

## DBS ELIGIBILITY CRITERIA GUIDE

### (Imperial College roles excluding healthcare/NHS setting)

This guidance does not cover roles in a healthcare/Occupational Health or NHS setting, for this please refer to [DBS eligibility criteria guide for working in healthcare/NHS](#).

Please refer to this guidance to determine whether you can obtain a statutory DBS check for members of staff (including casual workers and volunteers) and which level of DBS check and Workforce is appropriate.

Please note that this guidance has been created with Imperial College roles/jobs in mind, it is not a definitive list of all DBS eligibility criteria. If in doubt or for further assistance, please contact the Compliance and Safeguarding team ([staffDBS@imperial.ac.uk](mailto:staffDBS@imperial.ac.uk)).

---

Please view the activities and level of DBS check required by selecting the relevant areas of work in the table below:

<a href="#">Working with children under 18 years of age</a>	<a href="#">Working with vulnerable adults</a>	<a href="#">Other areas of work</a>	<a href="#">Work not eligible for a statutory DBS check</a>
---	--	-------------------------------------	---

	WORKING WITH CHILDREN UNDER 18 YEARS OF AGE -ACTIVITIES	Level of DBS check and Workforce	Examples of roles/areas where this level may be appropriate – please also refer to activity (List is not exhaustive)
1	<p>Work with children carried out <b>unsupervised</b> ‘regularly’ (once a week or four times in a 30 day period) or overnight (2am to 6am) providing:</p> <ol style="list-style-type: none"> <li>teaching, training or instruction to children</li> <li>care or supervision of children</li> <li>advice or guidance wholly or mainly to children and this specifically relates to their emotional, educational or physical well-being</li> <li>monitor the content of internet-based services aimed wholly or mainly for use by children (but see section 3 below for full details of requirements)</li> <li>drive children for a third party (i.e: on an employment basis)</li> </ol> <p>Counselling work: refer to <a href="#">points 8 and 9 of ‘Working in Healthcare’ section</a> below.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li><b>Exceptions to the above:</b> <i>this level of DBS cannot be requested if the service is provided and designed for adults so the presence of a child is incidental, i.e. an adult attends a night class and brings their child with them; a lecture is given to university students, some students are under 18 years of age; these activities are being provided to 16 and 17 year olds in work (including voluntary work).</i></li> <li>The same level of DBS check can be requested for the Day to Day Manager or Supervisor of somebody engaging in Regulated Activity, i.e. where an Enhanced DBS check with Children’s Barred list is required for the subordinate’s role</li> <li><b>Peer Exemption</b> applies if the peers are students, not staff. A person is exempt from a child-related DBS check if they are: 1. part of a peer group <b>and</b> 2. assisting or under the direction of a person who is engaging in regulated activity. For example a student helping a teacher. If Peer Tutors are paid for their role this changes their role from being categorised as "Assisting" to being categorised "Work". This negates the Peer Exemption.</li> </ul>	<p>Enhanced DBS check with Children’s Barred list check</p> <p>Workforce type = Child Workforce</p>	<ol style="list-style-type: none"> <li>Counsellor</li> <li>Mental Health Adviser</li> <li>Wardens/Sub/Asst</li> <li>Apprentice Tutor</li> <li>Lifeguard duties carried out by Sports Centre Recreation Asst/Duty Manager</li> </ol> <p><b>Some roles/roles within the following areas may meet the criteria for this level of check:</b></p> <ol style="list-style-type: none"> <li>Personal Tutor/ 1-2-1 teaching or pastoral etc. (<a href="#">also see section 4 below</a>)</li> <li>Student Recruitment &amp; Outreach (<a href="#">also see section 3 and 4 below</a>)</li> <li>Students’ Union</li> <li>Contracted out playschemes</li> <li>Global Summer School (<a href="#">also see section 3 and 4 below</a>)</li> </ol>

2	<p>Work with children carried out <b>unsupervised</b> 'regularly' (once a week or four times in a 30 day period) or overnight (2am to 6am) in the following PLACES:</p> <ul style="list-style-type: none"> <li>a) educational institution mainly used for the full-time education to children (e.g.: school, under-18 further education)</li> <li>b) children's nursery</li> <li>c) children's hospital</li> </ul> <p><b>Note:</b> The same level of DBS check can be requested for the Day to Day Manager or Supervisor of somebody engaging in Regulated Activity, i.e. where an Enhanced DBS check with Children's Barred list is required for the subordinate's role</p>	<p>Enhanced DBS check with Children's Barred list check</p> <p>Workforce type = Child Workforce</p>	<p>1. EYEC</p> <p><b>Regular and unsupervised work as:</b></p> <ul style="list-style-type: none"> <li>1. Volunteer in EYEC</li> <li>2. Carrying out activities at a, b or c,</li> </ul>
3	<p>a. Communicating with children by telephone, internet or other electronic means (once a week or more, or 3 days in any 30 day period, or overnight) where this this communication is related to a Regulated Role i.e:</p> <ul style="list-style-type: none"> <li>• <b>teaching, training or instructing</b> children or providing <b>advice or guidance</b> wholly or mainly to children and this specifically relates to their emotional, educational or physical wellbeing</li> </ul> <p><b>Note:</b> If the frequency criteria for 'a' above is not met or they are supervised, the above roles are not classed as Regulated Activity and there would be no requirement for a DBS check</p> <p><b>Or</b></p> <p>b. Monitoring the content of internet based services aimed wholly or mainly for use by children. This role must include:</p> <ul style="list-style-type: none"> <li>• being able to access and remove content or prevent it from being published and control who uses the service or have contact with the children using the service</li> </ul> <p><b>Note:</b> The frequency criteria stated at 'a' above must be met for item 'b', but the supervision criteria does <u>not</u> apply.</p>	<p>Enhanced DBS check with Children's Barred list check</p> <p>Workforce type = Child Workforce</p>	<ul style="list-style-type: none"> <li>1. Student Recruitment &amp; Outreach*</li> <li>2. Global Summer School*</li> </ul> <p>*also see section 1 &amp; 4</p>

4	<p>a. Work with children carried out <b>supervised</b> 'regularly' (once a week or four times in a 30 day period or overnight - 2am to 6am) <b>or</b>:</p> <p>b. Work with children that is <b>not</b> carried out 'regularly' (i.e. less than once a week or four times in a 30 day period or overnight - 2am to 6am)</p> <p><b>Notes:</b></p> <ol style="list-style-type: none"> <li>1. For option 'a' above, the same level of DBS check can be requested for the Day to Day Manager or Supervisor of somebody engaging in this activity. This is not necessary for option 'b' above</li> <li>2. With regard to interviewing students for places on degree programmes, given the short, one-off nature of such interviews, it will be permissible for members of interviewing panels not to have been DBS checked, although as a matter of good practice such interviews should not be carried out by one sole interviewer. It is also preferable for at least one member of the interview panel to have been DBS checked where the interviewee is under 18.</li> <li>3. <b>Peer Exemption</b> applies if the peers are students, not staff. A person is exempt from a child-related DBS check if they are: 1. part of a peer group <b>and</b> 2. assisting or under the direction of a person who is engaging in regulated activity. For example, a student helping a teacher. If Peer Tutors are paid for their role this changes their role from being categorised as "Assisting" to being categorised "Work". This negates the Peer Exemption.</li> </ol>	<p>Enhanced DBS check</p> <p>Workforce type = Child Workforce</p>	<p><b>Some roles/roles within the following areas may meet the criteria for this level of check:</b></p> <ol style="list-style-type: none"> <li>1. Personal Tutor/ 1-2-1 teaching or pastoral etc. (<u>also see section 1 above</u>)</li> <li>2. Student Recruitment &amp; Outreach (<u>also see section 1 and 3 above</u>),</li> <li>3. Disability Advisers or similar</li> <li>4. Student Ambassador</li> <li>5. Programmes/events run by staff/ volunteers for under 18s who are not Imperial College students</li> <li>6. Global Summer School (<u>also see section 1 and 3 above</u>)</li> <li>7. Enterprise Lab.</li> </ol>
5	<p>Temporary Contractor or Volunteer working in the following PLACES (*supervised roles only)</p> <ol style="list-style-type: none"> <li>a. educational institution mainly used for the full-time education to children (e.g.: school, under-18 further education)</li> <li>b. children's nursery</li> <li>c. children's hospital</li> </ol> <p><b>Note:</b> * An Enhanced DBS check <u>with</u> Children's' Barred list check will be required if they will have <u>unsupervised</u> contact with children once a week or more, or 3 days in any 30 day period, or overnight (between 2am and 6am)</p>	<p>Enhanced DBS check</p> <p>Workforce type = Child Workforce</p>	<p><b>Supervised work as</b></p> <ol style="list-style-type: none"> <li>1. Volunteer/contractor in EYEC</li> <li>2. Those carrying out activities set out at a, b or c</li> </ol>

	<p><b>WORK WITH VULNERABLE ADULTS</b> <i>Note: For DBS purposes a vulnerable adult is 18+ years old <u>and</u> is elderly, ill or disabled (Illness is defined as someone in receipt of Healthcare*)</i></p> <p>Also see <b>Working in Healthcare guidance at link below</b></p>	<p><b>Level of DBS check and Workforce</b></p>	<p><b>Examples of roles/areas where this level may be appropriate – please also refer to activity (List is not exhaustive)</b></p>
<p>6</p>	<p>The following activities only have to be done once to be a Regulated Activity requiring a Barred List check.</p> <ul style="list-style-type: none"> <li><b>a) Healthcare to vulnerable adults</b>, e.g. Doctor, nurse, pharmacist, optometrist or other healthcare professional or someone supervised by one while providing healthcare.</li> <li><b>b) Personal care</b> to adults (physical assistance or advice with eating, drinking, washing, going to the toilet, dressing).</li> <li><b>c) Social care worker</b> providing social work which is required in connection with any health care or social services to an adult who is a client or potential client.</li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• “<b>Health care</b>” includes all forms of health care provided for individuals, whether relating to physical or mental health and includes palliative care and procedures that are similar to forms of medical or surgical care but are not provided in connection with a medical condition</li> <li>• Also see section 7 below for detailed guidance, taken from the NHS Algorithm, on work activities and the relevant level of DBS check.</li> <li>• The same level of DBS check can be requested for the Day to Day Manager or Supervisor of somebody engaging in Regulated Activity (see above) with adults or children.</li> </ul>	<p>Enhanced DBS check with Adults’ Barred list check</p> <p>Workforce type = Adult Workforce</p>	<p>Professional Counsellor</p> <p>This role requires the same level of check for a Child Workforce</p>
<p>7</p>	<p>Individuals who work with elderly, ill or disabled adults* (18+ years old) once a week or more, or 3 days in any 30 day period, or overnight (between 2am and 6am) providing:</p> <ul style="list-style-type: none"> <li>a. training or teaching</li> <li>b. instruction or assistance</li> <li>c. advice or guidance</li> <li>d. moderating a public electronic interactive communication service which is likely to be used wholly or mainly by adults who receive a health or social care service</li> </ul>	<p>Enhanced DBS check</p> <p>Workforce type = Adult Workforce</p>	<p>Disability Adviser*</p> <p>Mental Health Adviser*</p> <p>(these roles also require the same level of check for a Child Workforce)</p>

	<b>Note:</b> The same level of DBS check can be requested for the Day to Day Manager or Supervisor of somebody engaging in this frequent activity can also request the same level of check.		
--	---	--	--

	Other areas of work	Level of check and Workforce	
8	<p>a. <b>Legal Profession</b> positions: solicitor, registered foreign lawyer, legal executive, Chartered Legal Executives (CILEx)</p> <p>b. Chartered/certified accountants starting out in the profession, in order to obtain approval by the Financial Conduct Authority (FCA).</p> <p><b>Notes:</b></p> <p>c. This level of check is only application for very specific activities (see complete list of when <a href="#">Standard DBS checks</a> are eligible)</p>	<p>Standard DBS check</p> <p>Workforce type = Other Workforce</p>	

Work that is not normally eligible for a statutory DBS check			
9	<p>The following roles will not normally be expected to require statutory DBS clearance</p> <p>a. Accommodation staff</p> <p>b. Services/facilities staff</p> <p>c. Student Hub</p> <p>d. HR staff</p> <p>e. Registry staff</p> <p>f. ICT staff</p> <p>g. Sports centre staff (incl. those entering changing rooms). Note: DBS checks <u>will be required</u> for all Lifeguards and any roles involving regular supervision, teaching or advice to U18s, unless incidental to activity with adults (e.g. someone who teaches a weekly sports class aimed at adults which one or two U18s attend would not need a DBS check). For further information, please see the DBS guidance on <a href="#">Leisure centre staff – working with children</a> and <a href="#">Leisure Centre pool and beach lifeguards</a>..</p> <p>h. Group work aimed at University aged students, where a student under 18 is incidental to the event, e.g. a lecture or workshop</p>		

- i. Student peers in volunteer roles (see section 4 above)
- j. Staff handling cash or alcohol or with similar responsibilities who do not work working specifically with children or vulnerable adults
- k. Administrators etc. who do not work specifically with children/under 18s or vulnerable adults, but their team do, e.g. Disability Advisory Service, Student Recruitment/ Outreach, Global Summer School, Student Support, Enterprise Lab
- l. College First Aiders
- m. Staff who handle data for under 18s or vulnerable adults but do not work with them in a manner that requires a statutory DBS check
- n. **Interviewing for students on Degree programmes** - Given the short, one-off nature of such interviews, it will be permissible for members of interviewing panels not to have been DBS checked, although as a matter of good practice such interviews should not be carried out by one sole interviewer. It is also preferable for at least one member of the interview panel to have been DBS checked where the interviewee is under 18.