



POLICY FOR CRIMINAL RECORD BUREAU CHECKS / DBS CHECKS

Introduction

Chigwell London Ltd utilises the Criminal Records Bureau (CRB) disclosure service to assist in the assessment of applicant's suitability for positions of trust, whereby we are fully compliant with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information and expect our employees and supply chain partners to adhere to the same levels of conduct.

Although each of our Client's has individual standards that they perceive to meet the requirements of the legislation, we have taken expert advice, in the form of the CRB Code of Practice and have adopted formal processes, to ensure that the process is undertaken where it is required for the protection and safeguarding of the public. This fail safe system has ensured that we are fully compliant, with zero incidents of issues within this area.

We recognise the importance of this process and are increasingly being requested by our Client's, predominately Local Authorities, when undertaking works within key sectors such as education, social housing refurbishment, care homes, blue light etc, to undertake enhanced level checks when our operatives may come into contact with vulnerable people.

We can confirm that all members of staff have been formally checked to an enhanced level within the last 12 months, with our supply chain operatives also submitted for checking as required.

Systems for Ensuring CRB Check Process Implementation

Chigwell London Ltd has produced a standard risk assessment process, with respect to ascertaining the requirement for undertaking CRB checks and the level of check required, to ensure the protection of vulnerable groups, a copy of which is attached. This assessment is undertaken as part of our health and safety arrangements for all projects, produced collaboratively between our Health and Safety Manager, Contracts Manager and the Client's representatives.

Where the risk assessment indicates that CRB checks are required, then it is the responsibility of our Contracts Manager to advise our Human Resources department, in order to confirm that current checks are in place for our proposed project team members, whilst also initiating checks where they are not. The Contracts Manager will also advise all proposed supply chain partners of the requirement to instigate their own CRB checks at enquiry stage, particularly when we have identified a requirement for an enhanced level check.



With regards to our professional design team consultants, it is Chigwell's policy for individuals who may be required to undertake activities within environments which require an enhanced level check, i.e. an advanced survey within an occupied school, to possess enhanced clearance prior to appointment.

Upon arrival at site, responsibility lies with our Site Manager to ensure that all Chigwell London Ltd's personnel, supply chain operatives and professional design team consultants possess the required CRB clearance documentation and relevant level of check, prior to being allowed entry to the site and commencing works.

At Employment CRB Checks

The CRB undertake security checks and other searches on individuals, with their primary purpose bring to assist employers in making safer recruitment decisions and appointments. The checks provide information which identifies prospective candidates who may be unsuitable for certain work or appointments, especially those involving contact with children or other vulnerable members of society.

We have various procedures and policies in place, aligned with our corporate governance, which ensure acceptable routes of employment, in conjunction with processes detailing how we appoint directly employed staff and supply chain operatives. Where an individual or supply chain partner is considered for works that require a CRB check, then this will be undertaken prior to employment being offered.

The disclosure required from the candidate in advance of taking up employment will contain details of all convictions held on the Police National Computer, including current and 'spent' convictions as well as details for any cautions, reprimands or final warnings. It will also indicate whether information is held on government lists held by the Department of Health and Department of Education and Employment.

All disclosure information is retained on record within the respective candidate's staff file, at our Head Office, for the remainder of their employment, whilst being available upon request. Should it be found that false or inaccurate information has been provided, either deliberately or not, the individual will be subject to disciplinary action, including dismissal.

Where candidates for employment disclose criminal records or they are found to exist as a part of the CRB check process, then the information is considered by our Human Resources Manager, in order to ascertain whether the offense precludes employment or restricts the type of work that the individual may undertake. This assessment is based upon the offense committed and the timing of the offense.

If any doubt exists in the mind of our Human Resources Manager, then the matter is referred to our Board of Directors for a final decision. Offenses of a sexual, violent or drug nature are considered serious in any circumstances and generally preclude engagement unless evidence can be provided of successful rehabilitation from an expert body.



Induction checks

Chigwell London Ltd operates a formal site induction process across all of our projects, which is aligned with our CRB checking process, prior to allowing any operative or project team member to enter site and commence works, with all visitors to site asked to sign in on a recorded sheet where their CRB details are checked. A part of the induction process includes the checking of CRB responses for all staff, where the risk assessment indicates that the procedure is required. In this way we ensure that all staff have been checked and that only appropriate staff are engaged for the work.

Items included in the induction will cover subjects such as site safety rules, the requirement for a photographic identity (ID) card, dependent upon project requirements, management team structure and means of communication. New starters are monitored to ensure they do not encounter any problems, with additional support provided as required.

It is our policy, where applicable dependent upon project requirements, for photographic identity cards to be worn at all times by our employees and operatives, clearly showing that they work for Chigwell London Ltd. In accordance with our simple rule of no ID, no work, these ID cards are produced without prompting, with a copy kept at the office to aid identification. A contact number is also marked on the card so that customers can contact the offices to verify that they work for the company.

Enhanced Checks When Working Within the Vicinity of Children

Chigwell London Ltd is fully aware of the direct responsibilities of Local Authorities, Schools and Further Education (FE) Colleges, to safeguard the welfare of children and young people. As such when undertaking such education sector projects, we ensure that all personnel and supply chain operatives are CRB checked to an enhanced level; the CRB issue three levels of disclosure, each of which represents a different level of check.

The Safeguarding Children and Safer Recruitment in Education Directive, sets out statutory guidance and recruitment best practice, underpinned by legislation, for the Local Authority, School and FE education sectors; is adhered to by our internal resources and most specifically when appointed to projects where we are involved with young people up to the age of 18. In relation to point 4.74 of the guidance, children will be strictly segregated from all construction works for health and safety reasons, with 6ft high solid hoarding erected in order to ensure maximum security for the children.

Under no circumstances will children be allowed on site unless organised through the Head teacher and Governors, through structured education visits to site, where there will be a minimal amount of subcontractors on site at the time. These will only be organised by the directly employed site management team and the Education Liaison Team, all of whom are CRB checked. We welcome our Clients to independently audit us with regards to our



compliance with the Safeguarding Children and Safer Recruitment in Education statutory guidance issued by the Department for children, schools and families.

Code of Conduct

Chigwell London Ltd operates a robust Code of Conduct and standards of behaviour for our directly employed personnel and supply chain operatives which must be adhered to at all times, aligned with the CRB Code of Practice, which is disseminated and promoted to all individuals via our Staff Handbook, which is issued as part of the induction process.

This document contains a defined list of appropriate conduct standards, whilst also covering our procedures, processes and requirements' for when working within the vicinity of young persons and vulnerable groups, all of which are aligned with the CRB enhanced level checks. The Code of Conduct is linked to our personnel's conditions of employment and failure to observe the standards detailed therein results in disciplinary action.

Child Protection Training

In addition to the procedures we have implemented with regards to CRB compliance and enhanced level checks, as detailed above, we have also implemented a training programme in the form of toolbox talks in relation to child protection measures, for both our own directly employed personnel and supply chain operatives, thus ensuring that child protection and the general protection of vulnerable groups remains at the forefront of our service delivery approach.

This training is successfully implemented at the beginning of each project which has a 'vulnerability' impact, for example Education and Social Housing schemes primarily. The training is carried out with the Project Management Team and the Supply Chain Partners to ensure full compliance.

Dean Floyd, Managing Director

Review Date: **1st January 2018**

Next Review: **1st January 2019**