

Recruitment of Ex-Offenders Policy (England, Scotland and Wales)

Title of Policy Document	Recruitment of Ex-Offenders Policy (England, Scotland and Wales)
Issue Date and Version	January 2026 (Version 1)
Author / Department	Compliance Manager
Signed off by	 Director
Next review date	January 2027
Distribution	All services
First issue date	January 2026

1. Our position

Cucumber Partners uses criminal record checks where roles require them, particularly work with children and adults at risk, but a criminal record is not an automatic bar to working with us. We assess people, not labels: what matters is whether a conviction is relevant to the role in question. This policy follows the DBS Code of Practice, and we make it available to every applicant asked to undergo a check.

2. The legal background

Under the Rehabilitation of Offenders Act 1974, most convictions become spent after a period of time and need not be disclosed for most jobs. Some roles, including regulated activity with children or vulnerable adults, are exceptions, for these, standard or enhanced DBS checks may lawfully be required, and certain old and minor convictions are still protected from disclosure under the filtering rules introduced in 2013. We only ask about, and only take into account, what the law entitles us to for the specific role.

3. How we treat disclosed information

- Checks are run only where the role lawfully requires them, and applicants are told at the outset.
- An open and honest disclosure is treated as a point in an applicant's favour, not against.
- Where a check reveals content, we discuss it with the applicant before any decision is made.
- Decisions weigh the nature of the offence, when it happened, its relevance to the role, and

any pattern, against the role's duties and safeguarding responsibilities.

- Withdrawing an offer because of a conviction happens only where the conviction makes the person unsuitable for that role, and we explain the decision.

4. Failure to disclose

What we cannot work with is concealment of something the role legally required to be disclosed: that, rather than the conviction itself, may lead to refusal or withdrawal. Barred individuals seeking regulated activity are refused and reported, as the law requires.

5. Confidentiality and review

Disclosure information is handled under our DBS Certificate Handling Policy: minimum access, secure storage, destruction within the timescales of the Code of Practice. The Compliance Manager reviews this policy annually.