DBS Referral Policy

United African Association

Registered Charity CIO 1192725
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Policy owner	Board of Trustees
Version	1.0
Approval status	Approved by the Chair
Approval date	October 2026
Next review	October 2027
Applies to	Trustees staff volunteers contractors and relevant partners

Purpose

This policy ensures UAA meets its legal duty to refer a person to the Disclosure and Barring Service when the referral conditions are met.

Scope

This policy applies wherever UAA works, including Barratt House, Leicester Street Community Centre, partner venues, the foodbank and food larder, community meals, welcoming spaces, youth activities, football, swimming, wellbeing sessions, allotment work, trips, outreach, home or hospital visits, online sessions, social media and transport arranged by UAA.

Legal and good practice framework

- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Disclosure and Barring Service current barring referral guidance

Responsibilities

Role	Responsibility
Board of Trustees	Approves the policy, receives assurance, provides resources and remains accountable.
Chief Executive or delegated manager	Implements the policy, allocates competent leads and escalates significant matters.
Policy lead	Maintains procedures, records, training and contact details and reports themes to trustees.
Staff volunteers and contractors	Follow the policy, attend required training and report concerns promptly.

When a referral may be required

UAA considers a referral when it removes a person from regulated activity, or would have removed them had they not resigned or otherwise left, because the person harmed or posed a risk of harm to a child or adult at risk, satisfied the harm test, received a relevant caution or conviction, or met another statutory referral condition.

Procedure

1. Take immediate safeguarding action and notify statutory agencies where required.
2. Secure records and appoint a person independent of the allegation where possible to coordinate fact finding.
3. Decide whether the legal referral conditions are met. Obtain specialist advice when needed, but do not delay a required referral.
4. Submit accurate relevant information to the DBS as soon as possible.
5. Record the decision, reasons, documents supplied and any parallel referrals.

Responsibility and oversight

The Designated Safeguarding Lead normally coordinates the referral. The Chief Executive or Chair appoints an alternative if the lead is implicated. The Board receives anonymised assurance and remains accountable.

Fairness and confidentiality

The person will normally be informed about the referral and factual inaccuracies may be corrected, unless notice would place someone at risk, prejudice an investigation or conflict with statutory advice. Information is shared lawfully and only with those who need it.

No settlement to avoid referral

A settlement agreement, resignation or ending of a volunteer role does not remove UAA's safeguarding or DBS referral duties.

Records and confidentiality

UAA will keep proportionate, accurate and secure records. Access is limited to people who need the information for their role. Records are retained and disposed of in line with the Data Protection and GDPR Policy and any legal, insurance or funding requirement.

Training and communication

The policy lead will include this policy in induction and arrange refresher or role-specific training where the level of risk requires it. Current procedures and reporting routes will be accessible to staff and volunteers.

Monitoring and review

The policy lead will monitor incidents, complaints, near misses, audit findings and feedback. The Board will review this policy at least annually and sooner after a serious incident, material legal or operational change, significant complaint or identified control failure.

Related UAA policies

- Child Safeguarding Policy
- Adult Safeguarding Policy
- Safer Recruitment and Ex Offenders Policy
- Whistleblowing Policy
- Incident and Serious Incident Reporting Policy

Approval

Approved by the Chair



Raymond
Chair of UAA
Approval date: October 2026
Next review date: October 2027