

Audit and Governance Committee – 25 April 2018

Safer Recruitment Internal Audit 2017/2018

Report by the Director for Human Resources

Introduction

1. This report explains the issues identified by the Safer Recruitment Internal Audit in February 2018 and the actions being taken. The report particularly focuses on the findings in relation to criminal record checking (DBS checks).

Background

2. In July 2015 the function of processing applications for criminal record checks from the Disclosure and Barring Service (DBS checks) transferred from Oxfordshire County Council to Hampshire Shared Services (HSS). This function includes applying for checks at the request of council managers and recording completed checks against employee records on the SAP payroll system. The responsibility for ensuring all relevant staff have DBS checks remains with council managers.
3. In September 2016 Oxfordshire County Council changed its policy in relation to rechecking criminal records for employees working in roles eligible for DBS checks. Up until September 2016 only employees working in children's services were subject to a fresh DBS check every three years. This policy was extended in September 2016 to all staff in relevant roles including adult social care, Fire & Rescue Service, Libraries and Solicitors.
4. This policy is not a legal requirement but allows council managers to monitor the criminal record status of employees working with children and vulnerable adults, reducing the risk if employees fail to disclose changes in their criminal record status.

The process for DBS checking and rechecking

5. Managers are responsible for ensuring DBS checks and rechecks are carried out. They do this as part of the recruitment process and for rechecks submit an online request to Hampshire Shared Services along with the required documentation. HSS as the registered body submit the application to the Disclosure and Barring Service.
6. When a DBS check is received from the Disclosure and Barring Service, HSS use a system called "e-bulk" to upload the completion date and DBS certificate number on to the employee's SAP record. The manager is notified about any disclosures. At the same time a flag is set on the system to trigger a reminder to managers when the recheck is due. This reminder is sent three months in advance.

Findings from the Safer Recruitment Audit

7. The Safer Recruitment Audit carried out in February 2018 identified errors in the recording of DBS Checking on the SAP system and compliance with the three-year rechecking policy.
8. It is important to reassure the Committee that there are robust systems in place to check the criminal records and carry out DBS checks for all new starters joining the council in relevant posts. This includes existing council staff moving to new jobs. This is supported by the findings of the audit which showed all new recruits had a DBS check.
9. The audit also confirmed that we have comprehensive, up-to-date and accessible Safer Recruitment policies and procedures available at the Council. These set the strategic objectives and control requirements for all aspects of safer recruitment, including recruiting manager training, interview requirements and DBS checks.

Management Information – DBS Data Inaccuracies on SAP

10. Internal audit reported to the Audit Working Group on 4 April 2018 that:
 - *There are significant inaccuracies in the SAP DBS data, as SAP is not always updated when DBS checks are completed. This is a known IT issue and IBC has reportedly been trying to fix it over the past year. As a result, OCC have been unable to effectively monitor whether staff have up to date DBS checks or not since the responsibility for managing the DBS process transferred to IBC in 2015. From our audit testing, there was a 67% error rate with the DBS data on SAP in our sample of 45.*
 - *There is a further issue where the 3-yearly DBS checks are not being routinely undertaken by all managers. In just over half our sample of 15 where the DBS was recorded as expired on SAP, the DBS had indeed expired and the Manager had not requested a Renewal. The Renewal Reminder is not consistently used by Managers to ensure they are reminded when the 3-yearly Renewal is due (two thirds of the New Starters checked did not flag this Reminder). However, in almost half the cases checked, the Reminder had been used but not acted upon.*

Reasons for discrepancies

11. In December 2016 a fault started to appear in the e-bulk system. At first the fault was not recognised as it was failing on a very ad-hoc basis but then it became more widespread and was properly diagnosed in November 2017.
12. The system fault means that completed DBS checks for new starters and for employees being rechecked were not consistently uploaded onto employees' records from December 2016. This resulted in inaccurate records and flags not being set for recheck reminders due from 2019. This has now been resolved.

13. Where DBS rechecks were found to be overdue this was due to managers not acting on reminders but some were due to the policy change in September 2016 where some posts were missing the relevant flag to trigger a reminder to managers.

What action have we taken?

- The system fault was fixed on 6 March 2018 and all backdated records have been uploaded.
- The HR team are checking every employee and their record to ensure the records are accurate, that any expired DBS checks are carried out and that the right flags are set on the record. This work will be complete by the end of April.
- Managers are being contacted where DBS checks are found to have expired and are being instructed to initiate rechecks.
- All managers who have not done the Recruitment and Selection training in the last three years are being asked to do so by the end of June 2018.
- Classroom training on recruitment vetting and checking is being rolled out to managers from May.

Management information and creation of sensitive posts

14. Internal Audit also reported that:
- *Due to the inaccurate data, management information on DBS checks is therefore not currently being produced nor used. Furthermore, there is a known issue that posts are not always flagged as 'sensitive' when they are created. This is now a manager responsibility, under the IBC HR Recruitment work flow system. Without flagging a post as 'sensitive' it is difficult to data match against DBS records in order to identify gaps. The inaccuracy of SAP DBS data against both posts and personnel records on SAP is a known issue within Corporate HR, and work has been underway to identify and resolve inaccuracies.*
15. It is correct that the inaccuracies of the data on SAP have affected our ability to monitor and report on DBS checking and managers have had to rely on their own records of DBS checks as reminders are not consistently sent.
16. There have also been issues with managers creating posts on the system without the correct level of DBS flag.

What action have we taken?

- Improvements to the self-service system were introduced in January 2018 making it simpler for managers to create posts with the correct DBS flags.

- We are improving our online guidance making it easier for managers to look up the level of DBS check required for jobs.
- Monthly reports are being run by HR for all new posts created to check that the right DBS flags have been included.
- HR are introducing a reporting system that identifies where three year rechecks are overdue and will contact managers.

Action plan in response to all Safer Recruitment Internal Audit Findings

17. The HR team have done considerable work since the change of the rechecking policy and since the fault in the system was identified to run reports from SAP and work with services to manually check that employees have up to date DBS checks. This has been hampered by not having direct access to SAP to change records ourselves but in January 2018 one member of the team was given access and this is helping us correct records more quickly.
18. In relation to the other findings managers have been reminded about uploading interview notes and have been asked to undertake the recruitment training if they have not done so in the last three years.

Financial and Staff Implications

19. There are no financial implications but there are risks that staff working for the council have not had a DBS re-check in line with the council's policy.

RECOMMENDATION

20. **The Committee is RECOMMENDED to support the actions being taken to resolve the discrepancies in our recording system and the actions being taken to ensure rechecks are consistently carried out every three years.**

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