

Division(s):

Audit and Governance Committee – 25 July 2018

Safer Recruitment Internal Audit 2017/2018

Report by Director of Human Resources

Introduction

1. This report provides an update on the actions taken to ensure that employee records held on the Council's SAP database are accurate and up to date in relation to Disclosure and Barring Service (DBS) checks. This follows the report presented to the Committee on 25 April 2018.

Background

2. The Safer Recruitment Audit carried out in February 2018 identified errors in the recording of DBS Checking on the SAP system.
3. Whilst managers are responsible for ensuring criminal record checking is carried out for all new recruits and for rechecking employees every three years, (in accordance with Council policy), the inaccuracy of data held on the central system exposed weaknesses in the Council's ability to centrally monitor compliance and accuracy of DBS checking.
4. As a result of the audit findings and following further interrogation of the data, a joint project team of officers from Hampshire Shared Services and Oxfordshire Human Resources was formed to carry out a complete review of all DBS data held on SAP. This project team was also tasked with designing systems to improve oversight to monitor DBS checking compliance and data recording.

Progress Update

5. All posts and employee records on SAP have now been checked. Multiple root causes of the data inaccuracies were identified as follows:
 - 5.1 When employee data was migrated from Oxfordshire County Council SAP system to Hampshire IBC SAP some records were missing DBS check and/or reminder information.
 - 5.2 Due to a fault, the E-Bulk system has not consistently and accurately updated SAP with completed DBS checks and reminder notifications.

- 5.3 The process of implementing reorganisations and TUPE transfers has led to inaccurate data being set up on SAP
- 5.4 The process of self-service gives responsibility to managers for ensuring the correct DBS flags are set against newly created posts. Managers have not always done this correctly.

Action taken

6. Actions taken to resolve and correct data inaccuracies are as follows:
 - 6.1 The E-Bulk system was fixed on 6 March 2018 and all retrospective uploading of DBS checks has been carried out.
 - 6.2 All posts on SAP have been checked to ensure those eligible for DBS checks are correctly identified and flagged with the right level of check (either Basic, Standard, Enhanced or Enhanced with Adults, Children's or both barred list checks). Where flags have been found to be missing or incorrect these have been amended.
 - 6.3. 3657 Council posts (excluding schools) require a DBS Check and these are all correctly recorded on SAP. A system has been put in place with Hampshire Shared Services for Oxfordshire HR team to be provided with monthly reports to ensure that all newly created posts are correctly flagged with the correct level of DBS check.
 - 6.4 Employee records have been checked against each post. Where data has been found to be missing or inaccurate on SAP the team has carried out investigations to find evidence that a DBS check or recheck (where due) has been carried out and the data is being corrected.
 - 6.5 Additional assurance checking processes have been put in place within the Hampshire Shared Services Recruitment Team to ensure that:
 - DBS check requests are in line with flags held on the post;
 - Returned DBS check data continues to be accurately recorded in SAP.
 - 6.6 Standard templates used for re-structures and TUPE transfers have been amended to provide more control in the capture of DBS related data.
7. The findings from the review and the position at the time of writing this report was that:
 7. 1 No employees have been recruited into post without having the required DBS check at point of recruitment.

- 7.2 Data for 41 employees is still incomplete, eg where the certificate number is recorded, but the level of the check carried out is not. We have requested to see all DBS Certificates for this group of staff to verify the level of check that has been completed.
- 7.3 306 employees are due for a re-check. All have been DBS checked previously and new checks will be carried out pending the outcome of the Policy review on rechecking.

Review of Re-checking Policy

- 8. There is no legal requirement to repeat DBS checks for employees unless they move to a role that requires a different level of check or they have a break in employment of more than three months.
- 9. As part of the work we have done to review all systems and processes in relation to DBS checking, we are reviewing the Council's three' year rechecking policy to establish its effectiveness in reducing the risk of the Council being unaware of changes to employees' criminal record status. Other systems are being explored and reports are being presented to Adult and Children's Safeguarding and Leadership teams to seek a view of their preferred approach.
- 10. Other actions we have taken:
 - 10.1 All managers who have not done the Recruitment and Selection training in the last three years were asked to do so by the end of June 2018. Due to workloads for some managers this deadline has been extended until the end of July 2018.
 - 10.2 Classroom training on recruitment vetting and checking was launched for managers in May and more sessions are programmed throughout the coming year.
 - 10.3 Improvements to the self-service system were introduced in January 2018 making it simpler for managers to create posts with the correct DBS flags.
 - 10.4 Having checked all posts across the council and identified the correct level of DBS check required for each one, we are producing an online look up list to help managers quickly look up the level of DBS check required for jobs.
 - 10.5 Hampshire Shared Services and Oxfordshire HR team will develop reporting to identify where three year rechecks due to allow central monitoring (subject to the outcome of the review of the rechecking policy).

Financial and Staff Implications

11. 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

12. 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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