof. Residents of other countries will be notified that they must provide proof of an equivalent police check and proof of their fitness to work with children and vulnerable adults.
2. Prospective students on the SCCO's Introduction to Paediatrics and the SCCO's Paediatric Osteopathic Diploma (and any subsequent courses related to children and/or

vulnerable adults) will be notified that they must send through copies of current enhanced DBS certificates in order to be accepted onto these courses, or for non UK residents, equivalent police checks in their country of residence.

3. Where a prospective student declares information or the receipt of a disclosure lists information of convictions the CEO will arrange to meet with the student to discuss the contents of the disclosure. The student will be questioned about this information and the CEO may commence a risk assessment process.

6. Decision on acceptance of students

The decision on accepting an applicant who has a spent or unspent conviction will be based upon the abilities, skills, experience and qualifications to complete the course. Only then will the criminal convictions be taken into account.

7. Making an offer of acceptance

1. Based on the information gained through the disclosure, communication with the applicant, and a risk assessment (if appropriate) the Board of Trustees will make a decision and identify any conditions on acceptance onto an SCCO course.
2. Applicants will be advised, in writing, that the SCCO reserves the right to withdraw its acceptance should any conditions not be met.

8. International and EU applicants

1. The Police National Computer has only a limited number of overseas convictions on record and the data is not comprehensive. In respect of international or European Union applicants, a request may be submitted to the DBS who have access to data from 15 countries. Where countries do not offer this service applicants will be asked to provide a "Certificate of Good Conduct" from the appropriate embassy or a copy of their own criminal record from overseas. For further guidance, go to the DBS website www.DBs.gov.uk/overseas
2. If a Certificate of Good Conduct is obtained, it is the student's responsibility to ensure that the SCCO is provided with a certificated translation.

9. Disclosures obtained by other organisations

The SCCO will accept disclosures obtained by other organisations providing that the check is of the required level and is current.

10. Costs of disclosures

The cost of checks relating to admission onto SCCO courses will be met by the student and the cost of any re-checks required will be borne by the student.

11. Disputes

Where a student disputes the information contained in the disclosure, the student must contact the DBS's Dispute line and inform the SCCO of the dispute. It is the student's responsibility to keep the SCCO informed of the progress and outcome of the DBS dispute. If the SCCO is not kept up to date with the dispute, the student can be withheld from attending courses.

12. Data security

The SCCO will operate within the data protection regulations with regards to security and safekeeping of Disclosure information.

13. Policy Review

This policy will be reviewed annually or sooner should the need arise.

Declaration

The responsibility for ensuring that this policy is reviewed belongs to the CEO.

We have reviewed and accepted this policy

Signed by:	Susan Farwell
Position:	Chair of Trustees
Signature:	
Date:	
on behalf of the SCCO	

Employees of the SCCO have been consulted on how we implement this policy

Signed by:	Sally Pettipher
Position:	CEO & Safeguarding Lead
Signature:	
Date:	

Revision History

Version	Change	Author	Date of Change
1	First draft	Sally Pettipher	11th August 2015
2	Added tutors and specified paediatric courses or those involving child models	Sally Pettipher	12 th Jan 2016