



PONY PARTNERSHIPS



Policy on the Recruitment of Ex-Offenders

Name of Organisation: Pony Partnerships

Venue Address for which policy applies: All sites.

Date of last review: 1st September 2025

Date of next review: 31st August 2026

Name of Risk Assessor: Danielle Mills

1. Policy Statement

As an organisation assessing applicants' suitability for positions that are exempt from the Rehabilitation of Offenders Act 1974 (ROA) under the ROA (Exceptions) Order, Pony Partnerships CIC complies fully with the Disclosure and Barring Service (DBS) Code of Practice.

We are committed to fair treatment of all applicants and staff, regardless of:

- Criminal record
- Race, colour, ethnic or national origin
- Gender or gender identity
- Sexual orientation
- Religion or belief
- Age
- Disability or health condition
- Responsibilities for dependants
- Socio-economic background

We actively promote equality of opportunity and welcome applications from candidates with diverse backgrounds, including those who may have criminal records.

Principles

- Fair Recruitment
 - Pony Partnerships CIC does not discriminate unfairly against applicants with a criminal record.
 - Selection is always based on skills, qualifications, experience, and suitability for the role.
- Transparency
 - This policy is made available to all applicants at the start of the recruitment process.
 - Applicants will be informed in advance if a role requires a DBS check.

2. Proportionality

- An application for a DBS certificate will only be made after a role-specific risk assessment confirms it is both proportionate and relevant to the position.
- We only ask about convictions and cautions that are not protected under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended).

3. Legal Compliance

Recruitment processes comply with:

- Rehabilitation of Offenders Act 1974 (as amended in 2014 and 2020)
- Police Act 1997
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- UK GDPR & Data Protection Act 2018

Certificate information is handled in line with our DBS Handling Policy.

4. Procedure

- Job adverts, application forms, and recruitment briefs will clearly state when a DBS check is required.
- Recruitment staff are trained to fairly assess information disclosed on a DBS certificate and to ensure decisions are made in context.
- Where relevant information is disclosed, an open and confidential discussion will be offered to the applicant.
- Failure to disclose relevant, non-protected information may lead to withdrawal of an offer of employment.
- Any decision to withdraw an offer will only be taken after:
 - Reviewing the offence in context (nature, seriousness, relevance to the role).
 - Considering how much time has passed since the offence.
 - Discussing the information directly with the applicant.

5. Safeguarding Commitment

Certain roles at Pony Partnerships CIC involve working with children, young people, and vulnerable adults. For these posts:

- Enhanced DBS checks, including barred list checks where appropriate, will be required.
- Where offences are disclosed, a safeguarding risk assessment will determine whether employment is suitable.

6. Confidentiality

- Information disclosed during recruitment or on a DBS certificate is treated as sensitive personal data under UK GDPR.
- It will only be shared with those directly involved in the recruitment decision and will never be retained longer than necessary.

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