



Disclosure &
Barring Service

Disclosure and Barring Service

ANNUAL REPORT AND ACCOUNTS

For the period 1 April
2024 to 31 March 2025

HC 1486



Disclosure and Barring Service
Annual Report and Accounts

For the period 1 April 2024 to 31 March 2025

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

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2024-25 FOREWORD BY THE CHAIRMAN

I am pleased to introduce our 2024-25 annual report and accounts, which sets out how the Disclosure and Barring Service (DBS) has performed over the last year.

This report marks the end of DBS' 2020-25 strategy which we co-created with our staff. It also coincides with the retirement of our Chief Executive, Eric Robinson, whose sterling leadership was instrumental in the development and successful delivery of this strategy and the creation of our new 2025-28 strategy.

With excellent progress made within the first 3 years of our 2020-25 strategy, we undertook a mid-point strategy refresh in 2023 to identify further changes to support our aim of making recruitment and employment safer. This approach ensured that the strategy continued to deliver in areas such as digitising our services, expanding the advice and support available for employers around both DBS checks and the importance of organisations referring individuals to us for barring consideration, as well as further developing the skills of our staff.

We delivered strong operational performance throughout 2024-25, managing high demand for DBS checks and improving our performance for Basic and Standard DBS checks compared to the previous year, ensuring information needed to help to make safer recruitment decisions across a wide range of employment sectors is provided in a timely manner.

We fell short of our target to issue 80% of Enhanced DBS checks within 14 days, achieving 75.6%, with an average time to issue Enhanced certificates at 12.4 calendar days. Regrettably, customers' experience of the Enhanced DBS check service is dependent upon whether checks need to be undertaken

by police forces, as well as those undertaken by DBS against the records held on Police National Computer and the performance of those forces. Under the current police model, high numbers of checks needing further information to be supplied by some police forces, coupled with the ongoing staffing challenges in police force disclosure units, has a direct impact on our overall Enhanced DBS check performance.

Within our 2025-28 strategy, we are committed to seeking improvements to the effectiveness in the police disclosure unit model to tackle this inherent risk to delivery of our Enhanced check performance.

For the 2025-26 reporting year, we have introduced a new timeliness metric for Enhanced checks that are not referred to local police forces as part of the disclosure (DBS check) process. These are checks that are completed within DBS only and equate to around 40% of all Enhanced checks. Typically, over 99% of these are completed within 10 days. I am proud that DBS has afforded greater protection for vulnerable people by delivering upon our strategic aim to develop partnership work to increase awareness of DBS. This, alongside enhancements to our customer-facing online barring referral service, resulted in a 14.2% growth in 2024-25 referral intake compared to the previous year. There are now over 104,000 people included on the Barred Lists, with 6,207 individuals added during 2024-25, providing greater protection to children and vulnerable adults from those that may seek to harm them or put them at risk of harm.

Our 2024-25 business plan focused on delivering activities to meet our 4 key strategic objectives and to complete our 2020-25 strategy. We wanted to retain focus and momentum on activities that made a difference for the whole of DBS, as well as for our customers, partners, and stakeholders. This report shows the strong progress made against each strategic objective, with highlights including the introduction of key customer service improvements, embedding our innovation framework, and maturing our research and horizon-scanning activities to support internal developments and assist in optimising our products and services in alignment with customers' needs.

We also maintained and enhanced our existing technology and progressed the development of the modernisation of our digital services that will provide an accessible digital Standard and Enhanced application service, as well as online certificates, ensuring we have the digital tools needed to be an efficient organisation. We also worked with the Home Office and other partners on the implementation of recommendations from the Independent Inquiry into Child Sexual Abuse (IICSA) and the previous government's Bailey review of the disclosure and barring regime.

We widened our external reach through our social media communication channels and developed and delivered a business engagement programme with retail, logistics, and hospitality sectors to support optimal take up of all our products and services.

Within our research and horizon-scanning functions, we have been proactive in understanding impacts of national, local, and sector-based policy developments ensuring that our capabilities can be future-proofed. We were also delighted to again achieve re-accreditation with the Customer Service Excellence standards, showing our ongoing commitment to ensuring our customers benefit from high quality, accurate, and efficient services.

We delivered 5.4% efficiency savings this

year against a target of 5% through our value for money framework and DBS efficiency plan, enabling us to continue to deliver products and services that represent value for money to our customers and the Home Office, whilst also absorbing inflationary pressures and the increased demand for some of our services.



DBS was also subject to an independent public body review in 2025, sponsored by the Home Office. I was pleased to support the Lead Reviewer, Ann Harris, in my capacity as DBS Chairman during the review period. I am also pleased that the review team's findings acknowledge DBS' strong management and governance, and that the recommendations will further strengthen the working relationships between DBS and the Home Office and provide support to opportunities already identified by DBS to further improve safeguarding, such as improvements to the police model. I look forward to seeing the recommendations implemented over the coming year.

The strategy renews our focus on providing improved value for money and improving our products and services to both protect the vulnerable and enable people to safely enter employment. Co-created with our staff

with insight from our various partners, the strategy outlines our commitment to enhance the quality, efficiency, and effectiveness of our services across DBS, while also fostering an organisation that is more inclusive, more transparent, and more responsive. It will ensure that DBS contributes to lowering the risk of harm, protecting the right to rehabilitation, and contributing to economic growth. It commits DBS to embracing innovation, making informed, data-driven decisions, and ensuring we remain at the forefront of safeguarding and protection, as a trusted organisation.

I am also delighted, this year, to welcome Dr Jeff James CBE to DBS as our new Chief Executive from 1 June 2025. Jeff will lead DBS through our next phase of development and be responsible for delivering our new 2025-28 strategy.

I hope you find this report of interest.



Dr Gillian Fairfield
DBS Chairman

DBS: OUR YEAR

Issued just under
7.3 million DBS
certificates

75.6% of Enhanced
DBS certificates were
issued within **14
calendar days**

Average time to issue
an Enhanced DBS
certificate was **12.4
calendar days**

18.7% of Standard
and Enhanced
certificates were
issued free-of-charge
to the voluntary sector

99.5% of Update
Service-related
complaints were
responded to within
6 days

Delivered **5.4%**
of annualised
efficiencies



73% reduction of
overall carbon
emissions from estate
and business travel
against baseline

Barred **6,207**
individuals



90.6% of Standard
DBS certificates were
issued within **3
calendar days**

Average time to issue
a Standard DBS
certificate was **1.2
calendar days**

99.99% accuracy of
all decisions and
information issued
on a certificate

98.0% of automatic
barring cases closed
within **6 months**

Obtained a Customer
Satisfaction Index
score of **75.2**, rated as
'fully compliant' with
all 57 elements of the
Customer Service
excellence standard

The ethnic diversity of
our employees
increased to **5.48%**

Worked with **92**
Responsible
Organisations and
644 Registered Bodies

88.1% of Basic
DBS certificates were
issued within **2
calendar days**

Average time to issue
a Basic DBS
certificate was **0.8
calendar days**

2.9 million total
active Update
Service subscribers

42.1% of cases
where we were
'minded to bar' were
closed within
9 months

Barring quality
rate of
99.92%

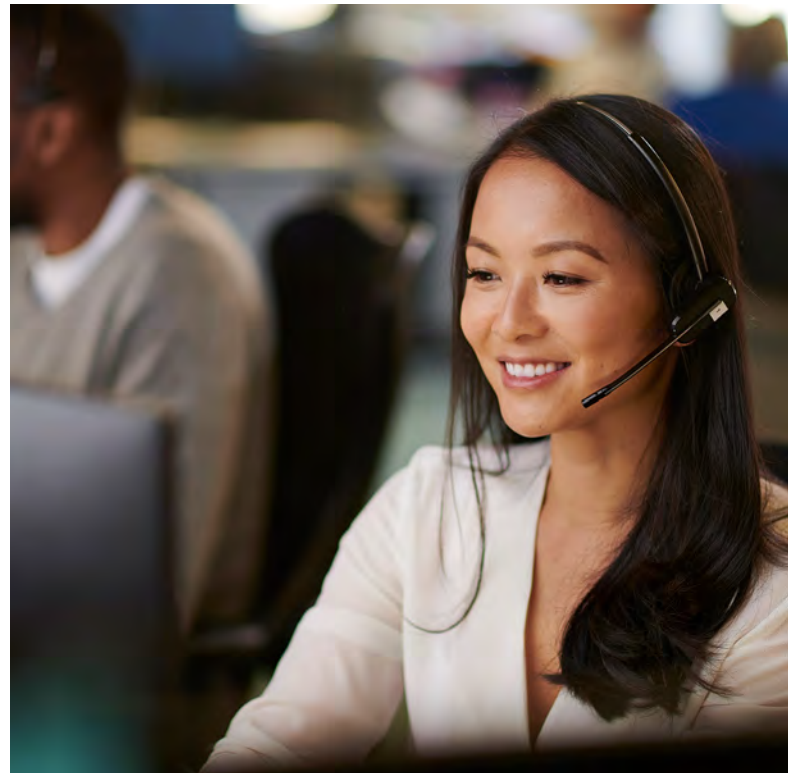


Rolling year average
working days lost
due to sickness
decreased to
7.92 days

PERFORMANCE REPORT

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.

PHOTOGRAPHY
GETTY IMAGES



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 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 criminal records information to help employers decide whether someone is suitable for a role - from

basic checks for any type of job, to more detailed checks for positions involving regular contact with vulnerable groups, including children. Our information should be used alongside other recruitment tools, not as the sole basis for a decision. We also decide whether an individual can work in regulated activity by determining if they should be placed 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.

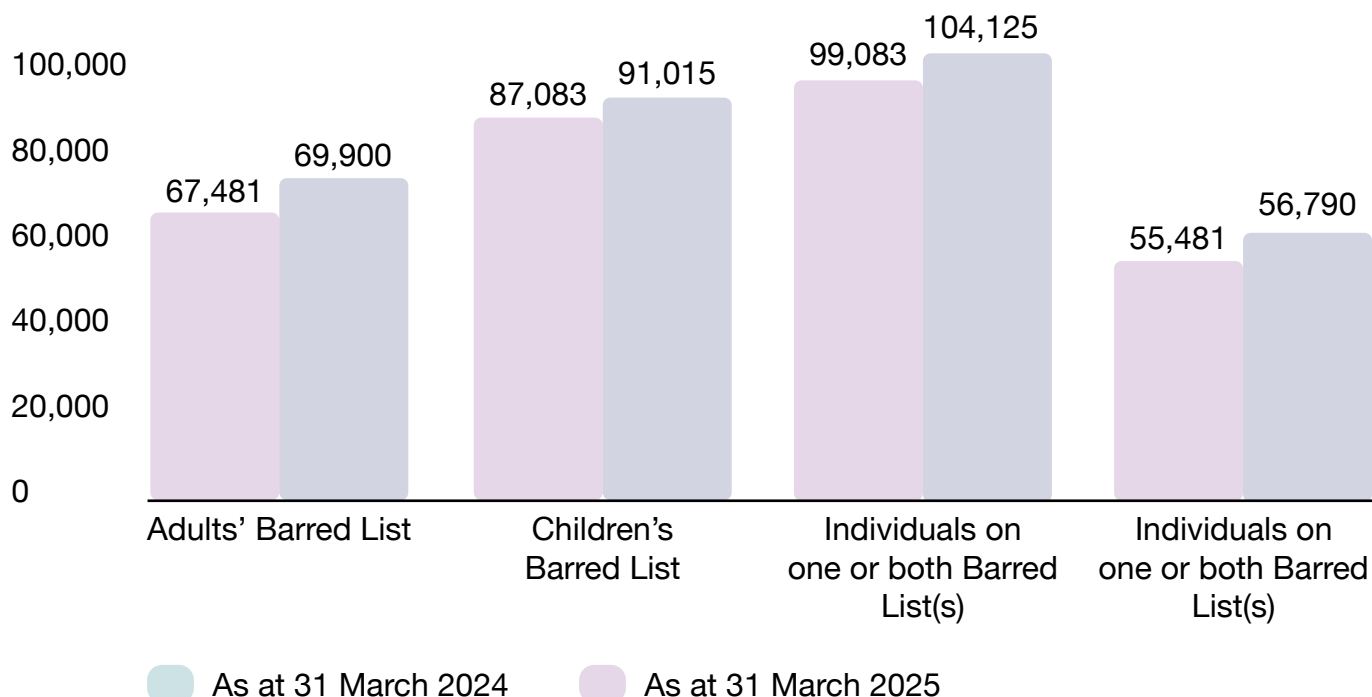
Regulated activity

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.

Figure 1: Number of individuals on the Barred Lists



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

DBS will consider individuals as detailed in the 2 points above 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.

Additionally, we 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.

However, we also have to consider the impact that any barring decision may have on those children or vulnerable adults that 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 finely balanced decisions.

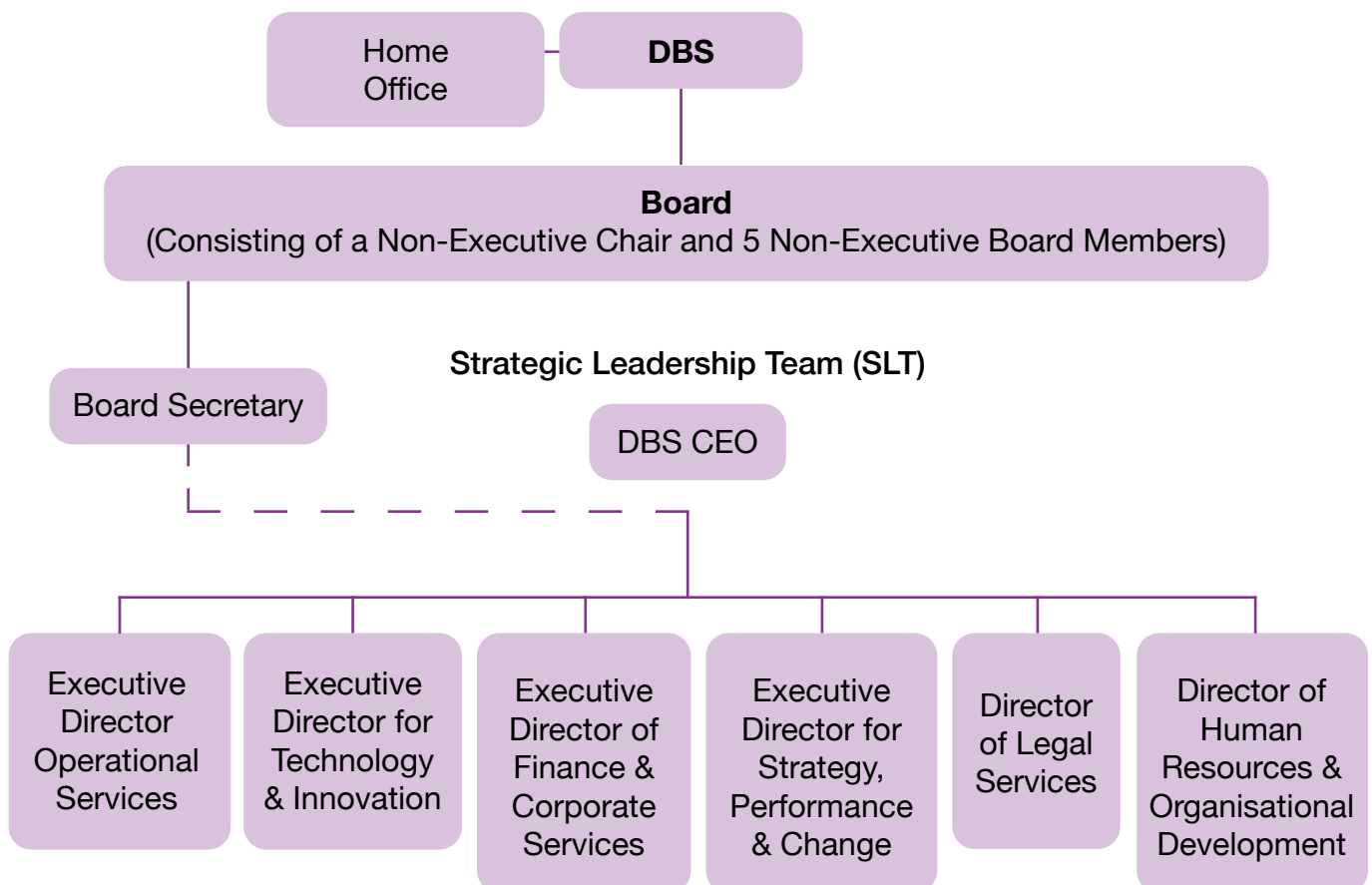
Our organisation, structure, and partners

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 had 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 2 years of the strategy offered further opportunities to rise to the challenge of maximising the contributions we make to safeguarding.

The strategic objectives set for 2023-25 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 2024-25 business plan set out an ambitious but pragmatic workplan for the year which was focused on the actions we needed to take in the final year of our refreshed 5-year strategy to complete the remaining strands.

The delivery of the change elements of the business plan was managed in-year through a comprehensive Change and

Transformation plan (including but not limited to progressing with the delivery of the Legacy Technology Estate Replacement programme, implementation of a new delivery model for the customer contact centre, and further exploration of changes to the police algorithm and automation of operational processes under robotic process automation).

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 carried into our 2024-25 business plan, we worked under 4 strategic priorities. These priorities have underpinned 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 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 customers, partners and stakeholders.

For the 2024-25 business plan, we also continued to work towards the following strategic objectives for the final completion year of the strategy:

- 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 2024-25, the DBS business plan identified 29 actions to complete the strategy known as strategy completion actions; none were removed in-year.

All but 6 strategy completion actions were

fully completed by year-end, meaning we achieved 79% of our actions (23 out of 29). Of the 6 strategy completion actions which were not fully complete, 5 have been deferred into the business plan for 2025-26 and 2025-28 strategy.

These have been slightly reframed to reflect the work undertaken in 2024-25 and the remaining elements required for the delivery of the new strategy.

The one strategy completion action which has not been fully completed related to the arm's length body review with delivery timescales being out of the control of DBS; the action will be carried forward as business-as-usual activity.

In comparison to the above, in 2023-24, we achieved 78% of our business plan milestones (32 out of 41) with 3 milestones removed following Strategic Leadership Team (SLT) review and board approval, and 7 were deferred into 2024-25.

The 5 strategy completion actions which are being carried forward into 2025-26, and will be monitored in the business plan, are largely technology related. The complexities of the system and procurement requirements, and the nature of the information used by DBS has meant that these projects require more time to ensure developments can be completed.

Throughout this year we have used the collective understanding of both internal staff and external stakeholders to develop a view on the future threat, harm, and risk of safeguarding, and design a new strategy that will see DBS through the next 3 years.

Table 1: Strategy Completion Actions achieved against our business plan in 2024-25

Strategic Objective	Achieved	Deferred or not Completed
SO1. Customer Experience: Providing increased reliability, consistency, timeliness, and accessibility of services for our customers, increasing quality and value for money (6 actions)	4	2*
SO2. Technology: Driving efficiencies and value for money across DBS; fostering a culture of innovation (9 actions)	6	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 (3 actions)	3	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 actions)	10	1**

*Variations of these actions will be carried forward into the 2025-26 business plan

**This action will not be carried forward into the 2025-26 business plan

STRATEGIC OBJECTIVE 1

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

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GETTY IMAGES

In 2024-25, our work continued to strengthen safeguarding in the workplace, both at the point of recruitment and throughout the employment of an individual.

We issued 7.27m DBS certificates, and our barring intake increased, with referrals now 58% 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 again achieved re-accreditation with the Customer Service Excellence standards, showing our ongoing commitment to ensuring our customers benefit from high quality, accurate, and efficient services.

Throughout our 5-year strategy, we have implemented technological and policy updates needed to support the introduction of changes to legislation, including those to the Rehabilitation of Offenders Act 1974 and further improved the quality and inclusivity of our existing products and services, whilst mapping out further service improvements based on our understanding of our customer needs.

We have supported and introduced customer service improvements and embedded our innovation framework. We have matured our research and horizon-scanning activities which have not only supported internal developments but has also assisted in optimising our products and services around our customers' needs.





What we said we would do	What we achieved
SO1.1a We will develop and strengthen our outward-facing policies, commercial arrangements, and agreements in place with Responsible Organisations (ROs) and Registered Bodies (RBs) to ensure they meet the required standards to support us and our customers. We will review those within the network as required.	• Developed a working group with terms of reference and representation from across the business to consider scope and opportunity • Progress made in some areas of activity with ROs and RBs, and numbers of both reduced in the network • Activity required to continue into 2025-26 and has been deferred into the business plan
SO1.1b: We will provide bespoke product and service engagement activity for both disclosure and barring. This will allow customers to accurately access the relevant disclosure (DBS check) products, and will support an improvement in the volume of barring referrals received, as well as the quality of the information within these referrals.	• Agreed a core offer of engagement and implemented across all regions • Bespoke engagement opportunities delivered with named departments • Consistently overachieved maintained engagement with over 80% of key organisations against a target of 60% • Increased number and quality of barring referrals received through the barring referral service as a result of the engagement offer • DBS Annual Conference held over three days in October 2024 • Facilitated a number of ‘roundtables’ with individual sectors to raise awareness of aspects of disclosure and barring and gather insights across themes has been deferred into the business plan
SO1.2a: We will improve customer confidence by addressing queries and concerns at the earliest opportunity, through an improved online service provision. This will include the in-year development of guidance on key issues, ensuring customers have the information they need, resulting in a reduction in calls and an increase in self-serve solutions. Our working practices and customer services arrangements will be aligned to support this approach.	• Transitioned to a new system contract for customer service ensuring that queries and concerns can be addressed efficiently via a range of channels including increased self-service options, and web-based chat functions

What we said we would do	What we achieved
SO1.3a: We will develop a digital identity (ID) strategy and implement an updated and unified approach to ID validation for RBs and ROs, which is easily understood by customers and increases the use of digital ID validation. We will review, update, and maintain a paper ID process to ensure an inclusive approach.	• Undertook a full review of identity verification (ID) guidance and process • Piloted a streamlined process and removed the direct link to right-to-work making it easier for customers • Digital ID guidance re-developed in line with the Data (Use and Access) Act 2025, which received Royal Assent in June 2025 • Published updated manual ID guidance
SO1.3b: We will complete a comprehensive customer-mapping process across both disclosure and barring to identify actions that will support us in delivering high-quality, efficient, and effective services.	• Developed and launched a customer and employer survey in English and Welsh • Widened the scope of the customer survey reach and increase responses via innovation work
SO1.4a: We will develop an accessibility implementation plan which will incorporate a full staff information and training plan. This will follow an accessibility review of our products and services, including our use of British Sign Language (BSL), Welsh, and Irish Gaelic languages.	• Full accessibility review conducted with implementation plan developed and approved • Increased awareness and documents which are translated into British Sign Language • Accessibility review including reviewing relevant documents and pages on the DBS website to better support those with accessibility requirements including the creation of a support signposting page • Delivery of the implementation plan is ongoing

2025-28 strategy

Throughout the course of this year, we have been developing our new strategy which will run to 2025-28. This was published on 2 April and contains 5 objectives, all of which touch on the customer experience and journey through DBS.

A specific focus for the new strategy is on customer data and insight to ensure that DBS can be even more responsive to our customer needs than before. Capturing feedback and understanding how customers

use and access our services is pivotal to DBS considering any future changes that may be required. Throughout the new strategy, accessibility and ease of use of our products and services remains an underpinning focus and this area of work will continue to be key to the future delivery of everything that we do.

STRATEGIC OBJECTIVE 2

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

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In 2024-25, we focused on maintaining and enhancing existing technology, which is critical for a legacy estate, and we continued to progress the development of the modernisation of our digital services; while ensuring we had the tools 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 RBs and testing online certificates for customers.





What we said we would do	What we achieved
SO2.1a: We will further develop our technology to enable implementation of the necessary changes to issue DBS certificates digitally-by-default and launch the Standard and Enhanced online application service.	• Both of our new online services – Standard and Enhanced application service and Digital Online Results service – were deployed into private beta phase with full life cycle testing undertaken - with live applications having been received, processed and viewed through the new services
SO2.1b: We will explore appropriate enhancements and developments to deliver an improved, accessible Update Service (subscription service) available to DBS customers in line with the recommendation made by the independent review of the disclosure and barring regime.	• Discovery and alpha stage activity undertaken, and based on user research, and existing knowledge and understanding, a number of options for future development work are being considered
SO2.1c: We will make it easier for individual referrers and referring bodies to provide us with relevant information through continually assessing user feedback and making appropriate improvements to our barring referral service.	• Refinements made to the barring referral service resulting in increases in digital referrals received relative to paper referrals
SO2.2a: We will use data and planning models to improve the organisation, and take positive action to improve the quality, effectiveness, and efficiency of our products and services.	• Data Maturity Steering Group established • Number of data maturity assessment workshops and focus groups undertaken • Gaps and opportunities identified for development
SO2.3a: We will replace the interface we use with RBs, known as e-bulk.	• All RBs successfully transferred to the new e-bulk platform in June 2024

What we said we would do	What we achieved
SO2.3b: We will optimise use of automation in our services and increase the use of digital tools to streamline manual processes.	• Robotic process automation, within our customer services environment, has been progressed into the delivery stage • Piloting of Co-pilot undertaken throughout teams in-year • The MS Power Platforms teams is fully operational and working through design stages with first solution roll out being undertaken before year-end
SO2.3c: We will implement improved security tooling and services.	• Full options and impact assessment undertaken with work being carried forward into 2025-26
SO2.4a: We will source, and begin implementation of, our next-generation technology estate and the supporting service model. These, once implemented, will allow us to decommission our legacy applications and infrastructure (legacy technology estate replacement).	• Procurement and tender processes have been undertaken with further developments in progress to be carried forward into 2025-26
SO2.4b: We will deliver improved quality of matching processes and reduce manual intervention.	• Initial tuning completed for matching model with pen testing designed • Further development of existing matching processes and agreement to transition to a service model endorsed – establishment of the matching team to be commenced

2025-28 strategy

Throughout the development of our new strategy, the use and consideration of innovative technology is a key driver and enabler of our future vision. There will be a dedicated objective in the new strategy to ensure that DBS has the capability and agility to respond to emerging and new innovative technology that is available to better support and efficiently deliver our ambitions.

As is the nature of technology-related projects, some elements are highly complex meaning elements of some of the actions outlined here will continue to be developed and implemented into 2025-26. As new technologies are refined, DBS will be able to maximise the use of these to reduce time for processing whilst maintaining the highest quality of products and services.

STRATEGIC OBJECTIVE 3

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

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Being a visible, trusted, and influential organisation is vital to maintaining confidence in the services we provide, significantly contributing to the safeguarding of vulnerable people. Being recognised as a source of specialist expertise also ensures that consistent approaches are undertaken and understood by our partners and stakeholders. 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 course of our Strategy, we have raised awareness with over 50,000 employers across regulated activity providers and non-regulated activity provider sectors.

We have widened our external reach with continued use of our social media communication channels and have continued to align our communications planning to the government functional standards for communication.

We have been developing and trialling our duty to refer framework and developed and delivered a business-engagement programme with retail, logistics, and hospitality supporting the optimal take up of all of our products and services.



What we said we would do	What we achieved
SO3.1a: We will develop relationships with trade bodies, delivering a business-to-business engagement programme with sectors such as retail, logistics, and hospitality. This will help to secure optimal take-up of our disclosure (DBS check) products (particularly of Basic DBS checks).	• Developed a nurture programme with over 500 contacts – this is a monthly communication programme to future progress our relationship network • 2 Commercial roundtables held across a number of sectors (non-regulated activity sectors) • Designed relevant webinars for non-regulated activity sectors
SO3.2a: We will strengthen existing frameworks with formal safeguarding bodies and statutory services, influencing and achieving compliance against legislative or policy requirements by them.	• Additional data sharing opportunities identified with key partners • Piloted failure to refer process • Policy support and guidance provided to relevant government departments • Ongoing engagement undertaken with relevant bodies to discuss enhancements to regulatory schemes
SO3.3a: We will deliver a co-ordinated, multi-faceted compliance improvement programme that includes activity to deliver the IICSA recommendation of increasing compliance with the statutory duty to refer for barring consideration, ensuring that appropriate cases are referred with effective information provided.	• Working group established across DBS • Additional insights and analysis work undertaken to support development of compliance improvement programme • Trial of programme underway to test designed process

2025-28 strategy

Being visible, trusted, and influential is recognised as a pivotal objective for DBS going forward to 2028; this is a specific element of the new strategy and key component of the 2025-26 business plan.

We will continue to roll out the duty to refer

framework and increase our work in educating employers in both our regulated activity and non-regulated activity sectors.

Continuing to support the government's response to the recommendations made within the IICSA report will be a focus for us over the next year.

STRATEGIC OBJECTIVE 4

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.

PHOTOGRAPHY
GETTY IMAGES

Throughout our strategy, we have concentrated on the development of the DBS Academy as we worked to become an exemplar organisation and employer of choice. 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.

For the second year running we ran our annual learning festival, and we have further worked effectively to develop the skills and capability of our staff through our new academy portal.

We have significantly improved our knowledge management functions – developing and delivering our new Knowledge Connect service across the organisation. Within our research and horizon-scanning functions, we have been proactive in understanding impacts of national, local, and sector-based policy developments ensuring that our capabilities can be future-proofed.

We have designed and delivered new essential equality, diversity, and inclusion (EDI) training for all members of staff with a further 4 modules to be delivered throughout 2025-26.

We have identified several efficiency opportunities through the implementation of a rolling programme of reviews across all parts of the business.



What we said we would do	What we achieved
SO4.1a: We will have an agreed employer brand that we use internally and externally which will include employee stories of opportunities and successes that demonstrate that we are an employer of choice.	• Collaborative plan developed across DBS which covers recruitment, onboarding and internal communications • New employer brand will launch in line with the new Strategy
SO4.2a: We will implement a new collaborative operating model to strengthen and drive delivery of EDI activities including staff networks and customer-facing activity.	• New collaborative approach developed and implemented • Opportunity for staff to come together as part of the EDI advisory group informally and formally through a Practitioners Forum • Greater governance in place for EDI activity to strengthen and drive its delivery • Introduced the '5 Is of Inclusion' to ensure every member of staff can reflect and resonate with equality, diversity and inclusion
SO4.2b: We will improve our diversity declaration rates and complete a full analysis of EDI data in relation to recruitment processes, to support the removal of any barriers and further positive action.	• EDI declaration rates have increased throughout the year • Awareness campaigns to raise understanding of the importance of sharing this information undertaken • Relevant EDI data through recruitment, where available, has been considered with options available to support candidates through recruitment processes • Active, positive approaches to recruitment have been undertaken
SO4.3a: We will evaluate the reward and recognition scheme by considering best practices from other government departments, ensuring equitable application throughout the organisation.	• Full evaluation undertaken working with other Government departments and good practice • Updated policy and guidance implemented • Equality and equity of use regularly monitored and active use of the reward and recognition scheme is proactively encouraged

What we said we would do	What we achieved
SO4.4a: We will deliver a co-ordinated approach to research and horizon-scanning to stay ahead of national, local, and sector-based policy developments to ensure our capabilities are future-proofed.	• Implemented standardised training, with cross departmental work on a wide range of projects. • Active participation in multiple cross government communities, • Data repositories across DBS developed with literature reviews of key DBS areas established • Drivers behind DBS demand better understood which allows us to tailor wider forecasts for DBS
SO4.4b: We will begin to capitalise upon opportunities identified through the initiation of a rolling programme of reviews across all parts of the organisation to deliver efficiencies	• Rolling programme of reviews developed and undertaken through the year identifying opportunities for efficiencies going forward • Year 2 plan developed and agreed • Evaluation of activity undertaken this year will support implementation of year 2 plan
SO4.4c: We will ensure that knowledge and team expertise is shared across the organisation, ensuring that we are effectively sharing best practice and guidance.	• Strengthened knowledge management in place • Knowledge management methodologies engrained as business as usual and include knowledge harvest, knowledge cafes, shadow organisation and the knowledge connect service • Community of Practice established across DBS to champion good knowledge management practices and support the delivery of knowledge initiatives
SO4.4d: We will adapt our workplaces to meet current and future operational needs.	• Feasibility studies undertaken on optimum workplaces required in the future • Discussions are ongoing to ascertain steps required and will be carried forward into 2025-26

What we said we would do	What we achieved
SO4.5a: Following the Cabinet Office's Public Bodies review programme and the review of DBS, we will consider the findings and agree an action	• DBS has been well placed and prepared throughout the year to contribute to the DBS review under the Cabinet Office's Public Bodies review programme • Due to circumstances beyond the control of DBS, this review did not commence until Q4 and therefore there has been no time for DBS to consider the findings and agree an action plan • This will be carried forward as business-as-usual work in 2025-26
SO4.5b: We will continue to develop our Value for Money framework, embedding the measurement recommendations into activity and analysing the results of additional data to support greater effectiveness of our operations	• Measurement recommendations have been embedded within activity with performance reporting against all measures in progress • Full dashboard of Value for Money activity – aligned to the value for money questions – is now available • Specific analysis undertaken completed in relation to “effectiveness” and “equity” measures – drawing on insights from customers and employers
SO4.5c: We will develop and design our new post 2025 strategy co-creating it with staff and stakeholders	• The development of the new 2025-28 strategy has been completed with the new strategy being published on 2 April 2025. • This was a collaborative, co-created approach across the organisation with over 50 hours of engagement offered to staff on its development

2025-28 strategy

Developing our workforce, workplaces, and practices are fundamental requirements for our successful achievement of activities in the safeguarding space. This will remain a central focus of activity to ensure that our staff are supported in the best, and most equitable ways.

We will continue to adapt our workplaces

so that we can effectively meet current and future operational needs – we will achieve optimum and efficient practices through year 2 of our business optimisation programme.

In all that we do, our new equality objectives and our ‘5 Is of Inclusion’ approach – as outlined in the new strategy – will be the driving force behind our EDI efforts.

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.

2024-25 was the fifth and final year of our 2020-25 strategy. In 2024-25, our ability to achieve all our performance targets was affected by changing demands for our

services and continued IT platform instability, yet we have continued to respond positively to the challenges faced. We processed around 7.3 million DBS checks, including over 4.6 million Standard and Enhanced checks (including those with Barred List checks). We also barred 6,207 people. At year-end, we have achieved or exceeded 5 out of 8 operational targets and we continued to maintain a high quality of service.

Published service standards

For 2024-25, we achieved 6 out of 11 of our reported published service standards. These standards provide an overall view of DBS performance, encompassing key elements of operations, people, finance, and customer performance.

In 2024-25 our ability to achieve all our performance targets was again affected by changes in the profile of demand for DBS products and the continuing instability of DBS IT platforms. However, 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, despite some challenges to our speed of service. We have achieved our efficiency target for this year and whilst we have not achieved our primary EDI employment target, we have nonetheless made positive progress in this area.

Table 2: Performance against published service standards

KPI description	22-23	23-24	24-25	24-25 target	Status
Quality: barring quality rate of closures (monthly)	99.86%	99.97%	99.92%	>99.50%	Achieved
Quality: percentage of all criminality and barring information that DBS should place on a certificate will be included (monthly)	100%	99.99%	99.99%	>99.98%	Achieved
Quality: customer rating of experience of DBS within previous 3 months (index measure) (annually)	78.4	72.6	75.2	85	Not Achieved
Timeliness: percentage of Basic DBS certificates despatched within 2 days (monthly)	85.2%	87.2%	88.1%	85%	Achieved
Timeliness: percentage of Standard DBS certificates despatched within 3 days (monthly)	N/A	88.7%	90.6%	85%	Achieved
Timeliness: percentage of Enhanced DBS certificates despatched within 14 days (monthly)	78.4%	77.1%	75.6%	80%	Not Achieved
Timeliness: percentage of automatic barring cases completed within 6 months	98.1%	98.1%	98.0%	>97.0%	Achieved
Timeliness: percentage of cases where we were Minded to Bar, that were closed within 9 months	47.8%	59.5%	42.1%	>50.0%	Not Achieved
Efficiency: efficiencies delivered as a percentage of DBS spending	5.2%	5.4%	5.4%	>5.0%	Achieved
People: the engagement level of our employees	58%	Not Collected	64%	≥66.0%	Not Achieved
People: the diversity of our employees	2.79%	4.10%	5.48%	≥7%	Not Achieved

Going concern

As detailed in the Accounting Policies on page 132, DBS is considered to be a going concern. In accordance with the Financial Reporting Manual (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.





PERFORMANCE ANALYSIS

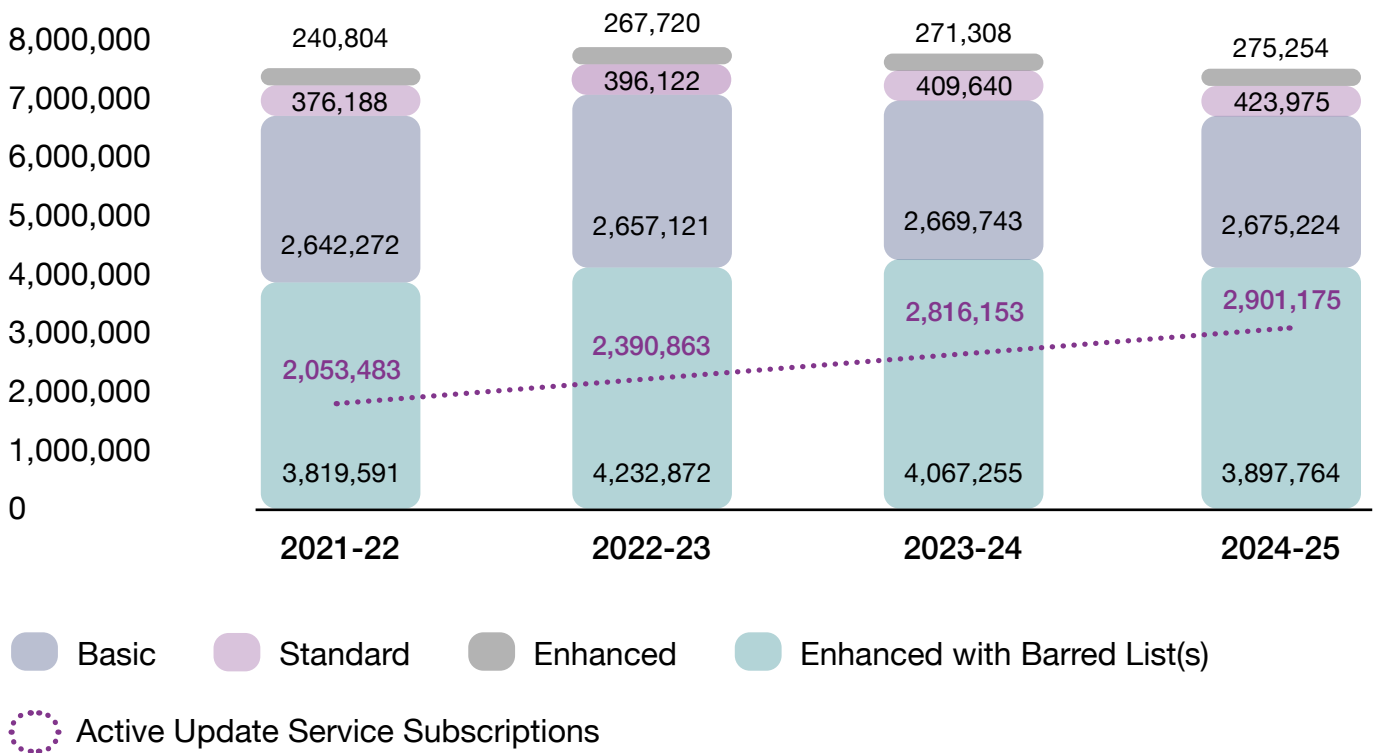
The performance analysis section focuses on the distinct services that DBS provides, covering disclosure services and barring functions, and how performance aligns with our quality standards. It also discloses performance against key aspects such as customer and stakeholder engagement, and our performance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

Disclosure

During 2024-25, we issued a total of 7,272,217 Basic, Standard, Enhanced, and Enhanced with Barred List(s) check DBS

certificates. The figure below shows changes in DBS check application levels and Update Service subscriptions over the last 4 years.

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



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.

Since then, DBS has formed part of these arrangements, to help safeguard individuals and families coming from Ukraine as part of the scheme. This year we have received 5,527 Enhanced checks, with 75.7% of these completing within 14 days. We have received a total of 68,982 Enhanced checks since the launch of the scheme.

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 2024-25.

DBS checks – demand and timeliness

During 2024-25 we issued 2,675,224 Basic DBS certificates for customers in England and Wales compared with 2,669,743 issued in 2023-24. Since the launch of Basic DBS checks in 2017-18, we have issued a total of 16,573,138 Basic certificates.

Once again, the intake of Basic DBS Checks increased on previous years, with a total of 2,679,854 million checks received. The gig economy remains a significant driver behind the increasing application volumes.

Table 3: Time to issue certificates by type

Type of DBS Certificate	2023-2024			2024-2025		
	Target	Attainment	Average time to issue all	Target	Attainment	Average time to issue all
Basic DBS Certificates	85% in 2 days	87.2%	0.8 days	85% in 2 days	88.1%	0.8 days
Standard DBS Certificates	85% in 3 days	88.7%	1.3 days	85% in 3 days	90.6%	1.2 days
Enhanced DBS Certificates*	80% in 14 days	77.1% (target achieved on day 18)	11.6 days	80% in 14 days	75.6% (target achieved on day 20)	12.4 days

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

We processed 7.27 million DBS checks during 2024-25. Standard DBS check volumes represent only 9.2% of total annual volumes of Standard and Enhanced checks.

18.7% of Standard and Enhanced DBS certificates were issued free-of-charge to volunteers, compared to 18% in 2023-24.

Standard and Enhanced check intake during the year was around 182k less than the previous year, continuing the downward trajectory of 2023-24. Volumes were expected to plateau but were affected by changes to the Shortage Occupation List, international student visa legislation, changes to the labour market and the increase to the living wage.

The average 4-week workload target for police forces for Enhanced DBS checks has not been met this year, with an average of 12.2 days for the year, against a service level agreement of 12 days. However, this is an improvement on the 14.9-day average in 2023-24. The target for police cases 'aged greater than 60 days' was not met, with actual performance of 11.5% 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, coupled with ongoing resource challenges at the police forces. The referral volumes to police were within just 0.6% (17.4k) of the 2024-25 forecast. Recruitment challenges at forces continued to impact performance across the 2024-25 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.

Update Service

At the end of March 2025, the total number of Update Service subscribers was just over 2.9 million, representing growth of 3.01% from March 2024. The Update Service was introduced to encourage portability of checks

between employers. It is particularly suitable for people who require multiple checks for roles in different organisations, where the cost of multiple checks could be prohibitive. In December 2024, DBS launched a new annual notification process for volunteer subscribers to the Update Service. This process invites subscribers to confirm whether they still require their subscription. This means that now, subscribers who don't respond, or chose not to renew, are removed from the service.

Previously, volunteer subscriptions were set up for auto-renewal, meaning that subscriptions would be perpetually renewed until the subscriber chose to login and cancel it. The implementation of this solution has reduced growth compared to that seen in previous years.

Barring

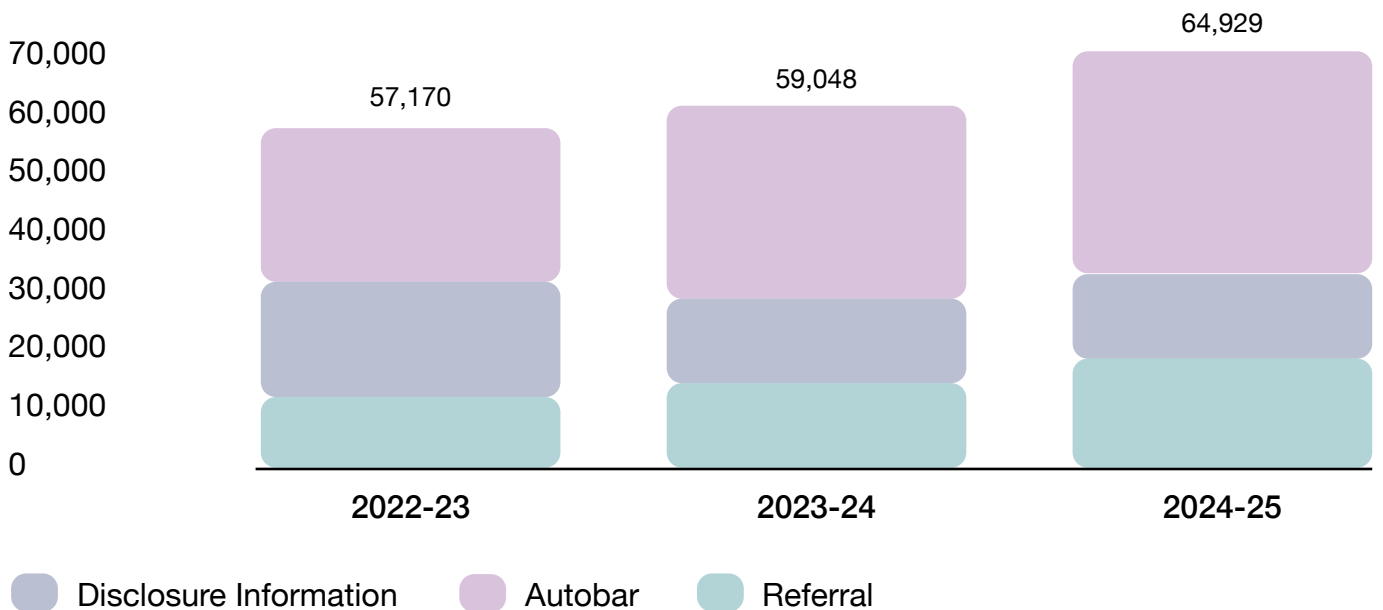
During the year, we continued to deliver our key statutory function to manage the lists of people barred from working or volunteering in regulated activity with children and/or adults (the Children's and Adults' Barred Lists).

There are 3 main ways in which individuals are referred to DBS for barring consideration: referral, disclosure information and autobar.





Figure 3: Trends in referred cases for barring information



In 2024-25, we saw significant growth (14.2%) in referral intake compared to the previous year.

This has been driven by our proactive engagement with regulated activity providers through our outreach and strategic partnerships work. This has been instrumental in educating them about their referral obligations, the timing of referrals, and the critical information required for DBS decision-making. Concurrently, enhancements to the customer journey via the barring referral service have driven increased utilisation of this referral route. This approach was a major contributor to the increases seen this year. We also saw an 8.3% rise in cases generated through the Disclosure Information route and a 10.6% increase in autobar cases. We added 6,207 individuals to the Barred Lists.

Barring quality

Our barring caseworkers make risk-based judgments that are often finely balanced, supported by a rigorous quality assurance process. Where the quality assurance process identifies any cases requiring further work, these cases are prioritised before a decision

is communicated, with learnings shared to enhance the quality of barring decisions.

The 'quality rate of closure' metric, which measures the percentage of cases closed by the Operational Services directorate over the last three years that are later deemed to have an incorrect outcome, stood at an assuring 99.92%, surpassing our target of 99.50% for the fourth consecutive year. This achievement demonstrates our commitment to maintaining high standards in casework decisions, despite the challenge of increased intakes.

Quality remains a cornerstone of our service provision across all functions. Our service quality undergoes regular internal audits, and our barring decision-making process is certified to the ISO:9001 quality standard.

Barring timeliness

In 2024-25, we achieved a 98.0% closure rate for automatic barring cases within 6 months, surpassing our target of 97.0%, which was an increase from the previous year's target of 96.0%. Additionally, we met our timeliness target for cases that did not reach a 'minded to bar' decision, achieving 80.2% against a

target of 80.0%.

However, we faced challenges with the timeliness target for cases where a 'minded to bar' decision was reached. We closed only 42.1% of these cases within 9 months, against our target of 50.0%. The increased volume of referrals continued to exert pressure on this target, which reflects the most resource intensive cases that we deal with.

To address this, we have recruited and trained additional caseworkers in 2024-25 and will continue to do so in 2025-26 to bridge the gap between actual resources and the required capacity to assess growing intake volumes. However, the lead-in time to recruit

and train staff is a further challenge with training alone typically taking 10 months to achieve full competence and productivity.

Case closures

In 2024-25, we closed a total of 19,543 barring cases, representing an 18% increase in the previous year.

Aged cases

During 2024-25, we successfully 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 56 aged cases within Barring work in progress (WIP).

Figure 4: Closed cases for 2024-25

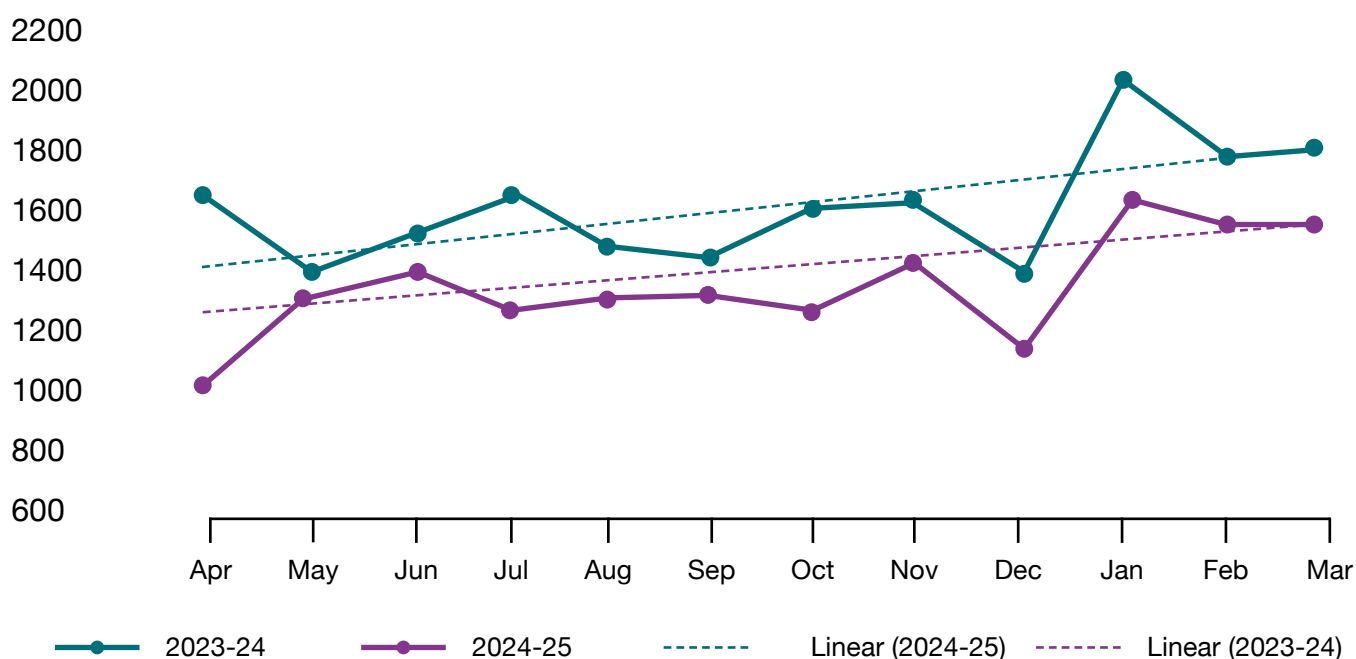
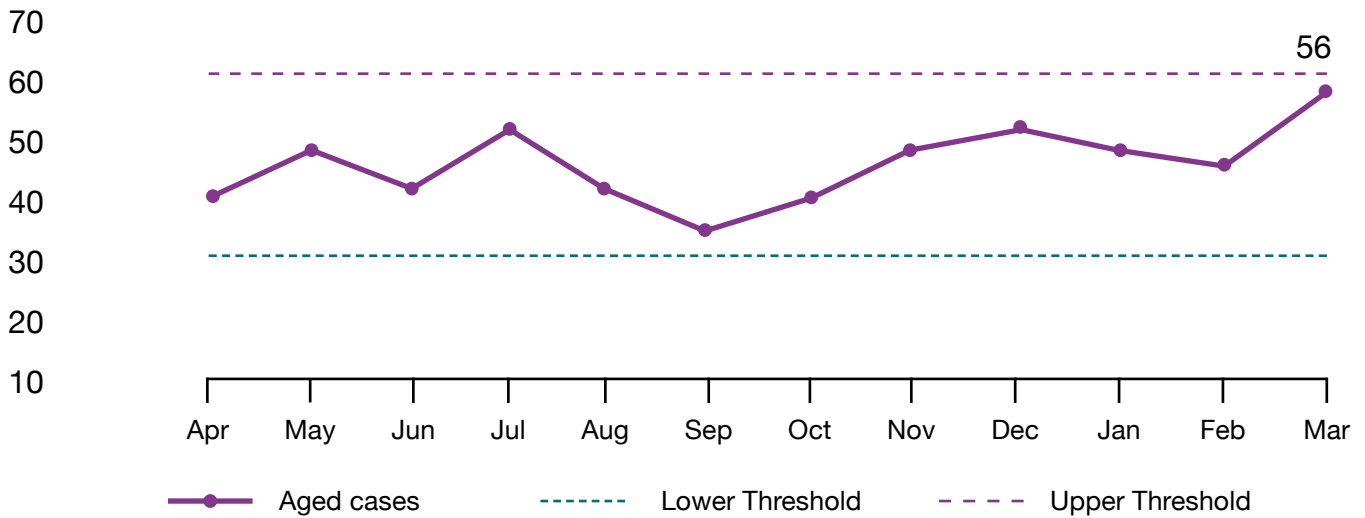


Figure 5: Aged cases for 2024-25



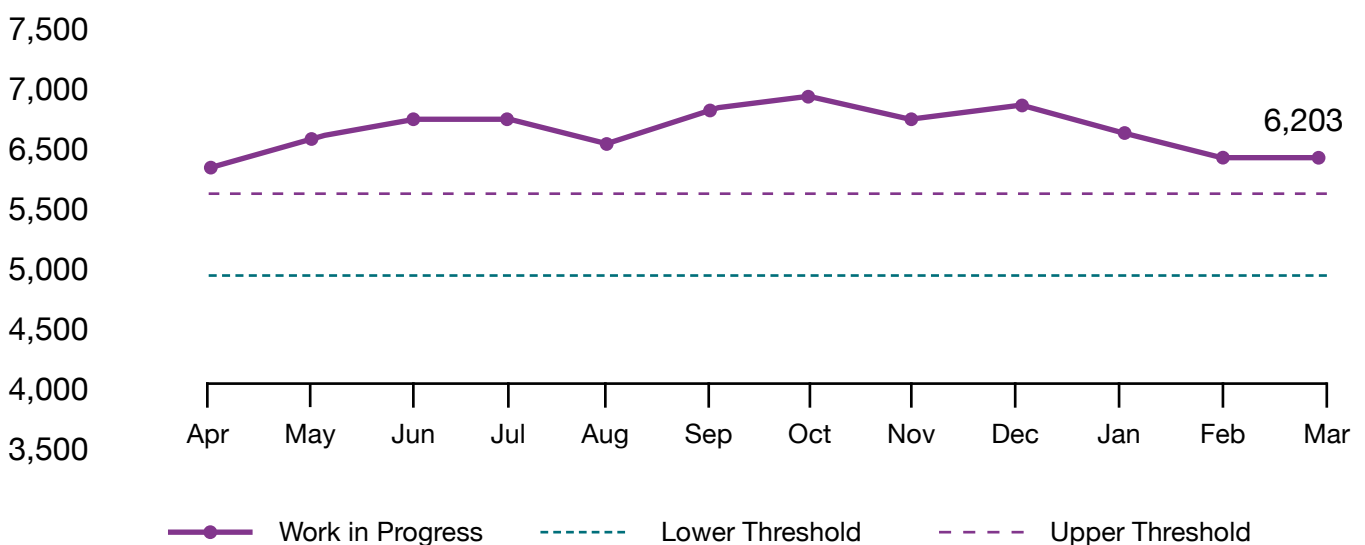
Barring work in progress (WIP)

Despite ending the year above the target operating range, our barring WIP saw a reduction in Q4, finishing with 6,203 cases, a decrease of 55 cases from the end of 2023-24. This achievement was driven by excellent performance in our triage function. However, maintaining this momentum in early 2025-26 will be challenging due to the complexity of the remaining cases.

Looking ahead to 2025-26, we have

strategic plans to address the increase in WIP. These include enhancing our operational capacity and exploring efficiency opportunities through a revised operational structure. Given the recruitment and training timescales for caseworkers, achieving a sustained reduction in WIP will be challenging. Additionally, we recognise that an increased intake will necessitate a higher WIP operating threshold, as more cases will be working through the system at any given time.

Figure 6: Barring WIP for 2024-25



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 2024-25 reporting year, 306 appeals were lodged, representing an increase of 6.3% (18 cases) compared to the

288 appeals lodged in the previous year.

Appeals WIP reduced from 375 at the end of 2023-24 to 307 at the end of this year – a reduction of 18.1%.

During 2024-25, we concluded 374 appeals, an increase of 12.3% compared to 333 concluded in 2023-24.

In 2024-25, 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 2024-25

Status or outcome	2023-24	2024-25	% Change
Appeals lodged	288	306	+6.3%
Closed - DBS withdrew (excluded appeals - appellant removed from Barred Lists)*	49	75	+53.1%
Closed - DBS withdrew (appellant removed from Barred Lists)**	39	47	+20.5%
Closed - DBS decision maintained***	235	236	+0.4%
Closed – removed from Barred List(s) following substantive appeal hearing	10	16	+60%
Total appeals closed	333	374	+12.3%

*Excluded denotes appeals whereby a Paragraph 18A [of Schedule 3 to the Safeguarding Vulnerable Groups Act 2006 (SVGA)] 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



Customers and stakeholders

Customer complaints

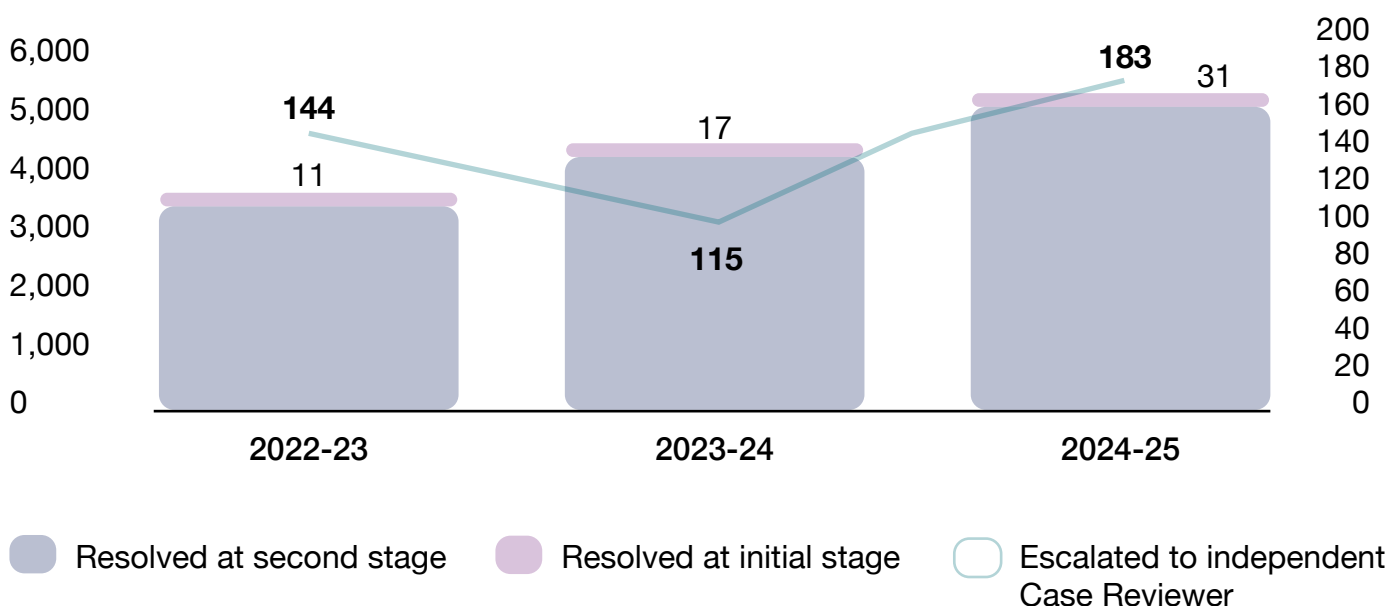
We achieved our targets for dealing with customer service complaints for the year.

Our target was to respond to 98% of all complaints within 6 working days. This target was met, with an attainment of 99.4%.

Table 5: Customer complaints in 2024-25 compared to previous years

	2022-23	2023-24	2024-25
Number of complaints received	3,351	4,287	5,690
% Change	-	+27.9%	+32.7%

Figure 7: Complaints processed in 2024-25



DBS launched a customer satisfaction (CSAT) survey in April 2022 to understand the perceptions and attitudes of customers and stakeholders towards DBS and the customer experience. In May 2024, we issued a refined version of the survey, to deepen DBS' understanding of the experiences of DBS check customers.

Between the 22 May 2024 and 31 March 2025, a total of 347 responses to the CSAT survey were received. Of those, 55 (15.9%)

reported to be satisfied or satisfied with the overall service they received. Similarly, 55 (15.9%) and 50 (14.4%) of respondents were satisfied or satisfied with the speed or quality of service.

In addition to the CSAT survey, the first Employer Survey was launched in May to survey satisfaction levels of employers, and their perceptions on the usefulness of DBS products and services. The feedback from employers was more positive compared

to disclosure customers filling in the CSAT survey, and of 266 responses, 160 (60.2%) were satisfied or satisfied with the overall service. For the speed and quality of service, 97 (36.5%) and 148 (55.6%) reported to be satisfied or satisfied. Employers further shared positive views on the usefulness of DBS checks, with 174 (56.4%) reporting that DBS checks have been extremely or useful to prevent negative consequences for their organisation. This is an encouraging endorsement on the safeguarding impact of our products. The number of respondents is low, but nevertheless likely to be representative of the wider employer population using our products.

For the upcoming financial year, 2025-26, both surveys will be further refined to continuously improve insights into the customer experience and to increase the number of respondents. The employer survey will be repeated between September and November 2025, allowing for the comparison of trends over time.

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 278 organisations in 13 sectors and releases its index each January and July.

DBS was the sixth-rated organisation in Public Services (National) in January 2025 with a score of 75.2 for overall satisfaction, compared to an average for the sector of 73.7.

The Customer Service Excellence standard was developed by the Cabinet Office to offer a practical tool for driving customer-focused improvements. DBS is assessed by external assessors to ensure that all aspects of the standard are demonstrated. In February 2025 DBS was assessed as being fully compliant with all 57 elements of the standard, and was deemed to have exceeded expectations against 11 elements.

External engagement

DBS has been raising awareness and supporting delivery of DBS products and services through external engagement.

To ensure an appropriate and proportionate use of Basic DBS checks we have used a sector-by-sector consultative approach to engage with senior leaders in sectors which do not ordinarily engage with DBS. We have held commercial roundtable discussions and worked with trade bodies and associations to extend our reach. We have developed tailored online resources for distribution through trade body websites and media channels.

Sectors newly targeted during 2024-2025 include property and call centres, and we continued to work with hospitality, retail, gig economies, construction, and logistics.

Maintaining a focus on the rehabilitation of ex-offenders is important to us as part of our commitment to safe and fair recruitment. We encourage employers to adopt proportionate, risk-based recruitment policies that reflect the level of risk associated with each role and applied on a case-by-case basis. We also signpost to organisations such as Nacro and Unlock for further support and guidance. In addition, we have introduced employers to the Employers Forum for Reducing Re-offending, with some subsequently joining the Forum.

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 continued to offer ‘open access’ workshops on a broad range of topics providing access to a wider range of organisations and in response to stakeholder feedback. New content for this year included recognising when it may be appropriate to refer someone to DBS because of harm caused outside the workplace. Through these workshops we have reached over 12,000 individuals working in safeguarding roles and are actively engaging with over 60% of our core stakeholders – for example, the NHS and local authorities – at a regional level, and this will grow over the coming year.

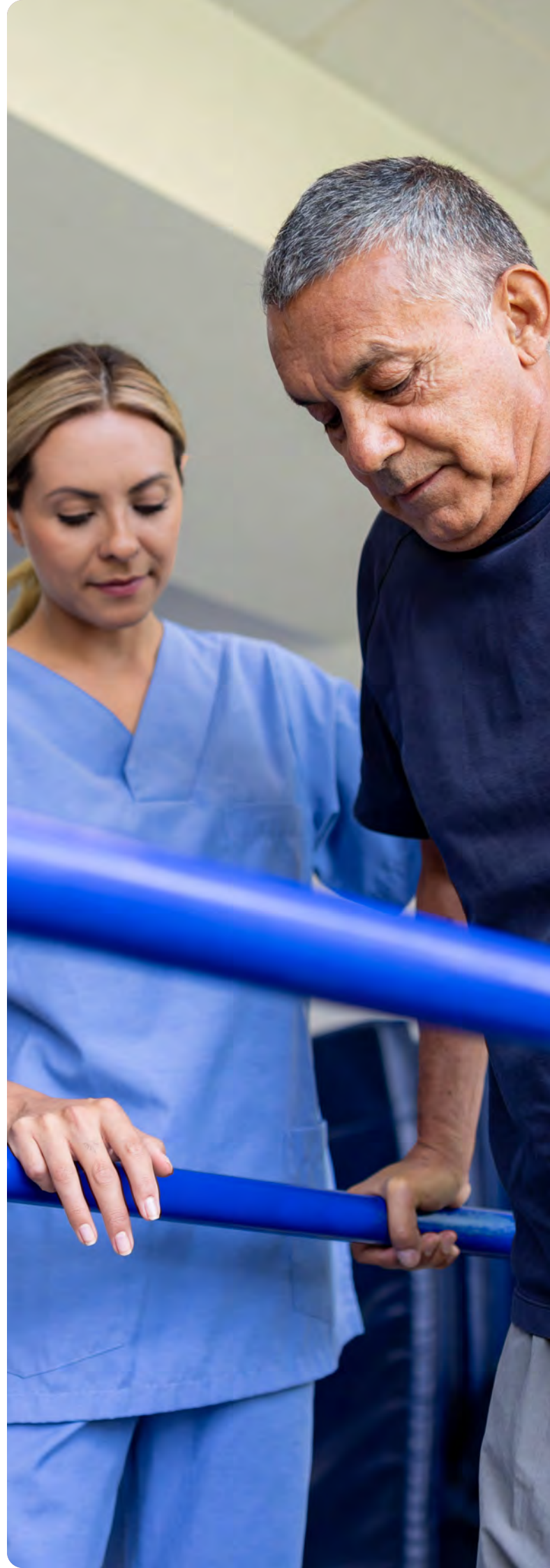
At a national and strategic level, we have been engaging with senior stakeholders in key sectors such as health, education, social care, local authorities, sport, and the rehabilitation of offenders. We have identified and progressed opportunities to collaborate with key partners to deliver our messages and explore data sharing and new ways of working. For example, we have worked 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.

We have held several sector/regional based online and in-person roundtables, which have led to excellent insight and collaboration from safeguarding and HR leaders. In the next year we plan to expand these to include further sectors and regions. This year the DBS Annual Conference was held over 3 days, online, with over 16,000 people registering to attend. The event could be watched live or downloaded on-demand.

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 2025, there were 644 RBs (a reduction of 33 from March 2024). These RBs submitted 4.612 million



applications during 2024-25, in comparison to around 4.7 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 or 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 92 ROs at the end of March 2025. The 92 ROs submitted 2.680 million applications in 2024-25, in comparison to 2.672 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 3 relevant recommendations, engaging with relevant government departments and external stakeholders as considerations are given to implementing those recommendations. Progress has been made in all 3 areas.

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

We have also sought to continue to work with the Home Office on the issues raised by the independent review of the disclosure and barring regime carried out by Mr Simon Bailey CBE, QPM, and published in April 2023. The Home Office is now dealing with them as a matter of business as usual.

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.

As of March 2025, there are 32 identity service providers (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 have started a review of digital identity, assessing implementation, and setting out plans for future development.

The Data (Use and Access) Act 2025 received Royal Assent in June 2025. The Trust Framework was previously updated under the earlier draft of the Bill, with DBS

reviewing and providing comments on those changes in 2024. The updated Framework has now been published by DSIT, following Royal Ascent and in anticipation of the legislation coming in to force. Some changes introduced through the Act have implications for how the DBS Supplementary Scheme will be drafted and maintained. Responsibility for the Supplementary Scheme now sits with DSIT. The DBS Policy Team is working closely with DSIT to ensure that the technical guidance aligns with DBS digital identity requirements.

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 is the fifth account 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 2024-25.

Safeguarding

DBS' ongoing commitment to safeguarding through the provision of a quality service and its aspiration for safeguarding and quality to become a tangible and recognisable feature of DBS culture is clearly demonstrated in the evidence above.

The Operational Services directorate who are responsible for delivery of our key products and statutory responsibilities have once again invested significantly in training and development activity to ensure the workforce understand their safeguarding responsibilities and that continuous learning

and developing is key to delivering a quality service.

That investment has applied equally to new staff as well as existing staff with a broad range of reflective learning such as themed case conferences, learning from appeals and root cause analysis, and refresher training such as evidence evaluation, police national computer system training, unsure matching, and data retention training. We have also ensured colleagues learn from our external safeguarding partners such as the Care Quality Commission, which demonstrates our collaborative, inclusive approach and eagerness to learn from those who can enhance our ability to safeguard vulnerable groups.

Understanding the fundamentals of safeguarding and how the work of DBS (both collectively and as individual teams/ areas) makes a difference to those most vulnerable in society, is the foundation which supports all learning across DBS. It's therefore encouraging to note the percentage of colleagues completing the mandatory Safeguarding Level 1 training has exceeded expectation and increased by 14.8% when compared to the previous performance year (73% compared to 87.8%).

As set out in the quality assurance framework, quality control and assurance are everybody's responsibility. Central to that is identifying the right quality assurance mechanisms and approaches, and responding when management information highlights emerging issues. The narrative provided in the quality account evidences this ongoing reflective practice where we are holding ourselves and each other to account. For example, we have made improvements in our customer service team following disappointing assurance results in the previous performance year by introducing quality assurance managers within each customer service area and independent customer relations manager checks.

Whilst it is disappointing to note there

have been delays to updating the police disclosure units' quality assurance framework for Enhanced checks due to other competing business priorities, it is positive that the barring quality assurance framework has been updated in consultation with forces which should lead to improved consistency.

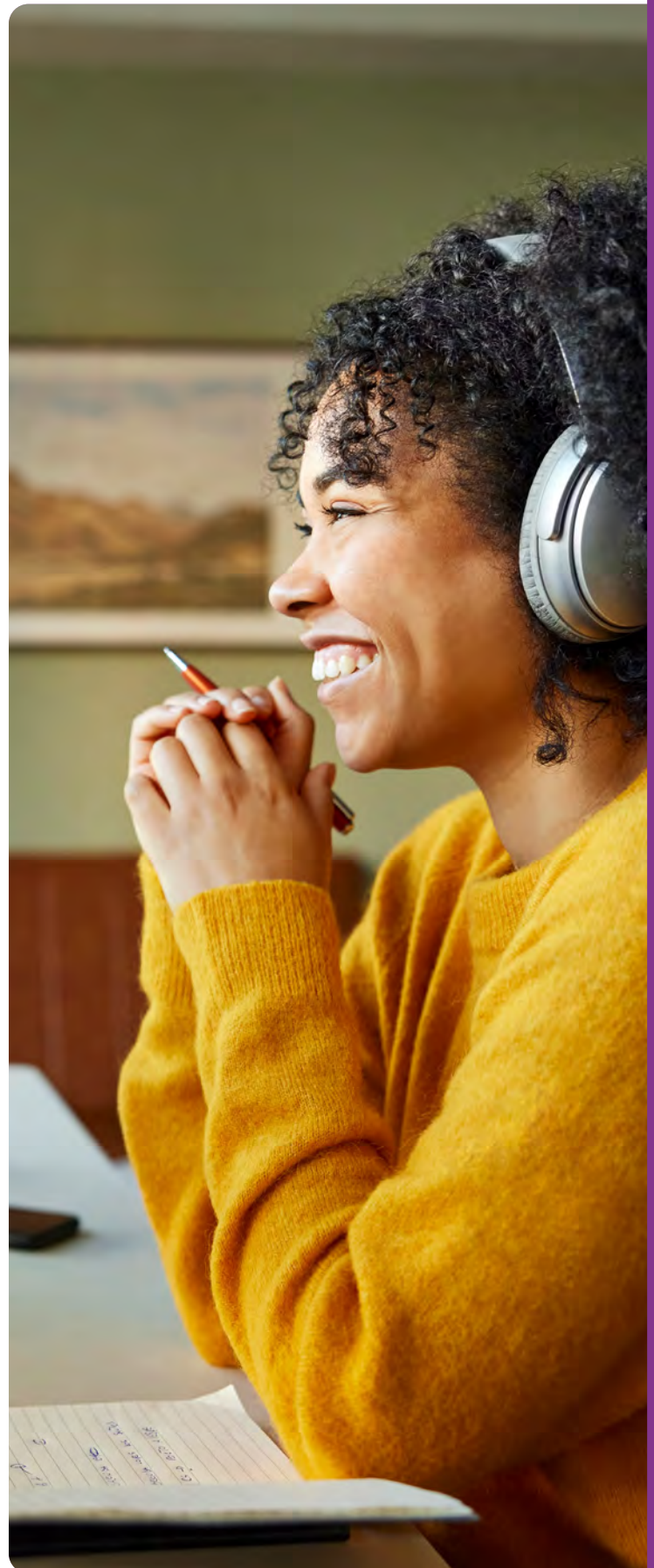
Finally, the work DBS has done throughout 2024-25 with our safeguarding partners in relation to reinforcing the duty to refer and improving the provision of information highlights our commitment to prioritise activities that enhance our ability to safeguard whilst challenging those that undermine our ability as set out in the safeguarding quality charter principles.

Efficiency and effectiveness

The DBS quality assurance framework imperative of 'efficiency and effectiveness' focuses on asking how we know we present good value for public money, whether all parts of the business are working well together and with partners, stakeholders, and customers, and whether we are a learning organisation.

There is a wealth of demonstrable evidence that activity across both operational and corporate or support functions throughout 2024-25 has sought to deliver a resoundingly positive response to those questions.

Our approach to continuous improvement is one led by staff who deliver our services, and stakeholders and customers who are affected or impacted by those services. The reflective culture of seeking to introduce efficient ways of working which improve customer experience, increase our ability to focus on value added safeguarding responsibilities, and realise financial efficiencies, is embedded throughout the organisation. This can clearly be seen by the volume of change initiatives reviewed and progressed. In addition, DBS demonstrates its alignment to the government strategy of modernising services through advanced technology and artificial intelligence (AI)





via the investment we continue to make in exploring innovative solutions to streamline our ways of working.

DBS has also continued to recognise the vital importance of supporting staff to ensure we can deliver our strategic objectives, vision, and purpose. Our staff have delivered an excellent performance this year and we thank them for their efforts. This appreciation can be seen in the increased use of our reward and recognition initiatives. DBS colleagues are passionate about the work they do and rightly demand they have the skills, knowledge, and tools to be able to perform at the highest level. During 2024-25, we invested in reviewing corporate and operational policies, procedures and guidance documents, embedded the digital DBS Academy platform, which has seen over 1400 colleagues engage with learning and development opportunities and continued developing our knowledge management service to provide knowledge resource accessible for all.

Although just over half of the workforce completed the 2024 employee engagement survey, it is encouraging to note that engagement scores have improved across a range of themes included within the survey. DBS understands it is key to have an engaged workforce in terms of wellbeing, productivity, and customer service and has continued to listen to and act on the employee voice.

Whilst it is noted that balancing business needs with apprenticeship requirements has proved challenging, it remains encouraging that we have seen some growth in the take up of the scheme.

Finally, DBS has made further strides in achieving our ambition to be a more sustainable and greener organisation by reducing greenhouse gas emissions, water consumption, and paper usage. We also remain committed to consciously increasing our social value and have promoted initiatives for staff to take part in activities which benefit

local communities.

User experience

The DBS model of quality improvements includes ensuring we learn about customer/ user and stakeholder perceptions, issues and expectations and using these views to inform and support changes in product development and service delivery. Throughout this performance year there has been a significant focus in collaborating with both established and new partners.

We have increased the reach of DBS in several ways during 2024-25 including the first DBS Spring Conference being delivered via LinkedIn Live where newly-developed content on our Basics service was presented to audiences who had previously not engaged with DBS. The panel discussions facilitated at the DBS Annual Conference and the sector-by-sector consultative activity undertaken by our Research team, provided effective platforms for us to gain valuable insight and feedback, which has and will be used to support improvements in the customer experience.

In addition, our reflective and collaborative approach to digital modernisation ensures user needs and views have been captured as we develop new products. Examples include RBs testing the DBS Standard and Enhanced Application Service and Digital Online Results Services, and introducing enhancements to existing services such as referring parties providing vital feedback in relation to 'save and return' functionality for the barring referral service.

Social media is increasingly becoming the way the public and safeguarding sector professionals engage generally, and DBS sees this as an essential and effective channel of two-way communication, in terms of understanding views and also providing information and updates on our safeguarding services. As such, we continued to invest in increasing visibility via these channels and saw our followers increase across X

(previously Twitter), Facebook, and LinkedIn. Finally, DBS further demonstrated its commitment to EDI and delivering against our Public Sector Equality Duty (PSED) during 2024-25. Our ambition to embed a culture of EDI and put that at the centre of everything we do is clear in the evidence provided in the quality account. Highlights include the development of an accessibility implementation plan to support staff and customers as well as ensuring resources are made available in British Sign Language, contributing to a better-quality customer experience and ensuring our service activities support people with diverse needs.

Financial performance

The DBS budget reflects the estimated costs of delivering services and achieving business priorities, balancing service demand, efficiency, and risk. It aligns with business plan milestones that support our strategic objectives and complies with HM Treasury's Managing Public Money (May 2023), which requires fees to break even each financial year. Effective cost control and volume forecasting are critical, and where possible, fees are reduced to deliver value for money to service users.

For 2024-25, DBS recorded a £20.6m surplus of which c£4.8m is driven by the nature of the accounting treatment in respect of the TCS case. Surpluses, past and present, are recognised as a CFER creditor, with amounts remitted based on forecasted cash requirements agreed with the Home Office. Over the last five years, holding fees against inflation and implementing targeted reductions has delivered £398m in cumulative savings to customers and the public purse (see Figure 8 opposite).

On 2 December 2024, fees for DBS checks were increased for the first time since April 2022 to offset rising operational costs of delivering DBS's safeguarding services. Each fee was set to fully recover its associated cost, following scrutiny and approval by

the DBS Board, Home Office, HM Treasury, and the Minister for Safeguarding. These adjustments are essential to maintaining service quality and supporting DBS' safeguarding role.

DBS continues to focus on efficiencies to deliver value for money to both customers and the Home Office. In 2024-25, 5.4% efficiency savings were achieved against a 5% target, representing annualised sustainable savings of approximately £8.5m across 28 schemes. Further efficiency schemes are being developed to support the 2025-26 budget and future financial targets. Key highlights:

- Record volumes of applications processed, resulting in higher fee income within the cost recovery framework
- Fees remain significantly below cumulative Consumer Price Index (CPI) inflation, supporting value for money for service users
- 5.4% efficiency savings delivered against a 5% target, equating to £8.5m annualised savings across 28 schemes

Analysis of the balance sheet

At 31 March 2025, DBS' total assets increased compared to the prior year, primarily driven by higher cash balances. This reflects the £20.6m in-year surplus, including the £13.7m release of the AME provision following settlement of the TCS litigation case.

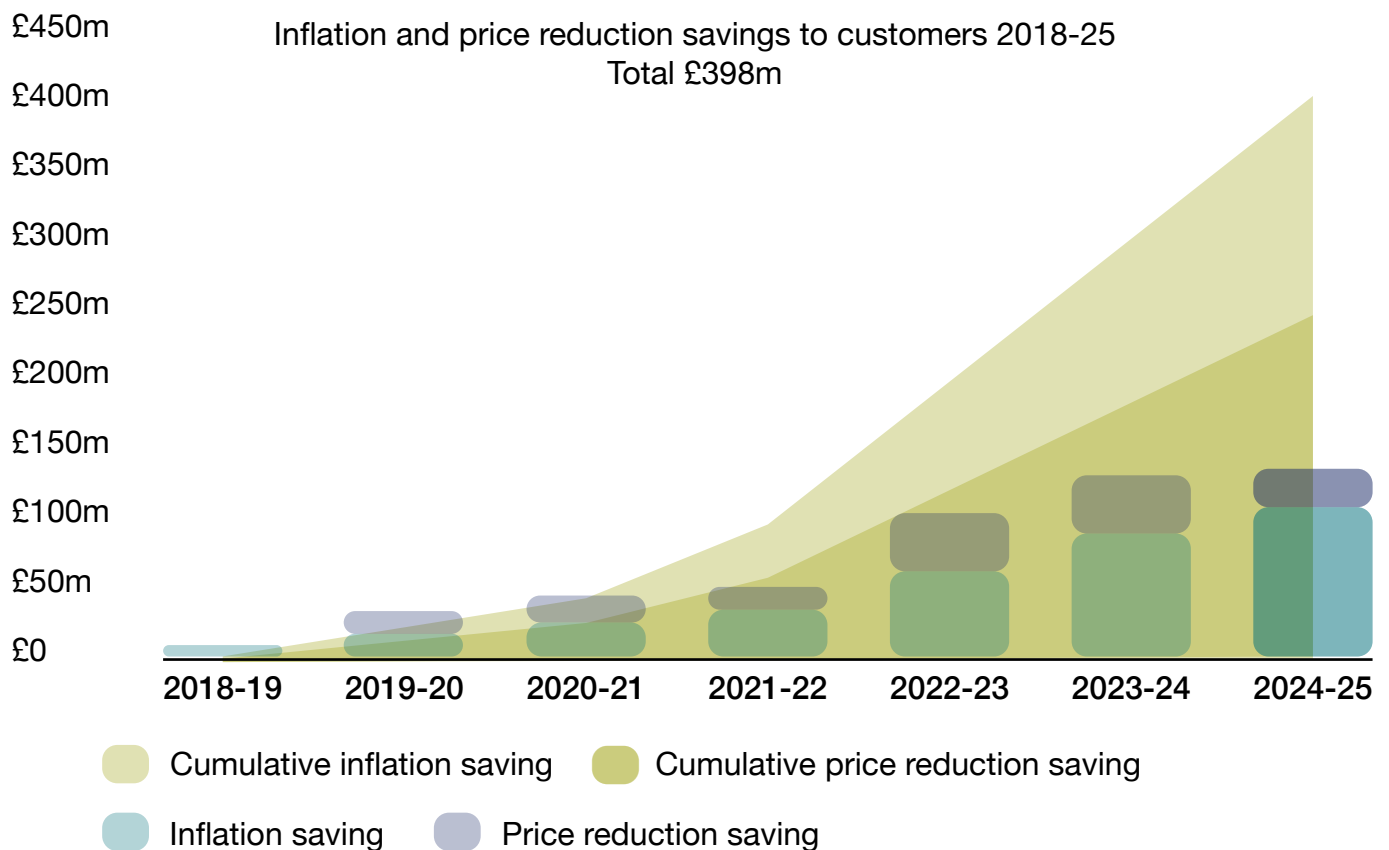
Non-current assets increased as a result of continued investment in IT systems, aligned with DBS' longer-term capital investment plans. This was partially offset by depreciation charges for the year. The useful lives of certain software assets were reassessed during the year, extending their anticipated service periods and aligning with updated delivery plans.

Total liabilities decreased, mainly due to the release of the AME provision noted

above. The CFER creditor balance increased, representing the surplus to be remitted to the Consolidated Fund in line with Managing Public Money. As a result, the year-end cash balance includes amounts earmarked for remittance and does not represent free reserves for discretionary use.

Overall, DBS's net asset position strengthened, supported by higher cash balances and reduced liabilities. This ensures the organisation is well placed to meet its operational and capital commitments in 2025-26 while continuing to operate on a full cost recovery basis.

Figure 8: Inflation and price reduction savings to fee payers 2018-25



Financial summary

Figure 9: How we generated our income

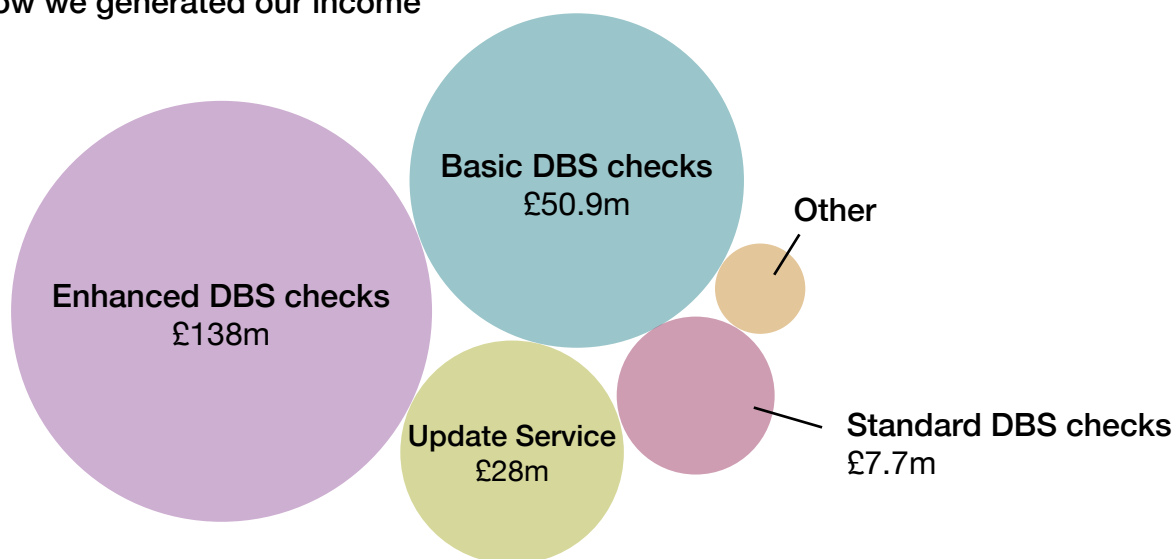
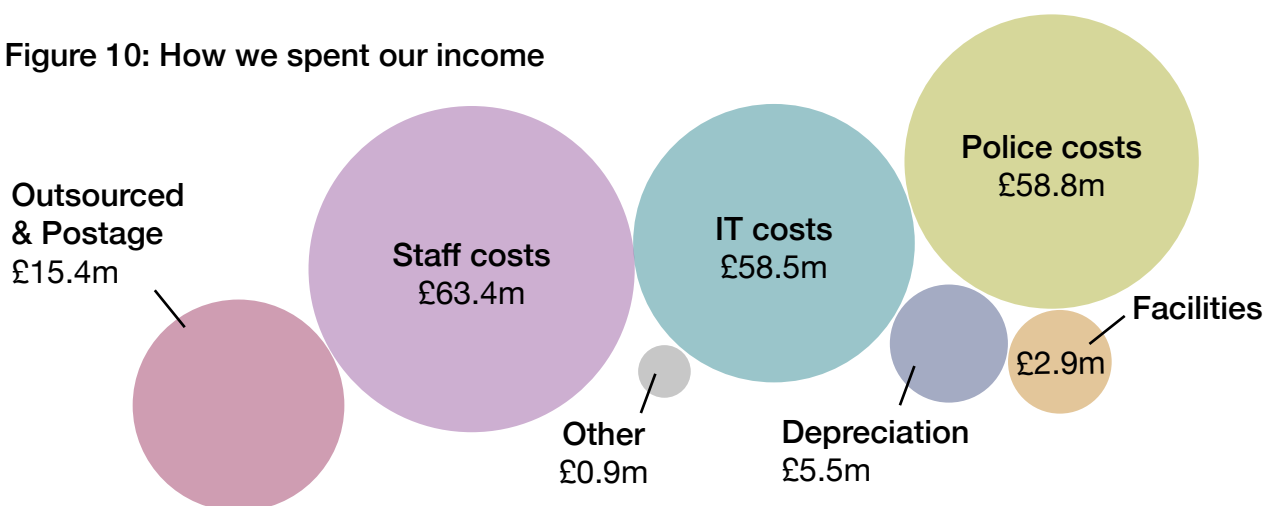


Figure 10: How we spent our income



How we generated our income in 2024-25

Basic DBS checks

Basic income has largely remained in line with budget with reduced demand through direct applications from applicants; this reduction in demand has been offset by fee increases.

2024-25 income: £50.9m
Variance to budget: +3%

Standard DBS checks

Demand for Standard checks has continued

to rise, with strong performance within the key sectors; marginal increase to income is also attributable to the fee increase.

2024-25 income: £7.7m
Variance to budget: +15%

Enhanced DBS checks

Demand for Enhanced checks remains strong as employers seek additional assurance to make safer recruitment decisions. Overall volume demand was 4% below budget,

driven by reduced demand across care and medical sectors, though reduced demand was offset by fee increase.

2024-25 income: £138.4m

Variance to budget: +2%

Update Service

Increases in DBS check applications has generated additional new subscribers to Update Service.

The long-term trend includes a mix of increased volunteer (non-paid) subscribers.

2024-25 income: £28.0m

Variance to budget: 2%

How we spent our income

Staff costs

Staff costs mainly remained in line with budget, though there were increases to some costs such as overtime, these were offset by vacancies not being filled as quickly as expected. Staff costs increased against the prior year primarily as a result of the pay remit and an increase to employer pension rates.

2024-25 expense: £63.4m

Variance to budget: -1%

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 increase in line with the levels of applications and barring referrals received, along with reduced legal fees in 2024-25.

2024-25 expense: £136.7m

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 increased against the previous year, as new assets came into use and the useful lives of assets were re-assessed reflecting the longer-term capital investment plans of the DBS.

2024-25 expense: £5.5m

Variance to budget: -1%

Provision

The very nature of provisions and the budget in which they sit means there is considerable volatility. The 2024-25 provision credit accounts for the full settlement of the TCS litigation case during the year. Refer to note 13.

2024-25 expense: (£782,000)

Variance to budget: -

Other non-financial performance

DBS has several policies which cover anti-corruption, 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 2024-25, no material incidents were reported.

Sustainability report

Sustainability information is compiled for DBS by Home Office Property Services (HOPS) Environmental Sustainability team as HOPS provides shared estates services to the Home Office, including the buildings that DBS occupies. As a non-departmental public body (NDPB) of the Home Office, DBS is committed to the UK government sustainability program.

DBS continues to improve understanding of climate change, expand data coverage and improve granularity in line with FReM minimum requirements, and to enhance transparency over sustainability objectives and performance.

Data quality

Sustainability data is gathered and validated by an external organisation and is quality assured by the (HOPS) Environmental Sustainability Team 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 Government Property Agency (GPA) and does not include where estates services are provided by a landlord and re-charged 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' non-financial indicators are compiled using data from the final quarter of the previous reporting year plus the first three 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 2024-25 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. Scope-1 (direct) and Scope-2 (indirect) emissions are separately tracked (table 6).

Our performance has improved against a number of targets since last year. We have achieved a 73% reduction of greenhouse gas emissions, meaning we are on track for the 2025 GGC target of 44%.

During 2024-25, water consumption reduced by 71% and paper usage reduced by 90% compared to the baseline year.

The proportion of waste recycled this year

is slightly lower than the 70% recycling GGC target at 67% and we sent zero waste to 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 43%. DBS continues to explore waste minimisation and management, including the reuse office furniture and IT peripherals where possible. We will include a reuse and recycling plan as part of our Future of Estates project. The data for total waste excludes ICT waste. We have previously been unable to report data on ICT waste separately, but we are working with Home Office and our IT provider in order to record this and plan to report on it from next year.

Water consumption continues to reduce, and we will look to improve supplier data and use of smart meter information. We are currently working with Home Office to develop our position on indirect water, and development of a water plan

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, emissions from domestic business flights continue to reduce. DBS is committed to the removal of single-use plastics from its estate and has ensured that reusable plastics are utilised where possible, meaning that the utilisation of single-use plastics is 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 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. DBS is aware that other resources such as energy, mileage, water and waste are produced at supplier sites or where staff work from other locations.

Table 6: Overall GGC performance for 2024-25

Area	Metrics	2017-18	2020-21	2021-22	2022-23	2023-24	2024-25
Greenhouse gas emissions	Total emissions (tonnes CO ₂ e)	970	732	854	374	277	264
Energy	Usage (kWh)	2,710,021	3,342,172	3,147,510	1,951,059	1,289,574	406,295
	Expenditure (£)	383,468	316,235	327,066	554,598	675,805	423,427
Domestic flights	Total emissions (tonnes CO ₂ e)	2.2	0	0.42	7.03	0.41	1.09
	km travelled	15,772	0	1,696	34,567	2,573	8,578
International flights	km travelled	46,101	0	0	0	0	0
Office waste	Amount (tonnes)	47	103	118	85	51	27
	% recycled by weight	100%	74%	61%	70%	76%	67%
	% Landfill	0	1%	0%	0%	0%	0%
	Expenditure (£)	7,109	29,067	N/A	N/A	N/A	N/A
Water	Consumption m ³	7,791	4,066	4,009	5,566	2,616	2,251
	Expenditure (£)	45,808	44,842	32,235	12,817	12,684	13,514
Paper	Amount (A4 reams equivalent)	4,885	475	945	972	940	501
	Expenditure (£)	19,902	1,224	2,699	2,776	3,426	1,841

*23-24 non-financial indicators have been restated to include actual performance data for the financial year

Table 7: Overall GGC performance against targets for 2024-25

Area	2024-25 performance against target*	Achievement against target	Explanation where target not achieved
Reduce greenhouse gas (GHG) emissions by 44%	73%	Achieved	
Reduce direct GHG (from heating) by 25%	-91%	Achieved	
Reduce the emissions from domestic business flights by at least 30%	-50%	Achieved	
Reduce the overall amount of total waste generated by 15%	-43%	Achieved	
Landfill waste to be less than 5%	0%	Achieved	
Increase the proportion of waste which is recycled to at least 70% of overall waste	-67%	Not achieved	Slightly below target, due to other building tenants using DBS waste management for a short period of time.
Reduce paper by 50%	-90%	Achieved	
Reduce water consumption by at least 8%	-71%	Achieved	
Remove consumer single-use plastic (CSUP) from the central government office estate	-	Working towards target	We are working towards this target.

*Target is by 2025 against a 2017-18 baseline, unless otherwise stated. The 2017-18 year has been taken as the baseline as DBS's targets continue to be founded against 2017-18 actuals.

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 (a) to (c))
- risk management (disclosures (a) to (c))

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:

- Given DBS' role, we consider our climate-related 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 DBS 2025-2028 strategy in which sustainability is an underpinning focus in everything we do
- 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 GGC 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 4 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 (ARA) including scrutiny of progress against GGC.

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.

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, 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 compiles the ARA including progress against the GGC and other sustainability targets, as required under the Government Financial Reporting Manual (FReM) sustainability and TCFD-aligned disclosure requirements.

An executive director has overall responsibility for climate-related responsibilities and reports against these

through governance channels, ensuring integration of climate-related considerations into decision-making processes where relevant.

In 2024, the Home Office commissioned Climate Change Risk Assessments for its own property assets, identifying the key risks to its estate and operations. DBS, as a sponsored entity of the Home Office, will be actively engaged within this commission.

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.

Clarification of sustainability objectives:

DBS is in the process of working with Home Office to clearly define and distinguish between targets, commitments, pledges, goals, aims, and ambitions, and integrating these into organisational plans and budgets.

For phase 2, the TCFD recommendation for Metrics and Targets is to disclose the metrics used to assess climate-related risks and opportunities in line with its strategy and risk management process, and describe the targets used to manage climate-related risks and opportunities and performance against targets.

DBS complies with the detailed GGC reporting in the 2024-25 ARA. Tables 6 and 7 provide full details of DBS' performance against the GGC and associated targets.

In July 2024 a corporate risk was added: 'Failure to manage climate change impact', managed and mitigated within the DBS Risk Management Framework, in line with TCFD risk management disclosure principles.



Dr Jeff James CBE, Accounting Officer
18 November 2025





ACCOUNTABILITY REPORT

This report explains the composition and organisation of DBS' governance structures for the period 1 April 2024 to 31 March 2025 and how they support achievement of DBS' objectives.

PHOTOGRAPHY
GETTY IMAGES



Directors' report

DBS is a body corporate established by the Protection of Freedoms Act 2012. It is designated as an 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.

A framework document agreed between the Home Office and DBS sets out how DBS operates. It is being reviewed by the Home Office and DBS within the context of the Cabinet Office's Public Bodies Review programme of DBS which commenced in January 2025. The review is being undertaken by Ann Harris OBE. DBS is working closely with her review team to provide the information required and we look forward to her report, which is expected in the next financial year.

The framework document is supported by a delegation letter from the Home Office to the DBS chief executive setting out the chief executive's financial authority. The delegation letter was received on 13 January 2025. Dr Jeff James CBE was appointed on 14 April 2025, initially as DBS Designate Chief Executive in anticipation of the former CEO's

retirement. Dr Jeff James took up post of Chief Executive and was appointed by the Permanent Secretary as DBS Accounting Officer with effect from 1 June 2025.

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. Two new members, Amanda Arrowsmith and Rob Eason, were appointed by the Minister on 3 February 2025 to replace Mary Cunneen, whose term as a member came to an end on 31 December 2024 and Samantha Durrant whose term ended on 31 March 2025.

The chief executive chairs our 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 (GDPR), there have been no personal data-related incidents, classified as 'Unauthorised Disclosure', reported to the



Information Commissioner's Office (ICO) for the reporting period 1 April 2024 to 31 March 2025.

After the reporting period, a data breach was identified which has been reported to the ICO on 3 September 2025. We await their response and direction.

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 GOV.UK, via the online DBS register of interests. 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 confidentiality 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 responsibilities

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 FReM 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 FReM 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.

This report relates to a period when I was not the accounting officer. I was appointed accounting officer with effect from 1 June 2025. I met with my predecessor, Eric Robinson, and received a letter from him providing appropriate assurances that the system of internal controls was sound and effective prior to my appointment, that direction has been given to provide all relevant material to auditors, and there are no matters to be drawn to my attention. Therefore, I consider that I have sufficient knowledge to take responsibility for this statement and confirm that I have taken all steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the department's 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 ARA 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 2024 to 31 March 2025

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 throughout the reporting year.

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 period 1 April 2024 to 31 March 2025.

Board governance

The board

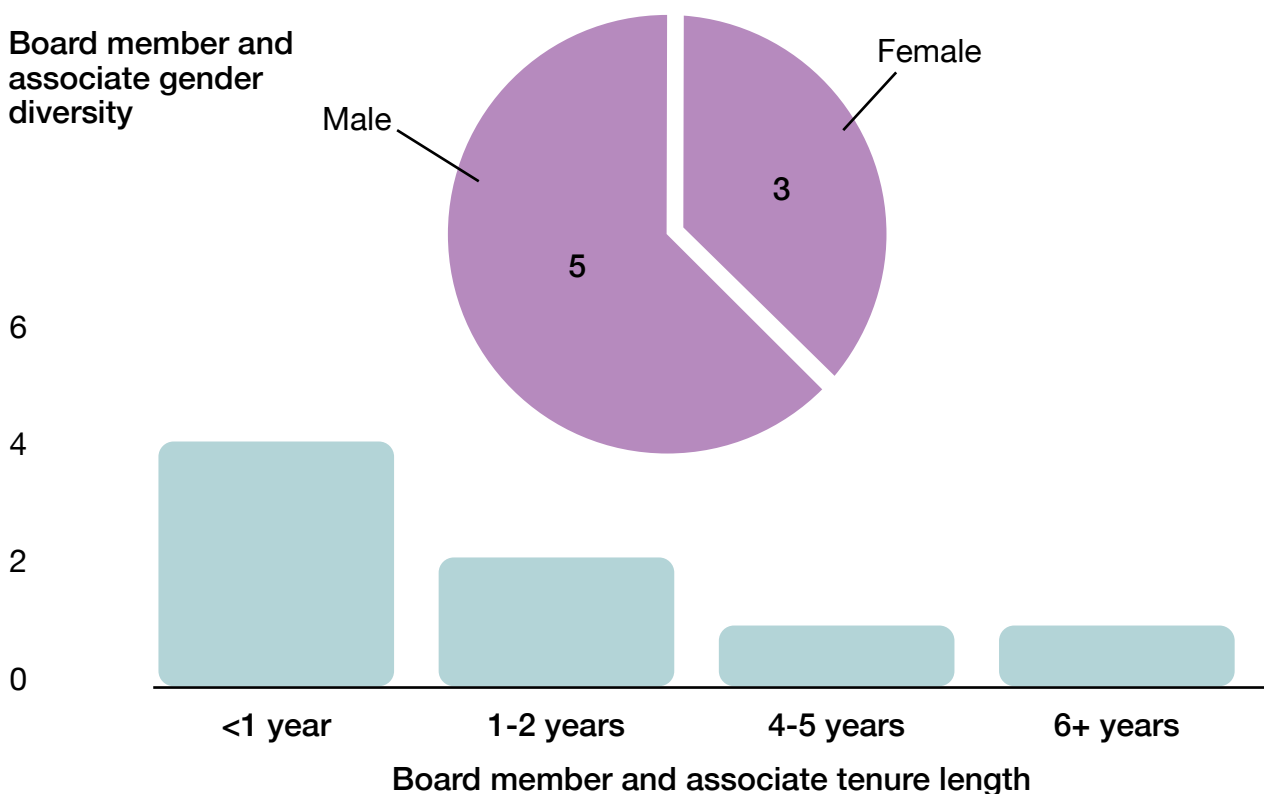
The DBS board is made up of DBS members appointed by the Secretary of State, all of whom act as non-executive board members.

The chief executive, 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 associate board members 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, including with the appointment of 2 new board members during this reporting period, to seek to strengthen board skills around driving efficiency, commercial skills and complex contracting, information technology, cyber, artificial intelligence, automation, and data protection, customer

Figure 11: Board member and associate diversity and tenure data



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 3 associate members to provide additional coverage across committees. 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 below.

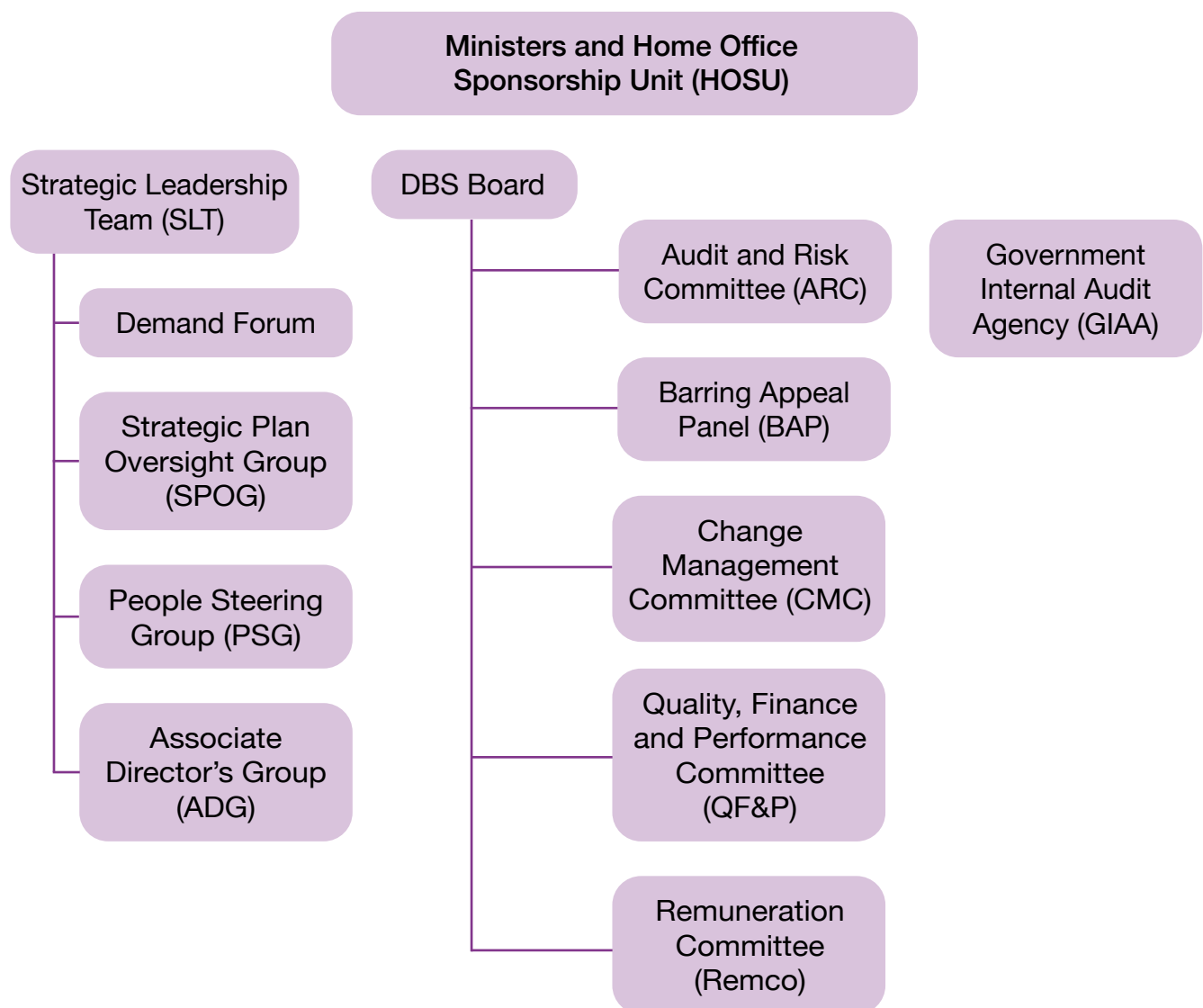
The board met on 9 occasions between 1 April 2024 and 31 March 2025, consisting of 6 board business meetings, 2 board development meetings, and one exceptional board meeting. The chairman invited the Head of HOSU to every scheduled board meeting.

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.



Figure 12: Board, SLT, committees, and HOSU structure



Summary of board work

The above figure shows the structure and how DBS board interacts with its committees, SLT, and the Home Office Sponsorship Unit as of 31 March 2025.

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 each committee's annual report for 2023-24 to ensure they deliver optimum oversight and direction

- agreed the TCS litigation strategy and ensured appropriate board oversight to deliver the best possible outcome for the public purse
- considered the timetable and approach for delivering the next strategic plan and shaped the post-2025 strategy through a series of development sessions

- approved the DBS strategy for the next 3 years covering 2025-28 and the DBS business plan for 2025-26, and approved the

3-year budget and the product and service fees for 2025-26

- considered the annual Value for Money (VfM) report to ensure 7 key VfM questions in the VfM framework are addressed and the out-turn of the assessment measures are appropriate
- regularly considered the risk register to ensure strategic risks and their control is appropriate and conducted an annual review and horizon scanning for strategic risks
- decided the appropriate action to take regarding charging for fees in Crown Dependencies after an issue was identified that the Statutory Instruments necessary for fees and for the Update Service and Basic certificates had not been laid in Parliament
- approved the annual report and accounts for 2023-24 prior to Accounting Officer signing
- considered and approved changes to the DBS budget 2024-27 and the proposed fees to ensure significant changes to DBS' financial position were accounted for
- considered the DBS quality account for 2023-24 to ensure it accurately reflects the programme of activity, assessment, and reporting of the quality and effectiveness of DBS systems and services
- considered the progress of the R0 Refresh Project and agreed essential funding for release from the strategic investment fund to enable the delivery of the final migration of the project
- approved procurement business cases related to the Legacy Technology Estate Replacement (LTER) programme and considered future capability following LTER to ensure it is fully exploited

- considered the annual health and safety report to ensure the executive's management of health and safety issues is appropriate

- approved the DBS Business Continuity and Disaster Recovery plan

- considered its own development to ensure that members are equipped with appropriate skills and knowledge to make strategic financial decisions and to assure themselves of DBS financial management

- considered how artificial intelligence could be applied in support of the DBS' strategy

Board effectiveness

The board reviews its effectiveness annually. The outcome of the latest effectiveness review was considered by board in September 2024 and focused on how effectively it fulfils its purpose.

Overall, the board was assessed as delivering effective strategic leadership and governance, with opportunities identified to continue enhancing its effectiveness and building on improvements in governance achieved over the last five years.

The board considered 5 key themes for assessing its effectiveness: committee effectiveness, effective board oversight, engagement and visibility of leadership, use of time, and diversity of input.

The board identified opportunities for greater consideration of customer journey in the committees, opportunities to increase the focus on strategy and external relationships and increasing members' engagement and visibility through internal communications or other initiatives.

The overall balance of members' time was assessed as appropriate, recognising the value of informal contact with the executive. The positive impact of apprentices and associate members to the diversity of input into board discussions was recognised, with potential further improvements achieved by

inviting external subject matter experts to board meetings and increased input from the executive in discussion of items.

Governance framework

I am required to comment on the board's assessment of its compliance with the Corporate Governance Code. HM Treasury and Cabinet Office's 'Corporate governance in central government departments: code of good practice' (2017) explains that its principles generally hold across other parts of central government and encourages arm's length bodies to adopt the code's principles 'wherever relevant and practical'. The code and the Cabinet Office's Requirements for Reviews of Public Bodies have informed the board's governance framework. The principles of the code have been adopted where relevant and practical and therefore in that respect the board complies with the corporate governance code.

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
- 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 for Review of Public Bodies set out that the 'comply or explain' principle applies to the requirements, as is standard in UK corporate governance. They are underpinned by a set of quadrants which outline the expectations for departments and their ALBs and some

indicators of good practice. DBS complies with all the mandatory expectations.

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, and 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 2024 to 31 March 2025

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 5 times in this

reporting period and in summary, they:

- considered reports on the management of risks and issues assigned specifically to the committee and its wider responsibilities for risk as a whole to ensure appropriate risk management is in place
- considered updates relating to open audit actions and approved an updated Internal Audit plan for 2024-25, including a projection of costs and the internal audit strategy for the next three years
- considered the 2023-24 annual report and accounts and advised the board and Accounting Officer on the content of the governance statement
- approved the committee's annual report to the board and Accounting Officer
- considered the executive's proposal to account for the TCS judgment and any related or anticipated financial transactions in the annual report and accounts, and considered the anticipated budget consequences to ensure appropriate accounting is applied
- considered the overall assurance framework to gain assurance that the internal activities and obligations of DBS within the control environment are appropriate and robust
- approved the internal audit charter and considered the annual opinion for 2023-24
- considered progress of open audit actions and approved the audit plan for 2025-26
- discussed the annual review of whistleblowing cases and the focus on developing a 'speak up' culture
- reviewed the committee's effectiveness ahead of board considering its effectiveness



- considered the DBS Business Continuity and Disaster Recovery plan, ahead of submission to board
- considered the application of the Accounting Officer delegation to make evident the controls that are in place to give assurance that all aspects are being complied with
- considered the annual health and safety report to provide assurance over the executive's management of health and safety issues, ahead of submission to board
- considered an annual review of the gifts and hospitality register
- considered the DBS audit completion report, DBS audit certificate and letter of representation 2023-24

Barring Appeal Panel

The Barring Appeal Panel (BAP) is a committee of the board, with delegated authority to, where legal permission has been granted, 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. It meets when a decision is required. Its membership comprises two board members selected by the board chairman, normally one of whom will be the QFP chairman, and the chief executive or a person appointed by the chief executive.

BAP met three times during this reporting period. They met twice 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.

They also met once to identify any lessons learned from appeals for which legal proceedings completed in the period April 2023 to March 2024, with focus on both barring practice and the effectiveness of the

panel.

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 4 times in this reporting period and in summary they:

- approved the committee's annual report to the board
- considered the executive's change and transformation plan to ensure it is aligned with the board's strategy and business plan, making recommendations to reframe elements relating to customers, quality, culture, efficiencies, and value for money
- considered updates on progress against the transformation plan and the programme risks and issues
- considered the extent to which DBS' change programme is being delivered in terms of time, cost, and quality, recommending that the change and transformation plan is developed to contain an explanation of the scope of each activity
- undertook a deep dive into innovation

and how to integrate this into the Lean programme, ensuring the approach is aligned to the wider DBS strategy and change landscape

- undertook a deep dive into the LTER programme, including assessing the plan, the progress against the plan, and associated risks to ensure the programme is on track to deliver as expected
- considered how the Lean programme will help to drive efficiencies to provide assurance that the business has capacity to take this programme on
- considered assurance and evidence from both inflight and complete projects since the benefits management framework was implemented, noting that the model was increasing in maturity and that useful analysis had been undertaken to show it is operating as intended
- assured itself of the appropriate management of relevant strategic risks and advised on the effectiveness of controls in place and status of actions, including adding commentary on the threats to DBS arising from external parties' use of artificial intelligence against DBS
- reviewed significant procurement business cases before the executive recommended them to board
- considered the rationale for DBS having a single senior responsible owner role as opposed to other models of governance

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 board-approved plans or policies specifically about DBS people
- the application of DBS policies specifically about DBS people

The PC met 4 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
- considered an analysis of the DBS' actual establishment compared to the establishment agreed by the Chief Executive and obtained assurance of the executive's management of the position
- reviewed the organisational baseline and the organisational development picture in relation to people, with a particular focus on consultancy and contingent labour, and knowledge transfer
- considered the executive's management of risk relating to retaining and developing talent to ensure DBS has the capability and capacity to develop the strategic objectives activity
- undertook a deep analysis on the gender pay gap to understand the data and reasons for the widening of the gap and considered the strategic plan to address the gender pay gap
- considered the strategic approach to DBS pay over the next three years to ensure the delegated grades pay strategy aligns with the market and ensures long-term sustainability

- considered an update on the employee



engagement action plan

- considered an update on the contract variation project including remote first and hybrid first
- agreed the committee's annual report for 2023-24 prior to presentation to board
- considered the end of year position in relation to performance development reviews (PDRs) for performance year 2023-24 and how the academy is supporting the process, noting upcoming adaptations to the performance management framework may increase engagement with the PDR process
- considered the business optimisation programme with a particular focus on people
- considered an EDI update, ensuring that EDI is captured within the 2025 strategy and discussed as part of the strategy item at development board
- considered an update on the DBS Academy and its plan for the next 12 months
- considered and supported the 2024-25 pay remit for approval at board
- considered the committee's effectiveness
- undertook a sickness absence deep dive to review the impact and benefits of the reduction in sickness absence across the organisation
- discussed the audit undertaken on reward and recognition
- considered an update on employee engagement, including the final analysis of the action plan from the 2023 survey and update on the measurement of the outcomes of staff communication and the annual communications plan as discussed in ARC in

June 2024

Quality, Finance and Performance 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 following matters, other than where they are specifically about DBS people matters:

- 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 plans and policies supporting their delivery

QF&P met 5 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 a deep dive into the quality assurance of the work of RBs and ROs to assure itself that DBS takes appropriate action in the light of that performance
- undertook a deep dive into barring appeals, outcomes, and withdrawals to assure itself of the quality of decisions by providing an analysis of barring appeals, their outcomes and withdrawals, and considered an analysis of the demographics of the barred lists
- undertook deep dives into the uptake of the DBS Update Service to assure itself that the service delivers the intended benefits, and

Table 8: Board members and chief executive's attendance at board and committee meetings from 1 April 2024 to 31 March 2025

Name	Role	Board	ARC	BAP	CMC	PC	QF&P	RemCo
Dr Gillian Fairfield	Chairman	9 of 9	-	-	1 of 4	-	-	3 of 5
Eric Robinson	Chief Executive (non-board member)	9 of 9	4 of 5	-	-	-	-	3 of 5
Mary Cunneen	Board member RemCo chairman ARC member	6 of 7	3 of 4	-	-	-	-	4 of 5
Samantha Durrant	Board member CMC chairman ARC member	8 of 9	5 of 5	-	4 of 4	-	-	-
Neil Rhodes	Board member Vice chairman QF&P chairman CMC member	7 of 9	-	1 of 3	3 of 4	-	4 of 5	-
Emir Feisal	Board member ARC chairman RemCo member	9 of 9	5 of 5	-	-	-	1 of 5	3 of 5
Julian Blazeby	Board member PC chairman QF&P member	9 of 9	-	1 of 3	-	4 of 5	5 of 5	-
Amanda Arrow-smith	Board member RemCo chairman ARC member PC chairman <i>(from 03/02/25)</i>	0 of 1	1 of 1	-	-	-	-	-
Rob Eason	Board member CMC chairman <i>(from 01/04/25)</i> PC member <i>(from 03/02/25)</i>	1 of 1	-	-	1 of 1	1 of 1	1 of 1	-

into the quality assurance of police forces to assure itself that factors which contribute to police performance are effectively managed and appropriate action is being taken to address poor performance

- approved the committee's annual report to board
- reviewed DBS' financial performance in delivering the strategic and business plans, including providing guidance on the draft strategy, business plan and likely budget
- reviewed the annual VfM report to ensure it appropriately addresses the 7 key VfM questions in the VfM framework, and provides an accurate overview of the out-turn of the assessment measures prior to board consideration; they also considered the VfM tools that are being developed as part of the VfM roadmap implementation
- assured itself of the reliability of financial forecasts by reviewing the available insight, horizon scanning and scenarios beyond the current financial year
- reviewed the DBS performance and quality report to assure itself of DBS' operational performance and focus on quality in delivering disclosure and barring services.
- reviewed the business plan delivery to assure itself that it is being delivered as intended
- agreed a programme of work to provide refunds for fees incorrectly charged to Crown Dependencies
- 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
- reviewed DBS financial forecasting to assure

itself of its reliability by reviewing the available insight, horizon scanning and scenarios beyond the current financial year, and considered financial information that includes scenario reporting and planning based on underpinning assumptions, available demand and resource modelling, prioritised risk and opportunities

- reviewed the quality account 2023-24 prior to presentation to the board
- considered and provided guidance on the strategy, business plan and budget, ensuring that the main issues and objectives are addressed and financial implications, including fees, and the approach to developing the strategy, business plan and budget are appropriately considered

Remuneration Committee

This Remuneration Committee (RemCo) supports the board and makes the following delegated decisions in respect to the chief executive, all SCS-graded posts or other posts reporting to the chief executive:

- oversee the recruitment process for very senior posts (VSPs) ensuring it is appropriate, fair, and in line with DBS policies and standards
- develop a fair and transparent procedure for remuneration of VSPs, including pay, bonuses, performance-related pay, incentives, pensions 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)
- agree the framework for appraisal of the chief executive by the chairman
- agree the framework for appraisal of all other VSPs
- receive annual appraisals of VSPs and



review them to assure the board that they are fair and consistent with the framework

- agree a process for the removal and/or special severance arrangements of the chief executive if necessary, having regard to the relevant codes of practice and terms of the contracts

- oversee the chief executive's management of strategic risks assigned to the committee by the chairman of the DBS board

RemCo met 6 times in this reporting period, and in summary, they:

- considered the approach for appointing a new chief executive, including how to oversee the recruitment and what remuneration to recommend to board

- 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 a strategic lead for safeguarding 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 senior posts

- decided how to oversee the recruitment

and agree the remuneration for the interim and permanent appointments for the Director of Human Resources & Organisational Development and Director of Technology and Innovation roles

Executive governance

Strategic Leadership Team

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

SLT membership is comprised of myself and all directors. The board secretary also routinely attends. SLT is assessed as consisting of a cohesive set of experienced professionals who engage with the board in an open, honest, and respectful manner. SLT agreed terms of reference for itself and 5 groups which it has established to support it in its leadership. Their roles are summarised below, with 4 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. 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 executive director of Finance and Corporate Services. This group scrutinises and facilitates coordination of the delivery of board (strategy, business plan, and budget) and executive (Change and Transformation plan, technology roadmap, procurement plan) approved plans. It also oversees the Strategic Investment Fund (SIF).

Demand Forum

The Demand Forum is chaired by the deputy chief executive. The forum provides challenge to strengthen scrutiny, assessment and decision on a realistic DBS demand and thus income forecast. The forum is used to leverage information from members to build range and scenario reporting for DBS board and the Home Office to allow a transparent assessment of risk impacts and build confidence in forecasting accuracy.

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' governance framework which includes the DBS risk management strategy. A risk management

framework informed by HM Treasury's Orange Book, is in place, alongside a formal statement of risk appetite. The strategy focuses on managing risks in line with appetite rather than eliminating them entirely.

The framework:

- identifies and prioritises risks affecting business aims and objectives
- assesses likelihood and impact
- manages risks efficiently and effectively

During the period, the board:

- reviewed and updated its risk strategy
- identified strategic risks linked to the corporate and business plans
- assigned committees to oversee corporate risks and seek assurance via ARC
- secured assurance, through ARC, in relation to risk management
- regularly reviewed me and my director's management of risk

Monitoring and review

- A dedicated risk manager supports strategic and operational risk management
- Strategic risks are reviewed monthly by SLT, with recommended changes approved by board
- ADG's agenda includes monthly corporate risk reviews, deep dives, and horizon scanning
- ARC meets 4 times a year to review the strategic risks and provide assurance to the board
- Board committees oversee risks within their remit

Risk assessment

Strategic risks are linked to DBS' 2020-25 strategy and recorded in a strategic risk register. Risks are assessed using a 5-point likelihood and impact scale (Very Low to Very High) covering public protection, reputation, finance, and/or delivery.

A risk matrix defines ratings by combining likelihood and impact categories.

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

Strategic risks as of March 2025

There are 12 strategic risks, each with an assigned risk appetite:

Table 9: DBS strategic risks

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 maintain visibility, trust, and influence	Minimalist
Risk 674 - Failure to deliver DBS 2020-25 strategic objectives	Open
Risk 826 - Failure to manage exposure to new technologies, including artificial intelligence	Cautious
Risk 835 - Failure to effectively manage DBS change and transformation activity	Open

Risk appetite definitions:

- **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

- **Cautious:** Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward
- **Averse:** Avoidance of risk and uncertainty is a key organisational objective for example zero tolerance for any decision that could lead to a child or vulnerable adult being harmed

Strategic risk matrix						
		Likelihood				
		Very Low	Low	Medium	High	Very High
Impact	Very High	Amber	Amber	Red	Black	Black
	High	Amber	Amber	Red	Red	Black
	Medium	Green	Amber 530	Amber 670	Red	Red
	Low	Green	Green	Amber 456, 668, 669 671, 835	Red 199, 637, 826	Red 393
	Very Low	Green	Green	Amber	Amber 674	Red

Further details on these risks and their mitigations are provided in the sections below.

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

As DBS becomes more digital and internet-facing, there is a risk of cyber-attacks causing data breaches, system outages, and loss of public confidence.

We protect data and systems through:

- two-factor authentication for most systems and users
- enhanced security operations centre monitoring
- recruitment of cyber security experts
- annual IT health checks and security accreditation

- third-party patch management governance
- proactive vulnerability management
- ISO:27001 and Cyber Essentials Plus compliance by suppliers
- annual cyber training for DBS and supplier staff
- annual government departmental security health check

Risk 393: Failure to safeguard

Delays or errors in safeguarding decisions, or poor referral information, risk harm to vulnerable individuals and damage to DBS reputation. We ensure timely, high-quality safeguarding by:

- embedding risk mitigation in directorate plans, including post-IICSA review and enhanced info-sharing
- stable IT platforms, prioritised transformation, insight, and cross-directorate support
- monthly SLT and board performance reviews

Increased demand via the barring referral service has raised workload and wait times, risking some unsafe clearances. Additional staff and ongoing quality controls are mitigating this. Legacy technology and business optimisation aim to improve efficiency further.

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

There is a risk that lacking skilled, diverse staff could impact service delivery and KPIs.

We mitigate this risk by:

- regular performance and people reporting

(Integrated Performance Report, PSG, PC)

- governance via SPOG and change boards for capability issues
- reward and recognition programmes and ongoing organisation design reviews
- focused recruitment to improve diversity
- close HR partnerships for workforce planning
- DBS Academy for skill development
- quarterly financial and resource reviews
- staff engagement and wellbeing plans
- regular GIAA audits
- co-ordinated response to emerging local or corporate risks

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

Risk 530 refers to the risk of inadequate response to incidents affecting safeguarding and service delivery.

We mitigate this risk by:

- having a dedicated BCDR manager and up-to-date policy
- having a BCDR programme that is aligned to BCI (Business Continuity Institute) lifecycle
- incident coordination structures and impact matrix
- comprehensive plans covering people, property, and systems
- incident management and communication plans

- lessons learned and supplier BCDR testing
- completion of audit recommendations

Risk 637: Failure of technology system

Being reliant upon legacy and core systems introduces a risk of service outages.

Mitigation includes:

- technology roadmap with prioritised improvements, monthly reporting
- continuous technical refresh and resilience built into core systems
- experienced technology partner (CGI)
- security and architecture governance
- strict change management in production environment

Risk 668: Failure in supply chain performance

Dependency on third-party suppliers risks disruption and reputational damage.

We mitigate this by:

- the governance of critical projects via technology roadmap and programmes
- the documentation of critical products, services, and supplier lists
- having risk management plans for key suppliers
- carrying out contract and SLA reviews
- having an intelligent client function to promote resilience
- supplier performance monitoring

Risk 669: Statutory Obligation compliance

This risk refers to missing statutory duties, which puts our organisational reputation and

confidence in DBS at risk.

We manage this through:

- compliance monitoring and legal review in board papers
- equality impact assessments (EqIAs) for all projects
- regular lessons learned and training on PSED
- action plans for GDPR and audit recommendations
- an ongoing review of data breach operations
- target PRAG rating achieved

Risk 670: Failure to manage financial resources

Risk 670 looks at the risk of insufficient funds due to Home Office allocations and fee-setting constraints. Controls include:

- a 3-year budget and annual reviews
- financial scenario analysis and quarterly forecasting
- multi-year capital plans submitted to Home Office
- working capital agreement to cover 3 months' cash needs
- 3-year budget and annual reviews

Risk 671: Failure to maintain visibility, trust, and influence

A low DBS profile introduces the risk of misunderstanding or a lack of understanding, affecting safeguarding and trust.

We support mitigation of this risk through:

- national and regional partnership and stakeholder engagement



- outreach across 11 regions, focusing on underserved groups
- media and communications campaigns and monitoring
- contingency plans for reputational issues

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

Our reputation, as well as service delivery could be at risk if we fail to achieve our strategic aims. We ensure delivery via:

- governance through senior management and board committees
- monthly risk reviews and annual business plan alignment
- regular staff engagement on strategy progress
- mid-term strategy refresh and final achievement review for 2025-28 strategy
- new risk being drafted for 2025-28 strategy delivery

Risk 826: Failure to manage exposure to new technologies including artificial intelligence

Risk of not managing artificial intelligence as well as other new technology could lead to missed opportunities or threats.

We manage this risk through:

- the research and testing of artificial intelligence use cases
- automation governance ensuring security and compliance
- risk reviews focused on artificial intelligence threats and opportunities, updating risk registers
- staff awareness training around artificial

intelligence

- architectural principles incorporating data accuracy, privacy, bias
- developing an ethics framework around artificial intelligence

Risk 835: Failure to effectively manage DBS Change and Transformation activity

There is a risk that poor governance and oversight could jeopardise delivery of business plan objectives. Mitigation includes:

- change and transformation framework with coordinated governance
- risk management identifying trends to minimise failure
- oversight by SPOG and CMC, monitoring time, cost, and quality
- dedicated change management function applying government standards
- strengthened leadership and capacity in change management
- specific board oversight of litigation with former supplier and Metis system issue
- ongoing reporting to ADG, SLT, board, and ARC for assurance

Risks will continue to be regularly monitored and reported to ADG, SLT, board, and ARC to ensure effective management aligned with the DBS risk management framework and appetite.

Delegation

My predecessor received the delegation letter from Home Office on 13 January 2025, setting out the financial authority for the financial year. In confirming receipt of the delegation, the former chief executive clarified

several matters to ensure transparency in the understanding of the delegation.

ARC conducted an exercise in October 2024 to evidence the controls that are in place and provide assurance that all aspects within the delegation letter are being complied with and ensure 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, contentious, or repercussive
- 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 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 with, and application of, functional standards

I am mandated to apply 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 its 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 four times a year to SLT and ARC, as we are working 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 2024-25 provides a moderate opinion in respect to the overall adequacy and effectiveness of DBS' framework of governance, risk management and control, noting the direction of travel remains positive and reflects well on the organisation. The

opinion reflects the outputs of assurance reviews, changes identified through internal audit activities over the year, management engagement, responsiveness to audit recommendations and the organisation's commitment to continuous improvement.

GIAA delivered an agreed internal audit programme for the 2024-25 financial year and ARC monitored progress against the plan. Both SLT and ARC received all reports from GIAA and monitored progress in implementing management actions arising from GIAA reports.

The tables below shows the final reported position relating to each agreed review for 2024-25 as reported to ARC in June 2025.

Table 10: Internal audit activities alongside results/opinions

Month	Title	Result/Opinion
August 2024	Barring Referral Management	Moderate
July 2024	Registered Bodies Compliance Management	Moderate
February 2025	Architecture Function	Moderate
March 2025	Forecasting Methodology	Substantial
April 2025	Procurement Regulations (Advisory)	N/A
March 2025	Equality, Diversity, and Inclusion	Moderate
March 2025	Budget Management	Moderate

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
Unsatisfactory (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 and subsequently agreed a revised 2024-27 budget and proposed fees in August 2024. As noted above, the Home Office provided financial authority for these budgets.

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.

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.

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.

For 2024-25, DBS exceeded its 5%



efficiency target through a DBS efficiency plan developed and based around five broad drivers of efficiency: benchmarking, organisation and workforce, service re-design and alternative delivery mechanisms, technology efficiencies, and digital transformation.

A business optimisation Programme (Lean) supports the delivery of efficiencies with a focus on the way we can use and leverage technology to drive efficiencies and increase productivity without degradation to the quality of our services. In particular, the use of automation to streamline our processes will be a key focus over the next 2 to 3 years, supporting a move into a new operating model that will ensure DBS is performing optimally.

Climate-related financial disclosures

TCFD requires UK public sector organisations to disclose climate information within their annual reports and accounts. For annual reports ending 31 March 2025, reporting entities are required to provide a TCFD compliance statement and the recommended disclosures for governance risk management metrics and targets on a 'comply or explain' basis.

A compliance statement on these requirements is contained within the GGC section of this annual report and accounts for 2024-25.

Whistleblowing

The DBS whistleblowing procedure provides a safe mechanism for whistleblowing, recognising that it is a key control in both preventing and detecting breaches of control. There was one disclosure for the period 1 April 2024 to 31 March 2025 and it returned no case to answer.

Information management

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



Dr Jeff James CBE, Accounting Officer
18 November 2025

REMUNERATION AND STAFF REPORT

Overview and strategy

In 2024-25, DBS has further delivered on its commitment to building a modern, supportive, and engaging workplace aligned to the objectives of our DBS 2020-25 strategy. We have significantly strengthened our employee value proposition (EVP), enhancing our attractiveness as an employer and fostering a positive organisational culture that empowers colleagues to thrive.

DBS Academy: Unlocking your potential

The DBS Academy continued its exceptional growth this year, demonstrating significant uplift in engagement with learning resources. Visits to our learning portal surged from 18,000 visits by 280 colleagues in 2022 to 624,000 visits by 1,082 colleagues in 2024, reflecting the clear value and ongoing appeal of our tailored learning offer. This is more important than ever looking ahead to the future.

Our refreshed Learning and Development policy clearly reinforces the importance of professional growth, entitling colleagues to 37 dedicated learning hours annually. A reporting mechanism to monitor uptake and impact is now being put into place from April 2025.

Our annual Learning Festival achieved a participant satisfaction rating of 4.27 stars. Colleagues reported increased confidence in pursuing mentoring, career development opportunities, and practical strategies, positively influencing productivity, resilience, and collaboration.

The introduction and early rollout of self-paced learning pathways such as the 'Going for Growth' programme have delivered positive outcomes with feedback reporting enhanced motivation, confidence, and productivity. The positive impact is

also evident through increased internal promotions.

Our EDI learning module represents an innovative approach to essential learning, leaning into dialogue and discovery rather than 'compliance' recognising the power of storytelling and shared sensemaking. This has been positively received by colleagues and delivered in a cross organisational way.

We have supported colleagues to access an open catalogue of learning through our online portal which includes on-demand, in-person and online learning and introduced an AI powered 'recommended for you' section, building a more personalised and accessible way for colleagues to discover learning most relevant and impactful to them. 93% of engaged colleagues tell us that our learning is a good use of their time with only 3% of colleagues believed that the intended learning purpose was not achieved.

The DBS Academy's expanded role as a learning consultancy provider ensures our learning solutions remain innovative, aligned to best practices, and responsive to the evolving needs of our workforce. Whilst still in its infancy the learning products created have inspired colleagues to explore development other learning products to support our core purpose.

Strategic wellbeing: Support for you, when you need it

Our wellbeing strategy has achieved significant organisational impact this year. Average Working Days Lost (AWDL) has notably decreased from 9.01 in March 2023 to 7.95 in September 2024, reflecting the success of our refreshed Attendance Management policy, extensive wellbeing initiatives, and tailored support from HR

Services.

The Wellbeing Hub has recorded approximately 24,000 views, confirming high engagement with resources covering emotional, physical, and financial wellbeing, as well as specific personal challenges such as menopause, bereavement, and neurodiversity.

Our menopause campaign was recognised as cross-government best practice, significantly improving how colleagues feel supported and valued at work. Specialist workshops have provided essential safe spaces, helping colleagues recognise symptoms and receive targeted support.

Expanding our health check offer from virtual to on-site provision resulted in tangible, sometimes life-changing health outcomes, enhancing employee wellbeing and organisational resilience.

Our new Stress Management policy and accompanying toolkit have supported staff and managers in managing stress effectively, particularly for remote working scenarios, contributing to overall mental health improvements.

Our updated bereavement grief toolkit, additional MHFA (Mental Health First Aid) coverage, baby loss and infertility resources, and awareness building around men's health show the continued building of a rich, positive and practical wellbeing hub.

DBS has enabled colleagues to support charities and good causes this year with 80 special leave days utilised.

Our wellbeing advocates and our mental health first aiders continue to be a source of support for colleagues across the DBS and a vital source of insight.

Developing leadership and people management

Our People Manager programmes have positively reshaped managerial expectations, reflected by consistent year-on-year improvement in staff survey outcomes relating to line management effectiveness.

Nearly 70% of all people managers have now completed this programme.

Internal promotions and temporary promotions reached record numbers (e.g. 30 as a point in time measure March 2025), driven partly by increased leadership capability and supported by structured resources like our new PDR toolkit, resulting in 82% of colleagues setting clear performance goals – a historical high for DBS. The Catalyst development pilot for HEO/SEO-level staff has successfully boosted career confidence and capability, demonstrating our commitment to nurturing future leaders. The development and initial rollout of our OneDBS leadership framework at the end of the year clearly sets out expected leadership values and behaviours, forming a robust foundation for leadership development aligned with our 2025-28 strategic direction.

Reward, recognition, and policy improvements

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

This approach over recent years has resulted in more competitive pay, narrower pay bands, and positive progress on measures such as gender pay gap. We also completed the introduction of enhanced annual leave, meaning colleagues now benefit from one additional day's leave per year of service, starting at 25 days and rising to 30 days. This policy has been positively received.

We continue to adopt a data-driven approach, utilising listening exercises prior to pay remit decisions as well as negotiating with our recognised trade union. Enhanced engagement and personalised communication, including individualised pay remit notes, have significantly reduced pay award-related errors and increased clarity for

all colleagues.

We need to recognise and reward our employees to ensure that they feel valued for their contributions. To fairly acknowledge their contributions above and beyond day-to-day responsibilities, we agreed a revised reward and recognition (R&R) policy in 2021. In 2021-22, we utilised approximately £60k of our non-consolidated performance-related pay pot. In 2023-24 we utilised approximately £160k which is a near 100% utilisation. This demonstrates sustained integration of thanks, praise, and recognition into daily working life. We will continue progressing this area by further considering the employee experience, staff awards, and celebrating our collective accomplishments.

Our refreshed reward, recognition, and benefits platform has been implemented to enable colleagues to access a greater range of flexible benefits and discounts, with early signs of increased engagement and even more meaningful savings for DBS staff. Addressing historical pay disparities through a targeted level-up adjustment has resolved long-standing concerns, increasing perceived fairness across work locations. The introduction of clearer overtime and HRA (higher rate allowance) calculations has simplified pay coherence, improving colleague satisfaction with an overtime rate that now matches their regular working time rate.

Future outlook

Our HR Services team has worked to establish an effective one stop shop hub that will be key to supporting our people to self-serve and solve problems in the future. Building on the success of our informal hybrid model, DBS has progressed its 'future of work' vision by developing flexible, modern work location choices/arrangements that enhance productivity, support employee wellbeing, and deliver long-term efficiencies. DBS has also engaged in establishing the future of DBS estates.



Looking ahead, DBS will maintain momentum by embracing the government's change agenda through ongoing policy refinement, impactful learning and wellbeing initiatives, and strategic leadership development that make work better for colleagues at DBS and delivers better value for the public.

The DBS Target Operating Model programme, the business optimisation programme and our Operational Services Transformation plan will enable DBS to embrace the challenges and opportunities that the next three years and beyond presents, and our Organisation Development plan will enable us to support our people to achieve the DBS 2025-28 strategy.

The substantial achievements of this year affirm our commitment to enabling colleagues to succeed, enhancing organisational effectiveness and efficiency, and positioning DBS strongly for future challenges.

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 PDRs and introduced a programme of senior leadership development activities. This included securing champions for several protected characteristics within our associate directors and aligning all of our SLT members into inclusion ambassadors.

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 our annual 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

so that we reflect the communities that we serve. 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 stretching 7%. The year-end position was 5.48% which was higher than the rate in 2023-24 (4.1%) but still lacking from the target. Over the course of the strategy, we have undertaken 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.

Where recruitment has been active in 2024-25, these focused workstreams have been further considered with a view to progress towards the target. During 2024-25, the EDI team, working with the Academy team and with a group of volunteer facilitators have delivered an organisational wide opportunity for learning in relation to EDI. This is a bespoke package developed for DBS staff and forms part of the annual essential learning offer. This is in addition to the ad-hoc learning sessions which have been available through live events, engagement opportunities and increased resources available through the Intranet to support staff understanding and confidence in creating an instinctively inclusive culture.

Remuneration report

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 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 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, non-cash benefits, and accrued pension benefits for DBS board members. Throughout the year ending 31 March 2025, 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 2025 totalled £2.3k (compared to £3.9k in 2023-24). 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 2024-25, 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.



Table 11: Senior salaries for non-executive directors (audited)

Non-executive directors	Salary (£)		Benefit - in - kind*		Total	
	(£'000)		(to the nearest £100)		(£'000)	
	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
Gillian Fairfield, Chairman	40-45	40-45	800	300	40-45	40-45
Neil Rhodes (Deputy Chairman from 14 April 2023)	5-10	10-15	-	1,300	5-10	10-15
Mary Cunneen (until 31 December 2024)	5-10 (5-10)	5-10	600	500	5-10 (10-15)	10-15
Samantha Durrant (until 31 March 2025)	5-10	5-10	300	800	10-15	10-15
Amanda Arrowsmith (from 3 February 25)	0-5 (5-10)	-	-	-	0-5 (5-10)	-
Julian Blazeby (from 17 April 23)	5-10	5-10 (5-10)	1,200	700	10-15	10-15 (10-15)
Robert Eason (from 3 February 25)	0-5 (5-10)	-	-	-	0-5 (5-10)	-
Emir Feisal (from 17 April 23)	5-10	5-10 (5-10)	900	300	10-15	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.

During 2024-25, an administrative error by DBS arose relating to benefits-in-kind attributed to several of DBS' board members. Whilst no additional monies were claimed by or have been paid to individual board members, the costs incurred by DBS exceeds the values listed in the table above. For transparency, based on payments of tax on benefits-in-kind made by DBS to HMRC, this would indicate that: Gillian Fairfield has reportable benefits-in-kind of £3,700, Mary Cunneen: £1,100, and Emir Feisal: £2,900. DBS is working to recover overpaid tax to address this issue.



Table 12: Senior salaries for directors (audited)

Executive directors and roles	Salary (£'000)		Bonus payments (£'000)	
	24-25	23-24	24-25	23-24
Eric Robinson , Chief Executive Officer	160-165	170-175	15-20 ³	15-20 ³
Paul Whiting , Deputy Chief Executive Officer and Executive Director for Finance and Corporate Services	120-125	125-130	5-10	-
Ian Benson , Executive Director for Strategy, Performance and Change (until 23 July 2024) ⁵	75-80 ⁴ (115-120)	120-125	-	-
Claire Graves , Director of Finance and Commercial	110-115	105-110	5-10	-
Ian Johnston , Executive Director for Disclosure (until 31 January 2025) and Executive Director for Operational Services (from 1 February 2025)	115-120	115-120	-	-
Paul Lowton , Interim Director for Barring Operations (from 1 December 2023 to 30 January 2025)	65-70 (75-80)	25-30 (75-80)	0-5	-
Andrew Robertson , Director of Legal Services	120-125	120-125	5-10	0-5
Barry Topham , Executive Director for Technology and Innovation ⁵	120-125	115-120	0-5	0-5
Rachel Welch , Director of Human Resources and Organisational Development (until 4 February 2025)	100-105 (115-120)	110-115	5-10	-
Sarah Clifford , Interim Director for Strategy, Performance and Change (from 12 June 2024) ⁵	60-65 (85-90)	-	0-5	-
Joanne Kelland Owen , Interim Director of Human Resources and Organisational Development (from 4 February 2025)	10-15 (85-90)	-	-	-
Steve Gardner , Interim Director for Technology and Innovation (from 23 March 2025) ⁵	0-5 (85-90)	-	-	-

Pension benefits ² (£'000)		Benefits-in-kind ¹ (to nearest £100)		Total (£'000)	
24-25	23-24	24-25	23-24	24-25	23-24
219	(65)	-	-	395-400	120-125
47	46	-	-	175-180	170-175
15	46	-	400	90-95 (130-135)	170-175
45	43	-	-	160-165	150-155
47	45	-	-	165-170	160-165
97	50	-	-	165-170 (180-185)	75-80 (125-130)
46	46	-	-	170-175	170-175
47	46	-	-	170-175	165-170
39	45	-	-	145-150 (160-165)	155-160
23	-	-	-	85-90 (110-115)	-
14	-	-	-	25-30 (95-100)	-
1	-	-	-	0-5 (85-90)	-

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

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

2. 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.

3. The Chief Executive is entitled to a contractual bonus award based on quarterly performance.

4. The salary disclosure includes compensation in lieu of notice (£30k-£35k) which is also disclosed in our exit packages, and purchase of remaining annual leave (£5k-£10k).

5. There are also 2 posts where there is both a substantive and interim postholder. During these periods, the substantive postholder was leaving DBS and so the interim postholder was the key decision-maker. For transparency, both postholders are reported.

Pension benefits

Table 13: Pension benefits for directors (audited)

	Accrued pension at pension age at 31/03/25	Real increase in pension and related lump sum at pension age	CETV* at 31/03/25	CETV* at 31/03/24	Real increase in CETV
Directors	£'000	£'000	£'000	£'000	£'000
Eric Robinson	160-165	10-12.5	3,057	2,701	206
Paul Whiting	30-35	2.5-5	532	452	36
Ian Benson	10-15	0-2.5	151	134	8
Claire Graves	15-20	2.5-5	265	212	28
Ian Johnston	25-30	2.5-5	503	423	38
Paul Lowton	40-45 plus a lump sum of 110-115	2.5-5 plus a lump sum of 7.5-10	985	858	94
Andrew Robertson	10-15	2.5-5	177	130	28
Barry Topham	25-30	2.5-5	349	287	30
Rachel Welch	30-35	0-2.5	413	365	25
Sarah Clifford	10-15	0-2.5	190	169	16
Joanne Kelland Owen	15-20	0-2.5	297	285	10
Steve Gardner	5-10	0-2.5	136	136	0

*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. However, 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 2024–25, employers’ contributions of £11.9m were payable to the pension schemes (2023–24: £10.2m), at a single rate of 28.97% of pensionable earnings for all members, as set by the scheme actuary from 1 April 2024. The scheme actuary reviews employer contributions, usually every 4 years, following a full scheme valuation. The contribution rates are designed to meet the cost of benefits accruing during 2024–25, which will be paid when members retire, rather than the benefits paid during this period to existing pensioners. Any surplus or deficit on the scheme is controlled through employer and employee contribution rates, as determined by the scheme actuary.

Employees may also opt to open a partnership pension account, which is a stakeholder pension with an employer contribution. Employers’ contributions are age-related and range from 8% to 14.75% of pensionable earnings.

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 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 have been calculated using the guidance on discount rates for unfunded public service pension contribution rates extant at 31 March 2024, following updated HM Treasury guidance published on 27 April 2023, which applies for the calculation of the 2024–25 CETV figures.

Real increase in CETV

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 – salary and allowances (audited)

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, non-consolidated performance-related pay, and benefits-in-kind. It does not include severance payments, employer pension contributions, or the CETV of pensions.

Highest-paid director

The banded salary and allowances of the highest-paid director (HPD) in DBS in 2024-25 was £160k-£165k (2023-24: £170k-£175k). The changes in pay for:

- salary and allowances is -5.80% from 2023-24; the prior year salary for the highest-paid director included a non-consolidated payment of £5k-£10k, there was no such payment in 2024-25
- performance pay and bonuses is 0% from 2023-24

Employees (excluding HPD)

Excluding the highest-paid director, the average change from 2023-24 to 2024-25, calculated on an annualised FTE basis, is:

- salary and allowances: +5.45% largely as a result of the Civil Service Pay Remit application
- performance pay and bonuses: +82.8% as a result of DBS continuing to encourage recognition of exceptional performance from colleagues across the organisation - this equates to £44 per colleague, compared to £24 per colleague in 2023-24

Relationship between the HPD and workforce remuneration

The tables opposite show the relationship between the highest-paid director's total remuneration and the median remuneration of the workforce, including salary-only comparisons.



Table 14.1: Total Remuneration - HPD vs. Workforce (2024-25 and 2023-24)

Year	25th Percentile	Median Pay	75th Percentile
2024-25 ratio	7.18:1	6.09:1	5.17:1
2024-25 remuneration	£25,419	£29,990	£35,322
2023-24 ratio	7.43:1	6.39:1	5.63:1
2023-24 remuneration	£25,210	£29,344	£33,262

Table 14.2: Salary-only Remuneration - HPD vs. Workforce (2024-25 and 2023-24)

Year	25th Percentile	Median Pay	75th Percentile
2024-25 ratio	6.39:1	5.42:1	4.60:1
2024-25 remuneration	£25,419	£29,990	£35,322
2023-24 ratio	6.84:1	5.88:1	5.19:1
2023-24 remuneration	£25,210	£29,344	£33,362

The median of total remuneration for the general workforce in 2024-25 was £25k-£30k, compared with £180k-£185k for the highest-paid director.

The changes in ratios are as a result of the different approaches DBS took to applying the

Senior Civil Servant Pay Remit in each 2023-24 and 2024-25.

The average value of performance pay and bonuses remained largely unchanged across the workforce and for the highest-paid director.

Staff report

This section provides an overview of staffing information and costs for DBS.

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	44,005	2,768	46,773	45,635
Social security costs	4,672	0	4,672	4,533
Other pension costs	11,938	0	11,938	10,260
Total net costs	60,615	2,768	63,383	60,428

*Others includes short-term contingent labour costs

Please refer to commentary in the Financial Performance section regarding increased costs in 2024-25.

Average number of persons employed (audited)

The average number of full-time equivalent

persons (excluding non-executive directors) employed during the year was 1,211 (compared to 1,158 in 2023-24).



Table 16: DBS headcount for the last 3 years

	2023-24	2022-23	2021-22
Directly employed	1,383	1,327	1,262
Fixed term appointments	9	15	112
Agency	0	0	4
Contingent labour in-year	14	19	18
Total	1,406	1,361	1,392

Spending 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.

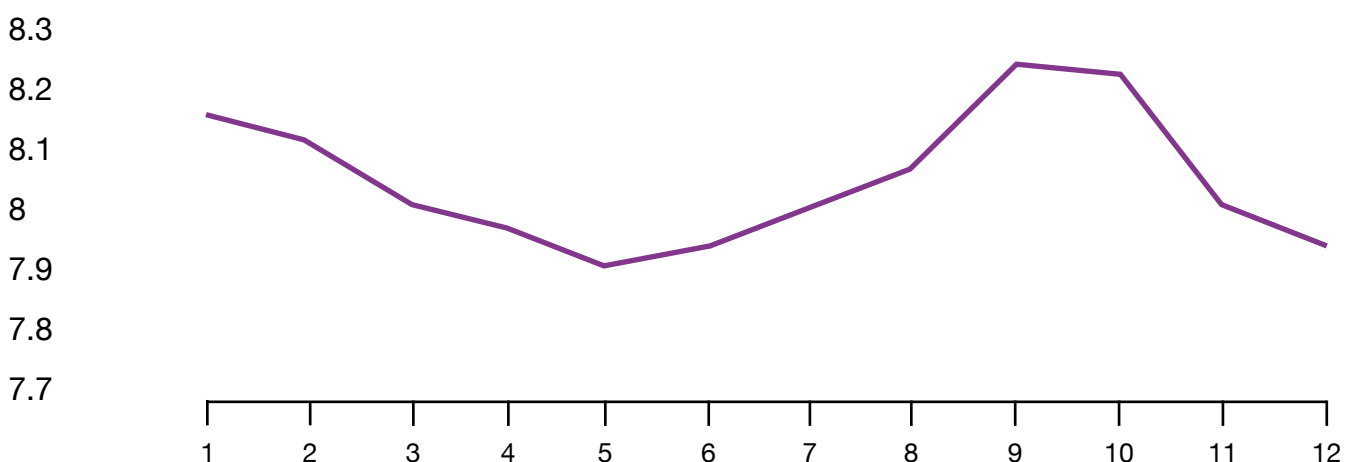
Total spend on consultancy during 2024-25 was £10k, compared to £116k in 2023-24. Total spend on temporary staff (including

contingent labour) during 2024-25 was £2,768k, as disclosed in the 'Others' column of staff costs (compared to £3,342k in 2023-24)

Staff sickness

The 12-month rolling year average working days lost (RYAWDL) representing the period 1 April 2024 to 31 March 2025 was 7.92 days.

Figure 13: RYAWDL to sickness 2024-25



Employee offer

DBS provides a generous Civil Service Defined Benefit Pension Scheme with an employer contribution rate of 28.97%. Employees benefit from a wide-ranging support package that includes flexible and remote working options, generous annual leave, and family-friendly policies such as maternity, paternity and adoption schemes. DBS is committed to employee wellbeing through services like the Employee Assistance Programme, 24/7 counselling, eyecare vouchers, and access to occupational health support including physiotherapy and counselling referrals. Staff also have access to ongoing training and development opportunities to support career progression and professional growth.

Public Sector Equality Duty

DBS is committed to fulfilling its responsibilities under the Equality Act 2010 and the subsequent PSED 2011. The duty requires public authorities to give proper consideration 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.

Actions undertaken in 2025-26 have ensured that DBS meets its obligations under PSED, and further steps are being undertaken to exceed in many aspects of the duty. A refreshed delivery approach and engagement with staff ensure that the obligation is understood by the workforce and all work towards an instinctively inclusive culture.

People

DBS participated in a further benchmarking review in May 2024 to assess our progress using the Employers' Network for Equality and Inclusion's (ENEI) Talent Inclusion and Diversity

Evaluation (TIDE). This was DBS' sixth TIDE submission and resulted in DBS maintaining its SILVER award.

The TIDemark allows DBS to measure progress in EDI practice in comparison with peers. DBS ranked 53 out of 185 organisations who participated in the TIDemark in 2024.

We received an overall score of 76% for 2024. Our overall score was 71% for 2023, 69% for 2022. In 2021, it was 64%, 2020 was 68%, and in 2019, was 40%.

Our 2024 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 been a priority in the offering by the DBS Academy in 2024-25. As we continue to embed learning and awareness in 2025-26, we will include additional training that relates to lived experiences, bias, self-reflection, and EqIA completion.

Customer

During 2024-25, we have developed this work further through the ongoing Support and Reasonable Adjustments (SARA) group to improve customer-facing processes and undertook further consideration with phase 2 of our accessibility review; this sought to 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 2024-25 business plan supported DBS' vision to



move the organisation beyond compliance and one that truly embraces EDI.

The EqIA 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.

Gender pay gap

The mean difference recorded at DBS for 2024 is 5.83%, against the national public sector mean gender pay gap of 13.1%. The DBS gap reduced from 2017 to 2019 from 5.50% to 2.00%. It then increased, from 2.00% in 2019 to 8.09% in March 2023.

The mean hourly rate for male employees was £17.46 per hour, and for female employees, it was £16.44 per hour. This means that male employees earned an average of £1.02 per hour more than female employees, compared to earning an average of £1.35 pence more per hour than female employees in 2023. 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.

DBS remains dedicated to fostering inclusivity through transparent reporting, robust initiatives, and ongoing action. By sustaining this current momentum, we aim to build on these achievements and maintain our leadership in pay equity. Improvements stem from increased

female representation in higher-paid roles, targeted pay strategies, and equitable access to bonuses. Workforce profile adjustments and internal promotions have further supported this progress.

Staff composition and gender

Table 17: Staff composition by headcount as at 31 March 2025

	Male	Female	Total
Non-executive directors*	6	3	9
Executive directors	3	0	3
Directors	2	3	5
Other senior civil servants	1	0	1
Board apprentices**	2	0	2
All other employees	509	863	1,372
Total	523	869	1,392

*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.

Reporting under Equality Act

Diversity data

The following data is based on the DBS headcount at 31 March 2025 (excluding

agency staff, contractors, and non-executive directors).

Table 18: Staff split by age

16-19	20-29	30-39	40-49	50-59	60+	Total
27	189	315	379	337	137	1,384

Table 19: Staff split by ethnicity

Minority Ethnic	White	Prefer not to say	Unknown	Total
58	984	25	317	1,384

Table 20: Staff split by disability

Disabled	No disability	Prefer not to say	Unknown	Total
106	726	30	522	1,384

Table 21: Staff split by sexual orientation

Blank	Heterosexual/Straight	LGBTQ	Prefer not to say	Total
333	951	46	54	1,384

Health and safety

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

Exit packages (audited)

Exit costs are accounted for in full in the year of departure. Where DBS has agreed early retirements, the additional costs are met by DBS and not by the Civil Service pension scheme.

Table 22: Exit packages in 2024-25

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 (2)	2 (2)
£100,000 - £150,000	-	0 (1)	0 (1)
£250,000 - £300,000	-	1 (1)	1 (1)
Over £300,00	-	1 (0)	1 (0)
Total number of exit packages	-	3 (4)	3 (4)
Total resource cost/£'000	-	638 (496)	638 (496)

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 12 HR policies in 2024-25, including:

- Reward and Recognition policy

- Resourcing policy and procedure

- Family Friendly procedure
- Special and Disability leave procedure

- Right to Request Flexible Working policy

- Attendance Management policy

- Cycle to Work policy

- Eyesight procedure

- Capability procedure

- Smoking and Vaping policy

- Induction procedure
- Workplace Adjustments policy

Off-payroll engagements

During 2024-25, there were 14 off-payroll engagements (contingent labour) with a total cost of £2.8m (£3.6m), with 14 contractors being paid more than £245 per day.

Following the Review of Tax Arrangements

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 2025, who are earning in excess of £245 per day

	No. of Appointments
Number of existing engagements as at 31 March 2024	14
Of which	
Number that have existed for less than 1 year at time of reporting	5
Number that have existed for between 1 and 2 years at time of reporting	8
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	1

Table 24: All new off-payroll engagements between 1 April 2024 and 31 March 2025, for more than £245 per day

	No. of Appointments
Number of engagements between 1 April 2024 - 31 March 2025	4
Of which	
Number assessed as caught by IR35	4
Number assessed as not caught by IR35	0
Number engaged directly 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 2024 and 31 March 2025

	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 2024 to 31 March 2025.

The information below is based on several

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

There were 14 employees who were trade union representatives at DBS during the period 1 April 2024 to 31 March 2025.

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 31 March 2025, PCS representatives had used 22.19% 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 2024 to 31 March 2025

Total cost of facility time (£000)*	41.9
Total pay bill (£000)	41,890
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

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 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

This section provides an overview of staffing information and costs for DBS.

Overview

DBS continues to operate as a self-funding NDPB 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 strive to minimise our fees whenever possible and pass on any savings to our customers. Our fees remained unchanged since the last reduction in April 2022, until the increase implemented on 2 December 2024, which was necessary to cover the rising operational costs associated with delivering DBS' safeguarding services. 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 HM Treasury's 'Managing Public Money' requirements.

Throughout the 2024-25 financial year, DBS made no settlement of monies due back to the consolidated fund, retaining a balance to meet its financial working capital requirements. We will continue to evaluate when these surpluses can be remitted to the consolidated fund. For further details, please refer to note 12.

Charging for services within Crown Dependencies

The power for DBS to charge fees for criminal record certificates is set out in The Police Act 1997. The act gives the Secretary of State the power to make regulations to set the prescribed fee for each product. In 2024-25, the Home Office 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.

Following identification of the issue, DBS worked urgently to assess the associated risks and impacts, while the Home Office progressed legislative corrections. As Accounting Officer, I concluded that the historic charging of fees in the absence of appropriate regulations was irregular, as the legal authority to charge was not in place. However, I am satisfied that DBS acted in line with the intent of Parliament, and that the financial impact is not material to the accounts as a whole.

Given that fees for the Update Service and Basic certificates have been in place since 2013 and 2018 respectively, it is reasonable to conclude that the omission of the Crown Dependencies from the relevant statutory instruments was unintentional. Without charging, customers in other geographical areas or taxpayers could effectively have been subsidising the cost for these services.

However, DBS recognised that charging could not continue until the regulations were corrected. From 1 August 2024, DBS, in collaboration with the Home Office, ceased charging for affected services in the Crown Dependencies pending corrective legislation.

The necessary statutory instruments have now been laid and commenced, providing legal basis to resume charging for services in the affected territories.

In line with this updated legal position, DBS is now facilitating retrospective refunds for fees that were charged without the appropriate legislative cover. As of 31 March 2024, DBS had collected approximately £1.2m in fees from applicants in the affected territories, and this amount has been recognised as a provision in the accounts. The provision amount remains unchanged in the 2024-25 financial statements. DBS is working to ensure that the refund process is

managed appropriately and transparently.

Parliamentary accountability disclosures

Losses and special payments (audited)

There were 0 cases of fruitless payments during 2024-25, and 16 fruitless payments in 2023-24, totalling less than £5k.

There were 414 cases of Ex-Gratia and 3 other special payments totalling £40k in 2024-25. There were 483 cases of Ex-Gratia and 6 other special payments in 2023-24 totalling £94k.

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 £122k (compared to £138k in 2023-24). 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 reporting requirements prescribed in HM Treasury's 'Managing Public Money'.

Remote contingent liabilities (audited)

There were no remote contingent liabilities as at 31 March 2025. Note 18 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	2024-25					2023-24
	Income	Costs	Surplus/ (deficit)	Actual % recovery	Planned % recovery	Surplus/ (deficit)
	£'000	£'000	£'000			£'000
Basic DBS checks	50,971	(44,700)	6,271	114%	100%	395
Standard DBS checks	7,753	(6,891)	862	113%	100%	815
Enhanced DBS checks*	138,350	(136,350)	2,000	101%	100%	3,146
Update Service	28,055	(30,179)	(2,124)	93%	100%	234
DBS Adult First	767	(744)	23	103%	100%	(31)
Other**	2	5	7	(30%)	100%	5
Total***	225,898	(218,859)	7,039	103%	100%	4,564

*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 counter-signatories.

***The total cost and surplus is different to that recorded in the Statement of Comprehensive Net Expenditure as DBS only allocates costs that are attributable to fee payers in the table above.

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.

Table 28: Notional cost per paid application received in 2024-25 (unaudited)

	Costs £'000	Applications (000)	Notional Cost (£)
Basic DBS checks	44,700	2,678	16.69
Standard DBS checks	6,891	409	16.85
Enhanced DBS checks*	136,351	3,371	40.44
Update Service subscriptions	30,179	2,240	13.47
DBS Adult First	744	127	5.88

*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 80% of the total Enhanced DBS checks compared with 80.7% in prior year reflecting the stability in volunteer applications.

Table 29: Notional cost per paid and volunteer applications received in 2024-25 (unaudited)

	Costs £'000	Applications (000)	Notional Cost (£)
Basic DBS checks	44,700	2,678	16.69
Standard DBS checks	6,891	427	16.15
Enhanced DBS checks*	136,351	4,215	32.34
Update Service subscriptions	30,179	3,060	9.86
DBS Adult First	744	127	5.88

*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 (20% Enhanced, 4.2% Standard, 26.8% 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.



Dr Jeff James CBE, Accounting Officer
18 November 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 2025 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 2025;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- 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 2025 and its net operating income 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 (2024). My responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of my certificate and report.

Those standards require me and my staff to comply with the Financial Reporting Council's Revised Ethical Standard 2024. 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 the 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 and report.

The going concern basis of accounting for the Disclosure and Barring Service 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 and report, 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 Report and Accountability Report 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 Report and Accountability Report.

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 Chief Executive and 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 and report that include 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 non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance 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, the Police Act 1997, Managing Public Money, and the relevant laws and tax regulations.

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
- assessment of the Disclosure and Barring Service's revenue recognition policy against accounting standards and substantive testing of income streams to address the risk of fraud in revenue recognition

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members including internal specialists in the form of IT auditors, 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: www.frc.org.uk/auditorsresponsibilities. This description forms part of my certificate and report.

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: 18 November 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 2025

	Note	2024-25 £'000	2023-24 £'000
Revenue from contracts with customers	5	(225,898)	(215,995)
Total operating income		(225,898)	(215,995)
Staff costs	3	63,383	60,428
Purchase of goods and services	4	136,710	145,582
Depreciation and impairment charges	6,7	5,500	4,631
Provision expense	13	(782)	14,852
Interest expense	16	14	24
Other operating expenditure	4	501	739
Total operating expenditure		205,326	226,256
Net operating (income)/expenditure for the period		(20,572)	10,261
Other comprehensive net expenditure		2024-25 £'000	2023-24 £'000
Items which will not be reclassified to net operating:	Note		
Less net (gain)/loss on revaluation of property plant and equipment	6	(3)	(17)
Less net (gain)/loss on revaluation of intangible assets	7	(100)	19
Comprehensive net expenditure for the period		(20,675)	10,262

The notes on pages **132 to 152** form part of these accounts.


Statement of Financial Position
as at 31 March 2025

		2024-25 £'000	2023-24 £'000
	Note		
Non-current assets:			
Property, plant, and equipment	6	1,054	2,119
Intangible assets	7	9,699	13,172
Total non-current assets:		10,753	15,291
Current assets:			
Inventories	9	1,073	-
Trade and other receivables	10	20,165	16,687
Cash and cash equivalents	11	84,923	82,522
Total current assets:		106,161	99,209
Total assets		116,914	114,500
Current liabilities:			
Trade and other payables	12	(113,453)	(96,609)
Provisions	13	(1,768)	(14,968)
Lease liabilities	16	(875)	(1,000)
Total current liabilities		(116,096)	(112,577)
Total assets less current liabilities		818	1,923
Non-current liabilities:			
Provisions	13	(270)	(603)
Lease liabilities	16	(264)	(2,139)
Total non-current liabilities		(534)	(1,742)
Total assets less total liabilities		284	181
Taxpayers' equity and other reserves:			
General fund		44	37
Revaluation reserve		240	144
Total equity		284	181

Dr Jeff James CBE, Accounting Officer
 18 November 2025

The financial statements on pages 128 to 131 were approved by Jeff James, Accounting Officer for DBS. The notes on pages **132 to 152** form part of these accounts.

Statement of Cash Flows

for the Year Ended 31 March 2025

		2024-25 £'000	2023-24 £'000
Cash flows from operating activities			
Net income/(expenditure) for the period	SoCNE	20,572	(10,261)
Adjustments for non-cash transactions		5,563	19,415
(Increase)/decrease in trade and other receivables	10	(3,478)	6,047
Less movements in receivables not passing through the statement of comprehensive net expenditure		(62)	92
Increase in trade payables and other payables	12	16,844	23,523
Less movements in payables relating to items not passing through the statement of comprehensive net expenditure		(20,573)	(23,893)
Utilisation of provisions		(13,533)	(111)
Purchase of inventories		(1,073)	-
Net cash inflow from operating activities		4,260	14,812
Cash flows from investing activities			
Purchase of intangible assets	7	(859)	(3,898)
Net cash outflow from investing activities		(859)	(3,898)
Cash flows from financing activities			
Capital element of payments in respect of lease liabilities		(1,014)	(990)
Interest element of payments in respect of lease liabilities		(14)	(24)
Consolidated fund extra receipts payable (funding returned to Home Office)		-	-
Net financing		(1,000)	(1,014)
Net increase/(decrease) in cash and cash equivalents in the period		2,401	9,900
Cash and cash equivalents at the beginning of the period	11	82,522	72,622
Cash and cash equivalents at the end of the period	11	84,923	82,522

The notes on pages **132 to 152** form part of these accounts.

Statement of Changes in Taxpayers' Equity for the Year Ended 31 March 2025		General Fund £'000	Revaluation Reserve £'000	Taxpayers' Equity £'000
Balance at 1 April 2023	SoFP	34,098	239	34,337
Comprehensive net expenditure for the	SoCN	(10,261)		(10,261)
Amounts payable to the consolidated fund	11	(23,893)		(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
Balance at 1 April 2024	SoFP	37	144	181
Comprehensive net expenditure for the	SoCN	20,572		20,572
Amounts payable to the consolidated fund	11	(20,572)		(20,572)
Non-Cash Adjustments:				
Net gain/(loss) on revaluation	6,7		103	103
Movement in reserves:				
Transfers between reserves		7	(7)	-
Balance at 31 March 2025	SoFP	44	240	284

The notes on pages **132 to 152** 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 2024-25 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 policies adopted by DBS for the financial year ended 31 March 2025 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 accrual's 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 Financial Reporting Manual (FReM), the Accounting Officer is responsible for preparing 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 balance sheet date

and on the date these financial statements are authorised for issue, DBS maintained a net asset position.

Additionally, the Accounting Officer reviewed DBS' annual breakeven budget, which forecasts a breakeven position for the year ending 31 March 2026. The cash flow forecast further supports a healthy cash position throughout the period.

The Accounting Officer also noted that there are no expectations or indications 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 2025, 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.

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 note 18 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, also referred to as TCS, and DBS. The outcome of this judgement is recorded in compliance with the relevant accounting framework in the Accountability Report and note 13.

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.

Crown Dependencies refunds

The recognition and measurement of this provision required management judgement in assessing the expected level of claims and eligibility criteria. While a revised approach was approved after the reporting date, this does not reflect conditions at 31 March 2025 and is therefore not reflected in the current year estimates.

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 1 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 2025 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
- RBs for DBS Adult First
- applicants for Update Service subscriptions

Recognition of income

Revenue recognition is accounted for in accordance with IFRS 15 (Revenue from Contracts with Customers) which establishes principles for reporting the nature, amount, timing, and uncertainty of revenue and related cash flows arising from contracts with customers.

DBS recognises revenue primarily from the provision of DBS checks and from Update

Service subscriptions.

Under IFRS 15, revenue is recognised when DBS satisfies its performance obligations by delivering the agreed service to the customer. For DBS checks, this typically occurs at a point in time when a certificate is issued, as this represents the completion of the service and the point at which the customer receives the benefit.

For Update Service subscriptions, revenue is recognised over time, on a straight-line basis over the 12-month subscription period, reflecting the continuous access to the service provided throughout the year.

The transaction price is determined based on the statutory fees set out in legislation for each service provided.

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

Income stream	Description of revenue stream	Performance obligation	Payment terms
Enhanced and Standard DBS checks - submitted via a RBs	Supply of DBS checks to individuals	Issue of certificate to customer	Invoiced to RBs in month of application receipt
Basic DBS checks - submitted via a Responsible Organisation	Supply of DBS checks to individuals	Issue of certificate to customer	Invoiced to ROs in month of application
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

single performance obligation.

Department of Health and Social Care (DHSC) reimbursement of free-of-charge checks

To aid the DHSC COVID-19 response, the Home Office and DBS put temporary arrangements in place to provide Standard and Enhanced DBS checks and fast-track emergency checks of the Adults' and Children's Barred Lists, free-of-charge.

Where the DHSC had 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.

The temporary arrangements ended in May 2023 with all DHSC reimbursement received during the 2023-24 year.

1.7 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.

Details of the annual pension contribution are provided in note 3 with additional information relating to pensions being included within the remuneration report.

1.8 VAT (Value Added Tax) and Corporation Tax

DBS registered for VAT in 2017-18 after recharges of salary costs to other government departments exceeded the VAT registration threshold. However, as DBS had limited ability to recover input VAT on its costs, most figures in the accounts continued to be stated inclusive of VAT.

In December 2022, DBS de-registered for VAT as salary cost recharges to other government departments were expected to remain below the registration threshold over the following 12 months.

DBS is subject to corporation tax, however it has reported no chargeable profits for the year ending 31 March 2025, and consequently, no corporation tax is due.

1.9 Financial instruments

DBS applies the requirements of IFRS 9 as interpreted by HM Treasury's FReM covering the classification, recognition, measurement, impairment, and derecognition of financial instruments. DBS does not engage in hedge accounting; therefore, the specific hedge accounting provisions of IFRS 9 are not applicable.

The majority of DBS' financial instruments held are trade receivables and payables. Receivables - including trade receivables, prepayments, and accrued income, generally due within 12 months - are held solely to collect contractual cash flows and are

measured at amortised cost.

In line with IFRS 9, DBS assesses expected credit losses (ECLs) using the simplified approach, recognising lifetime ECLs from initial recognition. Receivables are presented net of ECL allowances, which are based on historical default rates and adjusted for forward-looking information. This reflects the organisation's experience of overdue and impaired receivables

Receivables – including those due within 12 months – are assessed for impairment where there is evidence of credit risk or expected non-recovery, in accordance with the requirements of IFRS 9.

DBS considers the carrying value of receivables to approximate fair value. Transition disclosures are not provided, as IFRS 9 was adopted in a prior period and does not have a material ongoing impact on DBS's financial instruments.

1.10 Leases (IFRS 16)

IFRS 16 provides a single lessee accounting model, requiring the recognition of assets and liabilities for all leases, together with options to exclude leases where the lease term is twelve months or less, or where the underlying asset is of low value.

DBS will apply IFRS 16 to tangible assets only, which are assets with a physical substance, or where the asset value is below £5,000 (consistent with DBS' capitalisation policy).

Right-of-use assets are measured at an amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments. Right-of-use assets are depreciated on a straight-line basis over the term of the lease. Lease liabilities are measured at the present value of the remaining lease payments, discounted using HM Treasury's incremental borrowing rate at the time of lease inception.

DBS does not have any leasing activities as a lessor.

1.11 Provisions and contingent liabilities

Provisions and contingent liabilities 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 non-occurrence 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.

1.12 Cash and cash equivalents

Cash and cash equivalents include cash in hand and deposits held with financial institutions net of bank overdrafts.

1.13 Inventories

Inventories comprise paper certificates held at third-party storage facilities and are stated at the lower of cost and net realisable value, in accordance with IAS 2 Inventories as interpreted by the FReM.

Cost is measured on a per-page basis using the First-In, First-Out (FIFO) method. No transport, storage, or overhead costs are included in the valuation.

Net Realisable Value (NRV) is the estimated selling price less any estimated costs to

complete and sell the inventory. Given the nature of the certificates, the NRV is generally equivalent to cost unless stock is damaged or obsolete.

This is the first year that DBS has presented a stock balance on the face of the 'Statement of financial position'. In prior periods, stock holdings were considered immaterial for separate disclosure and were included within prepayments.

Inventory balances are reviewed regularly to assess for obsolescence or damage. Where necessary, stock is written down to net realisable value, with any resulting loss recognised in the 'Statement of comprehensive net expenditure'. No material write-downs were recorded during the reporting period

1.14 New standards, amendments and interpretations issued but not effective for the financial year beginning 1 April 2024 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 overleaf.



	Expenditure £000	Revenue £000	Net expenditure /(Revenue) £000
Operational Services Is responsible for delivering our disclosure service, & discharging our statutory function for England, Wales & Northern Ireland to manage the two Barred Lists. It also has wider responsibility for safeguarding & quality across DBS.	114,171	(225,896)	(111,725)
Technology and Innovation Is responsible for citizen-facing Technology, IT service management, innovation, architecture, data protection and cyber security.	60,857	-	60,857
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.	13,641	(2)	13,639
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 HOSU.	2,659	-	2,659
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.	13,999	-	13,999
	205,326	(225,898)	(20,572)



3. Staff costs

	2024-25 Total £'000	2023-24 Total £'000
Staff costs comprise:		
Wages and salaries	46,773	45,635
Social security costs	4,672	4,533
Other pension costs	11,938	10,260
Total	63,383	60,428

The staff report within the accountability section contains a full breakdown of staff costs.

4. Other operating costs

	2024-25 Total £'000	2023-24 Total £'000
Purchase of goods and services		
PFI (and other service concession arrangement) service costs	15,411	13,820
Police and other data source costs	58,782	54,917
Facilities management and staff services	2,907	3,981
Travel, subsistence, and other staff costs	589	1,089
Professional fees	423	11,581
Audit fees - external	122	138
IT - running and telephone costs	58,477	60,056
Total	136,710	145,582
Other operating expenditure	£'000	£'000
Other	501	739

Professional fees include the offset of a £4.6m contingent asset disclosed in the 2023-24 annual report and accounts relating to the TCS case.

5. Revenue from contracts with customers	2024-25 £'000	2023-24 £'000
Basic DBS checks	50,971	48,114
Standard DBS checks	7,753	7,166
Enhanced DBS checks	138,352	136,046
Update Service	28,055	23,582
Other	767	1,087
Total revenue from contracts with customers	225,898	215,995

Further details regarding DBS fees and charges can be found in the accountability and financial performance sections of this 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	Information Technology £'000	Equipment, Furniture & Fittings £'000	Total £'000
Cost or valuation					
Balance at 1 April 2024	3,489	1,207	11,916	1,020	17,632
Revaluations	-	31	-	-	31
At 31 March 2025	3,489	1,238	11,916	1,020	17,632
Depreciation					
Balance at 1 April 2024	(1,699)	(878)	(11,916)	(1,020)	(15,513)
Charged in-year	(849)	(219)	-	-	(1,068)
Revaluations	-	(28)	-	-	(28)
At 31 March 2025	(2,548)	(1,125)	(11,916)	(1,020)	(16,609)
Net Book Value at 31 March 2025	941	113	-	-	1,054
Net Book Value at 1 April 2024	1,790	329	-	-	2,119
Asset financing:					
Owned	-	113	-	-	113
Leased	941	-	-	-	941
Net Book Value at 31 March 2025	941	113	-	-	1,054

	Right-of-use Assets £'000	Leasehold Improvements £'000	Information Technology £'000	Equipment, Furniture & Fittings £'000	Total £'000
Cost or valuation					
Balance at 1 April 2023	3,489	1,148	11,916	1,020	17,573
Revaluations	-	59	-	-	59
At 31 March 2023	3,489	1,207	11,916	1,020	17,632
Depreciation					
Balance at 1 April 2022	(850)	(626)	(11,916)	(1,020)	(14,412)
Charged in-year	(849)	(210)	-	-	(1,059)
Revaluations	-	(42)	-	-	(42)
At 31 March 2023	(1,699)	(878)	(11,916)	(1,020)	(15,513)
Net Book Value at 31 March 2023	1,790	329	-	-	2,119
Net Book Value at 1 April 2022	2,639	522	-	-	3,161
Asset financing:					
Owned	-	329	-	-	329
Leased	1,790	-	-	-	1,790
Net Book Value at 31 March 2023	1,790	329	-	-	2,119

7. Intangible assets

	Information Technology £'000	Software Licenses £'000	Assets Under Construction £'000	Total £'000
Cost or valuation				
Balance at 1 April 2024	150,208	11,854	1,458	163,520
Additions	-	-	859	859
Impairment	-	-	-	-
Transfer	-	-	-	-
Reclassifications	1,083	-	(1,083)	-
Revaluations	277	-	-	277
At 31 March 2025	151,568	11,854	1,234	164,656
Amortisation				
Balance at 1 April 2024	(138,495)	(11,853)	-	(150,348)
Charged in-year	(4,431)	(1)	-	(4,432)
Impairments	-	-	-	-
Revaluations	(177)	-	-	(177)
At 31 March 2025	(143,103)	(11,854)	-	(154,957)
Net Book Value at 31 March 2025	8,465	-	1,234	9,699
Net Book Value at 1 April 2024	11,713	1	1,458	13,172
Asset financing:				
Owned	8,465	-	1,234	9,699
Net Book Value at 1 April 2024	8,465	-	1,234	9,699

	Information Technology £'000	Software Licenses £'000	Assets Under Construction £'000	Total £'000
Cost or valuation				
Balance at 1 April 2023	145,091	11,854	2,718	159,663
Additions	426	-	3,472	3,898
Transfer		-	-	-
Reclassifications	4,732	-	(4,732)	-
Revaluations	(41)	-	-	(41)
At 31 March 2024	150,208	11,854	1,458	163,520
Amortisation				
Balance at 1 April 2022	(134,956)	(11,842)	-	(146,798)
Charged in-year	(3,561)	(11)	-	(3,572)
Revaluations	22	-	-	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

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 non-

financial items in line with DBS' 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.

9. Inventories

	2024-25 £'000	2023-24 £'000
Inventories	1,073	-
Total	1,073	-

As at 31 March 2025, stock comprised of paper certificates held at 2 third-party locations: Loomis (our storage supplier) and SPS (our printing provider). The total stock value as at that date was £1.1m, measured at the lower of cost and net realisable value. No impairment provision was required during the year.

10. Trade receivables and other assets

Amounts falling due within one year:	2024-25 £'000	2023-24 £'000
Trade receivables	18,307	14,903
Deposits and advances	(22)	(6)
Prepayments	1,861	1,768
Contract assets	19	22
Total	20,165	16,687

Trade receivables largely relate to balances due to DBS from registered bodies and responsible organisations for fees charged.

11. Cash and cash equivalents

	2024-25 £'000	2023-24 £'000
Balance at 1 April	82,522	72,622
Net change in cash and cash equivalent balances	2,401	9,900
Balance at 31 March	84,923	82,522
The following balances were held at:		
Government Banking Service	84,923	82,522
Balance at 31 March	84,923	82,522

The year-end balance for 2024-25 includes consolidated fund extra receipts of £73.3m (2023-24: £52.7m). No payments were made in the financial year 2024-25. The payable is disclosed in note 12.

12. Trade payables and other current liabilities	2024-25	2023-22
Amounts falling due within one year:	£'000	£'000
Trade payables	2,378	6,129
Accruals	15,398	19,138
Contract liabilities	22,368	18,612
Payable to the Consolidated Fund	73,309	52,730
Total	113,453	96,609

Revenue is deferred where an application fee has been received but the application is still being processed by DBS.

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. During the year ended 31 March 2023, DBS remitted consolidated fund extra receipts of £45.0m relating to the financial years 2021-22, leaving £9.1m to remit in future years.

At 31 March 2025, total payables includes £20.6m relating to the surrender of consolidated fund extra receipts. This represents the full amount of net income retained for the year, with no cost of capital deduction applied, consistent with the approach taken in the 2024-25 budget.

During the year 2023-24, the 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.

13. Provisions

	Dilapidations £'000	Legal Costs £'000	Other Provision £'000	Total £'000
Balance at 1 April 2024	603	13,813	1,155	15,571
Provided in the year	-	155	-	155
Provisions not required written back	-	(937)	-	(937)
Provisions utilised in the year	-	(12,751)	-	(12,751)
Balance at 31 March 2025	603	280	1,155	2,038
Not later than one year:	333	280	1,155	1,768
Later than 1 year and not later than 5 years:	270	-	-	270
Balance at 31 March 2025	603	280	1,155	2,038

For property provisions, DBS recognises a dilapidation provision for leased premises where it has an obligation to return the property to a good state of repair at the end of the lease. The provision balance relates to two properties: Shannon Court, Liverpool and 1 Tithebarn Street, Liverpool.

The lease for 1 Tithebarn Street expires in September 2025; accordingly, £0.3m of the provision is classified as falling due within one year.

The legal costs provision decreased significantly following the full settlement of the TCS legal case during 2024–25, with £12.8m utilised in the year. A new provision of £155k was also recognised in respect of legal costs DBS was ordered to pay following the unsuccessful appeal.

The 'Other provision' balance relates to the provision of refunds for fees incorrectly charged in the Crown Dependencies, and reflects management's best estimate at 31 March 2025. Subsequent to the reporting date, the Board approved a revised approach that is expected to reduce the settlement amount. This event is disclosed as a non-adjusting post-balance sheet event in note 19.

13. Provisions (continued)

	Dilapidations £'000	Legal Costs £'000	Other Provision £'000	Total £'000
Balance at 1 April 2023	603	169	58	830
Provided in the year	-	13,742	1,183	14,925
Provisions not required written back	-	(73)	-	(73)
Provisions utilised in the year	-	(25)	(86)	(111)
Balance at 31 March 2024	603	13,813	1,155	15,571
Not later than one year:	-	13,813	1,155	14,968
Later than 1 year and not later than 5 years:	603	-	-	603
Balance at 31 March 2024	603	13,813	1,155	15,571

14. 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 2025, 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	2024-25 £'000	2023-24 £'000	Nature of Transactions
Security Industry Authority	(3,507)	(2,970)	Revenue receivable for DBS checks carried out during the year
Home Office	-	(1,023)	Revenue received via Home Office for free-of-charge background checks on behalf of DHSC as part of the COVID-19 response
Home Office	8,198	9,819	Recharge of IT services, rent, and facilities management recharges, sponsorship costs and Home Office Technology Live Policing Services (for access to Police National Computer checks)
Various police authorities (inc National Crime Agency)	58,752	54,898	Police costs incurred for work undertaken by Police Authorities to complete the disclosure process

15. 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:	2024-25 £'000	2023-24 £'000
Buildings		
Not later than one year	167	168
Later than 1 year and not later than 5 years	-	167
	167	335

The Darlington site is owned by the Home Office Property Group. DBS entered into a Licence of Occupation agreement with the Home Office Property Group effective from 1 April 2023 for a term of 3 years. For the purposes of this disclosure, the arrangement is treated as an operating lease.

16. Obligations under finance leases for the period

	2024-25 £'000	2023-24 £'000
Buildings		
Not later than one year	880	1,014
Later than 1 year and not later than 5 years	264	1,145
Less interest element	(5)	(20)
Present Value of Obligations	1,139	2,139

	2024-25 £'000	2023-24 £'000
Opening Lease Liabilities	2,139	3,129
Interest charged in SoCNE	14	24
Less interest paid	(14)	(24)
Less principal of lease liability	(1000)	(990)
Closing lease liabilities	1,139	2,139

There are 2 properties that fall within the scope of IFRS 16, relating to our offices within the Merseyside region. These obligations relate solely to these 2 properties.

	2024-25 £'000
17. Other financial commitments	
Not later than one year	15,910
Later than 1 year and not later than 5 years	-
Later than 5 years	-
Total Commitments	15,910

At 31 March 2025 DBS had non-cancellable financial commitments of:

- £14.5m for application management services and service integration
- £1.4m for other non-cancellable contracts under £1m each

18. Contingent liabilities

Management have made enquiries and is not aware of any legal claims, guarantees or other obligations that meet the criteria for disclosure under IAS 37.

The contingent asset of £4.6m relating to the TCS case was fully received in 2024-25 and used to offset the professional fees in note 4.

a significantly lower expected settlement than previously anticipated. As the change occurred after the reporting date and does not reflect conditions existing at year-end, it is treated as a non-adjusting event in accordance with IAS 10. The financial impact will be reflected in subsequent reporting periods.

19. 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 date, the board approved a revised approach to the provision of refunds for fees incorrectly charged to Crown Dependencies (note 13), resulting in

20. Controlling entity

For the purposes of accounting, DBS is considered a subsidiary of the Home Office, and the financial statements of DBS is fully consolidated within the accounts of the Home Office, which are available via GOV.UK. As explained more fully in the Performance Report, DBS is an NDPB accountable to Parliament through the Secretary of State for the Home Department.

