

5. In May 2012, the British Council signed a contract with Security Watchdog, a division of Capita, to carry out Criminal Checks on UK Nationals. This was operational by September 2012. Responsible hiring managers or HR staff in British Council locations who needed to carry out criminal records checks, were required to register directly with Security Watchdog to request a DBS vetting and to obtain the relevant data results. This process continues to date.
6. The International Child Protection Certificate (ICPC) was introduced in 2013 for Schools and Higher Education Institutions abroad associated with the British Council. International schools and other organisations often require new employees to obtain criminal record checks but are not always able to access UK police checks from overseas. It was therefore introduced as a screening requirement for the English Language Assistant (ELA) programme, and became a requirement for all UK ELAs who were to be placed in Schools & Higher Education institutions in the 14 countries around the world where the English Language Assistants programme is operational (Argentina, Austria, Belgium, Canada (Quebec), Chile, China, Colombia, Ecuador, France, Germany, Italy, Mexico, Spain and Switzerland). ELAs are not employed by the British Council but we assist in placing ELAs with International schools and other organisations abroad.
7. In 2014, the British Council engaged an external consultant to carry out a rapid audit of its safer recruitment practices in relation to UK appointed recruitment activity. This identified that there were inconsistencies in approach to obtaining criminal records checks in overseas offices. Accordingly, a Pre-Appointment Screening Policy has been devised which includes the following.

The Policy applies to all those wishing to work for, with or on behalf of the British Council, including current or prospective employees, temporary workers, trustees, secondees, interns, volunteers, work experience placements, partners, suppliers, contractors and consultants.

Mandatory Screening Checks: Roles involving regulated activity with children or managing roles that involve regulated activity with children:

- 10 Year Employment or Academic history or since leaving full-time education, including gap analysis
- Relevant professional qualification(s) where legally required or considered essential criteria for the role
- Criminal record: UK DBS Enhanced Disclosure (UK residence) or equivalent criminal record check from country of origin, plus check within all countries resided in previous 10 year period
- Professional and character references
- Child Protection criminal record self-declaration

Where possible under local law, for any individual in a role which involves regulated activity with children or managing a role that involves regulated activity, repeat checks are to be undertaken every three years.

The new policy will be implemented globally by the end of this current calendar year.

APPENDIX 2

- 1) RETENTION OF RECORDS POLICY
- 2) MORATORIUM ON DESTRUCTION OF RECORDS

British Council's Record Retention Policy

The British Council has a comprehensive records retention Schedule in place, which is based on the Information and Records Management Society's record retention policy and the National Archive guidance. Below are extracts of British Council retention policy relevant to material sought by the Inquiry. The retention periods are the baselines and are only varied where local (non-UK) requirements are stricter.

A. Human Resources Records Retention Schedule

Employee records are retained for **7 years** from the end of employment. There are the following exceptions:

- 1) Criminal Record Check Disclosures:
 - If clean, retain for **6 months** after the start of employment;
 - If a positive disclosure is made and the applicant is not successful in gaining employment, the Positive Disclosure Decision Form should be retained for **1 year**;
 - If the applicant is successful and the positive disclosures considered not relevant to the role, the form should be retained for **100yrs** in a separate file from the main employee (personnel) records file.
- 2) Employee Records – Particulars of employment
This refers to the primary records to be maintained detailing the individual's contract of employment, job history, record of overseas service, labour books, pay and pension details. Retain for **100 years** after the date of birth of the employee.
- 3) Formal Disciplinary Proceedings
Examples: Internal investigation papers; disciplinary procedures; formal employee disciplinary record; tribunal proceedings; formal appeals.
Retain for **7 years** after the end of the activity.
- 4) Grievances
Examples: Formal grievances (first and second stage which include: the nature of grievance raised, a copy of the written grievance, the organisation's decision, any actions taken and the reasons for any action taken, appeals and appeal decision's); recruitment grievances (including complaints raised from unsuccessful candidates about recruitment decisions)

Retain for **4 years** after the end of the activity.

5) **Grievances – Case Assessment Panel**

Examples: Records of serious grievances that have been brought before a Case Assessment Panel;

Retain for **7 years** after the end of the activity.

6) **Recruitment - General Administration and Successful / Unsuccessful Candidates**

Examples: Unsuccessful candidate application form; unsuccessful candidate references; records of rejected offers of employment; interview notes for all candidates; production of job vacancies; short listing matrix.

- Retain for **1 year** after the end of the activity.
- Records relating to the onboarding of successful candidates, such as their letter of acceptance, job descriptions, references, work permits, pre-employment health checks, and application form, are retained for **7 years** after the end of employment.

B. Child Protection section of the Records Retention Schedule

1) **Casework**

Examples: Child Protection Incident Log (Low Risk); Child Protection casework file (involving a referral to the authorities about a family or community member, about an actual or suspected situation of abuse involving a child or children known to the British Council)

Retain for **10 years** after the end of the activity.

2) **Child Protection Panel Casework**

Examples: Records that meet the threshold to convene a Child Protection Panel regarding a serious allegation or concern about actual or suspected staff misconduct and/or criminal activity involving the abuse of a child or children whether or not they are known to the British Council.

Retain for **40 years** after the end of the activity.

3) **Concerns about staff**

Examples: Expressions of concern (this may include concerns that have been logged about staff which could include allegations and disciplinary action but does not meet the threshold to have a full casework file).

Retain for **7 years** after the end of the activity.