

Criminal Records Bureau Disclosure
Faculty of Medicine Policy and Procedure

1. Introduction and Background

- 1.1 Admission to and continuation on the MBBS/BSc and MBBS course(s) at Imperial College London is subject to the Rehabilitation of Offenders Act (1974) Section 4(2) (Exemption) Order 1975 and DHSS Circular HC(88)9 guidelines regarding child protection and police checks. As a condition of acceptance/continuation, all applicants and continuing students are required to have completed an enhanced criminal record disclosure by a given deadline.
- 1.2 A disclosure is a document containing information held by the police and government departments. The Criminal Records Bureau (CRB), an executive agency of the Home Office, provides these disclosures. An enhanced disclosure contains details of:
 - 1.2.1 All convictions held on the Police National Computer (PNC) including current and “spent” convictions as well as details of any cautions, reprimands or final warnings. (It is a commonly held misbelief that all criminal records are wiped from police records when a person reaches the age of 21. This is not the case).
 - 1.2.2 As the MBBS programme involves working with children and vulnerable adults, the disclosure will indicate whether information is held on government department lists, held by the DCSF and DH of those who are banned from working with children or are unsuitable to work with vulnerable adults.
 - 1.2.3 Any additional local police records. If local police records contain information the Chief Officer of police may release information for inclusion in an Enhanced Disclosure. Exceptionally, and in a very small number of circumstances (typically to preserve the integrity of current police investigations), additional information may be sent under separate cover to the University that cannot be revealed to the applicant.
- 1.3 The College does not wish to debar individuals with criminal records from taking advantage of the opportunities provided by Higher Education. In general a criminal record is not to be regarded as an obstacle to studying at Imperial. However the College must also balance its responsibilities to provide a safe and secure environment for its staff, students, visitors, patients and others. In addition it has to take into account the demands of various professional bodies and requirements under the law as detailed above.
- 1.4 In assessing criminal records, the College will balance the interest of the applicant with its duty of care to special categories of people. The College does reserve the right to refuse to admit applicants where their criminal record makes it inappropriate for them to be admitted. The College also reserves the right to refer existing students to a Fitness to Practise Panel upon the disclosure of a positive CRB, the outcome of which could lead to a student being asked to withdraw from the College where their criminal record makes it inappropriate for them to continue with their programme of study.

- 1.5 The test which will be applied when deciding whether the criminal record of an applicant/existing student gives reasonable grounds for refusing admission or continuation of study is whether the student:
 - 1.5.1 Poses a real threat to the safety or property of staff, students, visitors, patients in the Trusts with whom we work and those coming into contact with the student during their studies; or
 - 1.5.2 Would be contrary to the law or to the requirements of any relevant professional or other regulatory body.

2. Assessment of New Applicants

- 2.1 A statement about criminal records disclosure is published on the College website and in the information sent to applicants when they are made an offer. This states that a criminal record may not necessarily be a bar to being accepted onto the programme of their choice. The College Policy on the Recruitment of Ex-Offenders and the Criminal Records Policy Statement Relating to Students are available at <http://www3.imperial.ac.uk/portal/pls/portallive/docs/1/5037988.PDF> and <http://www3.imperial.ac.uk/portal/pls/portallive/docs/1/5037989.PDF> and copies of both are attached (Appendices 2 and 3).
- 2.2 The UCAS application form prompts applicants to declare any criminal record.
- 2.3 All applicants are required to disclose spent and unspent offences when submitting information to the Admissions Office in accordance with paragraph 2.2 above. At this stage, all applications, whether or not any criminal record information has been revealed by the applicant, will be considered in the normal way alongside all other applications.
- 2.4 Applicants will be asked to complete their application forms for enhanced Criminal Records Bureau checks by a deadline, usually by 30 April (for A300) or 30 June (A100 and A101) respectively of the year of the admissions cycle. Candidates are notified that the offer will be withdrawn if they fail to meet this deadline. A conditional offer pack is issued which includes the CRB application form, the CRB completion guidelines and Registry guidelines. Copies of the CRB guidelines are available at <http://www.crb.gov.uk/pdf/01%2009%202007%20CRB11%20Guidance%20Notes.pdf> A copy of the Registry guidelines is attached (Appendix 4).
- 2.5 The completed CRB Disclosure application is forwarded to the CRB for immediate processing and prior to fulfilment of any other offer conditions. Applicants who have revealed criminal records to the Registry, in accordance with paragraphs 2.2 and 2.3 above, will be asked to complete and return their CRB application forms at that stage and they will be submitted immediately to the CRB for processing. Candidates will be advised that no formal decision will be made on any disclosed offences until the Disclosure has been received from the CRB. In the event that a Disclosure is not received from the CRB prior to the start of the academic year, it may be necessary to defer a candidate's offer for the coming year.
- 2.6 Candidates who have never lived in the UK will not be required to complete a Disclosure application but are required to provide a Certificate of Good Conduct from their government or police force by the above deadline.
- 2.7 If information relating to offences is withheld, erroneous, or is given in an incomplete form by the applicant, then the College reserves the right at any stage to reject their application.

- 2.8 All positive CRB Disclosures are considered by a minimum of two senior members of the Faculty of Medicine or its associated Trust e.g. a senior member of clinical staff and a senior member of the Faculty forming a CRB panel, supported by the Faculty Education Office (FEO):
- 2.8.1 The CRB panel members will review the criminal record and the applicant may be asked to submit his or her own statement;
 - 2.8.2 The applicant may then be called for interview and seek additional background information on the circumstances surrounding the criminal record;
 - 2.8.3 The CRB panel may, for example, require the applicant to provide information from third parties who may have a view on the above matters;
 - 2.8.4 These parties may include probation officers and others who are professionally or personally involved in the rehabilitation of, or are familiar with, the applicant;
 - 2.8.5 The CRB panel may also seek specialist advice.
- 2.9. In reaching their decision the panel may consider one or more of the following:
- 2.9.1 Whether the criminal record or other matter revealed is relevant to the programme on offer (including any secondments or placements);
 - 2.9.2 The seriousness, frequency and pattern of any offences;
 - 2.9.3 Whether the offences were premeditated;
 - 2.9.4 Whether the offences involved violence or threats of violence;
 - 2.9.5 Whether the circumstances surrounding the offences were unique;
 - 2.9.6 Whether the student's circumstances have now changed;
 - 2.9.7 Whether the applicant has adequately taken responsibility for his/her actions and shown remorse;
 - 2.9.8 What evidence the applicant produces to support the view that he/she is unlikely to offend again;
 - 2.9.9 How recently the offence was committed;
 - 2.9.10 The implications of any lack of appropriate judgement on their future medical career.
- 2.10 It is the responsibility of the Faculty Senior Tutor to keep the Director of Education or their designated deputy informed of each case under review.
- 2.11 The decision of the CRB panel is forwarded to the Faculty of Medicine Student Progress Group for ratification. The outcome of this process will be either:
- 2.11.1 Admission of the applicant is permitted (subject to the meeting of all other requirements of admission). In these circumstances, at the start of the academic year the Chair of the Student Progress Group will send the newly-admitted student a formal written warning noting the seriousness and possible repercussions (including referral to a Fitness to Practise Panel) of any further breaches of the standard of behaviour required in the medical profession, or
 - 2.11.2 A recommendation is made to the College Registry that the student's application for admission to the MBBS/BSc or MBBS course be rejected.
- 2.12 The chair of the Student Progress Group should notify the College Registry normally within 5 days of its recommendation.
- 2.13 The decision is then communicated to the applicant in writing, normally within 14 days of the Student Progress Group meeting. If a conditional offer is withdrawn as a result of the decision, then the notification should provide a summary of the reasons (if not precluded under CRB regulations). An opportunity to discuss alternative

career/course options within the College with a senior member of the Faculty/College should be offered and details of the appeal process included.

- 2.14 Appeals to the Academic Registrar should be made in writing within 28 days of the date of the notification. Appeals are considered by a panel comprised of a lay member of the Imperial College Court, the Clinical Dean and a further experienced clinician who is the Deputy Principal of the Faculty of Medicine or his/her nominee. The decision of this panel is final.

Appeals can only be considered on the following grounds:

- 2.14.1 Where there is new evidence which was not previously considered or could not previously have been provided and is deemed to have a direct impact on the student's case; and/or
2.14.2 Where due process was not followed.

3. Assessment Procedure for Current Students

- 3.1 All existing registered students are responsible for reporting the receipt of any police cautions, convictions or where a case is pending with the police, to the Faculty Senior Tutor in a timely manner.
- 3.2 All existing registered students due to progress to Year 5 in July of each year are required to complete a CRB self declaration form in January/February noting if they have received any police cautions, convictions or have a case pending with the police. (Appendix 6).
- 3.3 Where a positive declaration is made or case is pending, the student will be notified that they are required to complete an Enhanced CRB Disclose within 10 days of the notification.
- 3.4 A decision on whether to temporarily suspend the student during part or all of the investigation processes will depend on the nature of the offence in question. The decision will be made by the Director of Education or their designated deputy in consultation with the College Registry and other parties.
- 3.5 It is the responsibility of the Faculty Senior Tutor to keep the Director of Education or their designated deputy informed of each case under review.
- 3.6 The decision of the panel is forwarded to the Faculty of Medicine Student Progress Group for ratification. The outcome of this process will result in one or more of the following:
- 3.6.1 No action required as the nature of the positive disclosure has already been dealt with.
- 3.6.2 The student is required to meet with the Faculty Senior Tutor and to receive a formal warning. They are advised that any further transgressions of a similar nature may result in a referral to a Fitness to Practise Panel. Written notification of this warning is filed on the student's Registry and FEO personal file;
- 3.6.3 The student is required to meet with the Director of Education or their designated deputy to receive a final warning. They are advised that any further transgressions will result in referral to a Fitness to Practise Panel. Written notification of this warning is filed on the student's Registry and FEO personal file;

- 3.6.4 Direct referral to a Fitness to Practise Panel. The chair of the Student Progress Group should notify the College Registry normally within 5 days of its decision and request a Fitness to Practice Panel.
- 3.6.5 In addition, the panel can require a student to undertake and complete a formal treatment programme and/or appropriate counselling to deal with issues of alcohol abuse, anger management etc.

4. Management of CRB related documentation

- 4.1 The College Registry notifies the Faculty Senior Tutor as to the nature of the positive CRB via email. No copies of the actual CRB document are made.
- 4.2 The Faculty Senior Tutor liaises directly with the positive CRB panel members communicating the nature of the offence, the status of the recipient (applicant or existing student) and the student's name and contact details.
- 4.3 Once the panel have completed their deliberations and made a decision, this should be communicated to the Faculty Senior Tutor in writing. This decision should then be communicated to the next Student Progress Group meeting.
- 4.4 For reference the Faculty Senior Tutor should retain a record of all positive CRB cases and their decisions. These should be available to the panel, anonymised for reference information only.
- 4.5 Unless a case is referred to a Fitness to Practise Panel, all related documentation should be destroyed 6 months following the completion of the positive CRB panel process.

**Faculty of Medicine
2nd March 2011.**

Submitted to and agreed by:

**Education Committee – 19th November 2008.
Education Committee – 4th February 2009.
Medical Studies Committee – 3rd March 2010.
Student Welfare Committee – 2nd March 2011.**

Glossary of Terms used in Criminal Records Bureau Disclosures

Additional Information

Enhanced checks may contain 'additional' information. Occasionally the Chief Police Officer may, if thought necessary in the interests of the prevention or detection of crime, release 'additional' information to the Countersignatory only, in the form of a separate letter and should not be revealed to the applicant.

Approved Information

Enhanced checks may contain 'approved' information. This is non-conviction information provided by the police from their local records. The Chief Police Officer in each force will decide what, if any, information to provide. The CRB will print this information on both the applicant's and the Counter signatory's copy.

Caution

A caution is a formal warning about future conduct given by a senior police officer, usually in a police station, after a person has committed an offence. It is used as an alternative to a charge and possible prosecution.

Children

The Criminal Justice Court Service Act (CJCSA) defines a child as someone who is under 18 (under 16 if the child is employed).

Countersignatory

A person within a Registered Body who is registered with the CRB to countersign applications and receive the Disclosure.

Countersignatory reference number

The specific reference number allocated to each individual Countersignatory by the CRB.

Criminal Justice and Court Services Act 2000 (CJCSA)

The child protection provisions in Part II of the CJCSA 2000 are part of an integrated system for the protection of children.

Criminal Record

A record of convictions held on the Police National Computer for individuals convicted of crimes.

Department for Children, Schools and Families (DCSF)

Government department responsible for improving the focus on all aspects of policy affecting children and young people, as part of the governments aim to deliver educational excellence (formerly the Department for Education and Skills).

Department of Health (DH)

Government department responsible for protecting and improving the nation's health and ensuring that our health and social services are high quality, fast, fair and convenient.

Disclosure

The term that is used to describe the service provided by the CRB and the document issued to the applicant and Registered Body when a CRB check has been completed.

Disclosure Application Reference Number

The specific reference number allocated to each Disclosure application by the CRB.

Disclosure Fee

The cost of a CRB check.

Disclosure Information Pack

The guidance pack issued to all Counter signatories upon registration with the CRB.

Disclosure News

The monthly customer newsletter produced by the CRB.

Disclosure Scotland

This is the equivalent of the Criminal Records Bureau but for Scotland.

Enforced Subject Access

Under current legislation, individuals can exercise their right to apply for access to information held on them including criminal record information under the 'subject access' provisions of the Data Protection Act 1998. Currently, some employers seek to obtain this information about employees and potential employees by compelling them to exercise their rights under the Data Protection Act. This process is known as 'Enforced Subject Access' and is undesirable because details of all convictions are revealed. Most employers are not entitled to ask for this information under the Rehabilitation of Offenders Act (ROA) 1974.

Enhanced CRB Check

Also referred to as an Enhanced Disclosure. These are for posts that involve a far greater degree of contact with children or vulnerable adults. In general the type of work will involve regularly caring for, supervising, training or being in sole charge of such people. Examples include a Teacher, Scout or Guide leader. Enhanced checks are also issued for certain statutory purposes such as gaming and lottery licences.

This level of check involves an additional level of check to those carried out for the Standard CRB check - a check on local police records. Where local police records contain additional information that may be relevant to the post the applicant is being considered for, the Chief Officer of police may release information for inclusion in an Enhanced check. Exceptionally, and in a very small number of circumstances (typically to protect the integrity of current police investigations), additional information may be sent under separate cover to the Countersignatory and should not be revealed to the applicant.

Enhanced Disclosure

See Enhanced CRB Check

Excepted Professions

Positions of trust set out in the Exceptions Order to the Rehabilitation of Offenders Act (ROA) 1974, where an employer is entitled to ask a candidate to reveal details of all convictions, whether spent or not.

Exceptions Order

The Exceptions Order to the Rehabilitation of Offenders Act (ROA) 1974 sets out those occupations and positions exempt from the provisions of the ROA. These are generally positions of trust, where there is a valid need to see a person's full criminal history in order to assess their suitability for a position. This information is intended as general guidance only. It must not be regarded as a definitive interpretation of the Act. Anyone requesting further guidance should seek legal advice.

Exempted Question

An exempted question is a valid request for a person to reveal their full criminal history (including spent convictions) and is made possible by virtue of the Exceptions Order to the Rehabilitation of Offenders Act (ROA) 1974.

Ex-Offender

A person who has been convicted of a criminal offence and whose crime is now “spent” under the Rehabilitation of Offenders Act (ROA) 1974.

Information held under Section 142 of the Education Act 2002

This list was previously called ‘List 99’. This list is maintained by the Department for Children, Schools and Families (DCSF) and contains the details of teachers who are considered unsuitable or banned from working with children in education.

Lead Counter signatory

A senior figure within a Registered Body who has overall responsibility for the use of the CRB checks in their organisation.

List 99

See “Information held under Section 142 of the Education Act 2002”

Local Police Records

Police records, not held on the Police National Computer, containing non-conviction information.

Nacro

A crime reduction charity, making society safer by finding practical solutions to reducing crime. Since 1966 Nacro has worked to give ex-offenders, disadvantaged people, and deprived communities the help they need to build a better future.

Payment on Account (POA)

Payment on Account: the facility for Registered Bodies to pay for their fees by monthly invoice.

POCA List

Protection of Children Act List. This is a list, managed by the Department for Children, Schools and Families (DCSF) on behalf of the Department of Health (DH), of people banned from working with children.

Police Act 1997

The piece of legislation that brought about the CRB.

Police National Computer (PNC)

A national police database that contains information about criminal records i.e. convictions, cautions, reprimands, and warnings.

Portability

Portability refers to the re-use of a CRB Disclosure, obtained for a position in one organisation and later used for another position in another organisation.

This practice is no longer endorsed by the CRB due to the risks factors involved.

Positions of Trust

Roles that involve working with children and other vulnerable groups, that the CRB is dedicated to protecting.

POVA List

Protection of Vulnerable Adult List. This is a list, managed by the Department for Children, Schools and Families (DCSF) on behalf of the Department of Health (DH), of people banned from working with vulnerable adults.

POVAFirst

POVAFirst is a service available to those customers who are entitled to check the POVA list and who have requested a POVA check on the Disclosure application form. It allows those customers to see the result of the POVA check as soon as possible and before the full Disclosure is received. POVAFirst will benefit those customers who are required by law to undertake a POVA check before a care worker can start work.

Registered Bodies

Organisations that have registered directly with the CRB to use its services.

Regularly

This term carries its ordinary meaning as used in common parlance. Regularly could be used to describe the duties that a person carries out everyday but not all day; every week but not on every day; every month but only once a month.

Rehabilitation of Offenders Act (ROA) 1974

The Rehabilitation of Offenders Act (ROA) 1974 enables some criminal convictions to become 'spent', or ignored, after a 'rehabilitation period'. A rehabilitation period is a set length of time from the date of conviction. After this period, with certain exceptions, an ex-offender is not normally obliged to mention the conviction when applying for a job or obtaining insurance, or when involved in criminal or civil proceedings.

Rehabilitation Period

A rehabilitation period is a set length of time from the date of conviction. After this period, with certain exceptions, an ex-offender is not normally obliged to mention the conviction when applying for a job or obtaining insurance, or when involved in criminal or civil proceedings.

Reprimand

A reprimand has replaced the caution for young people aged under 18. A young person given a second formal warning about future conduct is given a final warning.

Spent Conviction

The Rehabilitation of Offenders Act (ROA) 1974 sets out to make life easier for many people who have been convicted of a criminal offence and who have since lived on the right side of the law. A person convicted of all but the most serious criminal offences and who receives a sentence less than 2.5 years in prison, benefits from the Act if they are not convicted again during a specified period. This is called the rehabilitation period. In general terms, the more severe a penalty is, the longer the rehabilitation period. Once a rehabilitation period has expired and no further offending has taken place, a conviction is considered to be 'spent'. Once a conviction has been spent, the convicted person does not have to reveal it or admit its existence in most circumstances, including, for example, when applying for a job. In most circumstances, an employer cannot refuse to employ someone, or dismiss them, on the basis of a spent conviction. There are some exceptions to the general principle that spent convictions do not have to be declared. When assessing the suitability of a person for a position of trust, an employer is entitled to ask a candidate to reveal details of all convictions, whether spent or not. This is, in part, to ensure that children and other vulnerable groups are adequately protected from those in positions of authority over them. These positions of trust, or excepted professions, are set out in the ROA Exceptions Order.

Standard CRB Check/Disclosure

Also referred to as a Standard Disclosure. These are primarily for posts that involve working with children or vulnerable adults. Standard checks may also be issued for people entering certain professions, such as members of the legal and accountancy professions. The Standard check contains details of all convictions held on the PNC including current and 'spent' convictions as well as details of any cautions, reprimands or final warnings. If a position involves working with children, the CRB check will indicate whether information is held on three government lists of those who are banned from working with children or the vulnerable.

Subject Access

Under current legislation, individuals can exercise their right to apply for access to information held on them including criminal record information under the 'subject access' provisions of the Data Protection Act 1998.

Umbrella Body

An Umbrella Body is a Registered Body that provides access to the CRB to other non-registered organisations.

Unspent Conviction

A conviction is described as unspent if the rehabilitation period associated with it has not yet lapsed. A rehabilitation period is a set length of time from the date of conviction, according to the sentence imposed.

Volunteer

The CRB defines a volunteer to be 'a person who performs any activity which involves spending time, unpaid (except for travelling and other approved out-of-pocket expenses), doing something which aims to benefit someone (individuals or groups) other than or in addition to close relatives'.

Vulnerable Adults

The CRB has two definitions of a vulnerable adult, one that is entitled to an Enhanced Check and one for a Standard check.

ENHANCED

A person who regularly cares for, trains, supervises or is in sole charge of vulnerable adults of the following description is entitled to an

ENHANCED CHECK.

A vulnerable adult for the purposes of an Enhanced Check is a person aged 18 or over who receives services of a type listed in paragraph 1) below and in consequence of a condition of a type listed in paragraph 2) below, has a disability of a type listed at 3) below.

1) The services are:

- a) accommodation and nursing or personal care in a care home,
- b) personal care or support to live independently in his or her own home,
- c) any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body,
- d) social care services; or
- e) any services provided in an establishment catering for a person with learning difficulties.

2) The conditions are:

- a) a learning or physical disability,
- b) a physical or mental illness, chronic or otherwise, including an addiction to

- c) alcohol or drugs; or
- c) a reduction in physical or mental capacity.

3) The disabilities are:

- a) a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions,
- b) severe impairment in the ability to communicate with others, or
- c) impairment in a person's ability to protect him or herself from assault, abuse or neglect.

STANDARD

Any employment or other work which is concerned with the provision of care services (2) to vulnerable adults (3) and which is of such a kind to enable the holder of that employment or the person engaged in that work to have access to vulnerable adults in receipt of such services in the course of his normal duties.

2) "Care services" means

- i) accommodation and nursing or personal care in a care home (where "care home" has the same meaning as in the Care Standards Act 2000);
- ii) personal care or nursing or support for a person to live independently in his own home;
- iii) social care services; or iv) any services provided in an establishment catering for a person with learning difficulties.

3) "Vulnerable adult", in the context of a Standard check, means a person aged 18 or over who has a condition of the following type:

- i) a learning or physical disability; ii) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or iii) a reduction in physical or mental capacity.

Warning

A young person given a second formal warning about future conduct is given a final warning. A reprimand has replaced the caution for young people aged under 18.

Working with children

The definition of this term is in two parts:

- 1) A child care position within the meaning of the Protection of Children Act. The Criminal Justice and Court Services Act (CJCSA) 2000 replaces the original definition in the Protection of Children Act with 'regulated position' for the purposes of Part II of the 2000 Act. Within the 2000 Act, section 36 sets out what the regulated positions are for the purposes of Part II of the Act; or
- 2) A position in which employment or further employment is prohibited or restricted by regulations made under section 218 of the Education Reform Act 1988.

**Imperial College London
Criminal Records Bureau Policy Statement, Relating to Students**

As an institution using the Criminal Records Bureau (CRB) Disclosure service to assess an applicant's and student's suitability for positions of trust, Imperial College London complies fully with the CRB Code of Practice and undertakes to treat all applicants for a course of study at the College and all students on a course of study at the College fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

Imperial College London is committed to the fair treatment of its students and potential students regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

Unless the nature of the position allows Imperial College London to ask questions about your entire criminal record we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Imperial College London who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

We make every subject of a CRB Disclosure aware of the existence of the CRB Code of Practice and make a copy available on request.

**Imperial College London
Policy on the Recruitment of Ex-Offenders**

- As an organisation using the Criminal Records Bureau (CRB) Disclosure service to assess applicants' suitability for positions of trust, Imperial College London complies fully with the CRB Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.
- Imperial College London is committed to the fair treatment of its students, potential students or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- We have a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.
- We 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. We select all candidates for interview based on their skills, qualifications and experience.
- A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms and recruitment information will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Imperial College London and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
- Unless the nature of the position allows Imperial College London to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.
- We ensure that all those in Imperial College London who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure 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 for a place on a course of study at Imperial College London.
- We make every subject of a CRB Disclosure aware of the existence of the CRB Code of Practice and make a copy available on request.
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Having a criminal record will not necessarily bar you from studying with us.

This will depend on the nature of the course of study and the circumstances and background of your offences.

**Imperial College London
Criminal Records Disclosure**

On your proposed course of study at Imperial College London you will be required to work with children and vulnerable adults. Under the Protection of Children Act (1999) the College has a duty of care to ensure that these groups of people in particular are protected from harm. In order to comply with this duty of care we must gain access to information that is only available through the Criminal Records Bureau (CRB).

Imperial College London does not wish to deter individuals with criminal records from taking advantage of the benefits of higher education. However, the College must balance its responsibilities to provide a safe and secure environment for staff, students, visitors, patients and others. Consequently, the College reserves the right to terminate the registration of any student whose criminal record makes it inappropriate for them to continue with their degree course.

The CRB has introduced a Disclosure document, which provides information on a person's criminal record, including cautions and 'spent' convictions.

If you decide to firmly accept your offer of admission to the School of Medicine – for year of entry x - you must submit an application by 30 April 200x (for A300 course) or 30 June 200x (for A100 and A101 courses) in the same admissions cycle to obtain an Enhanced Disclosure. Imperial College London will withdraw this offer if you fail to meet this deadline.

How to Obtain a Disclosure – New Applicants

You should complete the enclosed application and submit it with **original** proof of identity by **30 June 2011**. Please refer to the information overleaf regarding acceptable identity documents. This information is also available on the CRB website at www.crb.gov.uk/id.

Details on how to complete the application are provided on the front of the form. Please ensure that you read this information carefully before you begin.

Top tips for completing the application

Last year about a quarter of the Disclosure applications we received from MBBS candidates could not initially be processed as they were incomplete or incorrectly completed. The following tips are based on the most common reasons why we were unable to process last year's Disclosure applications.

- Ensure that you include a full, five-year address history. If necessary use the continuation sheet available at www.crb.homeoffice.gov.uk/continuation
- In Section B please provide your permanent home address. If you have a university or school correspondence address, include this address in Section C or on a continuation sheet.
- Ensure that you write in black ink
- Don't forget to sign the Declaration by the Applicant box!

Submitting the application

Your application and documentation should be submitted to:

Registry: Medicine Admissions
Imperial College London
Level 3 Sherfield Building
South Kensington Campus
London SW7 2AZ

If you are able to come in person your documentation will be photocopied and returned to you immediately. You should go the Student Hub, Level 3 Sherfield Building. We are open every weekday between 9.30 and 17.00 (Wednesdays 10.00 to 17.00).

If you send your documentation to us you are strongly advised to use **registered post**. We will also return your documents by registered post.

Applicants from outside the UK

If you have lived in the United Kingdom at any time (including for educational purposes) you must obtain an Enhanced Disclosure. If you have never resided in the UK you should obtain a Certificate of Good Conduct.

Admissions can provide information regarding the documentation available in many EU and Overseas countries. Please contact Admissions by email on medicine.ug.admissions@imperial.ac.uk.

Acceptable Identity Documents

You must provide **three original documents** with your CRB disclosure application; one document must be from Group 1 plus any two from Groups 1 or 2.

At least one document must confirm your **current address** and at least one document must confirm your **date of birth**.

If the document is denoted with * then it must be less than 3 months old.

If the document is denoted with ** then it must be issued within the past 12 months

Group 1

- Passport
- EU National Identity Card
- Identity Card for Foreign Nationals (ICFN) / Biometric residence permit
- Driving Licence (UK) (Full or provisional) Isle of Man /Channel Islands (a photo card is only valid if the individual presents it with the associated counterpart licence; except Jersey)
- Birth Certificate (UK & Channel Islands) - issued within 12 months of date of birth
- HM Forces ID Card (UK)
- Firearms Licence (UK)
- Adoption Certificate (UK and Channel Islands)

Group 2

- Marriage/Civil Partnership Certificate
- Financial Statement ** - e.g. pension, endowment, ISA
- Birth Certificate
- Vehicle Registration Document (Document V5 old style and V5C new style only)
- P45/P60 Statement **(UK & Channel Islands)
- Mail Order Catalogue Statement*
- Bank/Building Society Statement*
- Court Claim Form** (UK)
- Documentation issued by Court Services*
- Utility Bill* - electricity, gas, water, telephone – including mobile phone contract/bill
- Exam Certificate e.g. GCSE, NVQ, O Levels, Degree
- TV Licence**
- Addressed Payslip *
- Credit Card Statement *
- National Insurance Card / letter (UK & Channel Islands)
- Store Card Statement *
- NHS Card (UK & Channel Islands)
- Mortgage Statement **
- Benefit Statement* - e.g. Child Allowance, Pension
- Insurance Certificate **
- Council Tax Statement (UK & Channel Islands) **
- Work Permit/Visa (UK) **
- A document from Central/ Local Government/ Government Agency/ Local Authority giving entitlement (UK & Channel Islands)*: e.g. from the Department for Work and Pensions, the Employment Service , Customs & Revenue, Job Centre, Job Centre Plus, Social Security
- CRB, Disclosure Scotland and ISA Certificate (UK)**
- Letter from a Head Teacher*
- Connexions Card; including those cards carrying the PASS accreditation logo (UK & Channel Islands)

- One of the following documents from the United Kingdom Borders Agency (UKBA) (formerly the Immigration and Nationality Directorate – IND) (UK):
 - Convention Travel Document (CTD) - Blue
 - Stateless Person's Document (SPD) - Red
 - Certificate of Travel (CIT) - Brown (Formerly Certificate of Identity)
 - Application Registration Card (ARC)
 - Immigration Status Document (ISD)
 - Certificate of British Nationality (UK)

Self-Declaration Form

As per the Faculty of Medicine CRB Disclosure Policy and Procedures <https://education.med.imperial.ac.uk/Policies/Policies.htm> all existing registered students due to progress to Year 5 of the course in July of each year are required to complete a self-declaration in January/February noting if they have received any police cautions, convictions or have a case pending with the police.

Where a positive declaration is made, this will be reviewed and the student may be required to complete a new disclosure. The FEO will notify the student by email and the new enhanced CRB Disclose should be completed within 10 days of the FEO notification. Details of how to apply for an Enhanced CRB Disclosure are available via <https://education.med.imperial.ac.uk/Policies/Policies.htm>

Entry to Year 5 is dependent upon the completion of this declaration and where necessary, completion and receipt of a CRB Disclosure. In the event that a positive CRB disclosure is received a decision on whether to temporarily suspend the student during part or all of the investigation processes will depend on the nature of the offence in question. The decision will be made by the Director of Education or their designated deputy in consultation with the College Registry and other parties.

Completed declarations should be returned in a sealed envelope by the required deadline to:

Mr Jitender Yadav
Clinical Curriculum Manager
Faculty Education Office
Reynolds Building,
Charing Cross Campus

Note:

Any information disclosed in this declaration will be treated as strictly confidential. This information will be retained by the University under secure conditions and is not disclosed to any third party outside the University (other than in pursuance of a legal obligation).

If information relating to offences is withheld, erroneous, or is given in an incomplete form by the student, then the Faculty reserves the right take disciplinary action against the student.

Frequently Asked Questions

What is a Disclosure?

A disclosure is a document containing information held by the police and government departments. The Criminal Records Bureau (CRB), an executive agency of the Home Office, provides these disclosures.

The Disclosure service offers organisations a means of checking the background of students to ensure that they do not have a history that would make them unsuitable to work in a healthcare environment. The Disclosure will provide details of a person's criminal record including convictions, cautions, reprimands and warnings held by the Police National Computer (PNC). It also includes information held by local police forces and details from lists held by the Department of Health (DH) and the Department for Education and Skills (DfES) of those considered unsuitable to work with children or vulnerable adults.

As your course of study involves contact with children and vulnerable adults you will need an **Enhanced Disclosure**. This disclosure contains details of:

- All convictions held on the PNC including current and 'spent' convictions as well as details of any cautions, reprimands or final warnings.
- As the programme involves working with children the Disclosure will indicate whether information is held on government department lists, held by the DfES and DH of those who are banned from working with children or are unsuitable to work with vulnerable adults. The Disclosure also includes information held by the DH of those considered unsuitable to work with vulnerable adults.
- A check on local police records. Where local police records contain additional information that might be relevant to study on the MBBS course, the Chief Officer of police may release information for inclusion in an Enhanced Disclosure. Exceptionally, and in a very small number of circumstances (typically to protect the integrity of current police investigations), additional information may be sent under separate cover to the Countersignatory and should not be revealed to the applicant.

Why do I need to apply for a Disclosure?

It is a requirement that all candidates admitted to the MBBS course must complete a Disclosure.

What if I already have a Disclosure?

The School of Medicine will not accept Disclosures which you have obtained for other institutions. It will be necessary for you complete a new Disclosure.

My offer is for 200x. When do I need to submit an application?

All conditions of your offer must be satisfied in the current admissions cycle.

I intend to accept Imperial as my Insurance choice. Do I need to submit an application?

If you accept Imperial as your insurance medical school it is not necessary to complete a Disclosure for the School of Medicine by 30 June. If you are subsequently accepted on to the course at Imperial we will write to you regarding the Disclosure procedures at that time.

What if I live outside the UK?

If you have ever lived in the UK (even if this was to attend school) you must obtain a Disclosure. If you have never lived in the UK you will be required to provide a Certificate of Good Conduct. Please contact Admissions if you experience problems in obtaining documentation.

How much does the Disclosure cost?

The current (February 2011).cost of the Enhanced Disclosure is £36. However, Imperial College London has secured funding so that students currently will not be required to pay this fee. This may however change in the future.

How do I apply for a Disclosure?

Please refer to the enclosed How to Obtain a Disclosure document above.

Who will receive my Disclosure?

You will receive your Disclosure in the post. A copy of the Disclosure will also be sent to one of the counter-signatories at Imperial College London, all of whom have been registered with the CRB and have agreed to comply with the CRB's Code of Practice. We strongly advise you to keep your copy of the Disclosure in a safe place since photocopies are not acceptable. Imperial is not allowed to keep your Disclosure for more than six months. However, during your course you might be asked by one of the NHS Trusts at which you have a placement to present this information.

When will I receive my Disclosure?

The CRB claims that 90% of all Enhanced Disclosures are processed within four weeks of receipt. Please note that some disclosures take significantly longer than this to be processed and as such we strongly recommend that you complete your application **as soon as possible**.

According to our own practice, the final decision regarding admission will be made only when the School of Medicine has received a completed enhanced CRB disclosure report. In the situation where the School of Medicine is not in receipt of a completed enhanced CRB disclosure report prior to the beginning of term, it may be necessary to defer your admission for the coming year.

How do I know that the information contained in my Disclosure will be kept confidential?

Imperial complies with the CRB's Code of Practice, which is available on the CRB website at www.disclosure.gov.uk . Sensitive personal information about students at Imperial is stored securely. Your Disclosure will be stored separately from your other student records.

The Disclosure will be kept for no longer than six months after receipt from the CRB. Once you are registered as a student you have a duty to report to the Faculty Senior Tutor any police cautions, convictions or where a case is pending with the police.

What if I have a criminal record that may not be relevant?

Imperial has a policy of dealing with this information that ensures that criminal record information is not misused and that ex-offenders are not treated unfairly. It is not possible to provide a list of the types of convictions, cautions or reprimands which would cause the withdrawal of your place at the College. Each case will be considered on an individual basis by a specially convened panel.

Can I challenge the information on my Disclosure if it is incorrect?

Yes. If you think that the information contained in your Disclosure is incorrect please contact the Disclosure dispute line on 0870 9090 778 immediately to ask about dispute procedures.

Further Information

If you have further questions regarding your Disclosure application please contact Admissions at the above address or by email on medicine.ug.admissions@imperial.ac.uk The CRB website is www.crb.gov.uk There is also a dedicated Disclosure website at www.disclosure.gov.uk