



St Mary's
University
Twickenham
London

Regulations for Disclosure and Barring Service Screening (Students)

Policy, Codes of Practice and Guidance Notes

December 2025

1. Purpose and Scope

1.1 To ensure that St Mary's University fulfils its responsibilities and obligations for the safeguarding of children, young people, and vulnerable adults with whom students of the University may be in contact as part of their work or study, the university conducts checks through the Disclosure and Barring Service (DBS) to ascertain the suitability of candidates to provide such services as part of their course.

1.2. Students joining courses regulated by the Royal College of Occupational Therapists (RCOT), the Health and Care Professions Council (HCPC) or the General Medical Council (GMC) may be subject to other pre-learning checks specific to the requirements of the Professional, Statutory and Regulatory Bodies (PSRBs).

1.3 Scope

1.3.1 This policy applies to applicants for courses where disclosure is judged to be required and to current students enrolled in such courses. Appendix 1 provides more detailed information on how DBS checks are conducted across the university.

2. Policy

2.1 Introduction

2.1.1 The Disclosure and Barring Service (DBS) is an executive non-departmental public body, sponsored by the Home Office. It provides access to criminal record information through its disclosure service. This service enables organisations to make safer recruitment decisions by identifying applicants who may be unsuitable for certain work, or for entering professional practice.

2.1.2. Some programmes at St Marys University involve students undertaking a placement that includes contact with children or vulnerable adults. This is known as Regulated Activity.

2.1.3 St Mary's University and any other Higher Education Institutions that offer programmes of study where students engage in Regulated Activity are legally required to ensure that these students have applied for enhanced disclosure of criminal records through the DBS service.

3 Regulated Activity Programmes

3.1 Any student who enrolls on a programme that involves Regulated Activity will not be registered as a current student until they have been issued with an up-to-date enhanced DBS certificate that has been issued through St Mary's University.

3.2 There may be exceptions to this. i.e where the Regulated Activity is not due to take place until later in the programme or existing DBS certificates may be deemed valid.

3.3 For some courses, optional workplace learning modules will also require students to hold a current DBS certificate.

3.4 Where the Admissions team manage DBS checks, applicants to these programmes are required to make an enhanced declaration about criminal convictions at the point of their acceptance. These relate to professions or occupations which are exempt from the [Rehabilitation of Offenders Act \(1974\)](#). This means that all convictions (including cautions, reprimands or warnings), whether spent or not, must be disclosed. All applicants will be asked to

disclose all information regarding criminal offences as part of their application. To verify any declarations made, applicants will undergo an Enhanced Disclosure screening, or the international equivalent.

3.5 The declaration of a criminal offence (including convictions, cautions, reprimands or warnings) is not in itself a bar to entry onto the course. The university balances equal opportunities with public/patient safety and regulatory duties. Any offence will be considered together with the applicant's qualifications, experience, and overall profile and any professional or statutory body requirements. The university does however reserve the right to refuse admittance to a programme where an applicant is deemed to be unsuitable to be admitted based on the outcome of any DBS check.

3.6 In the health, education and social care professions, honesty and trustworthiness are of the utmost importance and usually failure to disclose a conviction (including a caution, reprimand or warning) will, after consideration (see section 7 below) lead to the applicant being rejected.

3.7 The University will only accept DBS checks from any other employer if the following conditions are met:

a) The DBS is an Enhanced DBS; and

b) A DBS fee was charged (you can see this information on the top left-hand corner of your DBS certificate; and

c) DBS Children's Barred List has been checked for anyone looking to enrol onto a teaching programme and the DBS Children's and Adults' Barred List has been checked for anyone looking to enrol onto a healthcare related course such as Medicine, Physiotherapy or Occupational Therapy; and

d) The applicant has the original DBS certificate in their possession; and

e) The DBS is registered with the DBS Update Service.

4. Disclosure and Barring Service Screening

4.1 All applicants for courses with Regulated Activity who are made an offer will be required to make an application for an enhanced disclosure application to the Disclosure and Barring Service (DBS). The University will be responsible for countersigning the application and forwarding it to the DBS. Responsibility for the decisions on student suitability following the DBS check having been provided is outlined in Appendix 1.

4.2 Once students have undergone an Enhanced Disclosure of criminal records they will be issued with a certificate by the DBS provider. The university as an employer is entitled to view a copy of your certificate.

4.3 Students will not be allowed to engage in Regulated Activity (which includes clinical placements) or may be unable to complete their enrolment and become a registered student until their DBS certificate has been issued.

4.4 If a Disclosure Certificate reveals a criminal conviction (including a caution, reprimand or warning) that has not been previously declared, the offer will normally be withdrawn as non-disclosure is not considered compatible with the requirements of the Professional, Statutory and Regulatory Bodies [PSRB] codes of conduct. If the University decides to proceed with the offer, this decision would be made by the Head of Admissions, with the decision being ratified by the Head of School or nominee.

4.5 Applicants are expected to pay for their own DBS check.

4.6 Where a DBS check is a requirement of joining a course, failure to provide a valid DBS certificate within a defined timeframe may be considered a cause for concern under the St Mary's University Fitness to Practice policy.

5. Ongoing requirements for disclosure and the Update Service

5.1 Once a student has been through the DBS screening process, they will not normally be screened again during their course unless there has been a period of interruption.

5.2 Students on teaching training and MBBS programmes will be required to complete a self-disclosure form at the point of re-enrolment giving their assurance that they have not received any criminal convictions during the previous academic year. Any criminal cautions or convictions that students receive once they have commenced their studies must be declared to St Mary's University (see section 8.6, below).

5.3 St Marys University strongly recommends that students register with the DBS Update Service. The Update Service allows individuals to apply to have their criminal record check kept up to date and the university to check that the information is current. Individuals can apply for the Update Service up to 30 days after the issue of the DBS Certificate. Students cannot apply for the update service at the same time as applying for their DBS as the update service requires an agreed DBS number to be supplied.

The School of Education and the School of Medicine are responsible for managing these ongoing processes and maintaining individual records to ensure the continued suitability of students to remain on their course.

6. Disclosure at application

6.1 Applicants applying through UCAS/ DfE complete a declaration on the UCAS form relating to criminal convictions. The [notes provided by UCAS](#) assists students in completing their application and guides what convictions need to be declared and for which types of courses.

6.2 Applicants applying directly via the University are also required to provide information relating to convictions on their University application form.

6.3 In addition all applicants may be required to complete a **Declaration of Suitability Form**, to ensure that they have declared all convictions including cautions reprimands and warnings and have had no further convictions since application.

6.4 Any applicant who is a non-UK resident or who is currently living in the UK but has lived outside of the UK for 12 months or more during the 5 years before the date of their application must provide a criminal record check or "Certificate of Good Character" from each applicable country as the DBS cannot currently access overseas criminal records or other relevant information as part of its disclosure service.

For information about overseas procedures please refer to the information on the government website [government website](#) Details on fees charged by different countries and guidance on how to apply for the required certificate or letter of authority can be found in the link.

All documents obtained from abroad must be translated (at the applicant's cost) from the relevant language into English. Applicants should contact the relevant foreign embassy for further information regarding the verification of documents.

6.5 To fulfil admission requirements overseas (including EU) applicants who have never resided in the UK, will be required to apply for an enhanced DBS check when they arrive in the UK, at the start of their course. The certificate of good character will be required prior to enrolment.

7. Consideration of Criminal Convictions

7.1 Where a criminal conviction is declared, the Head of Admissions or the Academic Registrar may be required to make a decision on the applicant or students suitability. The Head of Admissions and the Academic Registrar may consult with each other, senior academic staff linked to the course in question, or other staff to arrive at an informed decision which places the safety and wellbeing of all students, staff ,public and patients first.

7.2 Where it is felt that a decision cannot be reached, they may invite an applicant or student to a panel hearing to review the case. More information on this can be found within the [The St Mary's University policy on the Admission of Applicants with Criminal Convictions](#)

7.3 Where, having followed the procedures outlined in 7.1 and 7.2, the University deems an applicant or an enrolled student to be not suitable, we reserve the right to deny the application or terminate a student's enrolment through the [Fitness to Practise procedures](#)

8. Current Students

8.1 Where students are responsible for obtaining their own DBS, they should make the initial application at least 12 weeks in advance of the activity start date.

8.2 The Workplace Learning team are responsible for obtaining DBS checks for students undertaking workplace learning modules only.

8.3 Students are expected to pay for their own DBS check.

8.4 DBS numbers will be held on file and should be entered into the Student Records System by Registry or the department to which the student belongs.

Registry will oversee the DBS check data within SITS and ensure that a complete record of all DBS numbers is maintained annually.

8.6 For regulated programmes, students must promptly disclose (without undue delay) any new convictions (UK or overseas), cautions, reprimands or final warnings, any conditional cautions and any fixed penalty notices for relevant conduct (e.g. antisocial behaviour, fare evasion) to St Mary's University.

Appendix One

Programme of Study	Who administers DBS	When is DBS obtained	Provider	Responsible for updating the DBS number on SITS
BA Primary Education with QTS and BA Primary Education with QTS (work-based route) Top-Up	Admissions	Before the first enrolment	Certn	Admissions
Primary Education with QTS with Foundation Year	Admissions	Nov/Dec before proceeding into Level 4	Certn	Admissions
PGCE Primary/Secondary (including Glyndwr)	Admissions	Before the first enrolment	Certn	Admissions
FDN Chelsea Football	Chelsea Football Club	Student applies for Enhanced DBS check Chelsea FC manages this process.	Chelsea Football Club	Course Lead (see appendix 2)
FDN Sport and Exercise Science	Work placement Team	Before placement	First Advantage	Course Lead (see appendix 2)
BSc Sports Coaching Science	Placement provider	Before Placement	Decided by Placement Provider	Course Lead (see appendix 2)
BA Physical Education, Sport and Youth Development	The student obtains their own DBS	Before placement	First Advantage	Course Lead (see appendix 2)
BSc Sport Rehabilitation	Registry (for students who do not already have DBS in place)	Before placement. BASraT do not require students to have a new DBS for placement activity as long as the DBS they have a current enhanced check	First Advantage	Course Lead (see appendix 2)
BSc/MSc Physiotherapy	Admissions	Before the first enrolment	Certn	Admissions
MSc Occupational Therapy	Admissions	Before the first enrolment	Certn	Admissions
Placements and WBR modules	Placements team	Prior to placement	First Advantage	TBC
Research Degrees	Research Team/student	Prior to placement	First Advantage	TBC

MBBS	Admissions	Before first enrolment. For international students: prior to placement	Certn	School of Medicine team
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Appendix Two

Course	Course lead – September 2025	Administrator
FDN Chelsea Football	Alex Cattini	Nicola Ross
FDN Sport and Exercise Science	Cleo Jaye	Lorraine Kerswell
BSc Sports Coaching Science	Stewart Carrington	Lorraine Kerswell
BA Physical Education, Sport and Youth Development	Jessica Boyd	Lorraine Kerswell
BSc Sport Rehabilitation	Justin Smith	Bethan John
MBBS	Rakesh Patel	Corinne Cohen

Schedule of updates

Document Title	Regulations for Disclosure and Barring Service Screening (Students)
Accountable person	Academic Registrar
Author – Job Title	Helen A’Court - Academic Registrar
Document date	June 2025
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Version	1 2026
Related policies	Admissions Policy Policy on applicants and students with a criminal conviction The St Mary's University policy on the Admission of Applicants with Criminal Convictions