



# Disclosure and Barring Service Annual Report and Accounts

For the period 1 April 2023 to 31 March 2024

HC 651

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For the period 1 April 2023 to 31 March 2024

Presented to Parliament pursuant to paragraph 12 (5) of Schedule 8 of the Protection of Freedoms Act 2012

Ordered by the House of Commons to be printed on 28 January 2025

HC 651

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ISBN 978-1-5286-5005-2 E03140223 01/25

Printed on paper containing 40% recycled fibre content minimum

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office



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# 2023-24 foreword by the Chairman and Chief Executive Officer

We are pleased to introduce our 2023-24 annual report and accounts, which sets out the performance of the Disclosure and Barring Service (DBS) over the past year.

Our work includes delivering DBS checks for England, Wales, Jersey, Guernsey, and the Isle of Man, and barring functions for England, Wales, and Northern Ireland.

Our 2020-2025 strategy is having the desired impact as we move into its last year. We have strengthened safeguarding through increased demand over the lifetime of the strategy to provide greater protection to vulnerable people, continued strong operational performance, improved access to our services and delivered value for money, delivering 5.4% efficiency against a target of 5%.

2023-24 represents the penultimate year of our five-year strategy that was originally co-created with our staff and stakeholders in 2020. With more than 90% of the deliverables in our original strategy on track within the first three years, our subsequent mid-point strategy refresh completed in 2023 has identified further changes to make recruitment and employment safer. Our successful delivery of the key elements within our 2023-24 business plan has now placed DBS in an excellent position to fulfil our five-year strategy objectives by the close of next year.

We have delivered continued strong operational performance throughout 2023-24. Demand for DBS checks has remained high, with some 7.37 million DBS certificates issued in the year. We completed 87.2% of Basic checks within 2 days against an 85% target, and 88.7% of Standard checks within an improved target of 85% in 3 days. We issued 77.1% of Enhanced DBS certificates within 14 days against an 80% target, with the average time to issue Enhanced certificates at 11.6 calendar days.

Although Enhanced DBS check performance was affected by some police forces experiencing difficulties in managing volumes, overall police performance remains strong with a reduction from 8 forces missing service level standards last year to 5 this year.

We also maintained 2 Barred Lists that include over 99,000 people. Our strategic aim to develop our partnership work to increase awareness of DBS has contributed to a significant increase in barring referrals, representing a 43% rise in numbers over the lifetime of our strategy. We added 5,792 individuals to the Barred Lists during 2023-24, affording greater protection to vulnerable people by barring unsuitable individuals from regulated activity.

Our refreshed strategy continues our drive to modernise our services. We have developed innovative technology, allowing us to build new capabilities for DBS, including the introduction of automation into our customer services experience to improve efficiency and quality for all our customers. We have also continued our journey to being a digital-by-default organisation, in undertaking the foundation work to develop new digital Standard and Enhanced application services – the development of which will continue into 2024-25.

Additionally, we have continued to develop our digital basic service offering and have been placed in the top 50 GOV.UK services. We have delivered a 5.4% efficiency this year against a target of 5%, as we realise benefits arising from the first full year of the implementation of our Value for Money framework, alongside improvements to our forecasting capabilities. This has enabled us to continue to deliver products and services that represent value for money to our customers and the Home Office, allowing us to absorb inflationary pressures and increased demand for some of our services.

We have also continued to develop and forge new strategic relationships to support our ambitions of making a difference with the communities we serve. We have developed and embedded our engagement framework, allowing us to raise our profile and awareness for our statutory functions across safeguarding landscapes to better enable safer recruitment and employment decisions to be made. We are also supporting a recommendation arising from the Independent Inquiry into Child Sexual Abuse (IICSA) report to improve compliance with the statutory duty to notify DBS.

In October 2023, we introduced and delivered changes, in response to national policy and legislation changes across the Rehabilitation of Offenders Act (Exceptions Order) 1975 and Police Act 1997, in collaboration with other government departments and statutory services, to support more people back into employment.

This year also saw DBS achieve reaccreditation with the Customer Service Excellence standards, being assessed as fully compliant with all 57 elements and 'compliant plus' against 20 of these; showing our ongoing commitment to ensuring our customers experience high quality, accurate and efficient services. We were also pleased to have scored highly on the UK Customer Satisfaction Index (UKCSI) for overall satisfaction and for quality of customer experiences compared to the public service average.

We have continued to support and develop our workforce effectively, expanding our wellbeing approach and enhancing the offerings of the DBS Academy to integrate learning more effectively across the organisation and support personal and professional growth across DBS.

We are delighted that the DBS Academy was recognised as "Organisation Development Project of the Year" by the Organisation Development Academy that internationally champions and celebrates the art, science, and practice of sustainable and impactful organisational development.

We are now strongly placed to deliver the objectives set out in our 2024-25 business plan. This concentrated business plan aims to ensure successful completion of our strategy and to achieve all that we set out to back in 2020, and through our refreshed strategy in 2023. We remain focused on the continued modernisation of our products and services to maximise the use of technology and progress towards becoming a digitalby-default organisation, whilst ensuring we continue to place high quality services, value for money, and sustainability at the heart of everything we do.



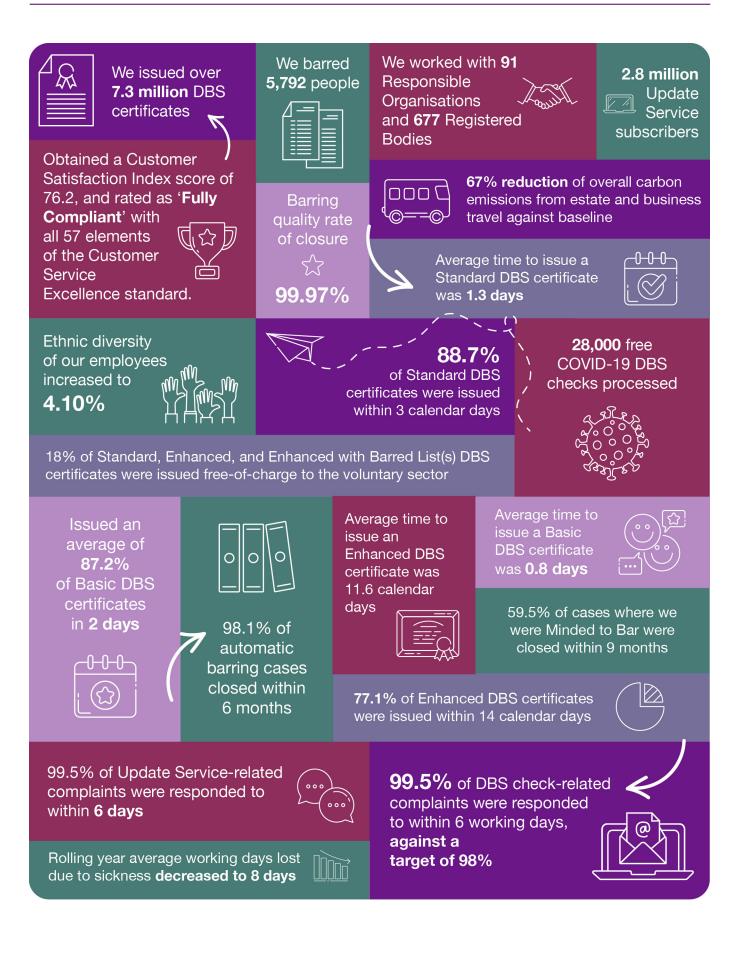
Dr Gillian Fairfield DBS Chairman



Mr Eric Robinson Chief Executive Officer



# DBS: Our Year





The performance report is designed to summarise the overall performance of DBS within the reporting year, covering our purpose, strategic objectives, and outcomes. Most importantly, it provides information about how we performed against our strategic objectives, and our performance against key targets that we strive to achieve.

### About DBS

The Disclosure and Barring Service (DBS) provides disclosure and barring functions on behalf of government. This includes processing DBS checks for England, Wales, Jersey, Guernsey, and the Isle of Man and providing barring functions for England, Wales, and Northern Ireland.

DBS was created in 2012 under the provisions of the Protection of Freedoms Act 2012. We are a non-departmental public body (NDPB) accountable to Parliament through the Secretary of State for the Home Department. As an arm's length body, we contribute directly to the Home Office's outcome delivery plan (ODP), where our focus is on protecting the vulnerable.

"We provide criminal records information and, where necessary, make barring decisions to help employers from all sectors - public, private, and voluntary - make better informed and safer recruitment decisions."

We provide an important service helping to safeguard and protect people in our society while ensuring proportionality and protecting the rights of individuals. We provide criminal records information and, where necessary, make barring decisions to help employers from all sectors - public, private, and voluntary - make better informed and safer recruitment decisions. We provide information that enables employers to determine whether an individual is unsuitable or unable to undertake certain roles and carry out work, for example, roles and work involving regular contact with vulnerable groups, including children. The information we provide should not be the sole tool used to determine an individual's suitability to work in a certain role and should be used in conjunction with other recruitment tools. We also determine whether an individual can work in regulated activity by making decisions as to whether they should be included on one or both of the DBS Barred Lists.

### **Our Activities**

DBS works to protect the vulnerable through two main strands - disclosure and barring.

### Disclosure

DBS processes 4 levels of DBS check, and each type of check results in a DBS certificate being issued. We operate a system of updating DBS certificates through the DBS Update Service. Our work is funded by the fees from our DBS check customers.

### **Basic DBS check**

A Basic DBS check is available for any position or purpose. A Basic certificate will contain details of convictions and conditional cautions that are considered to be unspent.

#### Standard DBS check

A Standard DBS check is available to individuals in certain roles. Standard DBS certificates show relevant convictions and cautions held on the Police National Computer (PNC), subject to filtering rules.

#### **Enhanced DBS check**

An Enhanced DBS check is available to anyone involved in work with vulnerable groups, and other positions involving a high degree of trust. Enhanced certificates contain the same information as a Standard certificate, with the addition of relevant local police force information.

#### Enhanced with Barred List(s) DBS check

An Enhanced with Barred List(s) DBS certificate contains the same information as an Enhanced DBS certificate but includes details of whether the individual is included on one or both of the Barred Lists.

These lists include individuals barred from working with children and vulnerable groups, where the role is in regulated activity.

#### Barring

DBS maintains the Adults' and Children's Barred Lists for England, Wales, and Northern Ireland, which are used to prevent unsuitable individuals from engaging in regulated activity with children and vulnerable groups.

#### **Regulated activity**

The full legal definition of 'regulated activity' is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, and includes for example, teaching, personal care, and healthcare.

DBS has powers to bar people from engaging in regulated activity under certain circumstances, where a person has been deemed unsuitable for working or having contact with the vulnerable.

#### Automatic barring offences

Automatic barring offences, also known as 'autobar' offences, are considered to be so serious in nature, as defined by Statutory Instruments, that a person will be automatically barred from engaging in regulated activity with vulnerable groups including children.

#### **Barring decisions**

We reach considered decisions about whether an individual should be included on one or both of the Barred Lists and barred from engaging in regulated activity.

Referrals are received from various sources including employers. Where necessary, DBS staff seek additional information to assist in the decision as to whether a referred person should be barred from engaging in regulated activity and included on these lists. We bar any individual who has accepted



a caution for, or been convicted of, an automatic barring offence. We also consider, for barring, any individual who has:

• accepted a caution for, or been convicted of an automatic inclusion offence (an offence that does allow representations)

• been referred to DBS from, for example, an employer or regulatory body, subject to any representations submitted by the individual – provided that DBS also has reason to believe that the person is, has been, or might in the future be, engaged in regulated activity with vulnerable groups including children

We also consider individuals who have applied for an Enhanced with Barred List(s) DBS check, where that check contains relevant criminality information or intelligence.

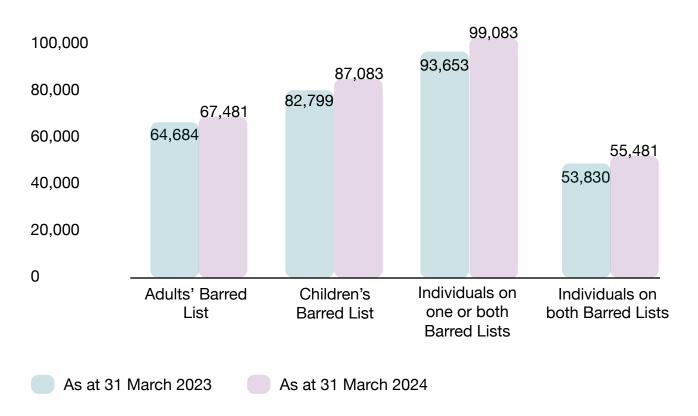
We also make decisions as to whether it

is appropriate to remove an individual from a Barred List, either on application following the expiration of the minimum barred period, if the current statutory test would not be met if considering a person afresh, or otherwise under our powers to review a person's inclusion at any time.

We are committed to ensuring that DBS makes fair, consistent, and thorough barring decisions that provide a proportionate response to the behaviour that has occurred, and consider the future risk of harm posed.

We are aware of the impact that a barring decision can have on the referred individual. We are also aware of the impact that any barring decision may have on those the referred individual may have come into contact with or would potentially come into contact with, in the future.

It is often necessary to make finelybalanced decisions.



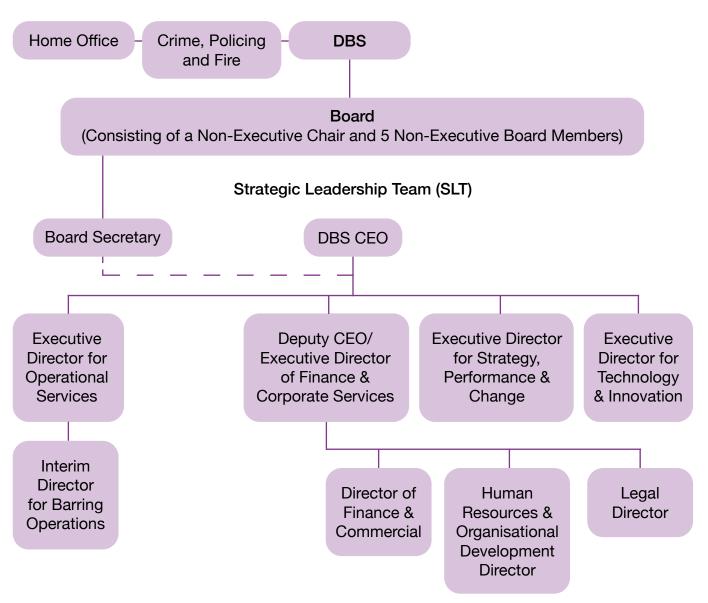
### Figure 1: Number of individuals on the Barred Lists

#### Our organisation

The successful delivery of our strategy is dependent on collaborative working and our relationships with our partners. Our relationship with the Home Office, as our sponsoring government department, is key to this. A close relationship exists, which is helping to shape the future of how we deliver our services.

DBS services are delivered with support

from external suppliers and partner organisations, including CGI, Hinduja Global Solutions (HGS), Swiss Postal Solutions (SPS), police forces and law enforcement agencies across the UK, and Shared Services Connected Limited (SSCL). We have worked, and will continue to work, with our customers, stakeholders, partners, and supply chain to effectively navigate the ongoing impact of economic uncertainty.



Governance structure of DBS



# Performance overview

#### DBS priorities and strategic objectives

The DBS 2020-25 strategy detailed our aspirations for a 5-year period and set the direction for DBS. The strategy was refreshed for 2023-25 following an exercise to understand and recognise the significant steps that DBS has taken since the strategy was first launched.

When we first produced our strategy, we wanted our objectives and their achievement to contribute to employers making safer recruitment decisions through the use of our products and services – and that fact remains. However, the achievements over the first three years of the strategy put DBS in a stronger position to focus on the further tangible differences we can make.

This refreshed strategy supported the refinement of our Purpose and Vision to encompass the contributions we make beyond recruitment; recognising the role we play in the ongoing safer employment of those working with vulnerable people. The final two years of the strategy offered further opportunities to rise to the challenge of maximising the contributions we make to safeguarding.

The new strategic objectives set for 2023-25 (detailed opposite and overleaf) have ensured that DBS has continued to develop, thrive, and provide services and products of the highest quality to support safeguarding in recruitment and employment.

Each year, a detailed business plan is produced, which focuses on the activities needed to achieve our strategic objectives. The DBS 2023-24 business plan set out an ambitious but pragmatic workplan for the year which was focused on the actions we needed to take in the fourth year of our refreshed 5-year strategy.



### **Our Purpose**

Our Purpose is protecting the public by helping employers make safer recruitment and employment decisions, and by barring individuals who pose a risk to vulnerable people.

#### **Our Vision**

Our Vision is to make recruitment and employment safer, by being a visible, trusted, and influential organisation. We will provide an outstanding quality of service to all of our customers and partners.

Our people will understand the important contributions they make to safeguarding and feel proud to work within an inclusive and increasingly diverse organisation.

#### Our strategic priorities and objectives

As part of the refresh activity work on the strategy, and included within our 2023-24 business plan, we identified four strategic priorities that underpin everything that we do in DBS. These are:

• Quality: Delivering the highest possible quality of products and services, to the highest standard of practice and integrity

• Diversity and Inclusion: Increasing the diversity of our workforces, the representation in our decision making and service offering, and the inclusivity of our operations and the services we provide

• Sustainability and Wellbeing: Increasing the sustainability in the improvement of our products and services, and enhanced focus on the wellbeing of our people and customers

• Value for Money: Achieving the optimal value from how we work, where we work and who we work with, for our customers and stakeholders

These priorities carry tangible deliverables to ensure that we retain focus and momentum on activities that make a difference for the whole of DBS, as well as for our partners and stakeholders.

In addition to our strategic priorities, we streamlined our 6 previous strategic objectives (SOs) into 4; these better supported the delivery of the fourth year of our strategy and help us deliver our vision to make recruitment and employment safer:

#### SO1: Customer Experience

Providing increased reliability, consistency, timeliness, and accessibility of services for our customers, increasing quality and value for money.

#### SO2: Technology

Driving efficiencies and value for money across DBS; fostering a culture of innovation.

#### SO3: Making a Difference

Strengthening our reputation as a recognised and trusted deliverer of public services, and an expert reference body for our contribution to safeguarding for our society.

#### SO4: Our People and Organisation

Making DBS a modern workplace where our talented and diverse workforce are empowered to do their jobs, and fulfil their public duty.

#### **Overview**

In 2023-24, the DBS business plan identified 44 milestones for completion; however, 3 milestones were removed in-year, following Strategic Leadership Team (SLT) review and board approval, due to no longer being relevant activity for DBS to undertake. This means we achieved 78% of our active and relevant business plan milestones at the yearend (32 out of 41). Of the 41 milestones being actively developed and delivered, 7 of them have been deferred into the 2024-25 business plan with new 'strategy completion actions' aligned to them to ensure delivery takes place in 2024-25. Two further milestones have been reported as incomplete and will continue to be tracked to ensure completion; these are both reflected in the 2024-25 business plan through new strategy completion actions. Some milestones were designed to be delivered over a two-year period and therefore they will be replicated in the 2024-25 business plan.

In comparison to the above, in 2022-23, we achieved 81% of our business plan milestones (51 out of 63) with 7 milestones removed following SLT review and board approval, and

5 were deferred into 2023-24. Work continued throughout 2023-24 on these milestones with delivery being monitored through the business plan and directorate activity. Some of the deferred milestones involved technology changes which are being aligned to continued technological developments for DBS.

The 7 milestones which are being carried forward into 2024-25, and will be monitored in the business plan, are largely technology related. The complexities of the system requirements and nature of the information used by DBS has meant that these projects require more time to ensure developments can be completed.

Strategic Objective	Achieved	Deferred	Removed
SO1 Customer Experience: Providing increased reliability, consistency, timeliness, and accessibility of services for our customers, increasing quality and value for money (10 milestones)	6	4	0
SO2 Technology: Driving efficiencies and value for money across DBS; fostering a culture of innovation (15 milestones)	10	5	3*
SO3: Making a Difference: strengthening our reputation as a recognised and trusted deliverer of public services, and an expert reference body for our contribution to safeguarding for our society (5 milestones)	5	0	0
SO4: Our People and Organisation: making DBS a modern workplace where our talented and diverse workforce are empowered to do their jobs, and fulfil their public duty (11 milestones)	11	0	0

#### Table 1: Milestones achieved against our business plan in 2023-24

\*These 3 milestones were removed in-year as operational activity deemed that they were no longer required and that the anticipated outcomes could be achieved more efficiently for DBS.



# Strategic Objective One

We will provide increased reliability, consistency, timeliness, and accessibility of service for our customers, increasing quality and value for public money

n 2023-24, our work continued to strengthen safeguarding in the workplace, both at the point of recruitment and throughout the employment of an individual.

We issued 7.37m DBS certificates, and our barring intake increased, with referrals now 43% higher than they were in 2018-19. We continued to ensure that quality is central to all of the work that we do.

This year, DBS also achieved reaccreditation with the Customer Service Excellence standards, showing our ongoing commitment to ensuring our customers experience high quality, accurate, and efficient services. In the first 4 years of our strategy, we implemented updates needed to support the introduction of changes to legislation, including those to the Rehabilitation of Offenders Act 1974. We improved the quality and inclusivity of our existing products and services, and we mapped out future service improvements.

We supported future service improvements and embedded our innovation framework. We have created a roadmap of research and horizon-scanning activities which will not only support internal developments but will also help to optimise our products and services around our customers' needs.

What we said we would do	What we achieved
<b>SO1.1:</b> We will further improve the quality of the barring referrals we receive, the quality of the information submitted for disclosure applications, and the quality of referrals we make to local police forces.	<ul> <li>Developed new communication materials to raise awareness of Basic checks, including sector specific targeted guides</li> <li>Commenced a new sponsored ad campaign to develop access to DBS products and services</li> <li>Undertook detailed sector prioritisation understanding to support improved quality of information submitted</li> </ul>
<b>SO1.2:</b> We will make it easier for our customers to resolve enquiries, and access guidance and advice, any time they need it.	<ul> <li>Awarded a new contract for our customer contact centre service</li> <li>Continued to develop improvements in digital self service of information</li> </ul>

What we said we would do	What we achieved
<b>SO1.3:</b> We will listen to our customers and optimise our product range to be digital-by-default, with new product options in development.	<ul> <li>Developed new customer satisfaction survey</li> <li>Developed new employer satisfaction survey</li> </ul>
<b>SO1.4:</b> We will improve the customer experience through excellent communication and service delivery.	<ul> <li>Launched a digital upload facility for our barring referral service resulting in increases in referrals received with the quality of information improved to support decision making</li> <li>Developed a centrally managed quality management system within DBS Operations</li> </ul>
<b>SO1.5:</b> Greater accessibility and ease of use of our products and services.	<ul> <li>Completed phase 1 of accessibility review for DBS services and products</li> <li>Developed third party support process within Barring</li> </ul>

#### Our focus for 2024-25

Looking to 2024-25, we will continue to improve customer experience by enabling queries and concerns to be addressed quickly at a time to suit them through improved online services and we will align our working practices and arrangements to support our digital-by-default ambitions and plans.

A key focus for us in line with the digital transactional world will be the implementation of a digital identity validation strategy. This will be responsive to our customer's needs, and easily understood to make it easier for identities to be validated without the need for paper copies whilst maintaining the highest quality and assurances in our processes.

Inclusivity and accessibility remain a fundamental area of work for DBS, with a full accessibility implementation plan to be developed following the completion of a comprehensive accessibility review of our products and services. This includes the use of British Sign Language (BSL), and Welsh and Irish Gaelic languages.

# Strategic Objective Two

We will drive efficiencies and value for money across DBS and foster a culture of innovation through a modern, stable, secure, and accessible technology estate

n 2023-24, we focused on maintaining and enhancing existing technology, which is critical for a legacy estate, and we continued to progress modernisation of our digital services (with a focus on paperless applications), while ensuring we had the technology tools we needed to be an efficient organisation.

We set ambitious milestones to ensure the availability of digital services including an accessible digital Standard and Enhanced application service for Registered Bodies (RBs) and online certificates for customers. We have also begun to implement tactical improvements to the PLX algorithm, which compares individuals' information against police databases and completing data mapping across all systems to understand where gaps currently exist.

The nature of technology change means that some our milestones last year were designed to be delivered over a 2-year period and therefore our work in 2024-25 will continue to focus on these projects.

What we said we would do	What we achieved
<b>SO2.1:</b> We will deliver new citizen facing products and services for our customers and partners	<ul> <li>Undertaken foundation work on developing new digital Standard and Enhanced application services for RBs</li> <li>Undertaken foundation work on developing a new digital online results service for customers</li> <li>New Update Service (subscription service) developed into Alpha stage</li> </ul>
<b>SO2.2:</b> We will embrace data to inform insight and drive an intelligence-led organisation	<ul> <li>Implemented new strategic data integration hub</li> <li>Defined a new strategic data management framework</li> <li>Implemented a new test management tool to improve overall oversight of test delivery</li> <li>Agreed identity management, adopting single sign-on as standard</li> </ul>
<b>SO2.3:</b> We will provide our people with new tools so they are better supported in their work, and introduce new capabilities to be a more efficient organisation	<ul> <li>Implemented new business solutions such as the automation solution for customer services triage and robotic process automation</li> <li>Completed foundation work for improved security tooling and services</li> <li>Staff have been trained in the use of M365 tools and new sessions being developed</li> </ul>

What we said we would do

**SO2.4:** We will strengthen our operating model to further realise value, innovation, and sustainability What we achieved

Development of innovation model and activity proposals

- Identification of owners for all products and services
- Penn testing completed for improved matching
  processes to reduce manual intervention



#### Our focus for 2024-25

In 2024-25, we will maximise technology to support DBS becoming a digital-bydefault organisation, with the majority of DBS certificates being issued digitally to customers. Accessibility remains a priority and therefore we will offer paper certificates to anyone who needs them, but our systems will be developed to flex to customer needs.

We will also explore appropriate enhancements and development of the Update Service (subscription service) which takes account of the recommendations of the independent review into the disclosure and barring regime. We will replace the digital interface between DBS and RBs so that we can continue to ensure that the highest quality of information can be provided to us, with inclusivity in mind. Our work to enhance our use of data will incorporate analysis of customer information which relates to equality and diversity so that we can further improve our services.

We will continue to listen to those who refer people for barring consideration to develop and enhance our barring referral service so that paper transactions are minimised, and digital transactions are maximised, speeding up processing times and increasing safeguarding in the workplace.

"We will maximise technology to support becoming a digital-by-default organisation."

# Strategic Objective Three

We will strengthen our reputation as a recognised and trusted deliverer of public services, and as a source of specialist expertise which in turn contributes to safeguarding for society

The first 4 years of our strategy focused on growing the profile of DBS as a visible, trusted, and influential organisation. We have developed our Outreach and Commercial Development teams which has strengthened our capability to deliver marketing, external engagement, and business development activities. Over the last year, we held over 550 workshops and roundtables, with over 10,500 attendees taking part.

We have widened our social media communication channels including facilitating our first ever LinkedIn Live webinar and have continued to align our communications planning to the government functional standards for communication. We have implemented a stakeholder tracking and evaluation framework for our work with external partners which is bringing real benefits to our engagement planning and resourcing, meaning that we are reaching more partners and stakeholders than ever before.

We delivered changes, in line with national policy and legislation including the Rehabilitation of Offenders Act (Exceptions Order) 1974 and Police Act 1997, in collaboration with other government departments and statutory services, to support more people with criminal records back into employment.

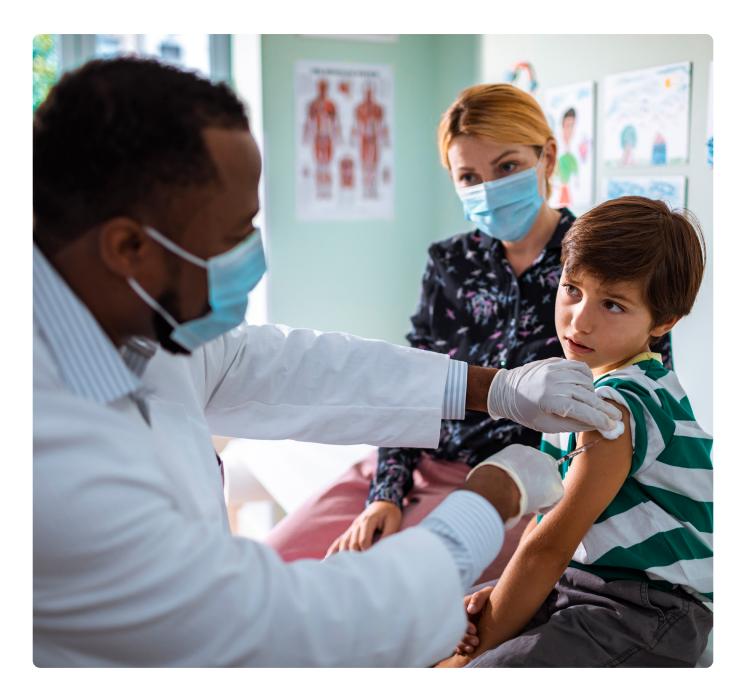
What we said we would do	What we achieved
<b>SO3.1:</b> We will increase the impact and reach of DBS through establishing direct relationships with, and support, third sector, or equivalent, organisations which champion safeguarding and the rehabilitation of offenders	<ul> <li>Business-to-business nurture programme developed</li> <li>Review of our core offer to organisations undertaken</li> <li>Updated offer utilising available insight from regional outreach and barring activity</li> <li>Targeted activity undertaken to raise awareness of duty to refer</li> <li>Implementation of legislative changes to Rehabilitation of Offenders Act 1974 and Police Act 1997</li> </ul>
<b>SO3.2:</b> We will enhance the way we operate our statutory functions relating to information gathering	<ul> <li>Finalised and implemented local authority model of working</li> <li>Updated standard operating procedures</li> </ul>

#### Our focus for 2024-25

In 2024-25, our focus will be on those new relationships which are still to develop so that we can deliver structured engagement activity with sectors such as retail, logistics and hospitality to secure optimal take-up of DBS check products, particularly a Basic DBS check.

We will strengthen our existing frameworks with formal safeguarding bodies, and in

response to recommendations made within the Independent Inquiry into Child Sexual Abuse (IICSA), we will deliver a high-profile programme of activity to increase compliance with the statutory duty to refer for barring considerations, ensuring that appropriate cases are referred - with effective information provided - so that we can strengthen and continue our commitment to making recruitment and employment safer.



# Strategic Objective Four

We will make DBS a modern workplace where our talented and diverse workforce are empowered to do our jobs and to fulfil our public duty

n the first 4 years of our strategy, we concentrated on the development of the DBS Academy as we worked to become an exemplar organisation and employer of choice.

In 2022-23, we explored options for future ways of working to ensure they meet the needs of our people, our customers, and our organisation. We have continued to work through hybrid arrangements and increasing flexible working arrangements for all staff, which in turn has provided a greater balance of effectiveness for our organisation, whilst meeting the needs of our people.

We have worked effectively to develop the skills and capability of our staff with our first annual learning festival taking place this year. This festival was a 3-week long event, focussed on learning and development. The event was flexible to allow staff to access around their work commitments, and it offered a diverse range of learning subjects and experiences. Over 30 different training sessions were delivered to over 291 colleagues.

We rolled out Public Sector Equality Duty training for managers and staff, with further discovery and design work being developed on a wider equality, diversity, and inclusion (EDI) learning package for the whole organisation.

What we said we would do	What we achieved
<b>SO4.1:</b> We will be an employer of choice in the public sector	<ul> <li>Developed our human capacity and resources effectively to increase efficiency</li> <li>Implemented "Doing more with less" manager guidance</li> <li>Improved annual leave entitlement as part of the 2023- 24 pay remit</li> <li>Enhanced employee benefits</li> <li>Developed a flexible working toolkit</li> <li>Launched an apprenticeship framework</li> </ul>
<b>SO4.2:</b> We will improve diversity across the organisation, with equality and inclusivity embedded in the way we work	<ul> <li>Delivered training to ensure managers and staff have timely and relevant skills and knowledge in relation to equality, diversity, and inclusion</li> <li>Undertaken analysis of impact on internal staff progression with a particular focus on under-represented staff groups</li> </ul>

What we said we would do	What we achieved
<b>SO4.3:</b> We will continue to ensure staff are appropriately rewarded and fairly-recognised for their achievements	<ul> <li>Developed our benefits offering and the total reward package through the 2023-24 pay remit</li> <li>Delivered roadshows, and provided individual breakdowns</li> <li>Increased use of discounts scheme</li> </ul>
<b>SO4.4:</b> We will have the most effective workplaces to best align with our ways of working and our workforce	<ul> <li>Evaluated future use of buildings and offices to maximise efficiencies</li> </ul>
<b>SO4.5:</b> We will continue to align DBS with cross- government standards and good practice	<ul> <li>Implemented a new business planning framework with development of detailed directorate plans</li> <li>Completed preparatory work for the arm's length body review of DBS</li> </ul>

#### Our focus for 2024-25

In 2024-25, we will implement any actions that arise from the arm's length body review which is due to be completed in 2024. We will continue to adapt our workplaces so that we can effectively meet current and future operational needs, developing a Business Optimisation Programme to review activity across the organisation to consider all business processes, structures, and systems.

In all that we do, we will be focussing on

improving our diversity and inclusion work, with a reshaped delivery structure and specific activity to complete a full analysis of EDI data, both of our workforce and those we consider for recruitment, so that we can remove any potential barriers to increased diversity in DBS. A key action for us in this final year of the strategy is to develop and design, through co-creation with staff and stakeholders, our new post-2025 strategy.



### Chief Executive's report on performance

Performance management is one of the controls we use to ensure we are delivering against the strategic objectives in the DBS 2020-25 strategy and contributing to the outcomes desired by the Home Office and government, for citizens and society. The Home Office has 4 priority outcomes in its Outcome Delivery Plan. DBS contributes to HO priority outcome 1: Reduce crime. DBS also contributes to other government priority outcomes, including those for health and social care, employment, education, protecting the public, and economic growth.

We measure our progress using a set of key performance indicators (KPIs) and targets agreed by our board annually. Our KPIs are grouped into 4 themes: quality, timeliness, finance/value for money, and people.

We have a strong focus on the quality and timeliness of our products and services. These are the issues that customers tell us are important to them and it is these that ensure we are supporting the safeguarding of vulnerable groups, including children, as effectively as possible.

As part of our performance management framework (PMF), progress towards targets is reviewed monthly by our SLT and board, with the Quality, Finance and Performance Committee and People Committee providing assurance that performance is being managed appropriately. KPIs are supplemented by other measures which operate at a corporate, directorate, service, and team level. DBS uses a 'balanced scorecard' approach to provide an indication of progress towards our priorities.

2023-24 was the fourth year of our 2020-25 strategy. In 2023-24, our ability to achieve all our performance targets was affected by changing demands for our services and IT platform instability, yet we have continued to respond positively to the challenges faced. We processed around 7.3 million DBS checks from April to March, which has included 54,400 checks to support the Homes for Ukraine scheme whilst the Standard, Enhanced, and Enhanced with Barred List(s) checks intake exceeded 5 million - the highest volume since the inception of DBS. We also barred 5,792 people. We have successfully implemented new ways of working and achieved positive results. At year-end, we have achieved or exceeded 5 out of 8 operational targets and we continued to provide a high quality of service and were praised for our overall operational response.

We have introduced a new outcomesbased framework for strategic planning, which focuses on the delivery of 6 outcomes: an outstanding quality of service, a visible role in safeguarding, trust and influence within the safeguarding landscape, our people understanding their contributions, inclusive and increased diversity, and pride in DBS. Our outcomes framework will define how we will apply these outcomes to each of our strategic objectives and how we will measure our progress towards delivering against them.

We will continue to strive to achieve all performance targets in 2024-25 as we transition to a post-COVID-19 'new normal', and in some cases, we have stretched our targets where we feel we are able to do better.

## Published service standards

For 2023-24, we achieved 7 out of 11 of our reported published services standards, though 1 was not applicable as we did not carry out our staff survey for 2023-24. These standards provide an overall view of DBS performance, encompassing key elements of operations, people, finance, and customer performance.

In 2023-24 our ability to achieve all our performance targets was affected by changes in the profile of demand for DBS products and the instability of DBS IT platforms. By prioritising the most critical areas of our business to ensure effective safeguarding, we delivered strong operational performance, and continued to provide a high quality of service. We are particularly pleased to have delivered substantial improvements to the timeliness of our Basic and Standard DBS check service compared to the previous year.

We have achieved our efficiency target for this year and whilst we have not achieved our primary EDI employment target improvements made over the last quarter of the year indicate this is going in a positive direction.

#### Going concern

As detailed in the Accounting Policies on page 125, DBS is considered to be a going concern. In accordance with the FReM, the Accounting Officer's responsibilities are to prepare these financial statements on a going concern basis. In concluding that the going concern basis is appropriate, the Accounting Officer considered that as at the Statement of Financial Position date, and on the date these financial statements were authorised for issue, DBS maintained a net asset position. In addition, the Accounting Officer considered that DBS prepares an annual breakeven budget which forecasts a breakeven position for the year ending 31 March 2026 as at the date these financial statements are authorised for issue. The Accounting Officer also considered that there are no expectations that DBS is likely to be wound up.

Table 2: Performance against published service standards
----------------------------------------------------------

KPI description	21-22	22-23	23-24	23-24 target	Status
Quality: barring quality rate of closures (monthly)	99.90%	99.86%	99.97%	>99.50%	Achieved
Quality: percentage of all criminality and barring information that DBS should place on a certificate will be included (monthly)	100%	100%	99.99%	≥99.98%	Achieved
Quality: customer rating of experience of DBS within previous 3 months (index measure) (annually)	81.4	78.4	72.6	85	Not Achieved
Timeliness: percentage of Basic DBS certificates despatched within 2 days (monthly)	80.7%	85.2%	87.2%	85%	Achieved
Timeliness: percentage of Standard DBS certificates despatched within 3 days (monthly)	86.2%	94.7%	88.7%	85%	Achieved
Timeliness: percentage of Enhanced DBS certificates despatched within 14 days (monthly)	81.8%	78.4%	77.1%	80%	Not Achieved
Timeliness: percentage of automatic barring cases completed within 6 months	N/A	98.1%	98.1%	>96.0%	Achieved
Timeliness: percentage of cases where we were Minded to Bar, that were closed within 9 months	N/A	47.8%	59.5%	>50.0%	Achieved
Efficiency: efficiencies delivered as a percentage of DBS spending	N/A	5.2%	5.4%	>5.0%	Achieved
People: the engagement level of our employees	58%	58%	Not Collected	≥66.0%	Not Applicable
People: the diversity of our employees	2.46%	2.79%	4.10%	>7%	Not Achieved

# Performance analysis

The performance analysis section focuses on the distinct services that DBS provides, covering disclosure services and barring functions, and how performance aligns with our quality standards. It also discloses performance against key aspects such as customer and stakeholder engagement, and our performance against sustainability targets.

#### Disclosure

During 2023-24, we issued a total of 7,371,582 Basic, Standard, Enhanced, and Enhanced with Barred List(s) check DBS certificates. Figure 2 opposite shows changes in DBS check application levels and Update Service subscriptions over the last 4 years.

# Enhanced DBS checks for healthcare professionals (fast-track)

In support of the government's response to COVID-19, we continued to provide a temporary service for certain roles, such as nurses, midwives, and social workers. When an application for an Enhanced with Barred List(s) DBS check comes in and it has been identified as an application for certain roles for COVID-19, we will do a check of one or both Barred Lists within 24 hours.

During the year, we received a total of

20,320 COVID-19 applications that required a check against one or both Barred Lists.

### Other COVID-19 free checks

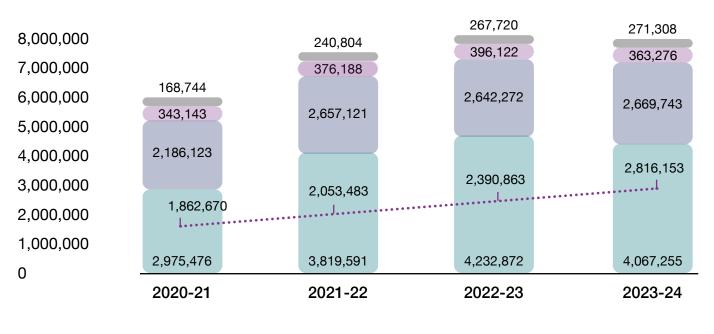
In support of the government's COVID-19 response, we also provided some freeof-charge Standard and Enhanced DBS checks, for roles that did not require a check of one or both Barred Lists, and that met certain criteria. Before these COVID-19 free checks ceased in May 2023, we processed 1,082 Standard checks of this type and 222 Enhanced checks of this type.

### Homes for Ukraine DBS checks

In March 2022, the government announced details of the arrangements for households in England, taking part in the Homes for Ukraine scheme.

The announcement confirmed that DBS checks would form part of these arrangements, to help safeguard individuals and families coming from Ukraine as part of the scheme.

This year we have received 8,658 Enhanced checks, with 81% of these completing within 14 days. We have received a total of 63,455 Enhanced checks since the launch of the scheme.

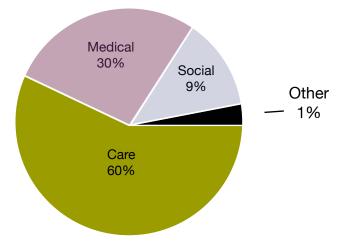


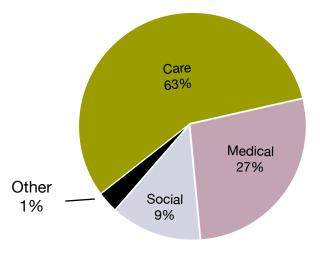
### Figure 2: Changes in DBS check application levels over the last 4 years

Basic Standard Enhanced Enhanced with Barred List(s)

Active Update Service Subscriptions

Figure 3: Sector breakdown of DBS check applications processed relating to COVID-19 Figure 4: Sector breakdown of all fast-track Enhanced with Barred List(s) DBS check applications processed relating to COVID-19





### Quality

We exceeded the target for our key quality measure, the percentage of all criminal and barring information that DBS should place on DBS certificates, achieving performance of 99.99% against a target of 99.98% in 2023-24.

#### DBS checks – demand and timeliness

During 2023-24, we issued 2,669,743 Basic DBS certificates for customers in England and Wales compared with 2,642,272 issued in 2022-23. Since the launch of Basic DBS checks in 2017-18, we have issued a total of 13,897,914 Basic certificates.

Over the year, Basic DBS check intake remained strong, with a total of 2.672 million checks received, marking the highest annual intake recorded for the Basic product. In line with trends observed since the onset of the COVID-19 pandemic, the gig economy remains a significant driver behind the increased application volumes.

#### Intake and volumes

Standard DBS check volumes represent only 8.6% of total annual volumes of Standard and Enhanced checks.

During 2023-24, 18% of Standard, Enhanced, and Enhanced with Barred List(s) DBS certificates were issued free-of-charge to volunteers, compared to 23% in 2022-23.

We processed approximately 7.37 million DBS checks during the financial year, which included 8,738 checks to support the Homes for Ukraine scheme.

Standard and Enhanced check intake during the year was around 223k less than the previous year. This can be attributed to a delay in additional funding, a decrease in

Type of DBS certificate	Target 2022-23	Attainment 2022-23	Average time to issue in 2022-23	Target 2023-24	Attainment 2023-24	Average time to issue in 2023-24
Basic DBS certificates	80% in 2 days	85.2% (target achieved on day 2)	1.1 days	85% in 2 days	87.2% (target achieved on day 2)	0.8 days
Standard DBS certificates	80% in 5 days	94.7% (target achieved on day 3)	1.6 days	85% in 3 days	88.7% (target achieved on day 3)	1.3 days
Enhanced DBS certificates*	80% in 14 days	78.4% (target achieved on day 16)	10.7 days	80% in 14 days	77.1% (target achieved on day 18)	11.6 days

### Table 3: Time to issue certificates by type

\*Enhanced DBS certificates refers to those both with and without a check of one or both Barred Lists.

COVID-19 and Homes for Ukraine checks, a full recovery of the applications lost to the COVID pandemic, and an increase in unfilled vacancies due to higher wages impacting employer recruitment, and a reduction in those not wanting to work as attitudes to work/life balance changed.

The average 4-week workload target for police forces for Enhanced DBS checks has not been met this year, with an average of 14.9 days at the end of March 2024, against a service level agreement of 12 days. The target for police cases 'aged greater than 60 days' was not met, with actual performance of 10.6% against the target of 2% of overall police work in progress. Throughout this year, attainment has been impacted by high work in progress and aged cases at the police stage, which are a result of a combination of high demand for the Enhanced DBS check product and ongoing resource challenges at the police forces. We expect to see improved results for this metric during the first quarter of 2024-25, as more vacancies are filled at the police forces and there is an increase at the efficiency of processing DBS checks.

The referral volumes to police was within just 1.4% (33,000) of the 2023-24 forecast. Recruitment challenges at forces continued into the 2023-24 reporting year and whilst DBS implemented a number of measures throughout the year to mitigate the overall impact, additional recruitment remains ongoing, and we continue to work closely with individual police forces to reduce work in progress and aged cases.

Budgets for all forces have been agreed early at the business planning stage for 2024-25. As more vacancies are filled and efficiency increases over the first 2 quarters of 2024-25, we expect work in progress to begin to reduce across quarter 1 and aged cases to reduce from quarter 2, where we expect to see the most improvement as volumes to forces are also forecast to reduce.

#### **Update Service**

At the end of March 2024, the total number of Update Service subscribers was just over 2.8 million, representing growth of 17.8% from March 2023. The Update Service was introduced to encourage portability of checks between employers. It is particularly suitable for people who require multiple checks – such as volunteers and individuals in roles that require moving from organisation to organisation – where the cost of multiple checks could be prohibitive.

#### Barring and safeguarding

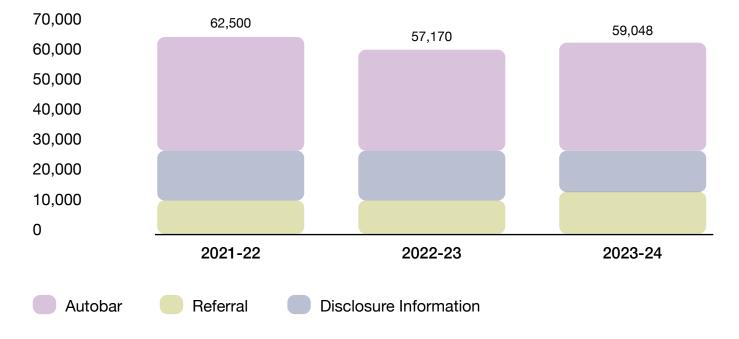
During the year, we continued to deliver our key statutory function to manage the lists of people barred from working or volunteering in regulated activity with children and/or adults (the Children's and Adults' Barred Lists). There are 3 main ways in which individuals are referred to DBS for barring consideration: referral, disclosure information, and autobar. Figure 5 overleaf shows the trends in referred cases for barring consideration over the past 3 years.

As explained in last year's report, the volumes in 2021-22 were increased due to catch up work by the Police National Computer (PNC) service, who provide data to DBS for the autobar workstream. This resulted in additional cases being flagged to DBS – however, many of these cases did not meet the test for regulated activity and were therefore closed at an early stage.

In 2023-24, there has been a significant increase in referral cases, due mainly to our outreach work, and new barring referral service, coupled with search engine optimisation activity to ensure easier, more intuitive website navigation and accessibility.

We added 5,792 individuals to the Barred Lists during 2023-24.

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#### Figure 5: Trends in referred cases for barring consideration

#### **Barring quality**

Barring caseworkers make risk-based judgments that are often finely balanced, and a rigorous quality assurance process is in place to monitor this.

Where the quality assurance process identifies cases that require further work before the decision is communicated to the referred individual, these are progressed as a priority, with any learning shared to improve the quality of barring decisions.

The barring 'quality rate of closure' measures the percentage of cases that have previously been closed by a caseworker team in the Barring and Safeguarding directorate in the last rolling 3 years, which are considered to have an incorrect outcome. An incorrect outcome can be an 'Incorrect Barring Outcome' (IBO), or a 'Safeguarding Event' (SE) as defined by the DBS Safeguarding Incident Management System.

The barring quality rate of closure was 99.97% against a target of 99.50%. This is the third year that performance has been successfully achieved against this measure.

Maintaining the quality of casework decisions has remained a priority throughout the reporting year, despite the pressure to maintain barring work in progress (WiP).

The quality of our service provision will always remain a key priority in the operation of all our functions. Our service quality is subject to regular internal audit review. The barring decision-making process is a fundamental part of our quality management system which is certified to the ISO 9001 quality standard.

#### **Barring timeliness**

In 2023-24, our Barring function exceeded both of its tier 1 timeliness targets.

We closed 98.1% of automatic barring cases within 6 months, against the target of 96%, a target which had been increased from 95% the previous year. We also closed 59.5% of cases where we were minded to bar, within 9 months, against a target of 50%.

#### **Case closures**

In 2023-24 a total of 16,508 barring cases

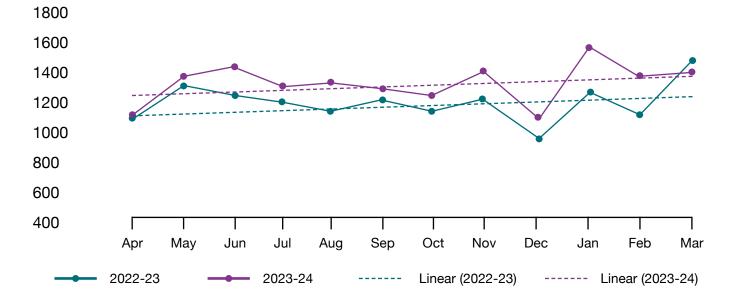
were closed – an average of 1,376 cases per month. This represents a 12% increase on the monthly average for 2022-23.

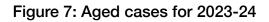
#### Aged cases

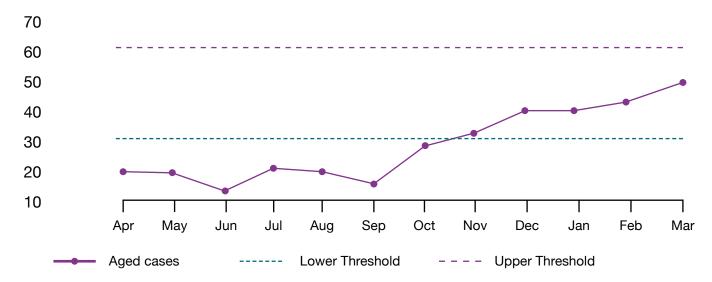
During 2023-24, despite the growth in WiP,

#### Figure 6: Closed cases for 2023-24

we have maintained aged cases (those older than 12 months) within our optimum threshold of 30 to 60 cases. At the end of the year, there were 53 aged cases within Barring's WiP.







#### Barring work in progress

Despite the increase in productivity and case closures, as explained above, we were unable to keep pace with the increased intake of referral cases, which typically require more effort than the other case types.

This has resulted in a rise in Barring WiP to 6,258 cases at year-end, exceeding our target threshold of 4,500. Moving into 2024-25, we have plans in place to address the increase in WiP, including through increasing our operational capacity. However, given the timescales for recruitment and caseworker training, we do not expect to see WiP start to reduce during 2024-25.

We also recognise that increased intake will dictate an increased WiP operating threshold, as there are more cases at any given time working through the system.

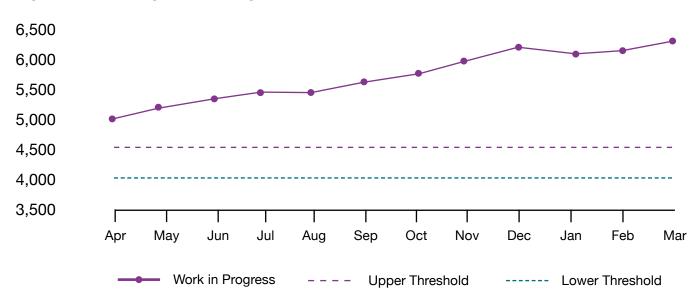
There have been difficulties in securing information from local authorities, particularly in relation to cases generated via the Disclosure Information workstream, which have contributed to a growth in WiP since quarter 2. Casework teams have remained proactive to ensure cases are concluded in a timely manner.

#### Appeals

A barred individual (other than those automatically barred without representations) has the right to appeal a barring decision but can only do so with the permission of the relevant tribunal (based on an error of fact or law). They cannot seek to appeal the barring decision itself solely because they disagree with the decision. Appeals are heard by the Upper Tribunal in England and Wales, and the Care Tribunal in Northern Ireland.

During the 2023-24 reporting year, 288 appeals were lodged. This is a reduction on the previous reporting year by 39 cases but proportionate to the reduction in people barred during the same period.

Appeals WiP has also reduced from 420 appeals at the end of 2022-23 to 375 at the end of this year. Significantly more appeals were closed this year – 333 compared to 130 in the previous reporting year. In 2023-24 additional resource was added to the Appeals team given the previous increases in appeals received. This increase included Higher Executive Officer (HEO) caseworkers, Executive Officer (EO) admin support and Administrative Officer (AO) admin support.





#### Table 4: All appeal closures in 2023-24

Status or outcome	2022-23	2023-24
Appeals lodged	327	288
Closed - DBS withdrew (excluded appeals - appellant removed from Barred Lists)*	17	49
Closed - DBS withdrew (appellant removed from Barred Lists)**	6	39
Closed - DBS decision maintained***	105	235
Closed – removed from Barred List(s) following substantive appeal hearing	2	10
Total appeals closed	130	333

\*Excluded denotes appeals whereby a Paragraph 18A review has been undertaken due to 'new information', so this is not necessarily because the original barring decision was wrong but something during the appeal has led to the conclusion that retention is no longer appropriate

\*\*The original DBS decision could not be defended

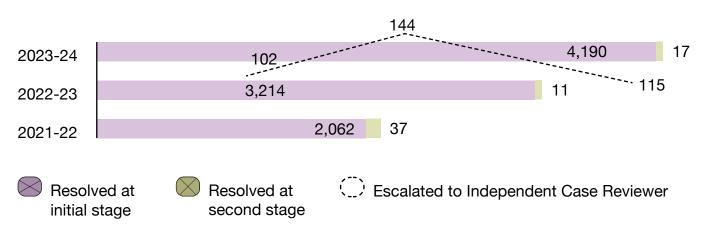
\*\*\*These are DBS decisions that have remained in place but may not have reached a substantive hearing

Customer and stakeholders	customer service complaints for the year.
	Our target was to respond to 98% of all
Customer complaints	complaints within 6 working days. This target
We achieved our targets for dealing with	was met, with an attainment of 99.4%

#### Table 5: Customer complaints in 2023-24 compared to previous years

Status or outcome	2021-22	2022-23	2023-24
Number of complaints received	2,133	3,351	4,287

#### Figure 9: Complaints processed in 2023-24



DBS launched a customer satisfaction survey on 1 April 2022 to understand the perceptions and attitudes of customers and stakeholders towards DBS and the customer experience.

Between 1 April 2023 and 31 March 2024, there were 311 responses; a significant decrease from the 639 responses received during the same period last year. Accepting that the survey is predominantly promoted to individuals who had contacted customer services for an enquiry, complaint, or dispute, just under a third of respondents have said that they were satisfied with the overall service that they received (up 3% from the previous year).

Customers' perceptions of DBS were

generally positive, and most customers agreed that DBS is an effective safeguarding organisation (67% - up 3% from the previous year), DBS checks provide information to support safe and fair recruitment practices (72%) - up 3% from the previous year), and that DBS provides information and guidance that is clear and easy to understand (62% up 9% from the previous year).

For the upcoming financial year, 2024-25, the customer satisfaction survey will be updated to improve insights into the customer experience. Changes include the collection of information on customer demographics, accessibility needs, and specific service aspects of the customer experience, such as the complaints and dispute process. Further efforts are also being undertaken to widen the target audience of the survey to reach a wider range of customers that didn't necessarily contact customer services, to increase the number of responses over time. Additionally, a second survey gathering information on the customer experience of employers will be implemented to gain insights into their satisfaction levels, in addition to their perception on the usefulness of DBS products on recruitment decisions.

DBS also participates in the UK Customer Satisfaction Index, published by the Institute of Customer Service. It is an independent, objective benchmark of customer satisfaction on a consistent set of measures on 287 organisations in 13 sectors and releases its index each January and July.

DBS was the sixth rated organisation in Public Services (National) in January 2024, with a score of 76.2 for overall satisfaction compared to an average for the sector of 73.6. DBS also scored 76.1 for the quality of customer experiences and interactions with the organisation, compared to the public service average of 74.7.

The Customer Service Excellence standard was developed by the Cabinet Office to offer a practical tool for driving customer-focused improvements. DBS are assessed by external assessors to ensure that all aspects of the standard are demonstrated. In December 2023, DBS were assessed as being fully compliant with all 57 elements of the standard and were deemed to have exceeded expectations and were rated as 'compliant plus' against 20 of them.

#### **External engagement**

DBS has been raising awareness and supporting delivery of DBS products and services through external engagement. A sector-by-sector consultative approach was used which engaged with senior leaders in the commercial sector via commercial round table discussions. During 2023-24, this was expanded to working with trade bodies and associations, and included developing and rolling out tailored online resources for distribution through trade body websites and media channels.

Our aim, in engaging in this way, is to ensure an appropriate and proportionate use of Basic DBS checks. This has included providing signposting to Nacro and Unlock on the rehabilitation of offenders to recommend a case-by-case approach, based on a proportionate recruitment policy. Sectors targeted during 2023-24 were hospitality, gig/ platform, and retail.

DBS delivers a regionally based outreach and engagement service providing support, advice, and guidance for organisations – from grassroots to national bodies in England and Wales, and Northern Ireland in relation to barring. Our aim is to ensure that DBS checks are used appropriately, in line with safe and fair recruitment practices and that organisations are fully aware of their legal duty to refer individuals to DBS where they have harmed or pose a risk of harm to vulnerable groups.

We work with sectors and individual organisations to deliver bespoke workshops on eligibility, the legal duty to refer, and how to make a good quality barring referral. This year we introduced 'open access' workshops to include a wider range of topics and engage with a wider audience. Through these workshops we have reached over 11,000 individuals working in safeguarding roles and are actively engaging with 60% of our core stakeholders – for example, the NHS and local authorities - at a regional level, and this will grow over the coming year.

At a national and strategic level, we have been engaging with senior stakeholders in key sectors such as health, education, social care, local authorities, sport, and the rehabilitation of offenders. We have identified and progressed opportunities to collaborate with key partners to deliver our messages, and explore data sharing and new ways of working. For example, we are working with NHS employers on a range of online events and materials to ensure that local staff are aware of their legal duty to refer people to DBS for barring consideration.

#### **Registered Bodies**

Applicants cannot apply directly to DBS for Standard, Enhanced, or Enhanced with Barred List(s) DBS checks, and DBS has a legislative reliance on Registered Bodies (RBs) to carry out this role.

At the end of March 2024, there were 677 RBs (a reduction of 136 from March 2023). These RBs submitted 4.7 million applications during April 2023 to March 2024, in comparison to around 5 million applications received in the whole of the previous financial year. The main responsibilities of RBs are:

· checking an applicant's identity

• checking eligibility for a DBS check, and the type of check needed

• ensuring the DBS application form is completed correctly (paper/e-application)

· collecting fees and paying DBS

countersigning applications and submitting these to DBS

#### **Responsible Organisations**

A Responsible Organisation (RO) is an organisation registered with DBS to submit Basic DBS checks through an online service. There were 91 ROs at the end of March 2024. The 91 ROs submitted 2.672 million applications in 2023-24, in comparison to 2.644 million applications in the whole of the previous financial year. The main responsibilities of ROs are:

- · checking an applicant's identity
- ensuring the DBS application form is completed correctly
- collecting fees and paying DBS

#### External inquiries and reviews

The government response to the Independent Inquiry into Child Sexual Abuse (IICSA) was published in May 2023. The recommendations made by IICSA which related to the disclosure and barring regime were:

• a greater use of Children's Barred List information

 improving compliance with the statutory duty to notify the DBS

• extending the disclosure regime to those working with children overseas

DBS has participated in discussions with the Home Office on all three relevant recommendations and will continue to do so, engaging with relevant government departments as considerations are given to implementing those recommendations.

DBS is engaged specifically in considering the development of an awareness campaign on the legal duty to refer.

We have also continued to work with the Home Office on the issues raised by the Independent Review of the Disclosure and Barring regime carried out by Simon Bailey CBE, QPM, and published in April 2023.

We are working closely with the Home Office on the recommendations which relate directly to DBS' processes, including scoping improvements to the Update Service and (in relation to individuals changing their names) feasibility work on how we might further strengthen cross-checks between DBS applicant information and data from other government departments.

#### **Digital identity**

DBS continues to work closely with the Government Digital Service (GDS), Department of Science Innovation and Technology (DSIT), and the Home Office in the development of digital identity services in government.

The Data Protection and Digital Information Bill (No. 2) continued its passage through parliament and received Royal Assent in Spring 2024. This brought the Trust Framework into law providing additional regulation of identity service providers (IDSPs) and enabling government-held information on individuals to be shared with IDSPs to improve the accessibility and safety of identity checks, potentially reducing dependence on driving licences and passports for this purpose.

As of March 2024, there are 27 IDSPs certified to DBS standards under the DSIT Trust Framework. These IDSPs are able to work with employers or RBs to validate an identity for a DBS application, for example by using biometrics and facial recognition to compare the person's details with an existing government document such as a passport or driving licence.

DBS has started a review of digital identity, assessing implementation and setting out plans for future development.



#### **DBS** quality account

The DBS annual quality account determines whether DBS has succeeded in its purpose by drawing together a range of both quantitative and qualitative data. It provides an assessment of quality assurance activity and the impact of that activity. This year includes a summary of both the 2022-23 and 2023-24 performance years and are the third and fourth accounts against the quality assurance framework (QAF) which was introduced in 2020.

The quality account provides evidence of activity and achievements against strategic objectives and the aligned QAF imperative of safeguarding, efficiency and effectiveness, and user experience.

The following brief overview from the quality account highlights achievements throughout 2022-23 and 2023-24.

#### Safeguarding

There is a wealth of evidence which demonstrates that the focus at DBS is on providing an outstanding level of service to all our customers. We have taken action to improve quality at individual, team, and directorate levels, and have continued to work with our safeguarding partners such as the police, RBs, and ROs, who we recognise are key to our overall success in meeting our shared safeguarding responsibilities.

We have invested in safeguarding training for our staff to support colleagues to understand the role they play in delivering quality services to protect vulnerable groups, including children. General process and casework training alongside the provision of proactive and dedicated support – such as quality sessions, peer support and wraparound delivered by our quality assurance colleagues – demonstrates the drive and commitment that DBS has to ensure quality outcomes. We have also continued to collaborate across teams and directorates to share learning and best practices. The continual review of frameworks, which underpin quality assurance both within DBS and with our partners, has also contributed to our ability to maintain and improve quality as well as strengthened relationships with our partners, which again enhances our ability to safeguard.

Equally, the evidence gathered for the annual quality account highlighted the ethos of a continuously developing quality culture, where we hold each other to account to gain assurance of our effectiveness. We used evidence from internal audits to highlight improvement opportunities and not only look at individual process but also conduct holistic end-to-end reviews to ensure we drive as much value as possible to benefit our customers.

In 2023-24, we have continued to deliver a broad range of continuous developments sessions particularly across the Operational Services directorate, such as casework decision making training, Police National Computer training, themed case conferences Unsure matching training. All of which have resulted in improved quality performance indicators.

Whilst it is disappointing to note the percentage of staff having completed their Level 1 safeguarding training in the year has fallen short of the target (73% v 85%), the attainment level remains positive. It should also be considered in the context of additional pressures caused by increased work in progress, meaning that staff have been focused on our statutory functions, directly delivering quality safeguarding decisions within Operational Services or undertaking work which supports those decisions.

Learning from error is also recognised as a vital tool both in terms of individual and organisation wide learning. The embedded Root Cause Analysis methodology ensures we understand why errors are made, what lessons need to be learned and how to address the associated learning needs. Similarly, the introduction of team Quality Assurance (QA) Managers in response to some disappointing QA results, evidences our proactive approach to quality and safeguarding.

We have made good progress this year in updating the Police Quality Assurance Framework whilst also delivering a training programme across the local police force (LPF) disclosure units to ensure consistency and quality. Whilst more widely reviewing the end-to-end processes between DBS and LPFs, updating and developing as required to support the achievement of our shared safeguarding responsibilities and delivering improved customer service.

Finally, our internal, independent auditors have continued to assess the effectiveness of the overall Quality Management System, challenging nonconformities and highlighting opportunities for improving the ways we work within and across teams, once again providing evidence of the importance DBS plays on striving for excellence though the delivery of quality products and services by our colleagues and partners.

#### Efficiency and effectiveness

We continued to explore innovation techniques to increase organisational effectiveness and continuous improvement opportunities are suggested, examined, tested, and implemented by colleagues across the organisation both within and across teams and directorates. This highlights the effectiveness of collaboration and that our people recognise the importance of being flexible and responding positively to change in order to support their ability to efficiently and effectively protect those that DBS serves in society.

We invested in our staff through the DBS Academy, central and local development opportunities, and wellbeing and reward and recognition, with increased offerings and takeup in all areas of the business. In creating the 'deputy pool' and launching the people manager programmes we demonstrated our commitment to investing in supporting and developing our own talent.

Advancements in business continuity and disaster management also ensure that despite some service disruption, DBS was able to continue to provide all our safeguarding services, again evidencing the effectiveness of our approach to maintaining quality outcomes.

Throughout 2023-24, DBS has been focused on identify and exploring opportunities to change and improve with the aim of increasing our effectiveness and efficiency, which ultimately leads to better outcomes for our customers and those we seek to protect. The evidence under this imperative highlights the wide range of mechanisms we deploy to do just that. Whether it be our Innovation colleagues testing and deploying automation techniques, Operations Solutions colleagues influencing the design and development of data screens, or Business Improvement and local CI leads working with operational colleagues to improve standard process and procedures, it is our staff who are championing and leading the way.

At DBS we recognise the value of our colleagues and have used the reward and recognition scheme to acknowledge exceptional performance and thank staff for a job well done. Equally we acknowledge the importance and value of their knowledge. Developing our approach to knowledge management provides a foundation for effective learning, continuous improvement and decision making based on experience and sound intelligence.

Increasing staff knowledge and the opportunity to develop skills and career pathways speaks to the Our People and Organisation strategic objectives and there is a wealth of evidence under this imperative of DBS investing in staff via Academy offerings, staff rotation and shadowing programmes and the Apprenticeship Scheme. In terms of supporting delivery of their roles, staff are supported by effective policies and procedures available via accessible platforms and regular information updates such as the OAE bulletin. All of which contribute to efficient, effective and quality safeguarding services.

Finally, it is encouraging to note the progress made by DBS in our ambition to come a greener more sustainable organisation. We take our social responsibilities seriously and are proud of the improvements we have made during 2023-24.

#### User experience

In 2022-23, we delivered a wide range of general and tailored collaboration events and opportunities for partners and stakeholders to attend. These served the purpose of both increasing knowledge and awareness of DBS' role and responsibilities, as well as supporting attendees and organisations in gaining a greater understanding of their own safeguarding duties.

Supporting employers to make effective recruitment and employment decisions is at the heart of our Purpose at DBS, and working with our partners to develop the 'best practice hiring toolkit' is clear evidence of this. Safer recruitment and robust vetting is the first 'line of defence' in preventing those who may be unsuitable from working with vulnerable people and DBS has demonstrated we are committed to embedding this safeguarding culture as part of our wider safeguarding responsibilities.

Work to introduce improvements in digital optimisation techniques has contributed to making DBS more visible and increased navigation to key digital services. Supporting this was the launch of the barring referral service which represented the achievement of an important milestone.

Our social media presence continued to grow throughout 2022-23 which undoubtedly increased the profile of DBS and our national safeguarding responsibility.

Our outreach teams have engaged directly with more individuals during 2023-24 when compared to 2022–23, delivering a wide range of opportunities for safeguarding professionals to increase their understanding of DBS products and services. The team have worked at national and regional level and across many different sectors, raising awareness of the duty to refer and what makes a good quality referral. Thereby reinforcing our shared safeguarding responsibilities and contributing to protecting the most vulnerable in society, including children and vulnerable adults. The team have also strengthened relationships with operational colleagues, using feedback to inform content of general and bespoke workshops in response to specific and thematic concerns thereby adding value from safeguarding and quality perspectives. Once again DBS has invested in exploiting technology to reinforce the safeguarding agenda. The growth of our presence on social media platforms, Facebook, Twitter and LinkedIn is further evidence that DBS is increasing its reputation as a trusted organisation with more people following our channels.

The deployment of Upload functionality on the Barring Referral Service (BRS) was significantly delayed due to some technical difficulties which was disappointing both from an organisation and customer perspective. However, since its deployment it has contributed to improvements in the customer journey and the ability for referring parties to provide all information at the point of referral. It is anticipated this will improve the quality of referrals and support the timeliness of decision making. Our strategic intent is to continue to improve the customer journey across all our services, including BRS and we have and will continue to seek and use customer feedback to inform future enhancements. Finally, there is a wealth of evidence in terms of the strides the organisation has made in embedding EDI across the organisation and our services. We have refreshed and strengthened our approach and delivered effective training to a large cohort of our workforce, demonstrating our commitment to creating an environment to celebrate diversity and ensure EDI considerations are at the forefront of organisational decisions and our services as well as embedded in the DBS culture for our colleagues.

#### **Financial performance**

The budget sets our estimated costs to deliver our services and business priorities, reflecting financial estimates of service demand, efficiency, and risk. The budget reflects the business plan milestones that support the delivery of our strategic objectives.

HM Treasury's Managing Public Money

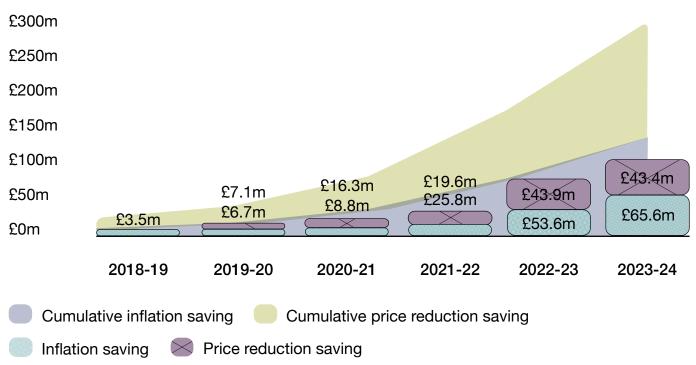


(2023) requires DBS to set its fees at a level that breaks even each financial year, balancing equally against the budgeted costs of delivering our services. Effective cost controls and volume forecasting are important elements of our business planning, as we can only set budgets on an in-year basis. We seek to reduce our fees where possible to ensure the value for money for fee payers.

In this financial year, we have made a deficit of £10.3m as a result of the court judgment in DBS v TCS explained in more detail within the Accountability Report. Excluding this one off event, DBS made a surplus of £4.6m against its budget. In line with Managing Public Money, we recognised those historical surpluses generated by the Criminal Records Bureau (CRB) as a CFER creditor. The level of remittance is determined depending on the forecasted cash requirements of DBS which must be kept at a minimum level, as set by the Home Office.

We continue to consider the impact of our fee regime on the users of DBS. Fees over the last 5 years, through a combination of holding fees against rising inflation and fee reductions, have delivered significant savings to customers and the public purse. Figure 10 below demonstrates savings to the end of this financial year reached £294 million over these past 5 years.

Effective Monday, 2nd December 2024, the fees for DBS checks increased to reflect the rising operational costs of delivering DBS's safeguarding services. Each type of DBS check has a specific fee designed to fully cover its associated costs, with each fee scrutinized individually. The revised fees have been thoroughly reviewed and approved by the DBS Board, the Home Office, HM Treasury, and the Minister for Safeguarding. These changes are essential to maintaining the highest standards of service and ensuring DBS can continue to safeguard our society effectively.



### Figure 10: Inflation and price reduction savings to fee payers 2018-24

Key financial highlights include a record number of applications being received and processed, which, in turn, drives significant revenue for DBS.

Our fees have remained unchanged since the last reduction in April 2022. While fees will increase from 2nd December 2024, they remain significantly lower than the inflation rates indicated by the Consumer Price Index (CPI).

The efficiencies driven through our focus on value for money will allow us to continue to deliver products and services that represent value for money to our customers and the Home Office in future years. DBS has delivered a 5.4% efficiency this year against a target of 5%. This represents 93% a cashable benefit, and 2.6% total recurring savings. We continue to develop efficiency schemes, with focus now on delivery of the 2024-25 budget.

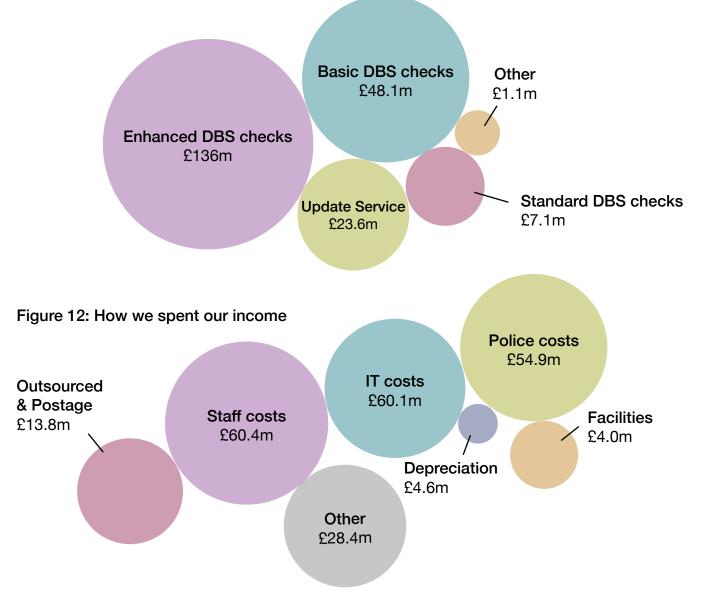
As we enter the final year of our revised strategy, our activities to build capacity and capability continue to deliver benefits and support the ongoing desire for transformational change and efficiency set out in our strategy.

Our modernisation plans remain dependent on capital funding availability within government and the pace of change is constrained by this, but we are on track to deliver our capital-dependent commitments within the remainder of our strategy.

Annual Report and Accounts 2023-24

#### **Financial Summary**





#### How we generated our income in 2023-24

Figure 11 above and the following information shows how we generated our income across 2023-24. We generated income from our DBS check products, and the DBS Update Service.

#### **Basic DBS checks**

Basic income has largely remained in line with budget with increased demand through direct applications from applicants. The long-term trend includes unprecedented volumes, coinciding with the implementation of the furlough scheme and growth within gig economy.

2023-24 income: £48.1m Variance to budget: +3%

#### Standard DBS checks

Demand for Standard checks has continued to rise, with strong performance within the key sectors. The long-term trend includes applications that would have been free of charge, which reduced in the previous financial year. Income from Standard checks has reduced relative to volumes because of the fee reduction introduced in April 2022.

2023-24 income: £7.2m Variance to budget: +11%

#### **Enhanced DBS checks**

Demand for Enhanced checks remains strong as employers seek additional assurance to make safer recruitment decisions. Overall volume demand was 4% above budget, driven by additional applications across all sectors, though changes in our WiP levels meant these were ongoing at year end. The long-term trend includes applications that would have been free of charge, which reduced in the previous financial year. Income from Enhanced checks has reduced relative to volumes because of the fee reduction introduced in April 2022.

2023-24 income: £136m Variance to budget: +2%

#### **Update Service**

Increases within DBS check applications has generated additional new subscribers to the Update Service. The long-term trend includes a mix of increased volunteer (non-paid) subscribers.

2023-24 income: £23.6m Variance to budget: +11%

#### How we spent our income

Figure 12, on page 51 and the following information shows how we spent our income across 2023-24 including staff costs and IT costs.

#### Staff costs

Staff costs were higher than budgeted, and

increased against the prior year primarily as a result of the higher than expected pay remit, a one-off cost of living payment and increased overtime to manage the seasonality of applications.

2023-24 expense: £60.4m Variance to budget: +13%

#### Purchase of goods and services

Purchase of goods and services covers IT, police, outsourced and postage, facilities and elements of other costs as broken down in note 4. Most of these costs are variable and despite volumes falling, have been offset by increases in our supplier costs due to inflation over the past 12 months.

2023-24 expense: £145.6m Variance to budget: -1%

#### Depreciation

Depreciation is expected to correlate in line with the investment into our IT systems, and the overall balance of software on our balance sheet. Depreciation fell against the previous year, and against budget as useful lives were re-assessed after the budget was set, reflecting the longer-term capital investment plans of DBS.

**2023-24 expense:** £4.6m **Variance to budget:** -9%

#### Provision, interest expense and other

The very nature of provisions and the budget in which they sit means there is considerable volatility. Provisions have rose significantly as a result of the post year-end judgment in DBS V TCS and in respect of Crown Dependencies.

2023-24 expense: £14.9m Variance to budget: +13,052%

#### Other non-financial performance

DBS has several policies which cover anticorruption, anti-bribery, fraud, and cyber security. These are monitored and any issues or events arising are raised and monitored at executive and board level. Fraud and error are reported via the Home Office to the Cabinet Office on a quarterly basis. During 2023-24, no material incidents were reported.

#### Sustainability report

Sustainability information is compiled for DBS by the Ministry of Justice (MoJ) Climate Change and Sustainability Unit (CCSU) as the MoJ Property directorate provides shared estates services to the Home Office, including the buildings that DBS occupies. As an NDPB of the Home Office, DBS is committed to the UK government sustainability programme.

#### **Data quality**

Sustainability data is gathered and validated by an external organisation and is quality assured by the MoJ's CCSU before submission to the Department for Environment, Food and Rural Affairs. All data is 'UK only' unless otherwise stated. The data relates to our two sites managed by the Home Office and does not include where estates services are provided by a landlord and recharged through a service charge.

The greenhouse gas conversion factors used can be found in the government environmental impact reporting requirements for business.

In accordance with annual reporting conventions across other UK government departments and agencies, DBS' nonfinancial indicators are compiled using data from the final quarter of the previous reporting year plus the first 3 quarters of the current reporting year.

Greening Government Commitments DBS is considered to be part of the Home Office for Greening Government Commitments (GGC) purposes. The data below shows DBS performance for the financial year 2023-24 against a 2017-18 baseline, unless otherwise stated. The data has recently been reviewed to ensure it better reflects the estate DBS occupies. As such, our baseline year non-financial indicators were restated in 2022-23 to reflect these changes. Our performance has improved against a number of targets since last year. We have achieved a 67% reduction of greenhouse gas emissions, meaning we are on track for the 2025 GGC target of 44%.

During 2023-24, water consumption reduced by 51% and paper usage reduced by 78% compared to the baseline year. The proportion of waste recycled this year has met the 70% recycling GGC target and we sent zero waste landfill.

Our overall amount of total waste generated when measured against the newly cleansed and more reliable 2022-2023 dataset shows good progress with a reduction of 22%. Emissions from domestic flights continue to be impacted by our new flexible ways of working which have enabled us to recruit staff from across the United Kingdom, resulting in additional air travel. However, DBS domestic flight travel remains below pre-COVID-19 levels.

DBS is committed to the removal of singleuse plastics from its estate and has ensured that reusable plastics are utilised where possible meaning that the utilisation of singleuse plastics is very low. DBS will continue to consider how best to replace single-use plastic with reusable or other alternatives where possible over the next 12 months. Table 6 below takes into account the usage at DBS offices and cannot take into account the emissions generated as a result of staff working from other locations.

#### Table 6: Overall GGC performance for 2023-24

Area	Metrics	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Greenhouse gas emissions	Total emissions (tonnes CO <sub>2</sub> e)	1,161	891	732	854	374	297
Energy	Usage (kWh)	4,276,927	3,696,015	3,342,172	3,147,510	1,951,059	1,374,969
	Expenditure £	338,062	333,410	316,235	327,066	554,598	675,805
Domestic flights	Total emissions (tonnes CO <sub>2</sub> e)	3.06	5.40	0	0.42	7.03	3.76
	km travelled	16,048	33,161	0	1,696	34,567	17,118
International flights	km travelled	3,002	1,352	0	0	0	0
Office waste	Amount (tonnes)	96	117	103	118	85	91
	% recycled by weight	49%	67%	74%	61%	70%	70%
	% Landfill	3%	2%	1%	0%	0%	0%
	Expenditure £	7,573	8,756	29,067	N/A	N/A	N/A
Water	Consumption m <sup>3</sup>	9,136	7,614	4,066	4,009	5,566	3,817
	Expenditure £	45,808	53,531	44,842	32,235	12,817	12,684
Paper	Amount (A4 reams equivalent)	3,510	2,440	475	945	972	1,065
	Expenditure £	14,300	6,064	1,224	2,699	2,776	3,179

The majority of the data above is provided by a third party, and DBS will continue to consider how it may improve disclosure on other measures going forward.

Area	2023-24 performance against target*	Achievement against target	Explanation where target not achieved
Reduce greenhouse gas (GHG) emissions by 44%	-67%	Achieved	
Reduce direct GHG (from heating) by 25%	-75%	Achieved	No gas data available for Shannon Court since 2022-23 due to contractual agreements, and no data for 1 Tithebarn Street.
Reduce the emissions from domestic business flights by at least 30%	69%	Not achieved	Less reliable baseline data. Remains below pre-COVID levels.
Reduce the overall amount of total waste generated by 15%	94%	Not achieved	Less reliable baseline but cleansed 2021-22 dataset and are showing -22% against this.
Landfill waste to be less than 5%	0%	Achieved	
Increase the proportion of waste which is recycled to at least 70% of overall waste	70%	Achieved	
Reduce paper by 50%	-78%	Achieved	
Reduce water consumption by at least 8%	-51%	Achieved	
Remove consumer single-use plastic (CSUP) from the central government office estate	_	Pending	We are working towards this target.

\*Target is by 2025 against a 2017-18 baseline, unless otherwise stated.

#### **Compliance statement**

DBS has reported on climate-related financial disclosures consistent with HM Treasury's Task Force on Climate-Related Financial Disclosures (TCFD)-aligned disclosure application guidance which interprets and adapts the framework for the UK public sector. DBS has complied with TCFD recommendations and recommendations disclosures around:

- governance (partial compliance for all recommended disclosures)
- metrics and targets (disclosures (b))

This is in line with the central government's TCFD-aligned disclosure implementation timetable. DBS plans to make disclosures for strategy, risk management and metrics and targets disclosures 'A' and 'C' in future reporting periods in line with the central government implementation timetable.

To provide some additional context around compliance, we'd like to add the following. Given DBS' role, we consider our climaterelated impact to be modest and our response to climate-related risks and opportunities is appropriately proportionate DBS had a Green strategic plan which has been subsequently subsumed within the refreshed DBS strategy which has a strategic priority specifically related to sustainability. DBS has taken steps to reduce its footprint and continues to consider future ways of working and estates and travel needs. DBS continues to improve its performance against the Greening Government Commitments as reported in Tables 6 and 7.

# Governance A: Describe the board's oversight of climate-related risks and opportunities

The DBS board approved the DBS Green strategic plan in March 2021 and the DBS

Green policy in October 2022. In March 2023, the board's agreed Green plan was withdrawn on advice that "we have consolidated the remaining elements of these plans, within our four new strategic objectives." However, whereas the Green plan set some governance in place, this was not replicated with the strategy; consequently, the board has not put governance in place which is explicitly about climate-related risks and opportunities other than detailed consideration of the annual report and accounts including scrutiny of progress against Greening Government Commitments. The board does however hold an annual strategic risk workshop to identify how our existing risk landscape might have changed over the past 12 months using techniques such as PESTLE analysis which considers environmental factors among others. Currently, DBS does not have any climate-related risks, but this will be specifically considered at the next board horizon-scanning workshop in May 2024. One of DBS' strategic priorities relates specifically to sustainability: We will look towards increased sustainability in the improvement of our products and services, and enhanced focus on the wellbeing of our people and customers. Board has approved policies which contribute to DBS minimising climate-related risks and achieving against opportunities including our Travel and Subsistence policy, Green policy, and reducing our footprint and considering our future of work estate's needs.

#### Governance B: Describe management's role in assessing and managing climate-related risks and opportunities

Management has not identified separately any climate-related risks and opportunities, but this was considered specifically in preparation at a board horizon-scanning workshop in May 2024 where recommendations were made for discussion of changes to our current risk landscape. Management compiles the ARA including progress against the Greening Government Commitments. An executive director has overall responsibility for climaterelated responsibilities and reports against these through governance channels.

#### Metrics and Targets B:

For phase 1, the TCFD recommendation for

Metrics and Targets is to disclose the metrics and targets used to assess and manage relevant climate-related issues where such information is material. DBS complies with the detailed Greening Government Commitments reporting in the 2023-24 ARA so complies with this requirement; tables 6 and 7 provide full details of DBS' performance against the Greening Government Commitments.

5m.

Eric Robinson, Accounting Officer, 24 January 2025



### Accountability report

#### Corporate governance report

This report explains the composition and organisation of DBS' governance structures and how they support achievement of DBS' objectives.

#### **Directors' report**

DBS is a body corporate established by the Protection of Freedoms Act 2012. It is designated as a non-departmental public body (NDPB) and the Minister for Safeguarding and Violence Against Women and Girls gives account for its business in Parliament. The DBS chairman, Gillian Fairfield, meets the minister periodically.

The framework within which DBS operates is set out in a framework document agreed between the Home Office and DBS. The document does not convey any legal powers or responsibilities. It is overdue for review but in the context of an anticipated review of the DBS as part of Cabinet Office's Public Bodies Review programme, the Home Office and DBS have not commenced reviewing it.

The framework document is supported by a delegation letter from the Home Office to DBS chief executive, Eric Robinson, setting out the chief executive's financial authority.

The DBS board is comprised of members appointed by the Secretary of State in accordance with the Protection of Freedoms Act 2012. They function as non-executive members. A board member was appointed for a second term in the year, and two new board members took up their appointments in April 2023 following the scheduled end-of-term for their predecessors. The minister recently extended the chairman's term of office to November 2026.

The chief executive chairs a Strategic Leadership Team (SLT) comprised of DBS directors. It provides strategic leadership to DBS in its delivery of strategic and business plans and agrees advice to be provided to the board. Further information about the functioning of the board and SLT are included in the governance statement.

In line with the General Data Protection Regulation, there have been no personal datarelated incidents, classified as 'Unauthorised Disclosure', reported to the Information Commissioner's Office (ICO) for the reporting period 1 April 2023 to 31 March 2024.

### Declaration and management of conflicts of interest

The management of conflicts of interest is addressed in the board's standing orders. This includes maintaining a register of interest for board members and members of the SLT to ensure that any perceived or real conflicts of interest can be identified. In addition, attendees are asked to declare any conflicts of interest at each meeting. The register of interest is updated regularly on the <u>DBS</u> <u>register of interests on our GOV.UK website</u>. The DBS board secretary conducts an annual risk assessment of declared conflicts of interest and advises the chairman of any action appropriate to manage risk.

A Conflict of Interest policy applies to anyone working on DBS' behalf and sets out the expectations and approaches for managing conflicts of interest. For senior civil servant (SCS) grades, it ensures declarations of conflicts of interest are obtained, whether actual or perceived, from SLT, DBS, and committee members at every meeting under the standing orders.

Application of business appointment rules There are government expectations that set out business appointments for civil servants. It requires transparency for outside appointments or employment taken up by former members of the department at SCS level.

Although DBS staff are public servants and not civil servants, relevant policies are in place. A Code of Conduct policy exists for staff at all grades which outlines the standards expected to maintain the integrity of DBS and its activities, including those who wish to take up appointments outside the business. This stipulates that any employee who wishes to undertake other employment, whilst still employed by DBS, must before commencing the other role, request permission in writing from their line manager or head of service.

All staff should also continue to observe their duty of confidentially after they have left DBS and be aware of, and abide by, the rules on the acceptance of business appointments after resignation or retirement.

### Statement of Accounting Officer's responsibility

Under Schedule 8 of the Protection of Freedoms Act 2012, the Secretary of State has directed DBS to prepare, for each financial year, a statement of accounts in such form as the Secretary of State decides. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of DBS, and of its income and expenditure, statement of financial position, and cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting manual and to:

• observe the Accounts Direction issued by the Secretary of State, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis make judgements and estimates on a reasonable basis

 state whether applicable accounting standards as set out in the Government
 Financial Reporting manual have been followed, and disclose and explain any material departures in the financial statements

• prepare the financial statements on a going concern basis

• confirm that the ARA as a whole is fair, balanced, and understandable, and take personal responsibility for the ARA and the judgements required for determining that it is fair, balanced, and understandable

The Home Office's Principal Accounting Officer has designated DBS' chief executive as Accounting Officer of DBS. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding DBS' assets, are set out in 'Managing Public Money' published by the HM Treasury.

As the Accounting Officer, I confirm that I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information, to establish that DBS' auditors are aware of that information, and that there is no relevant audit information of which the auditors are unaware.

I also confirm that the annual report and accounts as a whole is fair, balanced, and understandable and that I take personal responsibility for it and the judgements required for determining that it is fair, balanced, and understandable.

Accounting Officer's governance statement for the reporting period of 1 April 2023 to 31 March 2024 This governance statement is a key feature of DBS' annual report and accounts. It addresses corporate governance and risk management and demonstrates how I have fulfilled my duties to manage and control DBS' resources. This statement is for the full 2023-24 financial year and covers up to the date of authorisation of the annual report and accounts.

As the Accounting Officer for DBS, I am responsible for maintaining a sound system of internal control that supports the achievement of DBS' strategic and business plans, and aims and objectives, while safeguarding the public funds and assets for which I am personally responsible, in accordance with the responsibilities assigned to me in the HM Treasury 'Managing Public Money' guidance.

The system of governance, internal control, and risk management is designed to manage, rather than eliminate, the risk of failure to achieve policies, aims, and objectives; it therefore, provides high assurance, rather than absolute assurance, of effectiveness.

I confirm that I have reviewed the system of internal control in operation within my area of responsibility and, along with statements of assurance from directors, have made the following assessment to cover the full 2023-24 financial year.

#### **Board governance**

#### The board

The DBS board is made up of DBS members appointed by the Secretary of State, all of whom act as non-executive board members. I, the board secretary, associate board members, and directors routinely attend board meetings.

The board regularly reviews the skills available and those required, using skills audits. DBS appoints associates to support the board and widen the skill range. In the last skills audit, reported in August 2023, the board is assessed as consisting of highly experienced non-executive directors, with complementary skillsets. It is operating at a good standard with mature debate and insightful scrutiny and challenge.

The skills audit has been used to inform ministers of the skills required in future appointments, and as associate terms come to an end, to seek to strengthen board skills around: driving efficiency, commercial skills and complex contracting, information technology, cyber, artificial intelligence, automation, and data protection, customer journey, voice of the person or end user, and organisational transformation, human resources, and organisational development.

To strengthen the board further and to help develop talent, apprentice schemes are used to support aspiring non-executive directors through its sponsorship of the 'Black on Board' programme and the Boardroom Apprentice scheme.

The board is also attended by two associate members to provide additional coverage across committees, including one former apprentice who was appointed as an associate. Board members also have a good spread of tenures.

The board is the ultimate source of authority for the actions of DBS and is responsible for its functions and performance. The board is responsible for ensuring that all functions of DBS are carried out appropriately. The board is responsible for strategy, corporate governance, and business planning. The board is also responsible for ensuring effective financial and service performance, delivery of major projects, and an effective relationship with the Home Office minister via the chairman. The board provides visible leadership to DBS.

Regular reports are presented to board, its committees, and the Home Office Sponsorship Unit (HOSU), including through the minister's report. The board is satisfied with the quality of the papers, data, and risk considerations used to inform recommendations. Attendance at board meetings is outlined in table 8.

The board met on 9 occasions between 1 April 2023 and 31 March 2024, consisting of 6 board business meetings, 2 board development meetings, and one exceptional board meeting. The chairman invited the Head of HOSU to every board business meeting.

Under the Protection of Freedoms Act 2012, the Secretary of State may give written guidance or directions to DBS in relation to certain functions; no such guidance or directions have been received in this reporting period. Similarly, the chief executive may exceptionally seek direction from the board where he believes a course of action is inconsistent with the standards expected of him as Accounting Officer; no such direction has been sought or received in this reporting period.

#### Summary of board work

Figure 13, overleaf, shows how the DBS board interacts with its committees, SLT, and HOSU as of 31 March 2024.

Over this period, in addition to receiving reports from its chairman, chief executive, and committees, key elements of the board's work are summarised below. The board:

• considered the recommendations arising from the IICSA and DBS Regime Review recommendations and the government's response to them, and what they might mean for DBS

• considered and approved the full business case for the customer contact centre to be awarded to Hinduja Global Solutions Limited (HGS)

approved the annual report and accounts for 2022-23

• considered and approved amendments to the Offence Management section of DBS' Barred List Inclusion policy

• approved amendments to the Risk Management framework, ensuring that the existing strategic risks and issues reflect DBS' landscape

approved the pay remit and approach for 2023-24

• considered the board effectiveness review and approved the associated action plan, including revised board and committee terms of reference, scheme of delegation, and standing orders

• received updates on the EDI strategy, KPIs, roles at executive and board level, and the direction of travel

 approved the legacy technology estate replacement outline business case and assured itself that value for money requirements were evidenced

• considered an overview of the role of artificial intelligence (AI) in the business world to help to develop an understanding of what threats and opportunities it may bring for DBS

• considered a commissioned Deloitte report on forecasting, noting the identified opportunities to embed the right reporting and challenge forums to strengthen scrutiny, assessment, and decision on a realistic DBS forecast, for which further information is provided within the Financial Management section of this governance statement

• considered the 2024-25 financial plan and costings in the context of the mid-term financial plan and commissioned further work prior to agreeing fee proposals • agreed the business plan on which DBS consulted the Secretary of State and the budget for 2024-27

• assessed progress on the future of work programme – an initiative focused on DBS staff, our culture, and shaping the best ways for DBS to function in the future, and approved accommodation recommendations

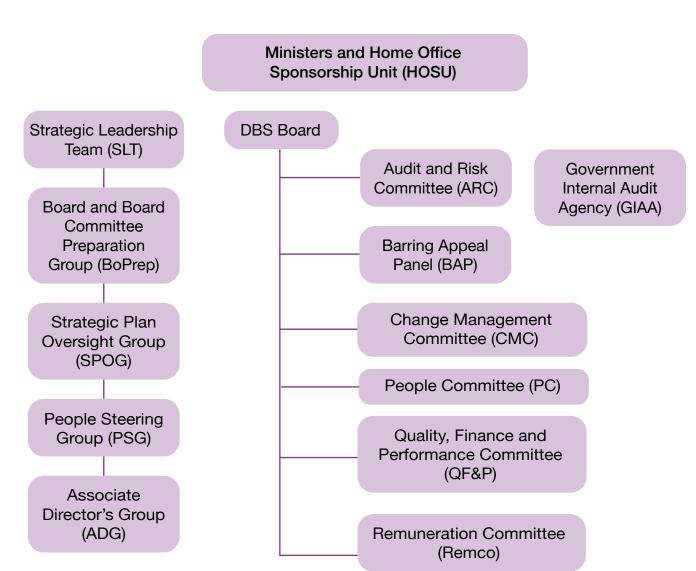
• agreed changes to the structure, roles and

responsibilities of posts reporting to the chief executive, ensuring safeguarding is fully considered within changes

• considered the present and future structure of committees in the context of board cadence and efficiency to ensure that they deliver optimum oversight and direction

#### **Board effectiveness**

The board chairman commissioned an



#### Figure 13: Board, SLT, committees, and HOSU structure

external review of the board's effectiveness in 2022-23, focusing on how the board can further enhance its effectiveness in fulfilling its purpose and identifying improvements to ensure compliance with the governance requirements, set out in <u>Requirements for</u> <u>Reviews of Public Bodies</u>.

The external review of board effectiveness reported to board in 2023-24 that the board is operating to a high standard with strong leadership from an experienced group of nonexecutive directors, supported by a stable and cohesive SLT. The board and committees are serviced by a dedicated corporate secretariat and the quality of administration is excellent. Board is also committed to consider carefully where potential for further improvement has been shown. It agreed an action plan and is monitoring progress in implementing the improvements.

In addition, in October 2023 the board carried out an internal review of its effectiveness by looking at the skills assessment. This assessed that the board remains a high performing board, but an additional blend of skills would assist the board to pursue further opportunities and drive value for money in everything that DBS does. While board members have a wideranging skillset, it is recognised by board that the agenda facing DBS is significant and capacity of members is limited, in terms of contracted days.

Two associate board members were appointed to fill capacity and address the identified skill gaps. One role aids governance of people, and the other, governance of equality, diversity, and inclusion. While not members of the board, associate board members participate in its meetings and add to the mix of expertise and skills from across the public and private sector.

With the current associate board members' terms coming to an end in 2024, an opportunity arises to address other identified

skills gaps through the appointment of new associate board members.

#### Governance framework

Drawing on HM Treasury's 'Corporate governance in central government departments: code of good practice' (2017) guidance and the Cabinet Office's Requirements for Reviews of Public Bodies, the board's governance framework comprises of a framework document agreed with the Home Office, standing orders, a scheme of delegation, terms of reference for the board and its committees, and a code of conduct for board members of public bodies, which is published by the Cabinet Office and adopted by the DBS board.

Cabinet Office's requirements set out that the 'comply or explain' principle applies to the requirements, as is standard in UK corporate governance.

The Cabinet Office's Requirements for Reviews of Public Bodies is underpinned by a set of quadrants which outline the expectations for departments and their arm's length bodies (ALBs) and some indicators of good practice. DBS complies with all the mandatory expectations other than: "All ALB boards shall have in place regular training and development opportunities. Specifically, all board members should receive appropriate training on financial management and reporting requirements."

The DBS board has regular training and development opportunities scheduled into each meeting. Select board members have received financial management training upon their request, however, this has not yet been provided widely, or incorporated into board development sessions. To fully comply, DBS has scheduled training on financial management and reporting requirements into the board development plan for the financial year 2024-25.

The board has kept its governance

framework under review throughout this reporting period.

#### **Board committees**

The board was supported by 6 committees:

- Audit and Risk Committee
- Barring Appeal Panel
- Change Management Committee
- People Committee
- Quality, Finance & Performance Committee
- Remuneration Committee

The committees oversee the responsibilities of the board for specific areas of DBS, providing advice and assistance where appropriate. Committee chairs report to the board on their committee's work, raising any relevant concerns or risks. They complete an annual report of the activities undertaken and consider their effectiveness as a contribution to the board's review of its effectiveness.

## Summary of committee activities from 1 April 2023 to 31 March 2024

#### Audit and Risk Committee

The Audit and Risk Committee (ARC) provides assurance to the board and Accounting Officer in relation to risk management, the internal control framework and environment, and the level of financial control. It oversees the work of the internal auditors, the preparation of the annual report and accounts and governance statement and works with external auditors as appropriate.

The committee met 4 times in this reporting period, and in summary they:

• considered the executive's recommendation in respect to changes to risks and issues and approved a deep dive schedule for the year

• considered the ARC Control Assurance report for assurance that the DBS control environment is appropriate • considered the performance of the main cyber security controls, ensuring that mandatory e-learning of cyber security is included as a key control

 agreed the audit charter and kept abreast of all internal and external audit actions, including agreeing the internal audit plan for 2024-25

 approved the committee's annual report to be presented to board

 completed a deep dive on the finance legacy system

• reviewed progress in implementing the mandatory element of all relevant functional standards and considered the executive's view on which other elements of the standards should be implemented and when

 considered the lessons learned from a constructive loss reported in the 2022-23 annual report and accounts related to a Crown Hosting procurement; following this they requested that all contracts not directly managed by DBS are reviewed and the risks considered, including analysis of the liabilities to DBS from services provided through a shared service to ensure appropriate tracking and risk assessments are in place

 considered annual reviews and reports relating to whistleblowing cases and the annual health and safety report

• considered the 2022-23 annual report and accounts and the governance statement ahead of presentation to the board

 reviewed risks exceeding the risk appetite set by board and ensured those risks were brought to the board's attention

#### The Barring Appeal Panel

The Barring Appeal Panel (BAP) meets when required, with delegated authority where legal permission has been granted to decide whether to pursue an appeal against an Upper Tier Tribunal or Care Tribunal decision and defend an appeal against an Upper Tier Tribunal or Care Tribunal decision.

Its membership is determined when it is decided that a meeting is required and will comprise 2 board members selected by the board chairman, normally one of whom will be the Quality, Finance and Performance Committee chairman, and the chief executive or a person appointed by the chief executive.

BAP met twice during this reporting period to decide whether to defend an appeal to the Court of Appeal and to decide whether to continue the DBS appeal against an Upper Tribunal's decision.

#### **Change Management Committee**

The Change Management Committee (CMC) assists the board in its oversight responsibilities by providing assurance to the board and chief executive in relation to:

• the robustness and effectiveness of DBS' change programme and project management arrangements

- oversight of DBS' change programme
- the robustness and effectiveness of DBS' commercial management arrangements
- the review or sign-off for specific business cases and expenditure by request of the chairman and/or board

CMC met 3 times in this reporting period as one meeting was cancelled at short notice, and in summary they: • reviewed and commented on significant procurement business cases before the executive recommended them to board

• considered the extent to which DBS' change programme is being delivered and reviewed progress and new activities to gain assurance that programme risks and issues are managed and delivered to time, quality, and cost, including recommending that benefit realisation should be included in the assessment

 considered a procurement report to enable the committee to reserve to the board any procurements that would otherwise be delegated to the chief executive and to provide assurance of the progress of procurements

 considered progress made with regards to DBS' maturity of supplier management, and progress against the Strategic Supplier Relationship Management plan

 endorsed an application management services full business case prior to consideration by board and considered an outline business case for the replacement of legacy technology estate prior to consideration by board

- considered progress of the barring referral service project outcome appraisal to achieve its objective to increase the number and quality of barring referrals
- discussed the potential high-level approach and principles for a change methodology to be used within DBS ahead of further development with board

• undertook a DBS Academy deep dive to provide clarity on the objectives and the degree to which they are being achieved, and to assure that the appropriate governance is in place including control of time, quality, cost, risks, and benefits

#### **People Committee**

The People Committee (PC) provides assurance to the board and Accounting Officer in relation to the management of DBS people matters, either employees or other workers that are not addressed by the Remuneration Committee.

This includes providing assurance to the board in relation to:

• the content of any organisational development strategic plans

• the content of any board-approved plans or policies specifically about DBS people

• the application of DBS policies specifically relating to DBS people

The PC met 3 times in this reporting period, with the chairman reporting to the board after each meeting. In summary, the committee:

• considered the people performance information included in the Integrated Performance report

• reviewed the organisational baseline and the organisational development picture in relation to people

• considered the activity and the action plan to mitigate risks arising from recruitment and retention issues within the Commercial and Change areas

• discussed the results from the staff engagement survey and considered the senior leadership team's response and the areas of focus and priority • endorsed the proposed pay remit prior to it being recommended to board

 endorsed the approach for a feasibility study relating to hybrid contracts to be presented to board for approval

 approved the committee's annual report to board

discussed the Employee Relations
 framework relating to the relationship with
 Trade Unions to ensure it is fit for purpose

• considered the updated grievance procedure and initial feedback following its implementation

• considered the Metis HR reporting strategic issues and its progress, noting the improved position following close collaboration with Home Office colleagues

 undertook a deep dive into how the people aspects of change are managed across DBS, including changes set out in the Organisational Change framework, the future of work programme, and DBS' business plan and strategy

• considered an update on the first full year of the DBS Academy, its improvements, services, and products

#### Quality, Finance and Perfomance Committee

The Quality, Finance and Performance Committee (QF&P) assists the board in its oversight and planning responsibilities. It provides assurance to the board in relation to:

• the framework and processes for quality, financial management, and performance of DBS

· the preparation and implementation of the

#### DBS budget

• ensuring that safeguarding is considered properly in the delivery of DBS functions

• strategic plans, business plans, and the policies supporting their delivery

QF&P met 4 times in this reporting period, and in summary, they:

• considered DBS' integrated performance report which provides performance reporting on delivery of the strategic and business plans

• undertook deep dives into the DBS' productivity and the factors that that impact it, including the quality assurance of Police Disclosure Units to ensure that performance at Police Disclosure Units is appropriately assured, and that the DBS takes appropriate action in the light of that performance

• approved the committee's annual report to board

• reviewed DBS' financial performance in delivering the strategic and business plans

• reviewed the quality of decisions of barring appeals, their outcomes, and withdrawals and whether increased numbers of referrals is also leading to an increase in the quality of referrals

 reviewed an analysis of the demographics of the Barred Lists

• considered progress in implementing the value for money framework and considered potential changes set in the framework prior to their consideration by board

• reviewed mid-term financial plan and proposed fees for 2024-25 ahead of board

 considered the appropriate management of strategic risks relevant to QF&P's area of business and assured itself that the strategy is being delivered as intended

• provided guidance on the main issues and objectives within the business plan and budget for 2024-25 and reviewed the Secretary of State's consultation response and the proposed final draft business case and budget prior to a decision at board

 endorsed the 2022-23 quality account to board

 considered the operation of the board approved complaints policy, including an analysis of redress payments, to ensure complaints are used to improve service delivery

#### **Remuneration Committee**

This Remuneration Committee (RemCo) supports the board and makes delegated decisions in respect to very senior posts (VSPs) which are defined as the chief executive (CEO), and all SCS-graded posts or other posts reporting to the CEO. It oversees the recruitment process for VSPs, ensuring it is appropriate, fair, and in line with DBS policies and standards. It is responsible for developing a fair and transparent procedure for remuneration of VSPs, including pay, bonuses, performance-related pay, incentives, and all other benefits and rewards ensuring that SCS pay is in accordance with the government's response to the Senior Salaries Review Body (SSRB).

RemCo met twice in this reporting period, and in summary, they:

• considered appraisals for VSPs other than the CEO to ensure they are fair and consistent with the framework • approved the procedure for remuneration of VSPs and agreed changes to remuneration in line with the committee's approved procedure, including approval of any bonuses or performance related pay

• reviewed the CEO's appraisal to consider whether it is fair and consistent with the agreed framework and to decide whether to recommend to the board any change to remuneration

• considered how to oversee the appointment of an interim director to ensure that the process is appropriate, fair and in line with DBS policies and standards and agreed the remuneration for the role, ensuring that it is in line with the committee's procedure for remuneration of very senior posts

#### Bespoke group to oversee HR matter

The chairman established a small oversight group comprising the DBS chairman, associate board member: DBS People, and the board secretary to oversee management of issues relating to an HR matter. This group focussed on process rather than become involved in the detailed working of the individual processes. It ensured that the relevant information was communicated and maintained an overview.

The HR matter is now resolved, and the chairman commissioned a lesson learned report which the board considered. One of the lessons was that this oversight group had been an element which had worked well.

#### **Executive governance**

#### Strategic Leadership Team

I chair the Strategic Leadership Team (SLT), which provides strategic leadership to DBS in its delivery of strategic and business plans and agrees advice to be provided to the board. It normally meets weekly, and I call additional meetings where necessary.

SLT membership is comprised of myself and all directors. The board secretary routinely attends. The SLT is assessed as consisting of a cohesive set of experienced professionals who engage with the board in an open, honest, and respectful manner.

A programme of development in the strategic leadership team is underway and I am in the process of making changes to the structure and responsibilities within the team as vacancies have arisen.

SLT agreed terms of reference for itself and 4 groups which it has established to support it in its leadership. Their roles are summarised below, with 3 of these groups reporting to SLT following each meeting.

#### Associate Directors' Group

The Associate Directors' Group (ADG) chair is appointed by the chief executive on an annual term. ADG is formed by associate directors (ADs) and provides a corporate perspective on the management of risks, data, policies, and processes to support SLT and to undertake tasks assigned by the SLT. An innovation this year has been the SLT and ADG joining together regularly as a Corporate Leadership Team to broaden and strengthen DBS' leadership.

#### **People Steering Group**

The People Steering Group (PSG) is chaired by the Human Resources and Organisational Development director. This group monitors DBS' performance in respect to its people, advises SLT on people-related policies and strategies to improve performance, and makes decisions about individual members of staff in accordance with those policies and strategies.

#### Strategic Plans Oversight Group

The Strategic Plans Oversight Group (SPOG) is chaired by the deputy chief executive and

# Table 8: Board members and chief executive's attendance at board and committee meetings from 1 April 2023 to 31 March 2024

Name	Role	Board	ARC	BAP	СМС	PC	QF&P	RemCo
Dr Gillian Fairfield	Chairman	9 of 9	-	-	-	-	-	2 of 2
Eric Robinson	Chief Executive (non-board member)	9 of 9	3 of 4	-	-	-	-	2 of 2
Mary Cunneen	Board member RemCo chairman ARC member	9 of 9	4 of 4	2 of 2	-	-	-	2 of 2
Samantha Durrant	Board member CMC chairman ARC member	6 of 9	3 of 4	-	3 of 3	-	-	-
Neil Rhodes	Board member Vice chairman QF&P chairman CMC member	8 of 9	-	1 of 2	3 of 3	-	4 of 4	-
Emir Feisal	Board member ARC chairman RemCo member	7* of 9	4 of 4	-	-	-	-	-
Julian Blazeby	Board member PC chairman QF&P member	7 of 9	-	1 of 2	-	4 of 4	4 of 4	-

\*Denotes partial attendance at three meetings.

executive director of Finance and Corporate Services. This group monitors delivery of the plans sitting beneath the strategic and business plans, facilitating co-ordination between them and scrutinising proposals coming from SLT. It also oversees the Strategic Investment Fund (SIF).

#### Board and Committee Preparation Group

The Board and Committee Preparation Group (BoPrep) is chaired by the deputy chief executive and executive director of Finance and Corporate Services. This group ensures sponsors of papers for board and board committees incorporate strategic, governance, and corporate considerations into draft papers presented to SLT. BoPrep also identifies issues coming to board and board committees that may merit early SLT development. BoPrep does not report directly to SLT. The relevant sponsor ensures the resultant draft papers are consistent with agreements reached at BoPrep and the board secretary includes any required development discussions into the SLT forward look.

#### Main elements of internal control

I explain below the main elements of internal control. To obtain assurance on the effectiveness of these, I place reliance on the work of the board's ARC and on the Government Internal Audit Agency (GIAA). In addition, I receive assurances from directors on the adequacy of the system of internal control within their area. The board secures assurance on the effectiveness of these controls in a similar way, and additionally, receives my assurance on their effectiveness when I present the annual report and accounts to them for their consideration.

#### Management of risk

The board is responsible for DBS' system of corporate governance, including management of risk. Throughout the period of this report, it had a risk management framework, informed by HM Treasury's 'Orange Book', in place, including a statement of its appetite for risk. The strategy is designed to maintain regularity and propriety and manage risk in line with the board's appetite, rather than eliminate all risks. The framework is based on a process that:

• identifies and prioritises the risks affecting our business aims and objectives

- evaluates the likelihood of those risks happening and their likely impact
- manages those risks efficiently and effectively

To ensure the continued effectiveness of the management of risk, within this reporting period the board has:

• reviewed and updated aspects of its risk management strategy and appetite

• collaborated with me to identify strategic risks relevant to its corporate and business plan

 made its committees responsible for overseeing my management of corporate risks

• secured assurance, through ARC, in relation to risk management

regularly reviewed my and my director's management of risk

The DBS risk reporting cycle is illustrated in figure 14, opposite. The main features that support regular monitoring, review, and assurance of the management of risk are:

• DBS has a risk manager in place to support the management of risk

• risks are identified and managed at strategic and operational level with proposed changes to strategic-level risks presented to the board for their consideration

• ADG undertakes a risk management review programme which includes a monthly review of corporate and strategic risks and issues; this is complemented by a programme of 'deep dives' into individual risks, and horizon scanning, to ensure they are a true reflection of the risk environment in which DBS operates and proposes actions that can be taken to reduce the risk to align with the risk tolerance

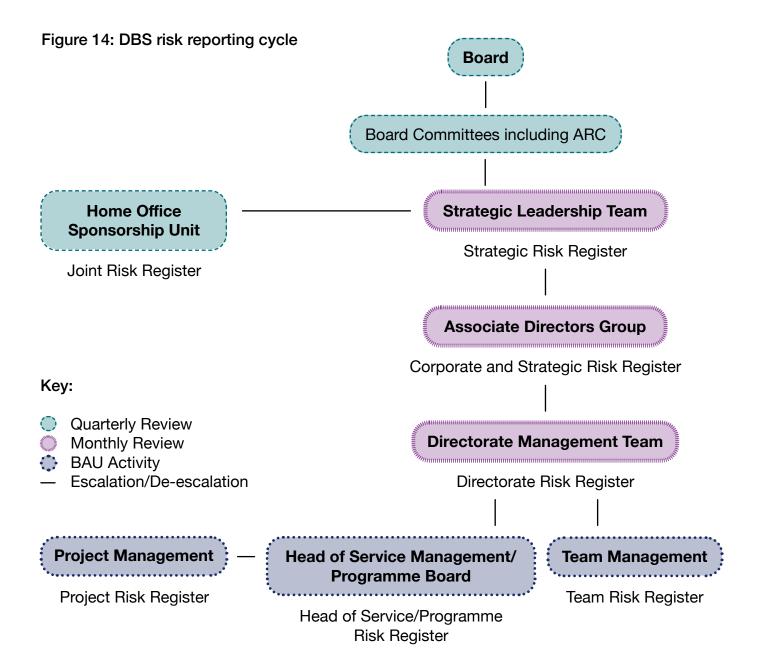
• SLT are the owners of the strategic risks and it reviews them monthly including the actions being taken to manage risks

• ARC meets 4 times a year to seek assurance on the management of risk, reviewing the strategic risk register and reporting their views to the board • board committees have been assigned responsibility for overseeing the management of strategic risks and to include this as a standing item on each committees' agenda as part of the board governance framework

Our risks are linked to our strategic objectives and the delivery of DBS' 2020-25 strategy. DBS maintains a strategic risk register that allows the board, relevant committees, and SLT to focus attention on areas of significant risk and monitor risk movement and the impact of mitigation.

DBS uses a 5-point scale for likelihood and impact (very low, low, medium, high, and very high) to give sufficient granularity to the assessment of how likely a risk is to materialise, and the impact it would have on public protection, reputation, finance, and/or delivery if the risks were to occur.

DBS uses a risk matrix to define the level of



risk by considering the category of likelihood, ra against the category of impact. Our risks are

rated as follows:

Very High (Black)	Probability: >80% (almost certain to occur) Impact: Very high impact on public protection, reputation, finance, and/or delivery if they occur
High (Red)	Probability: 51% - 80% (likely to occur) Impact: High impact on public protection, reputation, finance, and/or delivery if they occur
Medium (Amber)	Probability: 21% - 50% (may occur) Impact: Medium impact on public protection, reputation, finance, and/or delivery if they occur
Low (Green)	Probability: 6% - 20% (low but not impossible) Impact: Low impact on public protection, reputation, finance, and/or delivery if they occur
Very Low (Light Green)	Probability: 0% - 5% (very unlikely) Impact: Very low impact on public protection, reputation, finance, and/or delivery if they occur

As of March 2024, there are 11 DBS strategic risks. They are scored as follows on the risk

matrix, illustrating the risk appetite for each. See the table opposite.

Strategic risk title	Appetite
Risk 199 - Failure to protect DBS systems from a cyber-attack	Minimalist*
Risk 393 - Failure to safeguard	Minimalist
Risk 456 - Failure to retain and develop talent to ensure we have the capability and capacity to deliver our strategic objectives	Open**
Risk 530 - Failure to respond appropriately to a Business Continuity Disaster Recovery event	Minimalist*
Risk 637 - Failure of technology systems leading to reduced service performance	Minimalist*
Risk 668 - Failure in supply chain performance	Cautious****
Risk 669 - Failure to comply with statutory obligations	Minimalist*
Risk 670 - Failure to manage financial resources	Cautious****
Risk 671 - Failure to improve DBS profile	Minimalist*
Risk 674 - Failure to deliver DBS strategy 2020-25 strategic objectives	Open**
Risk 675 - Failure to effectively manage change and transformation	Open**

Stra	Strategic risk matrix								
			Impact						
		Very Low	Low	Medium	High	Very High			
	Very High	Amber	Amber	Red	Black	Black			
	High	Amber	Amber	Red	Red	Black			
ро	Medium	Green	Amber 530	Amber 670	Red 637, 671	Red			
Likelihood	Low	Green	Green	Amber 456, 668, 669	Red 199	Red			
	Very Low	Green	Green	Amber 675	Amber 674	Red 393			

\*Minimalist - Preference for ultra-safe business delivery options that have a low degree of inherent risk and only have a potential for limited reward

\*\*Open - Willing to consider all potential delivery options and choose the one that is most likely to result in successful delivery while also providing an acceptable level of reward and value for money etc

\*\*\*Averse - Avoidance of risk and uncertainty is a key organisational objective i.e., zero tolerance for any decision that could lead to a child and / or vulnerable adult being harmed

\*\*\*Cautious - Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward

Further details about the 11 strategic risks are set out in this following section, including information around what each risk is and key mitigations in place to manage them.

# Risk 199: Failure to protect DBS systems from a cyber-attack

As DBS services are becoming more digitalbased and internet-facing, there is a risk that a cyber-attack could occur, leading to data breaches, outage of our key processing systems, and reduced public confidence. We ensure data and systems are protected through use of cyber security measures. We do this by:

- delivering two-factor authentication for the majority of our systems and all our users
- improved Security Operations Centre (SOC) protective monitoring and reporting solution developed
- · recruiting additional cyber security resources

- · completion of annual IT health checks
- assurance through the control assurance report to ARC
- completion of IT health check and security accreditation for all IT changes
- complete cyber security IT external assurance audit
- implementing third-party patch management governance
- implementing proactive vulnerability management

encryption of data at rest within operational systems being investigated

- IT suppliers certified against ISO 27001
- IT suppliers Cyber Essentials Plus compliance being achieved
- DBS and supplier staff completion of annual cyber e-learning

• engagement in the government departmental security health check assessment

#### Risk 393: Failure to safeguard

As safeguarding decision-making within Operations may be delayed and/or inaccurate, there is a risk that a child or adult is subject to significant harm caused by a DBS action or inaction, leading to a failure to safeguard.

We ensure we make high-quality and timely decisions that safeguard the public by assuring quality and managing work effectively, including monthly performance monitoring by SLT and board. We do this by:

• ensuring that directorate delivery and DBS business plans include several initiatives to further mitigate this risk, including a post-

IICSA review of the usage and retention of information to inform barring decisions and the potential for more proactive information sharing, with progress reviewed monthly at senior leadership level

 working with all directorates across DBS to ensure this risk is mitigated by having stable IT platforms, prioritised transformation projects that optimise operational services, timely insight and intelligence and financial forecasting and timely support from HR, Commercial, and Legal

We have achieved the target PRAG (purple, red, amber, green) risk rating; however, an inherent risk will always remain and it continues to be included in the register to reflect the current position and efforts to maintain or further improve performance. The scope and focus of this risk remain under review, with increased recognition of external factors and how they may limit DBS safeguarding effectiveness.

In its current form significantly increased levels of barring referrals, following the successful launch of the barring referral service in March 2023, have driven barring WiP much higher. However, all timeliness and quality measures continue to be met and additional barring casework resource is being recruited to meet the increased demand. Deterioration of performance against these measures may result in a need for current PRAG rating to be raised.

#### Risk 456: Failure to attract, retain and develop talent to ensure we have the capability and capacity to deliver our strategic objectives

As DBS may not be able to attract, retain and develop the right skills, and ensure our equality diversity and inclusion, there is a risk that we do not have the people to deliver our services, leading to reduced service provision and an inability to achieve our KPIs and strategic objectives. We ensure we can attract, retain, and develop staff who produce quality work in support of our strategic objectives. We do this by:

• regular reporting and scrutiny via Integrated Performance Report, PSG, and PC related to people

• Change and Transformation board (C&TB) provide governance, assurance, and escalation routes for formal projects where capability or capacity issues may arise

• a reward and recognition procedure, a social recognition platform and a cross-organisation reward and recognition panel now sits quarterly

• our overarching organisation design (OD) is in place with ongoing review

• a full review of our recruitment across the last 12 months was recently completed, supporting our approach to attracting and supporting colleagues from an ethnic minority

• HR business partners work closely with each director and Directorate Management Team, with a particular focus on workforce planning

• DBS Academy in place to provide targeted skill and capability-based interventions, for example, digital skills

• DBS financial models are updated on a quarterly basis in line with revised forecasts with controls over the FTE profile of the organisation as a whole and with a view on vacancy rate

 case review and lessons learned in place in Human Resources and Organisational Development • staff engagement survey and action plan is in place

Wellbeing strategic and delivery plans are in place

• co-ordination with local or corporate issues or risks as they emerge related to 456

#### Risk 530: Failure to respond appropriately to a business continuity and disaster recovery event

As DBS could potentially be subject to a continuity or catastrophic event, there is a risk that the DBS response to this is not sufficiently managed, creating reputational impact from disruption to our safeguarding functions and achievement of PSS targets.

We maintain appropriate plans to ensure we can respond effectively to a business continuity and disaster recovery (BCDR) event. We do this by:

 corporate BCDR Manager role established in DBS staffing structure

• BCDR Management (BCDRM) policy and procedure in line with the organisational policy and procedure framework

BCDRM programme in line with BCI lifecycle

 an ongoing cycle of activities to build
 organisational resilience

• strategic, tactical, and operational coordination structure for major incidents

BCDR impact matrix to quantify incident response level

 framework of plans is in place including 3
 'denial of' plans – people, property (buildings), and processes (systems) – and directoratelevel plans • incident management and corporate communications plans for major incidents, including GOV.UK Notify

 de-brief procedures and lessons learnt from live incidents to inform further development of BCDR

actions progressed following recommendations from audit

Risk 637: Failure of technology system

As DBS is reliant upon systems, including some legacy systems, to deliver its services, there is a risk of service outages leading to reduced service performance.

We ensure systems are stable and enable us to operate our services. We are doing this by continuing to roll out the Technology 2025 Roadmap which articulates:

• a prioritised delivery schedule of functional changes/improvements reviewed and reported monthly to the Tech 2025 Steering Group

• a continuous improvement programme, including a technical refresh of the legacy estate

We also mitigate this risk as follows:

• by having significant levels of resilience built into the existing core DBS applications, which allows for a degree of component failure before service is affected

• our technology partner (CGI) has a significant track record of managing estates and technologies similar to DBS current and legacy systems

• we have security and architecture forums to ensure robust design principles are adhered to

· change management principles are in

place and adhered to when introducing new/amended services in the production environment

Delivery of the activity above will mitigate this risk of technical failure as far as practicable.

# Risk 668: Failure in supply chain performance

As DBS is reliant upon a range of third-party suppliers, there is a risk that DBS will not be able to deliver its services and/or will have to reprioritise if any of those suppliers are unable to deliver critical products or critical services, or deliver projects and services key to our strategy, which may affect DBS' reputation and public confidence in our organisation.

We ensure our suppliers enable us to meet our desired performance levels. We do this by:

 reviewing the projects and services key to our strategy and ensuring these are covered by Technology 2025 governance or other programme governance

 documenting the critical products and services, breaking those down to fundamental components where possible

• creating a critical supplier list

• developing a plan to ensure we can effectively risk manage the critical products and services from our third-party suppliers

• ongoing reviews of contracts and service level agreements in place

 promoting an intelligent client function to ensure resilience across supply chain where we can

• reviewing supply chain management performance model of all suppliers

**Risk 669: Statutory obligation compliance** As DBS is required to comply with several statutory obligations, there is a risk that an aspect is missed which could lead to reputational damage and reduced confidence.

We ensure we comply with all of our statutory obligations, and that these are managed appropriately and safely, through adherence to relevant legislation. We do this by:

• assurance and compliance monitoring in place

• legal compliance and/or challenges assessments are included within board decision papers

• equality impact assessments (EqIAs) are completed for all projects so the Public Sector Equality Duty (PSED) is considered during the design phase and any mitigating actions required to be progressed as a priority

• lessons learned reviews are regularly undertaken and built into updated practice

- PSED training completed by SLT in 2022-23
- PSED and EqIA training was provided to staff in 2023-24
- individual areas action plans are monitored to complete the external GDPR assessment recommendations

• planning is in place to implement technical changes recommended in the CGI GDPR IT estate review

• the action plan resulting from the DLA Piper review has now been completed

• the action plan arisen from the ICO consensual audit has also been completed

• effectiveness of operations review arrangements following data breaches are kept under review

Target PRAG (purple, red, amber, green) risk rating has been achieved.

# Risk 670: Failure to manage financial resources

As DBS is reliant upon allocations from the Home Office and is subject to time constraints for setting fees, there is a risk that insufficient working capital or capital will be available to DBS, leading to an inability to resource effectively and complete our desired strategic initiatives. We ensure we make effective use of our budget in accordance with Managing Public Money. We do this by:

• maintaining a rolling 3-year financial plan which is updated on an annual basis; the annual budget is the more detailed planning subset of the 3-year financial plan which assesses agreed budget resource and determines fees

• regularly undertaking financial scenario analysis to assess emerging risks, and opportunities, to financial performance, alongside detailed quarterly forecasting

• developing a multi-year capital requirement plan which is submitted to the Home Office

 forecasting our in-year capital requirements to the Home Office on a frequent basis

 having a working capital agreement in place with the Home Office, which ensures that DBS maintains sufficient cash levels to fund 3 months working capital

Risk 671: Failure to improve DBS profile

Due to the low profile of DBS and limited awareness of our purpose and how to

work with us, there is a risk that a lack of understanding of disclosure and barring responsibilities externally could adversely affect our ability to safeguard, deliver effective services, and achieve our strategic ambitions, reducing public trust and confidence.

We engage effectively with our partners to ensure we have a reputation as a highly valued public organisation that has the confidence of stakeholders and customers. We do this by:

• delivering planned and proactive national partnership and commercial development and business engagement activities, including senior stakeholder liaison with other national bodies at chair/CEO level

• delivering a regional outreach service across 11 regions to respond to customers' need for advice and information, drive awareness of DBS services and develop collaborative relationships to enhance profile and support delivery of the DBS 2020-25 strategy; this includes a proactive engagement programme across a wide range of national, regional, and local employers and trade/sector bodies

• proactive media and communications campaigns being developed and delivered; social media refresh and external communications strategy development ongoing

 we have a media monitoring and social media listening service, which enables the organisation to monitor media for coverage as well as understand open-source discussions; this allows us to respond, if necessary and appropriate – we are also undertaking Parliamentary monitoring to track key issues and any discussion of DBS

• comprehensive media and stakeholder handling and contingency plans for key

reputational issues developed in advance

# Risk 674: Failure to deliver DBS strategy 2020-25 strategic objectives

Due to the scale and complexity of the DBS 2020-25 strategy, there is a risk that DBS may fail to realise its strategic ambitions, resulting in DBS not achieving its strategic objectives to improve quality and profile and support its people effectively. This may also result in an associated loss of confidence by partners, customers, and staff, impacting on trust and DBS' ability to deliver services to make recruitment safer.

We ensure we are able to realise our strategic ambitions and achieve delivery of the DBS strategy. We do this by:

 having governance in place through senior management meetings, including SPOG and board tracking on a quarterly and annual basis

 ministers are consulted annually on the business plan

• developed and delivered a strategy refresh to ensure the strategy remains relevant and responsive to external changes and the development plans for a new, post-2025 strategy are being scoped

• we promote a collaborative culture to support achievement of the DBS 2020-25 strategy, and consistently engage with staff and managers about progress with the strategy, as well as co-creating the strategy refresh

• a centralised strategy and planning team is in place and well embedded to support monitoring of delivery of the DBS 2020-25 strategy

Risk 675: Failure to effectively manage change and transformation

DBS has a significant amount of change activity to undertake to realise the priorities and objectives within the DBS 2020-25 strategy. Therefore, there is a risk that without effective oversight and governance, a cumulative failure of change activity failing to deliver as intended, the delivery of the business plan objectives could be placed in jeopardy, leading to reduced confidence, impact on service delivery, and reputational damage for DBS.

We ensure we are able to change and transform our business. We do this by:

• a change governance and assurance is in place to ensure all change activity is coordinated through a unified pathway, with decision points and assurance gates at identified intervals

• a proactive risk management in place across the change portfolio, identifying trends and recurring issues to minimise the risk of failure

• effective oversight of change activity provided through C&TB, SPOG, and CMC to ensure progress is maintained against the Change and Transformation plan and to agreed performance measures of time, cost and quality

• an established Technology 2025 Roadmap for all technology change which is aligned to the Change and Transformation plan and other change governance; this ensures we are able to identify funding, resources and scheduling conflicts that impact any change activity across DBS

• a dedicated function within the Change Management and Business Improvement Unit to ensure government functional standards are applied to programme and project management • an operating structure is being established following the creation of the new Strategic, Performance & Change Directorate, to strengthen the change model and ensure the change pathway is appropriately adopted across the business.

 revised business processes introduced to ensure that change activity is undertaken in a consistent and appropriate manner

Two additional issues are being managed by specific board oversight and strengthened governance. These relate to:

· litigation with a former supplier to DBS

• an issue with Metis, the HR and finance reporting system, which means that we are having to deploy a workaround process in collaboration with Home Office colleagues to extract key management information

Risks will continue to be monitored on a regular basis and reported to ADG, SLT, board, and ARC to provide assurance that risks are being managed effectively and in accordance with the DBS risk management framework and risk appetite statement.

#### **TCS** litigation

In October last year, the Technology and Construction Court began to hear a dispute between Tata Consultancy Services (TCS) and the Disclosure and Barring Service (DBS). This relates to a contract that was agreed in 2012, where TCS were asked to design, build and operate a modernised IT system for DBS.

In 2018, it became clear that the relationship between TCS and DBS was not working, and DBS served Notice of Partial Termination of the contract with TCS on 19 September 2018. The contract then expired on 31 March 2020.

TCS issued a legal claim against DBS,

alleging that failures and issues with the system they created occurred because of delays that were caused by DBS. However, it was the view of DBS that not only did TCS fail to deliver its services on time, it also did not create a system that was fit for purpose, thereby failing to deliver what it was contractually obliged to do. As well as strongly refuting TCS' claims, DBS had to assert its position by issuing its own counterclaim. The trial took place between October and December 2023, TCS's claims in respect of delay were put at over £110 million. DBS's priority was to robustly defend such claims. Their claim in respect of the volumebased service charge (VBSC) was £14m.

The judgement was handed down on Friday 17 May 2024. In summary, DBS has succeeded in a number of areas. Most notably, the principal aim to defend TCS' £110 million delay claim has been achieved, such that TCS have been found to owe £2m more to DBS in relation to delay issues that DBS owes to TCS. Unfortunately, DBS fared less well on its other counterclaims and the VBSC dispute has tipped the balance against DBS. In relation to this, DBS won one of two main issues and TCS won the other main issue. The result is that of the over £14 million TCS was claiming, it has been awarded just under £7 million. The net position is that in relation to TCS claims of £124m, DBS was ordered to pay TCS just over £4.8 million. A Consequentials Hearing took place on 23 July 2024, which finalised the court's position and the results of this judgment are fully reflected in these accounts.

In line with the accounting standards, DBS has made a provision for the award to TCS, including interest and legal costs totalling  $\pounds$ 13.7m as disclosed in Note 12 and is fully reflected in the Statement of Comprehensive Net Expenditure. In order to comply with Managing Public Money and the Consolidated Budgeting Guidance, this is accounted for

as annual managed expenditure. However, unlike the award to TCS, the award found in favour of DBS has not been reflected in the Statement of Comprehensive Net Expenditure and is reported as a contingent asset in Note 17.

Subsequent to these events, DBS made payment to TCS in August 2024 totalling £7.9m. This payment will utilise the provision created above, and recognises the award found in favour of DBS in 2024-25.

#### Delegation

I was consulted on my delegation letter from Home Office in July 2023 setting out my financial authority for the financial year and received clarification of it in September 2023.

ARC conducted an exercise to evidence the controls that are in place and provide assurance that all aspects within the delegation letter are being complied with. The analysis confirmed that there are robust controls in place across all aspects set out in the delegation letter.

The board has agreed a scheme of delegation which sets out the matters that it has reserved to itself to decide. This includes approval of:

- all matters that are considered novel or contentious
- the strategic and business plan
- significant policies
- the budget
- significant procurements

 remuneration and framework for appraisal of senior posts

how performance reporting to the board is completed

I have established a scheme of delegation for the matters delegated to me by the board. This builds on delegations set out in DBS policies, annual budget delegations, and direct delegations issued by me. The executive scheme of delegation provides for segregation of duties and ensures that procurement activity is controlled in line with the procurement delegation issued by the Home Office.

#### Assurance framework

I have an assurance framework that provides a critical examination of the effectiveness of each directorate's key controls and maps their main sources of assurance. It outlines each of the assurance activities that are undertaken to provide confidence in the effectiveness of DBS policies and operations, the achievement of objectives, and DBS' compliance with its obligations.

A report is presented to each ARC meeting detailing the assurances relating to the control environment. This includes:

- whistleblowing
- · health and safety
- fraud
- computer system security
- · information management compliance

• conformance with freedom of information and parliamentary questions procedures

# DBS' compliance to, and application of, functional standards

I am mandated to apply the government functional standards, published by government, that support consistent and coherent ways of working within government organisations. DBS is compliant with all mandatory functional standards elements.

DBS continues to measure our compliance with functional standards against the available continuous improvement frameworks, collaborating with function owners across government to progress compliance with relevant advisory elements. As detailed in the DBS Assurance policy and procedure, progress is reported each quarter to SLT and ARC, as we work towards achieving an organisational compliance level of 'Better'.

#### Internal audit

Under the terms of the DBS framework document, the GIAA provides an independent and objective audit service operating to standards and an agreed audit methodology documented in 'Public Sector Internal Audit Standards'. The Head of Internal Audit attends ARC and periodically attends SLT.

In accordance with the framework agreement, ARC and GIAA agreed an Internal Audit Charter which formally defines the purpose, authority, and responsibility of the internal audit activity. This ensures that GIAA provide an independent and objective assurance and consulting service designed to add value and improve DBS' operations.

The Head of Internal Audit's annual report to ARC for 2023-24 provides a moderate opinion in respect to the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control, noting the direction of travel is positive and reflects well on the organisation.

GIAA has delivered an agreed internal audit programme for the 2023-24 financial year. ARC monitors progress against the plan. Both SLT and ARC receive all reports from GIAA and monitor progress in implementing management actions arising from GIAA reports.

Table 9 overleaf, shows the final reported position relating to each agreed review for 2023-24 as reported to ARC in June 2024.

Month	Title	Result/Opinion
October 2023	Wellbeing, including remote working	Moderate
January 2024	Innovation	Moderate
January 2024	Compliance with service standards (police forces)	Moderate
February 2024	Barring and Safeguarding delivery	Substantial
April 2024	Reward and recognition	Moderate
April 2024	Disclosure and Barring Safeguarding quality assurance	Substantial
April 2024	Stakeholder engagement	Moderate
April 2024	Key financial controls (expenses inc. T&S)	Substantial
June 2024	Change and transformation	Moderate

#### Table 9: Final reported position relating to each agreed review

#### Table 10: Opinion definitions

Table 10 outlines the definitions that relate to the opinions noted above.

Opinion	Definition
Substantial (Green)	The framework of governance, risk management, and control is adequate and effective
Moderate (Yellow)	Some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management, and control
Limited (Orange)	There are significant weaknesses in the framework of governance, risk management, and control, such that it could be, or could become, inadequate and ineffective
Unsatisfac- tory (Red)	There are fundamental weaknesses in the framework of governance, risk management, and control, such that it is inadequate and ineffective, or is likely to fail

#### **Financial management**

Processes, controls, risk management, and fraud prevention strategies delivered good financial stewardship and appropriate levels of propriety, regularity, and value for money.

The board agreed budgets in advance for the current financial year, considering forecast volumes and business planning objectives. The budgets were scrutinised at senior level across DBS in advance of formal approval by the board. The board exercised its retained function to make significant changes to the budget where these became necessary. As noted above, the Home Office provided financial authority for these budgets.

New delegated financial responsibility/ limits and additional controls were introduced during this reporting period to manage challenges for achieving a balanced budget for 2024-25 arising from cost of living pay awards, inflation, legal costs, new investments, supplier costs, police, and significant increases in referrals to barring and disclosure.

Fees are kept under regular review through prompt monthly reporting of expenditure against agreed budgets and subsequent re-forecasts, to ensure that DBS adheres to the principles of HM Treasury's 'Managing Public Money' guidance. This includes the monitoring of changes in forecast income and expenditure, and uncertainties such as demand fluctuations and the current risk profile. In this way, the board was able to maintain fee levels for its disclosure products (DBS checks) for 2023-24, despite inflationary pressures.

Actual financial performance against budget and forecast is reported to SLT monthly and to each board business meeting, as part of a wider integrated performance report. This includes commentary on key variances, with risks and other relevant financial information being highlighted. As part of the review of this information, directors are challenged on their financial and operational performance.

DBS commissioned Deloitte to undertake a review of the DBS' forecasting process. This assessed that the tools and models used for forecasting are comprehensive and fit for the intended purpose. Recommendations for further improvements to forecasting, especially around the depth and effectiveness of scrutiny and challenge, the organisation wide accountability for demand forecasting, expanding the forecasting horizon, and efficiencies and integration of monthly and quarterly forecasting processes are being considered.

#### Climate-related financial disclosures

A new reporting requirement arising from the Task Force on Climate-Related Financial Disclosures (TCFD) is being phased in over three years and requires UK public sector organisations to disclose climate information within their annual reports and accounts.

The first phase for the 2023-24 financial year requires reporting entities to provide a TCFD compliance statement and report against the following criteria on a comply or explain basis:

 a description of the board's oversight of climate-related issues

 a description of management's role in assessing and managing climate-related issues

 disclosure of Scope 1, Scope 2, and, if appropriate, Scope 3 – business travel only greenhouse gas (GHG) emissions, and the related risks

A compliance statement on these requirements is contained within the Greening Government Commitments section of this annual report and accounts.

#### Whistleblowing

The DBS Whistleblowing policy promotes the use of whistleblowing, recognising that it is a key control in both preventing and detecting breaches of control. For this period there has been two whistleblowing reports. Following investigation, it was found that there was no case to answer in response to the allegations made for one disclosure, and the other disclosure has now been finalised with no case to answer.

Recommendations arising from the cases relating to the need for hiring managers to protect the integrity of any recruitment process and recognise where there could be the potential for others to question the fairness of a selection process if any candidate is known or related to existing DBS staff members is being taken forward by the DBS Academy to ensure it is covered in the recruitment and selection training module for people managers.

#### Information management

With no personal data-related incidents referenced in the directors' report, there have been no significant lapses of protective security.

n ·

**Eric Robinson**, Accounting Officer. 24 January 2025

### Remuneration and staff report

#### **Overview and strategy**

To support achievement of the People objectives set out in the DBS 2020-25 strategy, a range of plans were developed to help support DBS towards its vision of being a modern, flexible, and contemporary organisation.

DBS has embarked on a programme of work to enhance its employee value proposition (EVP) and become an even more attractive employer, so that we retain and attract the talent we will need to achieve our organisation's strategic objectives.

#### **Enhancing our Human Resources function**

It was important that our Human Resources (HR) function had the right capabilities to deliver the DBS 2020-25 strategy. The Organisation Development function has continued to develop and implement a series of plans focused on developing and improving our employee experience, invigorating employee wellbeing, and strengthening our people management capabilities across the organisation.

# Fairly rewarding and recognising our employees

We need to recognise and reward our employees to ensure that they feel valued. To fairly acknowledge their contributions above and beyond day-to-day responsibilities, we agreed a revised reward and recognition (R&R) policy in 2021. This has been embedded during the 2023-24 period, shown by the remarkably positive increase in spend in this area. Across the financial year 2023-24, R&R spend was £76,825 compared to £56,525 in 2022-23. This is a like-for-like change of £20,300, or 36% increase in percentage terms. This shows that people and managers across DBS have begun to adopt thanks, praise, and recognition into their day-to-day lives. DBS will continue to make progress in this area.

We have further developed our flexible benefits options for employees, which suit their lifestyles and preferences, making rewards more appealing, but also support people with every day spend. DBS has, this year, invested in an enhanced retail discount scheme for employees which could see potential savings rise significantly from everything across groceries, electronics, lifestyle, and gifting.

The development of a range of our local pay arrangements continued to be a focus for DBS and solutions including recruitment and retention allowances, are being explored, alongside pay remit.

#### A healthy, happy, and productive workplace

This year, DBS has continued to support and develop its workforce effectively. We've expanded our wellbeing approach, enhanced the offerings of the DBS Academy, and made good progress in responding to Strategic Objective 4 which is all about realising the 'future of work' at DBS.

# Strategic Wellbeing: "Support for you, when you need it."

In 2023-2024, we continued to use our pillars of wellbeing to embed wellbeing across the organisation. DBS deepened its commitment to employee wellbeing in the strategy refresh, with wellbeing now featuring as a clear strategic priority. We continued what worked (and what we have reported in previous ARAs) in our delivery plan and launched new initiatives that respond to our organisation and colleagues' diverse needs.

#### Physical and mental health

We've continued to provide flu vouchers and on-site health checks, and introduced a new Menopause policy. We also partnered with healthcare experts to support our employees' overall health and wellbeing through delivering insights, talks, and supporting the development of robust and effective policies.

#### Stress and mental health management

We introduced a new stress management policy and toolkit to help our staff manage stress better, especially while working remotely. This was accompanied by specific tools and support for managers to help them have positive and effective conversations with their people who are experiencing stress or challenges related to mental health.

#### Attendance Management policy

We enhanced our former 'sickness absence' policy, providing managers with clearer autonomy and guidance for a more humancentric approach to supporting our people to attend work.

#### Enhanced support networks

There are a range of networks that support our people to have a positive experience of work and that support their wellbeing either directly or indirectly. Our 'Carers at DBS' community for example has grown, and our focus on mental health has helped create a more supportive workplace for colleagues affected by care. Our 'Neurodiversity Group' brings together the rich wealth of experiences of different colleagues and is channelling this around enhancing recruitment practices for all and helping to shape and build our emerging approach to realising the future of work at DBS.

We have learned that personal stories and the authenticity that comes with those really move the dial, drive engagement, and help us deliver positive outcomes that impact our people's lives and in turn, DBS. For example, our work on suicide and physical health checks this year showcases how with minimal investment we can get extremely positive outcomes where symptoms or conditions have been picked up which may have adversely affected employee's performance or attendance at work and their personal lives.

Our staff turnover this year is within our expected parameters. It is 8.68% (2022-23: 3.92%), which is slightly lower than we anticipated when building our DBS Academy model.

DBS was recognised as a 'Happiest Workplace 2023' by WorkL, which is a positive indicator. In the global measure, DBS is listed in the 10,958th position out of hundreds of thousands of organisations worldwide. It tests critical elements such as reward and recognition, pride, job satisfaction, wellbeing, and empowerment. Our score is relative to peers like the Office for National Statistics (7,946th), Crown Commercial Service (11,118th), UK Cyber Security Council (15,579th) and Merseyside Fire & Rescue (17,375th) with many other Civil Service and Public Service organisations recognised too.

#### Learning and Development: DBS Academy: "Unlocking your potential."

The DBS Academy has had another landmark year, its first full year in operation, integrating learning more effectively across the organisation.

#### Innovative learning solutions

We launched our learning portal, which provides tailored learning resources and has greatly improved access to professional development at DBS. This includes a range of courses, resources, microlearning and tools all designed, developed, or curated in response to an organisational needs analysis. This year we piloted and launched 'learning pathways' which typically take place over four weeks for one hour each week. They provide a guided cohort-based micro-learning experience that has proven to be extremely powerful and useful for colleagues so far.

#### **Engagement and accessibility**

Through initiatives like our innovative 'Gift of Learning' campaign, our inaugural annual learning festival, and various targeted communications campaigns, we've increased engagement and supported personal and professional growth across the organisation. We also launched our work shadowing scheme and mentoring scheme helping colleagues at DBS to look beyond a 'course' as learning and to find different and sometimes even more valuable ways of learning across the organisation. DBS launched a refreshed Apprenticeship Framework supporting employees to access specialist and full learning solutions funded by the apprenticeship levy.

#### Strategic development programmes

We continued our impactful People Management programme and the DBS Catalyst programme to help develop leadership skills and support career advancement to support realising the aspirational OneDBS ethos. We have seen the impact of this along with the expert support of our HR Advisory team, managers are dealing with issues informally and resolving challenges. Colleagues who had a goal in our relatively new performance, development and review (PDR) system have significantly increased year on year to 76% which is 16% higher than last year.

Over 1,185 employees (83%) engaged with the Academy's resources more than 72,000 times in its first year illustrating the initiative's early reach and impact. Our research shows that a recent Learning Technology Awards winner in 2023 achieved 16,000 visits in their first 6 months of a new learning platform from a similar-sized workforce. This shows not just people accessing our learning, it indicates value as people keep coming back for more.

The work of our Barring and Safeguarding directorate was celebrated this year after being highly commended by the Civil Service Awards for a talent initiative 'deputy pools' which was piloted and implemented successfully by the directorate.

The DBS Academy was recognised as 'Organisation Development Project of the Year' by the Organisation Development Academy which is an international organisation that exists to champion and celebrate the art, science, and practice of sustainable and impactful organisational development.

# Developing our organisation: "A modern work environment."

We continue to evolve and change as an organisation in support of enhancing our effectiveness and efficiency, and productivity and quality.

#### Pay and reward

The DBS pay and reward offer continues to evolve. In this year we took a 'progressive' approach to the pay remit this year with colleagues nearest the bottom of each grade achieving higher salary increases than peers closer to the top of the grade range.

We also started to introduce enhanced annual leave, so colleagues no longer have to wait until they have 6 years' service to start to benefit from enhanced annual leave.

We approached listening to colleagues prior to the pay remit differently by conducting research to inform our thinking and modelling and we enhanced our engagement and communications approach with all colleagues receiving a personalised pay remit note from the DBS pay lead.

Our work in recognition and reward (R&R) has continued to gather pace, at the

end of the financial year we made use of 64% of our budget available which equates to £77k which continues to show that the DBS is actively thanking, recognising, and rewarding exceptional performance across the organisation.

We introduced an enhanced retail discounts scheme which has been a valuable source of support for our colleagues, at an evaluative checkpoint comparing 2023 to 2024 we saw a 754% increase in savings made and a 500%+ increase in logins across desktop users and our app.

#### **Policy development**

We successfully reviewed, enhanced, and renewed 27 people policies. Our programme of modernisation is gaining traction with simpler, clearer, and easier to use people policies regularly being rolled out. This includes the Attendance Management procedure, Stress Management policy, Disciplinary procedure, Flexible and Remote Working, Performance Development & Review, Bullying, Harassment & Discrimination, Family Friendly policy and many more. We have developed a plan for the future of work, developed our future estates working group and responded to a range of organisational needs in the past year related to shaping the future of work at DBS. The Future of Work plan sets out the future DBS we want to achieve for our people and our organisation in line with strategic objective four. Our Innovation team have developed a range of opportunities that will improve and enhance DBS, and our Change Management and Business Improvement team have developed a Business Process and Service Excellence programme that will help DBS to optimise the organisation, leverage efficiencies and move towards the future of work.

#### **Future outlook**

Looking ahead, DBS will keep focusing on improving our culture through engagement, holistic policy development, shaping the future of work, evolving our pay offer, strategic wellbeing initiatives and impactful learning experiences. We aim to maintain our momentum, ensuring colleagues feel valued and well-equipped for their roles. The past year's efforts show our commitment



#### **Future of Work**

to creating a supportive environment that prioritises the wellbeing and development of our staff.

# Enhancing our focus on equality, diversity, and inclusion

Since 2021, when the board agreed a new plan for equality, diversity, and inclusion, we have introduced corporate EDI goals in performance development reviews (PDRs) and introduced a programme of senior leadership development activities; this included securing champions for several protected characteristics within SLT. We have continued to support board apprenticeship schemes (Black on Board and Boardroom Apprentice). One of the former apprentices was subsequently appointed as an associate non-executive director. We also completed regular staff surveys staff survey which provided a rich data source to use to better understand our workforce and identify any disproportionality that may have existed in our policies and working practices.

There has been a sustained focus on enhancing diversity of representation of protected characteristics within our workforce in order that we reflect the communities that we serve. We have tested different approaches to recruitment to see what works and partnered with other organisations which provide opportunities for different groups to enter the workplace. We have widened our reach through national recruitment campaigns, leading to a more diverse senior leadership group and by utilising partnerships with specialist community organisations like Thrive.

DBS has a KPI for the percentage of the workforce from an ethnic minority background, set at a very stretching 7%. The year-end position was 4.1%; higher than the rate in 2022-23 (2.79%) but still lacking from the target. Changes in our recruitment practice including advertising in a more diverse range of media and in areas with a high proportion of people from an ethnic minority, pre-application support and applicant workshops. These focused workstreams have been further considered in 2023-24 with a view to achieve the target over the medium term and plans developing for greater achievements in 2024-25.

During 2023-24, the team delivered an organisational wide opportunity for learning in relation to PSED and EqIAs, and towards the latter part of the year, significant resources have been made available to the workforce to enhance learning and development in EDI matters. Further work will continue through 2024-25 which aims to significantly achieve the stretching targets outlined as well as a truly inclusive culture. 2023-24 offered the opportunity to fully refresh our EDI efforts and a revised approach to reshape the delivery model so that equality, diversity, and inclusion can and does sit within the heart of the workforce and our customer-facing services do at DBS was agreed during the year for launch in April 2024.

# Remuneration report (audited)

#### **Overview and strategy**

The remuneration report sets out DBS' remuneration policy for directors, how the policy is implemented, the amounts awarded to directors, and where relevant, the link between remuneration and performance.

DBS' remuneration policy is set within HM Treasury guidelines.

#### **Remuneration policy**

The DBS chairman and DBS board members are appointed by the Secretary of State in accordance with the Governance Code on Public Appointments published by the Cabinet Office. Remuneration and allowances for the chairman and each of the members is determined by the Secretary of State. Together, they form the DBS board.

The chief executive officer (CEO) is appointed by DBS following consultation with the Secretary of State. Their remuneration terms are set following consultation with the Home Office and consideration by DBS' RemCo. The remuneration terms are linked to performance objectives and give due weight to the proper management and use of public resources.

The determination of the remuneration packages of other senior officials is also considered by RemCo and considers the work and recommendations of the Senior Salaries Review Body (SSRB) and the government response to this.

# Single total figure of remuneration for each director

This section, including table 11, sets out the salary and allowances, bonuses, noncash benefits, and accrued pension benefits for DBS board members. Throughout the year ending 31 March 2024, the DBS board consisted of non-executive members only.

'Salary' includes gross salary, overtime, and any other allowance to the extent that it is subject to UK taxation. This report is based on payments made by DBS and thus recorded in these accounts.

#### DBS board members' expenses

DBS board members' travel and subsistence expenses for the year ending 31 March 2024 totalled £3.9k (2022-23: £6.0k). All expenses were paid in accordance with DBS policy.

The monetary value of benefits-in-kind only covers benefits provided by DBS and treated by HM Revenue and Customs as a taxable payment. Benefits reported are calculated as the taxable value.

Any benefits-in-kind attributed to DBS board members are in relation to travel, accommodation, and meal costs for board meetings, case committees and other meetings pertinent to DBS operations, including at DBS' 2 main sites.

#### **Bonuses**

The terms of appointment for the chairman and non-executive board members do not include the payment of bonuses. The CEO is entitled to a contractual bonus award of up to £17.5k per annum based on quarterly performance.

#### Payments to past directors

During 2023-24, there were no payments to past non-executive directors or directors of DBS.

#### Payments to third parties

During the period no payments were made to third parties for the services of board members.

#### **Senior salaries**

#### Table 11: Senior salaries for non-executive directors

Non-executive	Sala	ry (£)	Benefit - in - kind*		Total	
directors	(£'C	000)	(to the nea	arest £100)	(to the nearest £100)	
	2023-24	2022-23	2023-24	2022-23	2023-24	2022-23
Gillian Fairfield, Chairman	40-45	40-45	300	2,000	40-45	40-45
Glenn Houston (until 14 April 2023)	0-5 (10-15)	10-15	-	200	0-5 (10-15)	10-15
Samantha Durrant	5-10	10-15	800	1200	10-15	10-15
David Banks (until 7 April 2023)	0-5 (10-15)	10-15	-	800	0-5 (10-15)	10-15
Mary Cunneen	5-10	10-15	500	900	10-15	10-15
Neil Rhodes	10-15	10-15	1,300	900	10-15	10-15
Julian Blazeby (from 17 April 2023)	5-10 (5-10)	-	700	-	10-15 (10-15)	-
Emir Feisal (from 17 April 2023)	5-10 (5-10)	-	300	-	5-10 (5-10)	-

Figures in brackets reflect the full year equivalent of the salary for individuals who left during the reporting year.

\*Benefits-in-kind relate wholly to taxable travel and expenses (due to workplace tax regulations) incurred in the necessary course of performance of duties

Executive directors		lary )00)		nus nents 100)	ts benefits in-kind (to (£'000)		in-kind (to			
	23-24	22-23	23-24	22-23	23-24	22-23	23-24	22-23	23-24	22-23
Eric Robinson	170- 175	160- 165	15- 20	15- 20	(65)	(89)	-	-	120- 125	90-95
Paul Whiting	125- 130	115- 120	-	0-5	46	46	-	-	170- 175	165- 170
lan Benson	120- 125	115- 120	-	0-5	46	46	400	-	170- 175	165- 170
Claire Graves	105- 110	100- 105	-	0-5	43	39	-	-	150- 155	140- 145
lan Johnston	115- 120	105- 110	-	0-5	45	42	-	-	160- 165	150- 155
Paul Lowton	25-30 (75- 80)	-	-	-	50	-	-	-	75-80 (125- 130)	-
Andrew Robertson	120- 125	115- 120	0-5	0-5	46	46	-	-	170- 175	165- 170
Suzanne Smith (until 30 Nov 23)***	170- 175 (110 -115)	110- 115	-	-	-	44	-	-	170- 175 (110- 115)	150- 155
Barry Topham	115- 120	110- 115	0-5	-	46	44	-	-	165- 170	155- 160
Rachel Welch	110- 115	105- 110	-	0-5	45	42	-	-	155- 160	150- 155

#### Table 12: Senior salaries for directors

\*\* The value of pension benefits accrued during the year is calculated as the real increase pension multiplied by 20, less the contributions made by the individual. The real increase excludes increases due to inflation or any increase or decrease due to a transfer of pension rights. This value derived does not represent an amount that will be received by the individual. It is a calculation that is intended to provide an estimation of the potential benefit of being a member of the pension scheme.
\*\*\* As part of the exit package for the Executive Director for Barring and Safeguarding, DBS paid £202k into the Civil Service Pension Scheme.

\*\*\* As part of the exit package for the Executive Director for Barring and Safeguarding, DBS paid £202k into the Civil Service Pension Scheme. The remuneration includes salary in year of £75k-£80k (FYE £110k-£115k) as well as payment for compensation in lieu of notice, excess leave and exit package totalling £90k-£95k"

#### **Pension benefits**

#### Table 13: Pension benefits for directors

	Accured pension at pension age at 31/03/24	Real increase in pension and related lump sum at pension age	CETV* at 31/03/24	CETV* at 31/03/23	Real increase in CETV
Directors	£'000	£'000	£'000	£'000	£'000
Eric Robinson	145-150	0	2,701	2,514	(66)
Paul Whiting	25-30	2.5-5	452	364	35
lan Benson	10-15	2.5-5	134	89	25
Claire Graves	15-20	2.5-5	212	159	26
lan Johnston	25-30	2.5-5	423	338	36
Paul Lowton	35-40 plus a lump sum of 100-105	0-2.5 plus a lump sum of 5-7.5	858	778	49
Andrew Robertson	5-10	2.5-5	130	84	27
Suzanne Smith	-	-	-	-	-
Barry Topham	20-25	2.5-5	287	224	29
Rachel Welch	25-30	2.5-5	365	294	29

\*CETV stands for cash equivalent transfer value

#### **Civil Service pensions**

The Principal Civil Service Pension Scheme (PCSPS) and the Civil Servant and Other Pension Scheme (CSOPS) – known as 'alpha' – are unfunded multi-employer defined benefit schemes, but DBS is unable to identify its share of the underlying assets and liabilities. The scheme actuary valued the PCSPS as at 31 March 2020. You can find details in the resource accounts of the Cabinet Office: Civil Superannuation.

For 2023-24, employers' contributions of £10.2m were payable to the pension schemes (2022-23: £7.6m) at 1 of 4 rates in the range of 26.6% to 30.3% of pensionable earnings, based on salary bands. The scheme actuary reviews employer contributions, usually every 4 years following a full scheme valuation. The contribution rates are set to meet the cost of the benefits accruing during 2023-24 to be paid when the member retires and not the benefits paid during this period to existing pensioners. The scheme actuary has set the employer contributions from 1 April 2024 at 28.97% for all members, and DBS expects to contribute circa £11.6m to the pension scheme in 2024-25. Any surplus or deficit on the scheme is controlled through employer and employee contribution rates, as set by the scheme's actuary.

Employees can opt to open a partnership pension account, which is a stakeholder pension with an employer contribution. Employers' contributions are paid to one or more of the panels of 3 appointed stakeholder pension providers. Employer contributions are age-related and range from 8% to 14.75%.

Employers also match employee contributions up to 3% of pensionable earnings (in addition to the employer's basic contribution).

In addition, employer contributions of 0.5% of pensionable pay, were payable to the PCSPS to cover the cost of the future provision of lump sum benefits on death

in service or ill-health retirement of these employees.

#### Cash equivalent transfer values

A cash equivalent transfer value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme.

A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are worked out in accordance with The Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from lifetime allowance tax, which may be due when pension benefits are taken.

CETV figures are calculated using the guidance on discount rates for calculating unfunded public service pension contribution rates that was extant at 31 March 2023. HM Treasury published updated guidance on 27 April 2023; this guidance will be used in the calculation of 2023-24 CETV figures.

#### **Real increase in CETV**

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This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation or contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement). It uses common market valuation factors for the start and end of the period.

#### Fair pay disclosures

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid director in their organisation and the median remuneration of the organisation's workforce. The median represents the remuneration of that staff member that lies in the middle of the linear distribution of the total staff, excluding the highest-paid director.

Total remuneration includes salary, nonconsolidated performance-related pay, and benefits-in-kind. It does not include severance payments, employer pension contributions, or the CETV of pensions.

# Relationship between the highest-paid director's total remuneration and the remuneration of the DBS workforce

The banded remuneration of the highestpaid director in DBS in the financial year 2023-24 was £185k to £190k (2022-23: £175k to £180k) where bonuses payable are unchanged between years.

The average salary and allowances in 2023-24 has increased by 4.4% since 2022-23. In 2023-24, 0 (2022-23: 0) employees received remuneration in excess of the highest-paid director.



Table 14.1: Relationship between the highest-paid director's total remuneration and the
median remuneration of the DBS workforce

Year	25th Percentile	Median Pay	75th Percentile
2023-24 ratio	7.43:1	6.39:1	5.63:1
2023-24 remuneration	£25,210	£29,344	£33,262
2022-23 ratio (restated)	7.03:1	5.99:1	5.19:1
2022-23 remuneration (restated)	£23,115	£27,139	£31,327

The changes in ratio and remuneration are materially because of the 2023-24 Civil Service Pay Remit which was weighted towards our AO and EO grades. The range of remuneration received by the DBS workforce is £20k-£25k and £185k-£190k.

Table 14.2: Relationship between the highest-paid director's salary-only remuneration and the median salary-only remuneration of the DBS workforce

Year	25th Percentile	Median Pay	75th Percentile
2023-24 ratio	6.84:1	5.88:1	5.19:1
2023-24 remuneration	£25,210	£29,344	£33,362
2022-23 ratio (restated)	7.68:1	6.54:1	5.66:1
2022-23 remuneration (restated)	£23,115	£27,148	£31,356

The changes in ratio and remuneration are materially because of the 2023-24 Civil Service Pay Remit which was weighted towards our AO and EO grades. The range of salary-only remuneration received by the DBS workforce is £20k-£25k and £175k-180k.

Disclosures relating to 2022-23 in both tables 14.1 and 14.2 have been restated to ensure the calculation methodology is consistent between financial years.



# Staff Report

#### Staff costs comprise (audit)

#### Table 15: Staff costs comprise (audit)

	Permanently employed & fixed term appointment staff	Others	2023-24 Total	2022-23 Total
	£'000	£'000	£'000	£'000
Wages and salaries	42,294	3,342	45,635	39,144
Social security costs	4,533	0	4,533	4,079
Other pension costs	10,260	0	10,260	9,253
Total net costs	57,086	3,342	60,428	52,476

Please refer to commentary in the Financial Performance section on page 49 regarding increased costs in 2023-24.

# Average number of persons employed (audited)

The average number of full-time equivalent persons (excluding non-executive directors) employed during the year was 1,158 (compared to 1,093 in 2022-23).

#### Spend on consultancy and temporary staff

DBS continues to reduce the usage of consultancy and temporary staff, though continues to utilise short-term expertise where value for money and efficiency requirements are met.

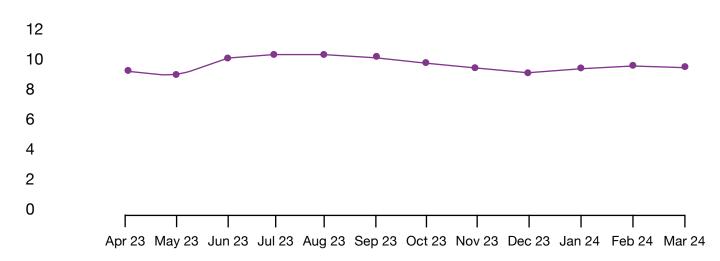
#### Table 16: DBS headcount for the last 3 years

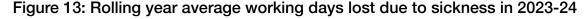
	2023-24	2022-23	2021-22
Directly employed	1,327	1,262	1,181
Fixed term appointments	15	112	52
Agency	0	0	4
Contingent labour in-year	19	18	21
Total	1,361	1,392	1,258

The 12-month rolling year average working days lost (RYAWDL) representing the period 1

#### Staff sickness

April 2023 to 31 March 2024 was 8.27 days.





#### Public Sector Equality Duty

DBS is committed to fulfilling its responsibilities under the Equality Act 2010 and the subsequent Public Sector Equality Duty (PSED) 2011. The duty requires public authorities to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. Under the Equality Act 2010, it is unlawful for us to treat any persons less favourably on the grounds of a protected characteristic. In addition to the Equality Act, the PSED 2011 also places obligations on DBS to consider how our decisions, systems, and policies affect those with different protected characteristics.

The DBS EDI charter was launched in 2021-22 and included a strong focus on both internal and external customer needs.

#### People

DBS participated in a further benchmarking review in May 2023 to assess its progress

using the Employers' Network for Equality and Inclusion's (ENEI) Talent Inclusion and Diversity Evaluation (TIDE). This was DBS' fourth TIDE submission.

The TIDEmark allows DBS to measure progress in EDI practice in comparison with peers. DBS ranked 51 out of 171 organisations who participated in the TIDEmark in 2022.

We received an overall score of 71% for 2023. Our overall score was 69% for 2022, 64% for 2021, 68% for 2020, and 40% in 2019.

Our 2023 overall score identified that we are working well within the following areas: workforce, strategy and planning, recruitment and attraction, and communication and engagement. There are increases in 'workforce' and 'communication and engagement' from the previous year.

However, similar to previous years, our overall score was reduced by the improvements needed in our learning and development offer and constraints within our commercial and procurement processes from an EDI perspective.

EDI has continued to be a priority in the development of the DBS Academy in 2023-24. As our academy offer continues to progress in 2024-25, we will include training that related to lived experiences, bias, and equality impact assessment completion.

#### Customer

During 2023-24, we have developed this work further through the ongoing Support and Reasonable Adjustments group (SARA) to improve customer-facing processes and undertook a collaborative approach to phase 1 of our accessibility review; this will continue throughout 2024-25 and ensure that all elements of accessibility and inclusion are considered within DBS products and services. We aspire to be seen as a supportive, progressive, listening organisation in our service delivery, where no customer groups are discriminated against in their access to, and understanding of, our services, products, and processes, or in their implementation. For this reason, the refreshed DBS strategy and 2023-24 business plan supported DBS' vision to move the organisation beyond compliance and one that truly embraces EDI.

The equality impact assessment process is embedded within our governance of both policy and change activity. These are scrutinised by the policy review group, SLT, and board as part of the approvals process and enhanced training for staff in this area was delivered in 2023-24.

The Public Sector Bodies Accessibility Regulations (PSBAR), enacted in 2018, require all websites and web-based platforms to be accessible. This regulation required public sector bodies to achieve specific accessibility standards for all existing websites and web-based platforms by 23 September 2020. DBS publishes an accessible documents policy on our website. This explains how accessible our documents are and how different formats can be obtained. DBS continues to make improvements to some of our older (pre-2018) documents. We have also launched an accessibility policy and guidance to support further improvements in accessibility.

#### Gender pay gap

The mean difference recorded at DBS for 2023 is 8.09%, against the UK mean gender pay gap of 14.3% . The DBS gap reduced from 2017 to 2019 from 5.50% to 2.00% and has increased since then, from 2.00% in 2019 to 6.77.% in March 2022.

The mean hourly rate for male employees was  $\pounds16.69$  per hour, and for female employees, it was  $\pounds15.34$  per hour. This means that male employees earned an average of  $\pounds1.35$  per hour more than female employees, compared to earning an average of  $\pounds1.10$  pence more per hour than female employees in 2022. This is used because it includes all pay from the lowest to the highest, but it can be affected by the highest earners.

The reasons behind this increase are varied and we know that workforce distribution drives gender pay gaps. Whilst there are more female employees working at DBS, and there are more female than male employees in all 4 pay quartiles, male employees are represented more in the higher pay ranges and so their average pay is higher.

Although we are disappointed that we are not making the progress we had hoped, we have a sound understanding of the drivers for the increase in the mean gender pay gap at DBS, and a robust action plan in place to address these.

#### Staff composition and gender

#### Table 17: Staff composition by headcount as at 31 March 2024

	Male	Female	Total
Non-executive directors	3	2	5
Executive directors	5	0	5
Directors	2	2	4
Other senior civil servants	1	0	1
Board apprentices*	0	1	1
All other employees	491	841	1,332
Total	502	846	1,348

\*The headcount for board apprentices represents those who are part of DBS' board apprentice programme as part of its commitment to support EDI. These board apprentices participate in board discussions but are not members of the board and have no voting rights.

headcount at 31 March 2024 (excluding agency staff, contractors, and non-executive

#### **Reporting under Equality Act**

#### Diversity data

The following data is based on the DBS

#### Table 18: Staff split by age

16-19	20-29	30-39	40-49	50-59	60+	Total
29	169	311	362	348	123	1,342

directors).

#### Table 19: Staff split by ethnicity

Black, Asian and minority ethnic (BAME)	White	Prefer not to say	Unknown	Total
55	960	24	303	1,342

#### Table 20: Staff split by disability

Disabled	No disability	Prefer not to say	Unknown	Total
102	750	31	459	1,342

#### Table 21: Staff split by sexual orientation

Blank	Hetrosexual/Straight	LGBTQ	Prefer not to say	Total
315	937	36	54	1,342

#### Health and safety

There were no major health and safety incidents recorded in-year.

of departure. Where DBS has agreed early retirements, the additional costs are met by DBS and not by the Civil Service pension scheme.

Exit costs are accounted for in full in the year

Exit packages (audited)

#### Table 22: Exit packages in 2023-24

Comparative data for previous years is shown in brackets.

Exit package cost band	Number of compulsory redundancies	Number of other departures agreed	Total number of exit packages by cost band
£0,000 - £50,000	-	2 (0)	2 (0)
£100,000 - £150,000	-	1 (0)	1 (0)
£250,000 - £300,000	-	1 (0)	1 (0)
Total number of exit packages	-	4 (0)	4 (0)
Total resource cost/£'000	-	496 (0)	496 (0)

Ill-health retirement costs are met by the pension scheme and are not included in the above table.

Redundancy and other departure costs, where paid, are calculated in accordance with the Civil Service compensation scheme, a statutory scheme made under the Superannuation Act 1972.

# Staff policies applied during the financial year

DBS introduced and updated the following HR policies in 2023-24:

- · Resourcing policy and procedure
- Grievance procedure
- Code of Conduct

- Stress Management policy
- Menopause policy
- Learning & Development policy
- Eyesight procedure
- Staff departure procedure
- · Flexi scheme guidance
- Annual leave procedure
- Childcare support policy
- Whistleblowing procedure
- Lone Working policy (published subsequent to the year-end)

• Disciplinary procedure (published subsequent to the year-end)

• Apprenticeship Framework (published subsequent to the year-end)

#### **Off-payroll engagements**

During 2023-24, there were 30 off-payroll engagements (contingent labour) with a total cost of £3.6m, with 17 contractors being paid more than £245 per day.

Following the <u>Review of Tax Arrangements</u>

of Public Sector Appointees published by the Chief Secretary to the Treasury on 23 May 2012, NDPBs must publish information on their high-paid and/or senior off-payroll engagements.

The expertise brought in through contractors included technical architecture and tooling for system builds, project managers and programme directors to support delivery of the DBS Strategy, alongside specialist commercial expertise to support contracting and procurement.

## Spend on consultancy services and temporary staff

Table 23: Total number of off-payroll engagements, as at 31 March 2024, who are earning in excess of £245 per day

	No. of Appointments
Number of existing engagements as at 31 March 2024	17
Of which	
Number that have existed for less than 1 year at time of reporting	12
Number that have existed for between 1 and 2 years at time of reporting	2
Number that have existed for between 2 and 3 years at time of reporting	0
Number that have existed for between 3 and 4 years at time of reporting	3

# Table 24: All new off-payroll engagements between 1 April 2023 and 31 March 2024, for more than £245 per day

	No. of Appointments
Number of engagements between 1 April 2023 - 31 March 2024	19
Of which	
Number assessed as caught by IR35	19
Number assessed as not caught by IR35	0
Number engaged directly (via PSC contracted to DBS) and are on DBS payroll	0
Number of engagements reassessed for consistency or assurance purposes during the year	0
Number of engagements that saw a change to IR35 status following the consistency review	0

Table 25: Engagements of board members and/or senior officials with significant financial responsibility, between 1 April 2023 and 31 March 2024

	No. of Appointments
Number of off-payroll engagements of board members and/or senior officials with significant financial responsibility, during the financial year	0
Total number of individuals on payroll and off-payroll that have been deemed board members and/or senior officials with significant financial responsibility, during the financial year	10

#### Trade union facility time

The Trade Union (Facility Time Publication Requirements) Regulations 2017 require certain public sector employers to publish information on facility time used by trade union representatives. This document sets out the relevant trade union facility time data for DBS covering the period 1 April 2023 to 31 March 2024.

The information below is based on several

assumptions for Public and Commercial Services (PCS) Union facility time.

There were 13 employees who were Trade Union representatives at DBS during the period 1 April 2023 to 31 March 2024.

Trade Union representatives for the period undertake facility time for no more than 50%

of their contracted hours, their activities included duty and activity. As at 31st March 2024, PCS representatives had used 16.5% of their facility time allocation.

The total cost of facility time represents the total salaries of all staff excluding contractors and overtime.

# Table 26: Percentage of pay bill spent on facility time in the period 1 April 2023 to 31 March 2024

Total cost of facility time (£000)*	34.7
Total pay bill (£000)	34,700
Percentage of the total pay bill spent on facility time	0.1%

\*Facility time is calculated retrospectively and is based on the pay bill from 2023-24

# Parliamentary accountability and audit report

#### Regularity of expenditure (audited)

#### **Overview**

DBS continues to operate as a self-funding non-departmental public body of the Home Office, on a full cost-recovery basis.

Our annual income is dependent upon the volumes of applications received for both paid DBS checks and Update Service subscriptions, with different levels of fees being charged for our products, as noted in the section headed 'Our activities'.

The fees derived by DBS are also used to fund volunteer applications and subscriptions, which are provided to Standard, Enhanced, and Enhanced with Barred List(s) DBS check customers free-of-charge.

DBS is expected to make neither a surplus nor deficit. In advance of each financial year, a budget is set which includes estimated costs to deliver our services and priorities for that year, reflecting estimates of service demand, efficiency, service transition timeframes, and risk.

We seek to reduce our fees where possible and pass savings back to customers and our fees have remained unchanged since the last reduction in April 2022. From Monday 2nd December 2024 however, fees for DBS checks will increase in order to meet the increased operational costs of delivering DBS' safeguarding service. Further detail surrounding fee setting can be found under 'Financial performance' within the 'Performance summary' section.

Consideration was given by both DBS and the Home Office during 2018-19 as to how our historical, current, and potential future year surpluses are to be remitted to the Home Office (and ultimately to Treasury's Consolidated Fund as a 'consolidated fund

# extra receipt'), in line with <u>HM Treasury's</u> <u>'Managing Public Money' requirements</u>.

During 2023-24, DBS made no settlement of monies due back to the consolidated fund, retaining a balance to ensure it met its financial working capital requirements throughout the financial year. However, DBS did transfer historic surpluses made from the Criminal Records Bureau to the consolidated fund extra receipts payables, and will continue to assess when these surpluses can be remitted to the consolidated fund. Refer to note 11 for further detail.

# Charging for services within Crown Dependencies

The power for the DBS to charge fees for criminal record certificates is set out in legislation under The Police Act 1997. That Act gives the power to make regulations to set the prescribed fee for each product. The Home Office recently identified that it had not laid statutory instruments prescribing certain fees within the Crown Dependencies, specifically for the Update Service in Jersey, Guernsey, and the Isle of Man or for Basic certificates in the Isle of Man and Guernsey. DBS makes proposals on potential fee changes to the Home Office, which is responsible for amending the regulations that set out the fees, if such changes are approved at ministerial level. DBS are not involved in the legislative process. DBS were not advised that these fees were not set out in regulations when charging fees for the services within the Crown Dependencies. DBS has urgently assessed the potential risks and impacts of this issue whilst Home Office works to correct the legislation at the earliest opportunity. As Accounting Officer, I have considered whether the historic charging for products from applicants in the affected Crown Dependencies is regular, and I have determined that these payments are deemed irregular as the statutory instruments were not in place. However, although these payments are deemed irregular. I am satisfied that DBS has acted within the intent of Parliament and that the payments are immaterial to DBS's accounts as a whole. With fees for the Update Service and Basic certificates introduced on the commencement of the services in 2013 and 2018 respectively, it is reasonable to assess that Parliament did not intend for the relevant SIs to exclude Crown Dependencies, with an associated unintended impact that customers from other geographical areas or taxpayers would be required to in effect subsidise DBS costs for these services to the Crown Dependencies. However, DBS recognises that charging for the services cannot continue until updated regulations are laid.

From 1 August 2024, DBS, in collaboration with the Home Office, stopped charging for services in the affected regions until the necessary SIs are revised. Additionally, Home Office, HM Treasury and DBS are considering how to ensure fees already paid when they had not been set out in regulations are not erroneously retained by the DBS. Up to 31 March 2024, DBS have collected approximately £1.2m in fees and has created a provision equal to that amount. The Home Office's Permanent Secretary and Principal Accounting Officer advised he looks to

"Our annual income is dependent upon the volumes of applications received for both paid DBS checks and Update Service subscriptions." the DBS to set out what options it has for covering any additional pressures; something I have worked with our Home Office sponsor to progress.

#### Parliamentary accountability disclosures

#### Losses and special payments (audited)

There were 16 cases of fruitless payments during 2023-24, totalling £5k, and 5 fruitless payments in 2022-23, totalling less than £1k.

There were 483 cases of Ex-Gratia and 6 other special payments totalling £94k in 2023-24. There were 174 cases of Ex-Gratia and 6 other special payments in 2022-23 totalling £64k. These payments relate to legal cases and claims from DBS customers for loss of earnings as a result of delays in processing DBS checks and claims for maladministration. Ex-Gratia payments are restricted to delays related solely to DBS processing.

These financial statements have been prepared in accordance with the Protection of Freedoms Act 2012 and are subject to audit by the Comptroller and Auditor General. The audit fee for this reporting period for DBS was £138k (2022-23: £109k). No remuneration was paid to the National Audit Office for non-audit work.

#### Gifts (audited)

No gifts were made or received during the reporting period that meet the requirements prescribed in HM Treasury's 'Managing Public Money'.

#### Remote contingent liabilities (audited)

There were no remote contingent liabilities as at 31 March 2024. Note **17** of the accounts provides further disclosures relating to contingent liabilities.

#### Fees and charges (audited)

DBS has a financial objective to achieve full cost recovery.

#### Table 27: DBS fees and charges

Activity		2023-24				2022-23
	Income	Costs	Surplus/ (deficit)	Actual % recovery	Planned % recovery	Surplus/ (deficit)
	£'000	£'000	£'000			£'000
Basic DBS checks	48,114	(47,719)	395	101%	100%	1,717
Standard DBS checks	7,166	(6,351)	815	113%	100%	100
Enhanced DBS checks*	136,041	(132,895)	3,146	102%	100%	15,529
Update Service	23,582	(23,348)	234	101%	100%	2,720
DBS Adult First	1,087	(1,118)	(31)	97%	100%	155
Other**	5	0	5	100%	100%	0
Total***	215,995	(211,431)	4,564	102%	100%	20,221

\*Enhanced DBS checks includes Enhanced checks both with and without a check of the Barred Lists

\*\*'Other' relates primarily to income (and associated costs) for applications by Registered Bodies and countersignatories.

\*\*\*The total cost and surplus is different to that recorded in the Statement of Comprehensive Net Expenditure due to the treatment of the legal case and crown dependencies provision reported in Note 12 which is not attributed to any product in 2023/24.

A description of the key DBS products can be found in the 'Performance report' section of this annual report.

Total costs are apportioned to each product, based on the share of those applicable. Where appropriate, barring costs are now allocated directly to the source of costs, and otherwise across all products based on full-time equivalent headcount. The cost of delivering services for volunteers are allocated to the original source product. This information is provided for the fees and charges requirements of HM Treasury only, and not for International Financial Reporting Standards (IFRS) 8 purposes.

IFRS 8 disclosures relating to operating costs by operating segment are included in note 2 of the accounts.

	Costs £'000	Applications (000)	Notional Cost (£)
Basic DBS checks	47,720	2,673	17.85
Standard DBS checks	6,351	398	15.97
Enhanced DBS checks*	132,895	3,582	37.10
Update Service subscriptions	23,348	1,965	11.88
DBS Adult First	1,118	184	6.07

# Table 28: Notional cost per paid application received in 2023-24

\*Enhanced DBS checks includes Enhanced checks both with and without a check of the Barred Lists

Depreciation charges apply to all products whilst the cost of capital is excluded. Paid checks this year were 81.2% of the total Enhanced DBS checks compared with 81.4% in prior year reflecting the stability in volunteer applications.

Table 29: Notional cost per paid and volunteer applications received in 2023-24

	Costs £'000	Applications (000)	Notional Cost (£)
Basic DBS checks	47,720	2,673	17.85
Standard DBS checks	6,351	414	15.33
Enhanced DBS checks*	132,895	4,409	30.14
Update Service subscriptions	23,348	2,861	8.16
DBS Adult First	1,118	184	6.07

\*Enhanced DBS checks includes Enhanced checks both with and without a check of the Barred Lists The cost of processing a paid DBS check recovers the free-of-charge volunteer applications (18.6% Enhanced, 4% Standard, 34.4% Update Service and 0% Basic) based on full cost-recovery methodology. The volumes above differ marginally to those disclosed within the 'analysis of performance section' due to timing issues arising from how volumes are recorded in our operations process compared to the financial system.

S.M.

Eric Robinson, Accounting Officer 24 January 2025



# The Certificate and Report of the Comptroller and Auditor General to the Houses of Parliament

#### **Opinion on financial statements**

I certify that I have audited the financial statements of the Disclosure and Barring Service for the year ended 31 March 2024 under the Protection of Freedoms Act 2012. The financial statements comprise the Disclosure and Barring Service's:

Statement of Financial Position as at 31
March 2024;

• Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended

• the related notes including the significant accounting policies

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards. In my opinion, the financial statements:

• give a true and fair view of the state of the Disclosure and Barring Service's affairs as at 31 March 2024 and its net operating expenditure for the year then ended; and

• have been properly prepared in accordance with the Protection of Freedoms Act 2012 and Secretary of State directions issued thereunder.

#### **Opinion on regularity**

In my opinion, in all material respects, the

income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

#### **Basis for opinions**

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2022). My responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's Revised Ethical Standard 2019. I am independent of the Disclosure and Barring Service in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

#### Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Disclosure and Barring Service's use of the going concern basis of accounting in the preparation of the financial statements is appropriate. Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on Disclosure and Barring Service's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Disclosure and Barring Service's is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

#### Other information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

#### **Opinion on other matters**

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with Secretary of State directions issued under the Protection of Freedoms Act 2012. In my opinion, based on the work undertaken in the course of the audit:

• the parts of the Accountability Report subject to audit have been properly prepared in accordance with Secretary of State directions made under the Protection of Freedoms Act 2012; and

• the information given in the Performance and Accountability Reports for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

#### Matters on which I report by exception

In the light of the knowledge and understanding of the Disclosure and Barring Service and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance and Accountability Reports. I have nothing to report in respect of the following matters which I report to you if, in my opinion:

 adequate accounting records have not been kept by the Disclosure and Barring Service or returns adequate for my audit have not been received from branches not visited by my staff; or

· I have not received all of the information and

explanations I require for my audit; or

• the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or

• certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or

• the Governance Statement does not reflect compliance with HM Treasury's guidance.

# Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;

 providing the C&AG with additional information and explanations needed for his audit;

• providing the C&AG with unrestricted access to persons within the Disclosure and Barring Service from whom the auditor determines it necessary to obtain audit evidence;

• ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error; • preparing financial statements which give a true and fair view in accordance with Secretary of State directions issued under the Protection of Freedoms Act 2012;

• preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Secretary of State directions issued under the Protection of Freedoms Act 2012; and

 assessing the Disclosure and Barring Service's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Disclosure and Barring Service will not continue to be provided in the future.

# Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Protection of Freedoms Act 2012.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of noncompliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting noncompliance with laws and regulations, including fraud is detailed below.

### Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

• considered the nature of the sector, control environment and operational performance including the design of the Disclosure and Barring Service's accounting policies.

• inquired of management, the Disclosure and Barring Service's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Disclosure and Barring Service's policies and procedures on:

- identifying, evaluating and complying with laws and regulations;
- detecting and responding to the risks of fraud; and

• the internal controls established to mitigate risks related to fraud or non compliance with laws and regulations including the Disclosure and Barring Service's controls relating to the Disclosure and Barring Service's compliance with the Protection of Freedoms Act 2012 and Managing Public Money;

• inquired of management, the Disclosure and Barring Service's head of internal audit and

those charged with governance whether:

- they were aware of any instances of non compliance with laws and regulations;
- they had knowledge of any actual, suspected, or alleged fraud;

• discussed with the engagement team, regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Disclosure and Barring Service for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions, and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Disclosure and Barring Service's framework of authority and other legal and regulatory frameworks in which the Disclosure and Barring Service operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Disclosure and Barring Service. The key laws and regulations I considered in this context included the Protection of Freedoms Act 2012, Managing Public Money, employment law, tax Legislation, The Police Act 1997.

Audit response to identified risk To respond to the identified risks resulting

from the above procedures:

• I reviewed the financial statement disclosures and testing to supporting

documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;

• I enquired of management, the Audit and Risk Committee and in-house legal counsel concerning actual and potential litigation and claims;

• I reviewed minutes of meetings of those charged with governance and the Board and internal audit reports;

• I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business; and

• I performed substantive testing of income streams and confirmed appropriate fees had been applied and the performance obligation had been met.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities

for the audit of the financial statements is located on the Financial Reporting Council's website at: <u>www.frc.org.uk/</u> <u>auditorsresponsibilities</u>. This description forms part of my certificate.

#### Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

#### Report

I have no observations to make on these financial statements.

Gareth Davies Comptroller and Auditor General

Date: 24 January 2025

National Audit Office 157-197 Buckingham Palace Road Victoria, London, SW1W 9SP



# **Financial Statements**

# Statement of Comprehensive Net Expenditure for the Year Ended 31 March 2024

for the Year Ended 31 March 2024			
		2023-24	2022-23
	Note _	£'000	£'000
Revenue from contracts with customers	5	(215,995)	(217,079)
Other operating income		(0)	(0)
Total operating income	_	(215,995)	(217,079)
Staff costs	3	60,428	52,476
Purchase of goods and services	4	145,582	133,798
Depreciation and amortisation charges	6,7	4,631	9,446
Provision expense	12	14,852	157
Interest Expense	15	24	33
Other operating expenditure	4	739	948
Total operating expenditure	_	226,256	196,858
Net expenditure/(Income) for the period	_	10,261	(20,221)
Other comprehensive net expenditure			
Items which will not be reclassified to net operating costs:	Note		
Less net (gain)/loss on revaluation of property plant and equipment	6	(17)	(18)
Less net (gain)/loss on revaluation of intangible assets	7	19	(215)
Comprehensive net expenditure for the period	_	10,263	(20,454)

The notes on pages 125 to 144 form part of these accounts.

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#### **Statement of Financial Position**

as at 31 March 2024

as at 31 March 2024			
		2023-24	2022-23
	Note	£'000	£'000
Non-current assets:			
Property, plant, and equipment	6	2,119	3,161
Intangible assets	7	13,172	12,865
Total non-current assets:	_	15,291	16,026
Current assets:			
Trade and other receivables	9	16,687	22,734
Cash and cash equivalents	10	82,522	72,622
Total current assets:	_	99,209	95,356
Total assets	_	114,500	111,382
Current liabilities:			
Trade and other payables	11	(96,609)	(73,086)
Provisions	12	(14,968)	(227)
Lease liabilities	15	(1,000)	(990)
Total current liabilities	_	(112,577)	(74,303)
Total assets less current liabilities	_	1,923	37,079
Non-current liabilities:			
Provisions	12	(603)	(603)
Lease liabilities	15	(1,139)	(2,139)
Total non-current liabilities	_	(1,742)	(2,742)
Total assets less total liabilities	_	181	34,337
Taxpayers' equity and other reserves:			
General fund		37	34,098
Revaluation reserve		144	239
Total equity	_	181	34,337
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Eric Robinson, Accounting Officer. 24 January 2025

The financial statements on pages 119 to 144 were approved by Eric Robinson as Accounting Officer for the Disclosure and Barring Service. The notes on pages 125 to 144 form part of these accounts.

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### Statement of Cash Flows

for the Year Ended 31 March 2024

for the Year Ended 31 March 2024			
	Note	2023-24 £'000	2022-23 £'000
Cash flows from operating activities Retained income for the year	SoCNE	(10,261)	20,221
Adjustments for non-cash transactions		19,415	9,519
(Increase)/decrease in trade and other receivables	9	6,047	(2,899)
Less movements in receivables not passing through the statement of comprehensive net expenditure		92	94
Increase/(decrease) in trade payables and other payables	11	23,523	(17,864)
Less movements in payables relating to items not passing through the statement of comprehensive net expenditure		(23,893)	25,877
Use of provisions		(111)	(78)
Net cash inflow from operating activities		14,812	34,870
Cash flows from investing activities Purchase of intangible assets		(3,898)	(4,720)
Net cash outflow from investing activities		(3,898)	(4,720)
Cash flows from financing activities Capital element of payments in respect of lease liabilities		(990)	(903)
Interest element of payments in respect of lease liabilities		(24)	33
Consolidated fund extra receipts payable (funding returned to Home Office)	ł	-	(45,000)
Net financing		(1,014)	(45,870)
Net increase/(decrease) in cash and cash equivalents in the period		9,900	(15,720)
Cash and cash equivalents at the beginning of the period	<b>1</b> 0	72,622	88,342
Cash and cash equivalents at the end of the period	10	82,522	72,622
The notes on pages 125 to 144 form part of these account	c		

The notes on pages 125 to 144 form part of these accounts.

# Statement of Changes in Taxpayers' Equity

for the Year Ended 31 March 2024	Note	General Fund £'000	Revaluation Reserve £'000	Taxpayers Equity £'000
Balance at 1 April 2022	SoFP	33,482	174	33,656
Comprehensive net expenditure for the year Amounts payable to the consolidated fund	SoCNE 11	20,221 (19,773)		20,221 <b>(19,773)</b>
Non-Cash Adjustments: Net gain/(loss) on revaluation	6,7		233	233
Movement in reserves: Transfers between reserves		168	(168)	-
Balance at 31 March 2023	SoFP	34,098	239	34,337
Balance at 1 April 2023	SoFP	34,098	239	34,337
Comprehensive net expenditure for the year Amounts payable to the consolidated fund	SoCNE 11	(10,261) (23,893)		(10,261) (23,893)
Non-cash adjustments: Net gain/(loss) on revaluation	6,7		(2)	(2)
Movement in reserves: Transfers between reserves		93	(93)	-
Balance at 31 March 2024	SoFP	37	144	181

The notes on pages 125 to 144 form part of these accounts.

This statement shows the movement in the year on the different reserves held by DBS analysed into Taxpayers' equity. The Revaluation reserve reflects the change in asset values that have not been recognised as income or expenditure. The General fund represents the total assets less liabilities of an entity, to the extent that the total is not represented by other reserves and financing items.





# Notes to the Accounts

## 1. Statement of accounting policies

These financial statements have been prepared in accordance with the 2023-24 Government Financial Reporting Manual (FReM) issued by HM Treasury. The accounting policies contained in the FReM apply International Financial Reporting Standards as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of DBS for the purpose of giving a true and fair view has been selected. The particular policies adopted by DBS for the financial year ended 31 March 2024 are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

DBS operates in accordance with the Protection of Freedoms Act 2012. The accounts have been prepared in accordance with the direction given by the Secretary of State on 2 May 2013 in accordance with the Protection of Freedoms Act.

#### **1.1 Accounting convention**

These accounts have been prepared on an accruals basis under the historical cost convention modified to account for the revaluation of property, plant, equipment, and intangible assets.

#### 1.2 Going concern

In accordance with the FReM, the Accounting Officer's responsibilities are to prepare these financial statements on a going concern basis. In concluding that the going concern basis is appropriate, the Accounting Officer considered that as at the Statement of Financial Position date, and on the date these financial statements were authorised for issue, DBS maintained a net asset position. In addition, the Accounting Officer considered that DBS prepares an annual breakeven budget which forecasts a breakeven position for the year ending 31 March 2026 as at the date these financial statements are authorised for issue. The Accounting Officer also considered that there are no expectations that DBS is likely to be wound up.

# 1.3 Judgements and key sources of estimation uncertainty

The preparation of financial statements requires management to make judgements and assumptions that affect the amounts reported for assets and liabilities at the year ending 31 March 2024, and for amounts reported for income and expenses during the year.

In the process of applying DBS' accounting policies, management has made the following judgements, which have the most significant effect on the amounts recognised in the financial statements.

#### **Re-lifing of assets**

DBS reviewed and revised the estimated remaining life of its non-current assets, also reflecting the extended use of existing assets. The impact of these changes was immaterial in year ending 31 March 2024.

#### Impairment of assets

DBS assesses whether there are any indicators of impairment for all financial and non-financial assets at each reporting date. Assets are tested for impairment when there are indicators that the carrying amounts may not be recoverable.

When value 'in use' calculations are

undertaken, if the asset is not held for the purpose of generating cash flows, value 'in use' is assumed to be equal to the cost of replacing the service potential provided by the asset, unless there has been a reduction in service potential.

#### Service Concession arrangements

DBS was party to a PFI arrangement that ceased on 31 March 2020. In May 2024, the Technology and Construction Court issued its judgement in the case between Tata Consulting Services (TCS) and DBS. The outcome of this judgement is recorded in compliance with the relevant accounting framework in the Accountability Report, note 12 and note 17.

#### **Development costs**

Initial capitalisation of costs is based on management's judgement that technological and economic feasibility is confirmed in line with the recognition criteria of IAS 38. For DBS, the main criteria of focus are that it is technically feasible to complete the project and that the project will generate probable future economic benefits.

There were no key sources of estimation uncertainty.

#### 1.4 Intangible assets

In line with the capitalisation policy, assets both tangible and intangible are individual items normally costing or valued at or above a threshold of £5,000, and with an expected life of more than one year.

An annual revaluation exercise has been conducted in accordance with appropriate Office for National Statistics indices and where a material revaluation is deemed necessary this has been taken to the revaluation reserve and/or Statement of Comprehensive Net Expenditure (SoCNE) as appropriate.

Development expenditure has been

recognised as an intangible asset in accordance with IAS 38 – Intangible Assets. All non-current assets being developed and not in operation at the year-end were capitalised as an asset under construction. Until the asset is ready for use, no amortisation is recognised; however, once the asset is available for use, amortisation is charged with the asset being transferred to the relevant 'Non-Current Asset' register immediately. DBS did not revalue assets under construction.

In line with IAS 36, DBS undertakes an impairment review of all intangible assets at least on an annual basis. This involves the use of a discounted cashflow model to consider future cashflows arising from the ongoing use of the asset against current net book value. Where it is found that the value in use is lower than the net book value at the balance sheet date an impairment would be required.

A review of assets under construction was undertaken in March 2024 to ensure that the purpose for which the assets was being constructed, and its associated valuation, was appropriate.

#### **1.5 Amortisation**

Assets under construction are not amortised until the asset is available for use and are amortised on a straight-line basis over their estimated useful lives. The useful economic lives of non-current assets are reviewed annually. The current asset lives to be applied are:

 Information technology – from date of recognition to end of useful economic life (3 to 15 years)

• Software licenses – from date of recognition to end of useful economic life (3 to 15 years)

**1.6 Income and income recognition** Income represents fees charged to:  applicants for applications for Standard, Enhanced, and Enhanced with Barred List(s) DBS checks of prescribed criminal record information

• applicants for applications for Basic DBS checks of prescribed criminal record information

• register corporate bodies and signatories to access the criminal record process

- Registered Bodies for DBS Adult First
- applicants for Update Service subscriptions
- rental income and recharges

#### **Recognition of income**

IFRS 15 provides a comprehensive standard for revenue recognition.

This standard establishes the principles that an entity applies when reporting information about the nature, amount, timing, and uncertainty of revenue and cash flows from a contract with a customer.

DBS recognises revenue primarily from the provision of DBS checks and Update Service subscriptions.

In accordance with IFRS 15, revenue is recognised as control is passed, either over time or at a point in time; with control being defined as the ability to direct the use of and obtain substantially all of the remaining benefits from the asset.

The transaction price is determined as the amount charged by DBS as set out in statute for each of its services.

#### Performance obligations

The table below sets out, for each material revenue stream, when performance obligations are typically satisfied, the significant payment terms, and the nature of the goods or services which DBS supplies. All income streams usually have a contract of a duration of one year or less, with only one single performance obligation.

Revenue stream	Description of revenue stream	Performance obligation	Payment terms
Enhanced and Standard DBS checks submitted via Registered Body (RB)	Supply of DBS checks to individuals	Issue of certificate to customer	Invoiced to RBs in month of application receipt
Basic DBS checks - submitted via Responsible Organisation (RO)	Supply of DBS checks to individuals	Issue of certificate to customer	Invoiced to ROs in month of application receipt
Basic DBS check - direct online application to DBS	Supply of DBS checks to individuals	Issue of certificate to customer	Payment made on application
Update Service	Subscription to online Update Service	Performance obligation over 12 month subscription period	Payment made on application

Department for Health and Social Care reimbursement of free-of-charge checks To aid the Department of Health and Social Care (DHSC) COVID-19 response, the Home Office and DBS have put temporary

arrangements in place, to provide Standard and Enhanced DBS checks, and fasttrack emergency checks of the Adults' and Children's Barred Lists, free-of-charge.

Where the DHSC has confirmed reimbursement for such free-of-charge checks, this funding will be treated as income, to the extent that the above performance obligations have been satisfied.

#### 1.7 Grant-in-aid

Grant-in-aid is recognised in accordance with applicable FReM guidance and IAS 20 Accounting for Government Grants and Disclosure of Government Assistance which applies as interpreted for the public sector.

Accordingly, grants-in-aid are accounted for as a source of financing and credited to reserves, and not income.

# **1.8 Pensions**

#### Principal Civil Service Pension Scheme

DBS recognises the expected costs on a systematic and rational basis over the period during which it benefits from employees' services by payments to the Principal Civil Service Pension Scheme (PCSPS) of amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the PCSPS.

#### Partnership and stakeholder schemes

The employer made a basic contribution of between 8% and 14.75% of pensionable earnings from 1 October 2015 (3% and 12.5% of pensionable earnings up to 30 September 2015) depending on the age of the member. This contribution is paid into a stakeholder pension product chosen by the employee from a panel of 3 providers. The employee does not have to contribute, but where they do make contributions, the employer will match these up to a limit of 3% of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.5% of pensionable pay from 1 October 2015 (0.8% of pensionable pay to 30 September 2015) to cover the cost of centrally provided risk benefit cover (death in service and ill-health retirement).

Details of the annual pension contribution are provided in note 3 with additional information relating to pensions being included within the remuneration report.

### 1.9 VAT and Corporation Tax

DBS registered for VAT (Value Added Tax) during 2017-18 as invoices raised for recharges of salary costs to other government departments exceeded the VAT threshold. However, the vast majority of figures in the accounts continued to be stated inclusive of VAT as DBS had little scope to reclaim VAT on costs. DBS became de-reregistered for VAT in December 2022 as the recharges for salary costs to other government departments is expected to fall below the VAT thresholds over the next 12 months.

DBS is subject to corporation tax on rental income however, no surplus is reported on this income.

#### **1.10 Financial instruments**

IFRS 9 includes requirements for classification, recognition and measurement, impairment, derecognition and general hedge accounting. DBS does not operate hedge accounting, so the specific requirements of IFRS 9 for hedge instruments do not apply.

The significant majority of the DBS financial instruments are trade receivables and payables. Receivables are shown net of expected credit losses. These accounts do not include transition disclosures in respect of IFRS 9, due to the effect of IFRS 9 not being significant for DBS. This is because DBS receivables with customers are held for collecting cash in the normal course of business.

Receivable items for DBS include only trade receivables, prepayments, and accrued income, all of which are due within the next 12 months. On this basis, no impairments in accordance with the requirements of HM Treasury's Financial Reporting Manual and IFRS 9 are required.

DBS believes the fair value of its receivable items is noted in the accounts, with no requirement to adjust the carrying value for estimated future flow of repayment. This is based on historical collection rates.

#### 1.11 Right of Use assets

# Practical expedients for short term and low value leases

In line with the practical expedients and FReM, DBS will not apply IFRS 16 to short term or low value leases and will expense lease payments as they fall due. These are defined as leases as described below:

• a lease term of up to 12 months are considered short term leases

• a lease of up to £5,000 are considered low value leases

This is consistent with DBS capitalisation threshold on purchases assets.

The total value of any short term or low value leases will be disclosed in the notes to the financial statements.

#### In scope leases

Leases of other tangible assets that do not qualify as short term or low value are recognised in the financial statements by recording a right-of-use asset and corresponding lease liability in the statement of financial position.

DBS does not recognise right of use assets that are considered intangible.

#### Depreciation

Right-of-use assets will be depreciated in line with the lease term and under the provisions of IAS 16.

### 1.12 Provisions and Contingent Liabilities Provisions and Contingent Liabilities

**Provisions and Contingent Liabilities** Provisions are carried in respect of certain known or forecast future expenditure. Under IAS 37, provisions are recognised when there is a present obligation arising from past events, it is probable that a transfer of economic benefits will be required, and a reliable estimate can be made. Where the future payment amount is unknown, provisions are set at a level which covers the estimated number of future payments and the estimated average payment amount. In calculating provisions, future payments may be subject to discount rates depending on the expected timing of cash flows. Provisions are calculated using the best available information, but the actual outcomes of items provided for, may differ from expectations. Contingent liabilities and contingent assets are not recognised as liabilities or assets in the Statement of Financial Position but are disclosed in the notes to the Accounts. A contingent liability is either: a possible obligation arising from past events, the existence of which will be confirmed by the occurrence or non-occurrence of one or more uncertain future events, or; it is a present obligation arising from past events but is not recognised because either an outflow of economic benefits is not probable to settle the obligation or the amount of the obligation cannot be reliably estimated. A contingent asset is a possible asset whose existence

will be confirmed by the occurrence or nonoccurrence of one or more uncertain future events not wholly within the control of DBS. Where the time value of money is material, the contingent liabilities and assets are stated at discounted amounts. In addition to contingent liabilities disclosed in the accounts in accordance with IAS 37, DBS discloses within its accountability report, for Parliamentary reporting and accountability purposes certain statutory and non-statutory contingent liabilities outside the scope of IAS 37 which have been reported to Parliament in accordance with the requirements of Managing Public Money.

#### 1.13 Cash and cash equivalents

Cash and cash equivalents include cash in hand and deposits held with financial institutions net of bank overdrafts. 1.14 New standards, amendments, and interpretations issued but not effective for the financial year beginning 1 April 2021 and not adopted early

#### **IFRS 17 Insurance contracts**

The IASB adapted IFRS 4 insurance contracts as an interim measure between the introduction of IFRS 9 (2018-19) and the new insurance contracts accounting standard IFRS 17. The Financial Reporting Advisory Board agreed to endorse the IFRS 4 amendments without adaptation or interpretation. IFRS 17 became mandatory from 1 January 2021. Application of IFRS 17 for Government Departments was expected to apply from the 2023-24 financial year. This has now been deferred until the 2025-26 financial year.

IFRS 17 is not expected to have a material impact on the financial statements.

#### 2. Statement of operating costs by operating segment

These segments represent each of the DBS' directorates, which are responsible for varying elements of DBS' activities. See opposite.

	Expenditure £000	Income £000	Net expenditure /(income) £000
<b>Operational Services</b> Our operational services team are responsible for delivering our disclosure service, and discharging our statutory function for England, Wales and Northern Ireland to manage the two Barred Lists. It also has wider responsibility for safeguarding and quality across DBS.	107,492	(215,995)	(108,503)
<b>Technology and Innovation</b> The Technology and Innovation Directorate is responsible for Citizen-facing Technology, IT Service Management, Innovation, Architecture, Data Protection and Cyber Security.	60,656	-	60,656
Finance and Corporate Services Finance and Corporate Services is responsible for providing financial, commercial, risk and business continuity management, human resource, and legal advice across DBS, including the preparation of the annual report and accounts. The directorate also includes Assurance and Facilities services.	39,865	-	39,865
Chairman and Chief Executive's Office The Chairman and Chief Executive's Office is responsible for providing Corporate Governance for the organisation, including freedom of information, parliamentary questions, Publication Scheme and leading on the relationship between DBS, and Home Office Sponsor Unit.	3,013	-	3,013
Strategy, Performance and Change The Strategy, Performance and Change directorate established oversight for developing the DBS' Strategy and Business Plan, ensuring performance to achieve strategic objectives in the business plan is managed effectively at an organisational level.	15,230	-	15,230
	226,256	(215,995)	(10,261)

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3. Staff numbers and related costs	2023-24 Total £'000	2022-23 Total £'000
Staff costs comprise:		
Wages and salaries	45,635	39,144
Social security costs	4,533	4,079
Other pension costs	10,260	9,253
Total	60,428	52,476

The staff report within the accountability section contains a full breakdown of staff costs.

4. Other operating costs	2023-24 Total £'000	2022-23 Total £'000
Purchase of goods and services		
Postage and other outsourced services* costs Police and other data source costs Facilities management and staff services Travel, subsistence, and other staff costs Professional fees Audit fees - external IT - running and telephone costs	13,820 54,917 3,981 1,089 11,581 138 60,056	14,956 47,680 3,200 730 8,242 109 58,881
Total	145,582	133,798
Other operating expenditure Other	<b>£'000</b> 739	<b>£'000</b> 948

\*Other outsourced services include call centre and ID verifying costs.

5. Revenue from contracts with customers	2023-24 £'000	2022-23 £'000
Basic DBS checks Standard DBS checks Enhanced DBS checks Update Service Other	48,114 7,166 136,046 23,582 1,087	47,772 6,978 141,595 19,732 1,002
Total revenue from contracts with customers	215,995	217,079

Further details regarding DBS fees and charges can be found in the accountability section of the annual report.

All revenue from contracts with customers is generated within the United Kingdom and Crown Dependencies.

# 6. Property, plant, and equipment

	Right-of-use Assets £'000	Leasehold Improvements £'000	ا Information Technology £'000	Equipment, Furniture & Fittings £'000	Total £'000
Cost or valuation					
Balance at 1 April Revaluations	3,489 -	1,148 59	11,916 -	1,020	17,573 59
At 31 March 2023	3,489	1,207	11,916	1,020	17,632
<b>Depreciation</b> Balance at 1 April 2023 Charged in-year Revaluations	(850) (849) -	(626) (210) (42)	(11,916) - -	(1,020) - -	(14,412) (1,059) (42)
At 31 March 2024	(1,699)	(878)	(11,916)	(1,020)	(15,513)
Net Book Value at 31 March 2024	1,790	329	-	-	2,119
Net Book Value at 1 April 2023	2,639	522	-	-	3,161
<b>Asset financing:</b> Owned Leased	- 1,790	329 -	-	-	329 1,790
Net Book Value at 31 March 2024	1,790	329	-	-	2,119

	Right-of-use Assets £'000	Leasehold Improvements £'000	lnformation Technology £'000	Equipment, Furniture & Fittings £'000	Total £'000
Cost or valuation					
Balance at 31 March 202 Adoption of IFRS 16 (refer to note 15)	2 - 3,489	1,109	11,916 -	1,020	14,045 3,489
Balance at 1 April 2022 Revaluations	3,489 -	<b>1,109</b> 39	11,916 -	1,020 -	17,534 39
At 31 March 2023	3,489	1,148	11,916	1,020	17,573
<b>Depreciation</b> Balance at 1 April 2022 Charged in-year Revaluations	- (850) -	(403) (202) (21)	(11,915) <b>(1)</b> -	(1,018) (2) -	(13,336) (1,055) (21)
At 31 March 2023	(850)	(626)	(11,916)	(1,020)	(14,412)
Net Book Value at 31 March 2023	2,639	522	-	-	3,161
Net Book Value at 1 April 2022	3,489	706	1	2	4,198
<b>Asset financing:</b> Owned Leased	- 2,639	522 -	-	-	522 2,639
Net Book Value at 31 March 2023	2,639	522	-	-	3,161

# 7. Intangible assets

	Information Technology £'000	Software Licenses £'000	Assets Under Construction £'000	2023-24 Total £'000
Cost or valuation				
Balance at 1 April 2023 Additions Impairment	145,091 426 -	11,854 - -	2,718 3,472 -	159,663 3,898
Transfer Reclassifications Revaluations	- 4,732 (41)		- (4,732) -	- (41)
At 31 March 2024	150,208	11,854	1,458	163,520
Amortisation Balance at 1 April 2023 Charged in-year Impairments Revaluations	(134,956) (3,561) - 22	(11,842) (11) - 0	- - - -	(146,798) (3,572) 22
At 31 March 2024	(138,495)	(11,853)	-	(150,348)
Net Book Value at 31 March 2024	11,713	1	1,458	13,172
Net Book Value at 1 April 2023	10,135	12	2,718	12,865
Asset financing: Owned	11,713	1	1,458	13,172
Net Book Value at 31 March 2024	11,713	1	1,458	13,172

	Information Technology £'000	Software Licenses £'000	Assets Under Construction £'000	Total £'000
Cost or valuation				
Balance at 1 April 2022	132,065	11,475	9,563	153,103
Additions	2,030	-	2,674	4,704
Transfer	(800)	-	817	17
Reclassifications	10,336	-	(10,336)	-
Revaluations	1,460	379	-	1,839
At 31 March 2023	145,091	11,854	2,718	159,663
Amortisation				
Balance at 1 April 2022	(125,889)	(10,894)	-	(136,783)
Charged in-year	(7,841)	(570)	-	(8,411)
Revaluations	(1,226)	(377)	-	(1,603)
At 31 March 2023	(134,956)	(11,841)	-	(146,797)
Net Book Value at 31 March 2023	10,135	12	2,718	12,865
Net Book Value at 1 April 2022	6,176	580	9,563	16,320
Asset financing: Owned	10,135	12	2,718	12,865
Net Book Value at 31 March 2023	10,135	12	2,718	12,865

#### 8. Financial instruments

As the cash requirements of DBS are met through the estimate process, financial instruments play a more limited role in creating and managing risk than would apply to a non-public sector body. Most financial instruments relate to contracts to buy nonfinancial items in line with DBS's expected purchase and usage requirements and DBS is therefore exposed to little credit, liquidity, or market risk.

The impact arising from IFRS 9 on DBS financial statements is not material to trade receivables, financial and other assets.

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#### 9. Trade receivables and other assets

Amounts falling due within one year:	2023-24 £'000	2022-23 £'000
Trade receivables Deposits and advances Prepayments Contract assets	14,903 (6) 1,768 22	17,095 12 4,678 949
Total	16,687	22,734

Trade receivables largely relates to balances due to DBS from Registered Bodies and Responsible Organisations for fees charged.

Prepayments increased due to timing differences in supplier billing from prior year.

#### 10. Cash and cash equivalents

	2023-24 £'000	2022-23 £'000
Balance at 1 April Net change in cash and cash equivalent balances	72,622 9,900	88,342 (15,720)
Balance at 31 March	82,522	72,622
The following balances were held at: Government Banking Service	82,522	72,622
Balance at 31 March	82,522	72,622

The year-end balance for 2023-24 includes Consolidated Fund Extra Receipts of £52.7m (2022-23: £28.8). £45m was transferred during 2022-23 in respect of the balance relating to 2021-22. The payable is disclosed in Note 11.

#### 11. Trade payables and other current liabilities

Amounts falling due within one year:	2023-24 £'000	2022-23 £'000
Trade payables Accruals Contract liabilities Payable to the Consolidated Fund	6,129 19,138 18,612 52,730	3,482 23,845 16,922 28,837
Total	96,609	73,086

Revenue is deferred to contract liabilities where an application fee has been received but the application is still being processed by DBS. The full balance of the contract liabilities recognised at the end of the previous reporting year was recognised as revenue in year.

During 2018-19 DBS and Home Office agreed an approach to remitting any in year annual surpluses reported by DBS after deducting cost of capital as a Consolidated Fund Extra Receipts.

There were no repayments to the Consolidated Fund Extra Receipts during the year.

At 31 March 2024 total payables include an amount of £52.7m relating to the surrender of the Consolidated Fund Extra Receipts after deducting the cost of capital.

During the year, Home Office directed DBS to remit the reserves transferred to DBS on its inception on 1 December 2012. The sum of reserves transferred to DBS was £23.9m.

The amounts repayable are £9.1m (2021-22), £19.7m (2022-23), and £23.9m (CRB/ISA)

### 12. Provisions

	Dilapidations £'000	Legal Costs £'000	Other Provision £'000	Total £'000
Balance at 1 April 2023	603	169	58	830
Provided in the year Provisions not required	-	13,742	1,183	14,925
written back Provisions utilised in	_	(73)	-	(73)
the year		(25)	(86)	(111)
Balance at 31 March 2024	603	13,813	1,155	15,571
Not later than one year: Later than 1 year and	-	13,813	1,155	14,968
not later than 5 years:	603	-	-	603
Balance at 31 March 2024	603	13,813	1,155	15,571

For property provisions, DBS recognises a dilapidation provision for the leased premises occupied where it has an obligation to bring the property into a good state of repair at the end of lease.

As fully explained on pages 80 and 81, DBS has accounted for the element of the court judgment found in favour of TCS in line with the requirements of the applicable financial reporting framework. The provision recorded under Legal costs reflects the court judgment of 17 May 2024 and subsequent judgments issued until the reporting date.

# 12. Provisions

	Dilapidations £'000	Legal Costs £'000	Other Provision £'000	Total £'000
Balance at 1 April 2022 Provided in the year Provisions not required written back	603 - -	105 169 (70)	1 100 -	709 269 (70)
Provisions utilised in the year	-	(35)	(43)	(78)
Balance at 31 March 2023	603	169	58	830
Analysis of expected timing of discounted flows				
Not later than one year: Later than 1 year and not later than 5 years:	- 603	169 -	58 -	227 603
Balance at 31 March 2023	603	169	58	830

## 13. Related-party transactions

The Home Office is the sponsor department of DBS and is regarded as a related party. For the year ended 31 March 2024, DBS had a number of material transactions with the Home Office and also with other entities for which the Home Office is regarded as the parent department – these are listed in the table below. DBS asserts that these transactions were conducted at arm's length. In addition, DBS had a small number of material transactions with other government departments and other central government bodies.

No board members, key managers, or other related parties have undertaken any material transaction with DBS during the year. The Remuneration Report provides information on key management compensation.

Related Party	2023-24 £'000	2022-23 £'000	Nature of Transactions
Security Industry Authority	(2,970)	(2,591)	Revenue receivable for DBS checks carried out during the year
Home Office	(1,023)	(10,328)	Revenue received via Home Office for free-of-charge background checks on behalf of DHSC as part of the COVID-19 response
Home Office	9,819	7,144	Recharge of IT services, rent, and facilities management recharges, sponsorship costs and Home Office Technology Live Policing Services (for access to PNC checks)
Various police authorities (inc National Crime Agency)	54,898	47,473	Police costs incurred for work undertaken by police authorities to complete the disclosure process

## 14. Commitments under operating leases

Total future minimum lease payments under operating leases are given in the table below for each of the following periods.

Obligations under operating leases for the following periods comprise:	2023-24 £'000	2022-23 £'000
Buildings		
Not later than one year Later than 1 year and not later than 5 years	168 167	168 335
	335	503

The Stephenson House site is owned by the Home Office Property Group. DBS has a Licence of Occupation agreement with the Home Office Property Group effective from 1 April 2023 for a 3-year term. For the purposes of disclosure, we are treating this as an operating lease.

#### 15. Obligations under finance leases for the period

		2023-24	2022-23
		£'000	£'000
Buildings			
Not later than one year		1,014	1,014
Later than 1 year and not later than 5 years		1,145	2,159
Less interest element		(20)	(44)
Present Value of Obligations	SoFP	2,139	3,129
		2023-24	2022-23
		£'000	£'000
Opening Lease Liabilities		3,129	4,033
Interest charged in SoCNE		24	33
Less interest paid		(24)	(33)
Less principal of lease liability		(990)	(904)
Closing lease liabilities	SoFP	2,139	3,129

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#### 16. Other financial commitments

	2023-24 £'000
Not later than one year Later than 1 year and not later than 5 years Later than 5 years	2.062 593 -
Total Commitments	2,655
At 31 March 2024 DBS had non-cancellable financial commitments of:	

- £0.8m for Shannon Court
- £0.7m for DXC Hosting Contract
- £1.2m for other non-cancellable contracts under £0.5m each

### 17. Contingent liabilities

The judgment in the case between DBS and Tata Consultancy Services was handed down on 17 May 2024 and were subsequently revised through a Consequential Hearing on 23 July 2024. As explained more fully on pages 80 and 81, DBS has recognised the award to it of £4.6m as a contingent asset, and there are no contingent liabilities to disclose.

#### 18. Events after the reporting period

The Accounting Officer authorised these statements for issue on the date that the accounts were certified by the Comptroller and Auditor General. After the reporting period events relating to TCS and Crown Dependencies emerged. These are reflected in these accounts as described on pages 80 and 81 for TCS, and pages 108 and 109 for Crown Dependencies.

# 19. Controlling entity

For the purposes of accounting, DBS is considered a subsidiary of the Home Office, and the the financial statements of DBS is fully consolidated within the accounts of the Home Office. As explained more fully in the Performance Report, DBS is an NDPB accountable to Parliament through the Secretary.

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