NHS
Kernow
Clinical Commissioning Group

Disclosure and barring service policy and procedure

Date approved: 9 July 2021

This policy was adopted by NHS Cornwall and Isles of Scilly Integrated Care Board (ICB) on 1 July 2022.

We are working to change the branding on our policies and to make sure they are accessible.

We intend to complete this work by 1 April 2023. While this work is underway, all references to NHS Kernow, the CCG and related structures should be taken to relate to the ICB.

This policy may not be suitable for users of assistive technology. If you use assistive technology (such as a screen reader) and need a version of this document in a more accessible format, please email ciosicb.corporategovernance@nhs.net. Please tell us what format you need. It will help us if you say what assistive technology you use.

Document control sheet

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Version number	Revision date	Revision by	Nature of revisions
4	20 September 2018	Vicky Elliot	Annual subscription fees can be reclaimed via NHS Kernow's expenses system.
5	January 2021	Tricia Phillips	Revision to update and to format within accessibility guidelines. To include compulsory, sign up to the update service for DBS required roles.
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5.2	October 2021	POD team	Final accessibility checks completed.

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1. Introduction

Disclosing and barring checks for criminal records are one of the 6 NHS employment check standards that must be carried out by the NHS Kernow Clinical Commissioning Group (NHS Kernow). This is part of the recruitment process to safeguard the children and vulnerable adults within its care.

Although a criminal conviction does not preclude anyone from working in the NHS, certain offences may indicate an applicant's unsuitability for employment with NHS Kernow.

It is mandatory for all appointments covered by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 to be subject to a criminal record check. Failure to carry out these checks could put the safety, and even lives of patients at risk.

It is illegal to carry out a disclosure and barring service (DBS) check on any post that does not require one.

Where a position meets the eligibility criteria, NHS Kernow will make it clear to prospective colleagues that any provisional offer of employment will be subject to a criminal record check. These checks are obtained through the DBS.

NHS Kernow recognises the importance of preemployment disclosure checks in line with the DBS code of practice, and in accordance with the following legislation and guidance:

- Criminal Justice and Court Services Act (Part II) 2000
- Criminal Records Registration Regulations 2006
- Data Protection Act 1998
- Mental Health Act 1983
- NHS Employers' employment checks, criminal records, and barring checks July 2013
- Police Act (Part V) 1997 (criminal records) (amendment) Regulations 2013
- Rehabilitation of Offenders Act 1974 (exceptions) Order 1975
- Rehabilitation of Offenders Act 1974 (exclusions and exceptions) (Scotland) Order 2003
- Protection of Freedoms Act 2012 (previously Safeguarding Vulnerable Groups Act 2006)
- Legal Aid, Sentencing and Punishment of Offenders Act 2012

NHS Kernow also has a duty under the Data Protection Act 2018 to ensure that personal and sensitive data is obtained, held, recorded, used, and stored in a secure and confidential manner.

Having a spent or unspent conviction, caution, reprimand, or a criminal record will not necessarily prevent successful candidates from taking up employment with NHS Kernow. This will depend on the nature, circumstances and background to the offence(s) committed.

2. Purpose

To comply fully with the DBS code of practice in the recruitment of colleagues; to ensure the protection of service users (children and vulnerable adults) and the fair treatment of colleagues' subject of a disclosure certificate.

This policy and procedure apply to all new colleagues, volunteers and existing colleagues moving within the organisation, regardless of the contract type such as substantive, fixed term, honorary, preceptee, secondment, and those returning from flexible retirement. Agency workers and medical locums should be checked by their agency.

3. Definitions

DBS

This is a criminal records check carried out by the DBS.

Criminal records bureau

This is a criminal records bureau (CRB) check which was the name that was used prior to September 2012 for the DBS check

Electronic staff record

Also known as ESR. An integrated HR and payroll system for NHS organisations which enables employers to record information about their colleagues including the date and reference number of an individual's DBS disclosure.

TRAC

An on-line application management system that covers the entire recruitment process from advertising through to interview, offer and preemployment checks.

DBS update service

An online subscription service which enables employers to check if an individual's criminal record status has changed since the last disclosure was issued.

4. Responsibilities

People and organisational development

People and organisational development (POD) will advise on the process.

Managers

Prior to commencement managers will identify the need for a DBS check and the level required. Advice can also be obtained from the POD team, gov.uk or NHS employers). This will include colleagues on:

- honorary contracts
- those returning to work following flexible retirement
- those joining the organisation as a new starter or volunteer
- an employee moving to another position within the organisation.

They also need to ensure colleagues awaiting a satisfactory DBS check work under supervision, where appropriate, until a satisfactory DBS check is received. They will make sure that individuals requiring a children's check do not commence work even under supervision under any circumstances.

They also need to:

- record the outcome of a risk assessment on the personal file
- ensure correct confirmation of check is held on the individual's personal file:
  - name and vacancy reference number (where applicable)
  - job title
  - issue date
  - disclosure number
  - level of check
- ensure that a copy of the DBS disclosure certificate is not held in the personal file
- ensure that each individual completes a self-declaration form
- check with agencies that agency colleagues have a DBS from the last 12 months
- ensure that appropriate DBS checks have been carried out at the correct level
- discuss any unsatisfactory DBS disclosure with the POD team
- ensure the job description and person specification include reference to the DBS

Recruitment services

- Oversight of the recruitment system, known as TRAC, through which applicants complete their DBS form electronically for the system to process
- informing the POD team of any DBS disclosures showing convictions

- monitor DBS progress on TRAC, follow up any that have not progressed

Counter-signatory for DBS checks processed outside of the TRAC system

They should ensure the details completed within the DBS form satisfy the requirements of the DBS (for example 5 years previous address history) and comply with the DBS code of practice. They should also:

- sign applications and receiving disclosures
- control the use and security of disclosures
- confirm the identity of the applicant
- check compliance with DBS code of practice

Interview panel and responsible manager

They need to ensure that candidates are not unfairly discriminated against and that the fully completed interview checklist is returned to the central recruitment team

Individual colleagues

They must inform NHS Kernow and, if appropriate, their professional regulatory body, in writing, of any criminal convictions they acquire during their employment with NHS Kernow. They should also complete a self-declaration form following their annual performance development review. This will be held on the colleague's personal file.

5. Policy

Recruitment of ex-offenders

NHS Kernow is committed to the fair treatment of its colleagues, potential colleagues, and users of its services regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical or mental disability or offending background. We therefore welcome applications from a wide range of candidates, including those with criminal records.

NHS Kernow is required by the DBS's code of practice to treat disclosure of applicants who have a criminal record fairly and not to discriminate because of a conviction or other information revealed. A copy of this code is available on request.

NHS Kernow is committed to equality of opportunity for all job applicants and aims to select people for employment based on their individual values, skills, abilities, experience, knowledge, and where appropriate, qualifications and training. NHS Kernow will therefore consider ex-offenders for employment on their individual merits. NHS Kernow's approach towards employing ex-offenders differs, however, depending on

whether the job is or is not exempt from the provisions of the Rehabilitation of Offenders Act 1974.

Jobs that are exempt from the Rehabilitation of Offenders Act 1974

If the job into which NHS Kernow is seeking to recruit is 1 of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (exceptions) Order 1975 or the Rehabilitation of Offenders Act 1974 (exclusions and exceptions) (Scotland) Order 2003, NHS Kernow will require the applicant to disclose all convictions, whether spent or unspent (other than where protected cautions and protected convictions do not need to be disclosed, depending on the job concerned) on their application form or sent under separate, confidential cover, to the POD team (giving full details of post applied for). We guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

Even in these circumstances, however, NHS Kernow will not refuse to employ an applicant unless the nature of the conviction has some relevance to the job for which the individual has applied.

If the job is exempt, NHS Kernow will, once it has selected the person to whom it wishes to offer employment, seek documentary evidence about that person's criminal convictions. NHS Kernow will seek the applicant's agreement to make a joint application to DBS for a standard or enhanced disclosure (as appropriate). NHS Kernow will reimburse the individual the fee for obtaining the appropriate criminal records certificate. Where the individual is a member of the DBS update service, NHS Kernow will, with his or her permission, carry out a status check on any current certificate.

NHS Kernow is committed to ensuring that all information provided about an individual's criminal convictions, including any information released in disclosures, is used fairly, and stored and handled appropriately and in accordance with the provisions of all data protection legislation. Data held on file about an individual's criminal convictions will be held only if it is required for employment purposes and will not be disclosed to any unauthorised person.

Query regarding offences declared in the recruitment process will be dealt with by the recruiting manager and people and organisational development.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place about 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 or appropriate disciplinary action under NHS Kernow’s disciplinary policy.

We undertake to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Should you have any queries regarding the disclosure process, please contact the POD team.

6. Procedure and process

Advertising

When recruiting, if the position requires a DBS disclosure, then the requirement for a DBS disclosure must be included on any job description and person specification and input accurately into the TRAC system.

The job description must include the following:

“Rehabilitation of Offenders Act: This post is exempt from the Rehabilitation of Offenders Act 1974. Should you be offered the post it will be subject to a criminal check from the DBS before the appointment is confirmed. This will include details of cautions, reprimands, final warnings, as well as convictions.”

The person specification must include that the DBS check is satisfactory to NHS Kernow.

NHS Kernow will inform applicants if a DBS check is required as part of the appointment process. This information will also be on each advert placed by NHS Kernow where applicable.

Interviewing

Where a candidate has declared a conviction on their job application form the recruiting manager should fully explore the details of this with them at interview, or in a separate discussion.

Receipt of the DBS disclosure

Employers no longer receive a copy of DBS disclosure forms (unless they request a copy and certain criteria apply). It is therefore the responsibility of the successful applicant to show the original disclosure to recruitment services.

If a criminal record is disclosed, then recruitment services will inform the POD team and the appointing manager who will undertake an investigation.

Where a satisfactory check is received the applicant will progress through the pre-employment checks on TRAC, and a start date may be confirmed subject to any other outstanding checks.

Unsatisfactory disclosure

In the event of the DBS disclosure containing relevant conviction or non-conviction information about an applicant, a decision will be made by the POD team and the appointing manager about whether the appointment should proceed. A risk assessment will be carried out by the appointing manager to determine whether the conviction is relevant to the post and whether the applicant poses any risk or potential harm to patient safety. This risk assessment and decision will be documented. If the risk assessment raises patient safety concerns the recruitment should not proceed and any provisional offer of appointment should be withdrawn. If an individual meets all other pre-employment criteria and the risk assessment decision is to recruit safeguards should be put in place as appropriate.

In cases where there are significant discrepancies between the information that the applicant has provided and the information on the disclosure, or if the information on the disclosure has not been disclosed on the application form, then 2 things need to be done. Firstly, refer to the local counter fraud service in accordance with NHS Kernow's antifraud and bribery policy. Secondly, discuss the discrepancy with the applicant to determine if a mistake may have been made by the DBS or if they can provide another reason for the discrepancy.

If the applicant has intentionally withheld information NHS Kernow may withdraw the offer of employment, and if the applicant is already employed by NHS Kernow, disciplinary action may be considered.

Except for regulated positions as detailed in the DBS code of practice, a criminal record will not necessarily be a bar to employment and NHS Kernow will not unfairly discriminate against the subject of disclosure information based on a conviction or other details revealed.

All applicants are required to inform NHS Kernow if, at any time after application for a post, they are charged with a criminal offence in the UK or another country. Failure to comply could result in disciplinary action being taken by NHS Kernow or the matter being referred to the local counter fraud service for investigation, which may result in dismissal.

Following risk assessment of the DBS disclosure information, NHS Kernow's decision to proceed with the appointment can be made conditional on an annual DBS check. This decision should be documented and in such exceptional cases, employment would be subject to the candidate's written agreement in advance.

Dispute about DBS information

In the event of a dispute about information contained in a DBS disclosure, the applicant should register a complaint with DBS. Until the dispute is resolved, and an amended

DBS disclosure has been issued, NHS Kernow will proceed based on the information contained in the original disclosure.

Starting employment with NHS Kernow

NHS Kernow colleagues appointed to posts involving regulated activity will not be allowed to commence work until the disclosure is received. NHS Kernow and the recruiting manager will be committing an offence under the Safeguarding Vulnerable Groups Act if they knowingly permit a person to engage in regulated activity from which a person is barred. The individual will also be committing a criminal offence where they engage in a regulated activity for which they are barred.

NHS Kernow may, in exceptional circumstance, make a risk assessed decision to appoint applicants whilst awaiting the outcomes of a DBS disclosure, for example, for them to do their induction training or to undertake other duties which would not include them engaging in any form of regulated activity.

NHS Kernow will ensure an appropriate DBS disclosure has been applied for. They will also ensure safeguards are put in place to manage that individual such as, full supervision where there is access to patients and restricted duties, until the disclosure has been obtained.

Temporary workers supplied by an agency

Temporary workers supplied by an agency are recommended to have DBS checks at least once a year. NHS Kernow may require more frequent checks, for example, where assurances have not been provided by the agency, or a new post changes the level of check required, or where there is a concern about an individual's criminal history. The recommendation for annual checks does not apply to individuals who are working as a bank worker or are registered with NHS professionals, where they are working in this capacity and hold a substantive NHS contract. The appointing manager should seek written assurances that the substantive employer has carried out appropriate checks at the correct level when they were first appointed. If, however, the individual leaves their substantive post, or where there is a break in service of 3 months or more prior to them applying to a work on the bank or via NHS professionals, then a new DBS check should always be requested.

Colleagues providing emergency services or training

Colleagues who are highly mobile, such as doctors or senior clinicians who hold a substantive post within 1 health organisation but are required to provide support with emergency or complex cases, often at very short notice, or to provide speciality training in another NHS organisation, are also regarded as being in continuous employment and do not require a new DBS check.

Contractual changes

A new DBS check is not normally required where an existing colleague has previously had a DBS check (or criminal records bureau (CRB) check if prior to 10 September 2012) and is moving internally to a new job where the roles and responsibilities do not require a different level of check. The requirement for a new DBS check is triggered in 2 situations. Firstly, where the individual has never had a DBS or CRB check before and is moving to a position that now requires them to have a check. This includes those moving from 0 hours to a substantive or fixed term post. Secondly, where the new position significantly changes the individual's role, responsibilities, or level of contact with vulnerable groups such as, involvement in a regulated activity which requires a different level of check, or a check against 1 or both barred lists

All colleagues have a contractual obligation to disclose any criminal convictions, cautions, reprimands, and warnings that are subsequently acquired during their employment. The disclosure should be made in confidence to their manager or POD so that the effect of the offence against the position held can be considered. Volunteers and temporary workers are also required to make a similar disclosure.

Existing colleagues may be subject to disciplinary action and dismissal if they knowingly fail to disclose relevant information in relation to their criminal record or barred list status. It is a criminal offence to knowingly allow an individual to continue to engage in a regulated activity when they are barred from that activity. It is also a criminal offence for that individual to apply for, or to engage in, regulated activity when they are barred from undertaking that activity.

Where an individual has changed their name through marriage or otherwise, changed address or changed their contract hours, there is no need for a further check to be undertaken, unless an increase in hours means that they meet the threshold to be considered as working in a regulated activity.

Retrospective and periodic checks

Although there is no legal requirement to carry out retrospective or periodic DBS checks on colleagues or volunteers who are already in NHS Kernow's workforce, colleagues will be required to sign up to the DBS Update Service. This is to ensure the most up to date information is available should any colleagues change role, undertake a secondment, or work temporarily in other organisations covered under the local workforce sharing agreement. Annual subscription fees can be reclaimed via NHS Kernow's expenses system. Checks will be carried out every 3 years on those in a role requiring a DBS check. Further information can be found on NHS Employers.

Duties to refer to the DBS

Under the Safeguarding Vulnerable Groups Act, NHS Kernow has a legal duty to refer information to the DBS if a colleague or volunteer has harmed or poses a risk of harm to

vulnerable groups and where they have dismissed them or removed them from working in a regulated activity with children or adults. This duty equally applies where an individual has resigned before a formal decision to dismiss or remove them from regulated activity has been made.

Levels of disclosure used by NHS Kernow

The DBS carries out standard checks detailing current unspent and spent convictions, cautions, reprimands and final warnings, and enhanced checks which contain the same information as standard checks but also may include any relevant non-conviction information.

Enhanced checks may be applied for without barred list information, for positions described as work with adults in the statutory instrument, the Police Act 1997 (Amendment) Regulations 2013, or with barred list information for people working in positions defined as regulated activity.

It is the policy of the NHS Kernow to obtain an enhanced disclosure for applicants for all posts that have access to children, vulnerable adults or their post is exempt from the Rehabilitation of Offenders Act Exceptions Order 1974.

Currently, DBS cannot access criminal records held overseas. When an applicant lives overseas or has done so for 6-months or more in the 5-years prior to their application, NHS Kernow will consider requesting a police check or certificate of good character from the country.

Portability of disclosures

NHS Kernow will not re-use DBS checks obtained for a position in another organisation. However, if the applicant has subscribed to the DBS update service their DBS certificate will be kept up to date and NHS Kernow can check it online, unless a different type or level of check is required. On payment of a small annual subscription or for no fee for volunteers, employers that register with the DBS can, in conjunction with job applicants for designated posts, apply for access to standard and enhanced criminal records checks. NHS Kernow will need sight of the original DBS certificate to carry out this check.

7. Retention and use of disclosures and disclosure information

Storage

All disclosure information is processed confidentially through the TRAC system or kept securely in a lockable, non-portable storage container with access strictly controlled and

limited to persons who need to have access to this information in the course of their duties.

A record of the following information shall be recorded in ESR under the individual's name the:

- name of the subject
- type of disclosure requested
- position for which the disclosure was requested
- unique reference number of the disclosure

Handling

Disclosure information is only passed to those who are authorised to receive it in the course of their duties. NHS Kernow recognises that under section 124 of the Police Act 1997 it is a criminal offence to share criminal record information to anyone not entitled to see it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention and disposal

Criminal record information is kept for no longer than necessary. Once a decision has been made as to whether to appoint or not, the disclosure record shall be kept for no longer than 6 months from appointment, and 6 months from when the applicant has been unsuccessful, to allow for the consideration and resolution of any disputes or complaints. If, in exceptional circumstances, it is considered necessary to keep criminal record information for a longer term than NHS Kernow will make a request to the DBS data protection manager.

Once the retention period has elapsed, all paper documentation pertaining to the disclosure is shredded.

8. Update and reviews

This policy will be reviewed at regular specified intervals which will normally be every 3-years or following a change to legislation.

9. Implementation plans and monitoring effectiveness

The policy will be implemented after review with staff voice and the unions.

Compliance will be monitored by internal audit of records held on ESR and monthly checks by POD for any outstanding DBS checks and to ensure all documents have been removed and destroyed as appropriate

Training on this process will be part of management training

10. Policies referred to in this document

- Antifraud and bribery policy
- Disciplinary policy
- Performance policy

These can be found in the document library or on IRIS.

Appendix 1: Equality impact assessment

Name of policy or service to be assessed: DBS policy and procedure
Department or section: People and organisational development
Date of assessment: 18 February 2021
Person(s) responsible for the assessment: Tricia Phillips, POD
Is this a new or existing policy? Existing

Aims, objectives and purpose of the policy

Describe the aims, objectives, and purpose of the policy
To ensure compliance with DBS requirements.

Who is intended to benefit from this policy, and in what way?
All colleagues to ensure safe recruitment and management processes.

What outcomes are wanted from this policy?
Adherence to DBS requirements.

What factors or forces could contribute or detract from the outcomes?
Failure to follow the policy.

Who are the main stakeholders in relation to the policy?
All colleagues.

Who implements the policy, and who is responsible for the policy?
Colleagues and team managers implement the policy. POD is responsible for updating the policy.

Differential impacts

Perspective of race, nationality and/or ethnic origin

Does this have a positive or negative impact on black, Asian and minority ethnic (BAME)?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of sex

Does this have a positive or negative impact on people who identify as male, female or intersex?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of disability

What is the positive or negative differential impact on people from the perspective of disability?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
Line managers or the POD team members can provide advice and guidance.

Perspective of sexual orientation

Does this have a positive or negative impact on people who identify as heterosexual, lesbian, gay, bisexual, pansexual or asexual?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of age

What is the positive or negative differential impact on people from the perspective of age?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of religion or belief

What is the positive or negative differential impact on people from the perspective of religion or belief?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of marriage and civil partnership

What is the positive or negative differential impact on people from the perspective of marriage and civil partnership? This is particularly relevant for employment policies.
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Perspective of gender re-assignment

Does this have a positive or negative impact on people who identify as trans or transgender, non-binary, or gender fluid?

This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take overview of cases for consistency.

Perspective of pregnancy and maternity

Does this have a positive or negative impact on people who are pregnant, breast-feeding mothers, or those on maternity leave?
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Other identified groups
This policy is consistently applied to all potential recruits and existing colleagues.

How will any negative impact be mitigated?
POD will take an overview of cases for consistency.

Human rights values

How have the core human rights values of fairness, respect, equality, dignity, and autonomy been considered in the formulation of this policy, service, or strategy?
This policy and procedure are based on the principles of fairness and equality and therefore supports the principals of the core human rights.

Which of the human rights articles does this document impact?

☐ To life
☐ Not to be tortured or treated in an inhuman or degrading way
☒ To liberty and security
☐ To a fair trial
☐ To respect for home and family life, and correspondence
☐ To freedom of thought, conscience, and religion
☐ To freedom of expression
☐ To freedom of assembly and association
☐ To marry and found a family
☐ Not to be discriminated against in relation to the enjoyment of any of the rights contained in the European Convention
☐ To peaceful enjoyment of possessions

What existing evidence (either presumed or otherwise) do you have for this?
This policy is consistently applied to all potential recruits and existing colleagues.

How will you ensure that those responsible for implementing the policy are aware of the human rights implications and equipped to deal with them?
Not applicable.

Public Sector (Social Value) Act 2012

NHS Kernow is committed and obliged to fulfil the requirements of the Public Sector (Social Value) Act 2012. This Act requires the organisations to consider how services commissioned or procured might improve the economic, social, and environmental wellbeing of an area.

Please describe how this will support and contribute to the local system, wider system, and community.
This helps to protect the community.

Describe how the policy contributes towards eliminating discrimination, harassment, and victimisation.
This policy is applied to all recruits and existing colleagues.

Describe how the policy contributes towards advancing equality of opportunity.
This policy ensures equal and consistent treatment in respect of DBS requirements.

Describe how the policy contributes towards promoting good relations between people with protected characteristics.
It encourages fairness.

If the differential impacts identified are positive, explain how this policy is legitimate positive action and will improve outcomes, services and/or the working environment for that group of people.
Not applicable.

Explain what amendments have been made to the policy or mitigating actions have been taken, and when they were made.
Updated for accessibility.

If the negative impacts identified have been unable to be mitigated through amendment to the policy or other mitigating actions, explain what your next steps are using the following equality impact assessment action plan.
Not applicable.

Signed (completing officer): Tricia Phillips, POD

Date: 12 January 2021

Signed (head of department or section): Emma Goudge, head of POD

Date: 12 January 2021

Please ensure that a signed copy of this form is sent to both the corporate governance team with the policy and the equality and diversity lead.