



Rainbow Migration Disclosure and Barring Service (DBS) Policy and Process and Policy on Applicants with a Criminal Record

General principles

- 1) This policy should be read in conjunction particularly with the Rainbow Migration:
 - Safeguarding policy
 - Lone working policy
- 2) As much of Rainbow Migration's work involves highly confidential matters, staff and volunteers will often unavoidably be working alone with clients or in the office. Working for Rainbow Migration gives them considerable status in the eyes of clients who will often be very marginalised and/or have multiple sources of vulnerability. Lone working raises issues in the assessment of the risks to the worker. It also means that great care must be taken in recruitment of staff and volunteers and their induction and in creating the right culture of transparency and respect, so as to reduce the risk that a member of staff or volunteer will present a risk of abuse to any client. This means that DBS checks and taking of references and checking employment history, including the investigation of unexplained gaps in history, are likely to be particularly important.
- 3) It is illegal for an organisation to knowingly allow a person barred by the DBS to work in what we will call safeguarding "regulated activity". At this time Rainbow Migration carries out no safeguarding regulated work so has no access to the barred list and no legal obligation under the DBS scheme to carry out DBS checks.
- 4) However, certain work carried out by staff and volunteers may, because of access for particular activities to vulnerable adults or children, give rise to an entitlement to carry out standard or enhanced DBS check against applicants and postholders. Where a standard or enhanced DBS check is permitted, Rainbow Migration will require the check before the applicant can take up post unless exceptionally a risk assessment of the particular post demonstrates that there is no risk to vulnerable adults or children.
- 5) It is unlawful to require someone to declare spent convictions, or to obtain an enhanced or standard DBS check, other than in circumstances where that is authorised in the legislation. It is also unlawful to use such information for any other purpose than that for which it is authorised.
- 6) Rainbow Migration will assess all other posts including volunteer roles on a risk basis (including particularly risk to clients, to financial and data security) to assess whether to require applicants to self-declare any unspent criminal convictions and a basic DBS check.
- 7) Where volunteers will only be volunteering in their current role as lawyers (whether solicitor, barrister, regulated caseworker or person employed in a solicitor's firm), no additional DBS check will be required and Rainbow Migration will rely instead on the

reassurance from their professional regulatory oversight. Volunteers are otherwise dealt with on the same basis as employees.

- 8) Trustees will be subject to a basic DBS check before they are appointed as signatory on the bank account. Trustees are required to self-declare unspent convictions including as it is required information for OISC and Rainbow Migration's insurance. If a trustee takes on another role in the organisation for which a DBS check is required, such as to become a bank signatory, the appropriate check will be carried out in accordance with this policy.
- 9) Job adverts will outline the requirements for convictions to be disclosed and link to further information on our website (see wording at Appendix C below).
- 10) In order to avoid the risk that the existence of convictions will prejudice the shortlisting unfairly, information about convictions will only be sought after interview once a conditional offer is made.
- 11) If a person is appointed from overseas or who has lived overseas for a significant period of time (in the past 10 years and whilst over 18 years old), the aim will be to obtain equivalent record checks on them for their periods outside the UK as for time spent within the UK. (See below for more information on the procedure)
- 12) Rainbow Migration wishes to ensure that all posts are open to application by refugees and former refugees and the difficulties they may face in evidencing their prior history will be approached sensitively and sympathetically and an individual risk assessment may be necessary.
- 13) All DBS checks required by Rainbow Migration will be paid for by Rainbow Migration.

Policy on Applicants with a Criminal Record

- 14) Rainbow Migration actively promotes equality, diversity and inclusion and welcomes applications from a wide range of candidates, including those with a criminal record. We select all candidates for interview based on their skills, qualifications and experience.
- 15) Rainbow Migration recognises the need to take a proportionate risk assessment-based approach to personal and DBS disclosures. Rainbow Migration will treat all documents and the information contained in them in the strictest confidence and will comply with the code of practice for the handling of DBS disclosures and the Data Protection Act 2018. Rainbow Migration will not discriminate unfairly on the basis of such information.

Declaration of investigations, cautions and criminal convictions

- 16) All staff and volunteers (including trustees) are required to notify the Executive Director or Chair if they are the subject of an investigation by the police or other safeguarding agency into an allegation of abuse of a child or vulnerable adult. Disciplinary action may be taken against staff failing to disclose this information. Volunteers and trustees may have their role terminated.
- 17) All staff and volunteers (including trustees) are required to notify the Executive Director or Chair if they receive a police caution or conviction for a criminal offence. Disciplinary action may be taken against staff failing to disclose this information. Volunteers and trustees may have their role terminated.

Consideration of offences

- 18) Decisionmakers (whether interview panels, Executive Director or HR Subcommittee) will ensure that a fair and measured discussion of any declared offences takes place.
- 19) Up to date guidance should also be sought on NACRO and Recruit.Unlock website and, if necessary, from external HR or employment law advisers.
- 20) Rainbow Migration must assess criminal offending history within the relevant legal framework and in accordance with the principles of applying public law.
- 21) Any decision Rainbow Migration makes on the impact of offences committed by an individual should be proportionate, fair and reasonable, within its powers, and based upon considerations that are strictly relevant.
- 22) Rainbow Migration will consider all relevant factors in assessing the risk presented by
 - any individual to Rainbow Migration clients (especially vulnerable adults and children), other staff and volunteers of the organisation
 - any individual to the security of Rainbow Migration's data (both financial and personal, including private information about vulnerable adults or children).
- 23) Relevant Factors include:
 - a) Whether the offence poses a cause for concern and is relevant to the work or activity to be undertaken. For work with clients, convictions or cautions for the following are particularly relevant: offences of violence, sexual violence, hate crimes, crimes of dishonesty, trafficking offences, crimes involving the commission of regulated immigration advice offences. An offence may also be relevant if it would reasonably undermine confidence in the integrity of Rainbow Migration's work or Rainbow Migration itself. Offences likely to be less relevant include immigration offences directly related to a person's history as an asylum seeker or refugee.
 - b) Whether the offence was an isolated incident or whether it is indicative of a pattern of behaviour that may place others at risk.
 - c) The time that has elapsed since the offence occurred.
 - d) The age of the individual at the time of the offence.
 - e) Whether subsequent amendments to the law mean that the offence is no longer illegal.
 - f) Whether there were particular mitigating circumstances at the time that led to the offence being committed (this should have been reflected in the sentence passed).
 - g) Evidence of remorse, positive change and rehabilitation since the offence was committed.
 - h) Whether the offence was wrongly omitted by the applicant from a pre-employment self-declaration statement or otherwise not disclosed when required.
 - i) If the person is an existing member of staff or volunteer, then their performance and record will be considered.

DBS procedure

- 24) Where a post or role is identified as one that requires a DBS check, all application forms, job adverts and recruitment literature will contain a statement advising that this will be requested in the event of the individual being offered the position.
- 25) In line with the Ban the Box campaign and GDPR advice, applicants will not be required to declare whether they have any convictions on the application form or prior to interview to avoid that being taken into consideration on shortlisting. Applicants will be asked to supply that information after interview on being conditionally offered a post. A self-declaration form specifying the level of DBS check will be issued for this purpose (see appendix D).
- 26) If the candidate discloses any convictions that are or may be relevant on the self-declaration form, the Executive Director will immediately invite them to a meeting (see below) (If the information revealed by any DBS check subsequent to this interview differs materially from the self-declaration a further meeting can be held).
- 27) If the self-declaration form does not reveal any convictions that are or may be relevant, a DBS check will be carried out to confirm the assessment of the suitability of the applicant for the position(s) for which they have applied.
 - a) An existing basic or standard DBS certificate can be accepted by Rainbow Migration if it is less than 6 months old. Enhanced checks must be done specific to the role for which they are sought so previous certificates will not be accepted.
 - b) If a candidate has lived abroad for more than 1 year in the past 10 years whilst over the age of 18 years, we will ask for a certificate from the country/ies in which they have lived or spent a significant amount of time. Advice on doing this is available on the www.gov.uk website. If this is not possible, a risk assessment will be made and further references or alternative employment confirmation may be requested if needed and available. Ways of minimising any risk, including through additional supervision or work restrictions, will be considered. Account will be taken particularly of the known difficulties encountered by former asylum seekers and refugees in evidencing their previous history.
 - c) The Executive Director, or Support Services Manager in cases that the applicant would be managed by them, will submit the application/assist the applicant to apply for any appropriate DBS check. All DBS certificates are issued to the applicant.
 - d) Applicants will be informed to deliver the certificate only to the Executive Director or Support Services Manager in the case of staff and volunteers that they will manage (or on the ED's instruction to the Chair of the HR Subcommittee/ Chair) in person or by post marked Private and Confidential. Once the certificate is received from the applicant it will be considered either by the ED or Support Services Manager. If the certificate is sent by email, the original must be subsequently examined by the ED or Support Services Manager and a note made of that. No other member of staff is to open or handle the certificate.
 - e) If there is no cause for concern this will be noted on the personnel file and the certificate given back to the individual. Any emailed/electronic image should be destroyed at this stage.
- 28) If convictions are revealed by the applicant or in the DBS check that are or may be relevant, where relevant the Support Services Manager will discuss this with the

Executive Director. The Support Services Manager will not inform the Executive Director of any convictions that are not relevant. The Executive Director and the Support Services Manager or a member of the Human Resources Subcommittee will invite the applicant to a meeting. In assessing relevance, staff and trustees must disregard any disclosure of spent convictions which the applicant has mistakenly revealed where there is no authorisation for a standard or enhanced DBS check. Staff and trustees should also disregard any convictions on self-declaration which should be filtered from a DBS certificate (for guidance see DBS website or <http://recruit.unlock.org.uk/knowledgebase/ignoring-filtered-criminal-records/>). It should be noted that overseas records will probably not have any entries removed that would be considered spent in the UK.

- a) The purpose of the meeting is to give the applicant a fair and open opportunity to discuss the convictions, give assurances and discuss any additional safeguards that may be appropriate before a decision is made. The Executive Director may arrange for this interview to be conducted by a trustee in their place if it is not reasonably possible to otherwise arrange for the meeting to take place promptly. Rainbow Migration will try to make sure there are two staff members and/or trustees at these meetings. The decision will be based on considerations set out in this policy.
- b) Following the interview, the Executive Director will draft a risk assessment report and will consult with the Chair(s) of the HR Subcommittee. A recommendation will then be made to the HR Subcommittee which will consider the matter and take the decision. The report will contain the minimum necessary information about offending history. There is no right of appeal against a decision not to confirm employment.
- c) Decisions about the relevance of convictions to an existing member of staff will be referred to the disciplinary policy and process.

Storage and access

- 29) DBS certificates will only be kept for as long as necessary through the decision-making process and will then be given back to the applicant.
- 30) We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. Scans of certificates attached to emails will be deleted.
- 31) We will keep an electronic record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.
- 32) In accordance with section 124 of the Police Act 1997, standard and enhanced certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain an electronic record of the DBS check of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it. We will also keep basic DBS information in the same way. The record will be saved on Rainbow Migration's cloud-based filing system and password protected. The password will be known only to: (1) either the Support Services Manager or Executive Director, and (2) the Chair.
- 33) Personnel information including the self-disclosure form are stored in the same way.

34) The self-disclosure form and DBS certificate are not to be used for any other purpose other than the employment decision and defending any decision (including any potential safeguarding reviews/inquiries).

Updating DBS information

35) Updated DBS checks are carried out for relevant staff every 2 years, commencing 2 years after the date of employment and every 2 years thereafter. A check may exceptionally be carried out earlier where there is an indication a further check is required e.g. where information indicates an undeclared conviction. The procedure for handling and retention is as above (except previous overseas checks will not be repeated).

Version	Date
First adopted	29 Jan 2019
Previous version(s) approved	4 June 2019
This version approved	21 April 2021
Next review due	April 2023
Updated with the new organisation name and re-formatted.	11 June 2021

Appendix A: Assessment of posts for DBS certificates

As authorised under Rehabilitation of Offenders Act and Police Act 1997 etc

For further guidance see DBS Website and <http://recruit.unlock.org.uk/knowledgebase/legislation/#police97>

Or <https://www.nacro.org.uk/resettlement-advice-service/support-for-employers/recruiting-safely-and-fairly-guide-a-practical-guide-to-employing-ex-offenders/>

Basis under which Rainbow Migration may seek DBS standard or enhanced checks:

para7 Pt2 Sch4 Safeguarding of Vulnerable Groups Act 2006 and s.59 as in force on 9 Sept 2012. (Version currently in force does not include any work Rainbow Migration do):

1. Working with children meaning any person under 18;
2. Frequently providing advice or guidance which is wholly or mainly for vulnerable adults (e.g. 3 days out of 30) where vulnerable adult includes:
 - a. Detainees
 - b. Someone receiving health or social care

The immediate line manager may also be eligible for the same check.

Enhanced DBS is also required by OISC for a regulated adviser to be approved.

Posts as at 30/11/2020

Post	Condition/justification	Level DBS and risk assessment.
Legal Officer	If requires OISC regulation. Access to petty cash.	Enhanced obligatory
Legal Officer	Solicitor or Barrister meeting the terms of their practice: May advise inside detention centres, advises detainees by telephone at least once per week. Likely to advise clients receiving health care on matters related to their health (e.g. HIV, Art 3 claims, need for health care or reports) at least 3 days per month. Access to petty cash. May occasionally meet/ advise a disputed minor or 16/17-year-old seeking services.	Enhanced possible

Support Worker	<p>Expected to visit detention centre 1 day per month. Support calls with detainees possible. Support groups and 1 to 1 sessions likely to have clients with medical needs or in receipt of health care totalling more than 3 days per month. Aim also to agree OISC accreditation for tasks such statements. Access to petty cash.</p> <p>May occasionally meet/ advise a disputed minor or 16/17-year-old seeking services.</p>	Enhanced possible.
Support Assistant	<p>Meets clients on fewer occasions to deal with more straightforward matters. May give advice about registering with GP or access to medical services. Detainees phone calls but less likely to have repeated contacts. Likely to be on more than 3 days a month. Access to petty cash.</p>	Enhanced possible.
Administrator	<p>No advice giving. No client meetings or calls other than message taking. Access to petty cash and to bank system.</p>	Basic only
Executive Director	<p>Rarely client one to one meetings – exceptional situations. Line manager of Support Worker and Legal Officer. Access to petty cash and to bank system.</p>	Enhanced possible on basis of management of ASSW and LO only
Team Assistant	<p>Meet clients and telephone calls. Don't give advice – carry out administrative tasks. Access to petty cash and client and office records.</p>	Only Basic possible
Senior Communications and Fundraising Officer	<p>No advice giving. Rarely client one to one meetings. Access to petty cash and some client records.</p>	Only Basic possible
Campaigns post (job title TBC)	<p>No advice giving. Rarely client one to one meetings. Access to petty cash and some client records.</p>	Only Basic possible
Office Volunteers	<p>Meet clients and telephone calls. Don't give advice – carry out administrative tasks. Access to petty cash and client and office records.</p>	Only Basic possible

Social Volunteer	Meets with clients. No advice	Only Basic possible
Legal volunteers	Solicitors, barristers, caseworkers at SRA firms, OISC regulated advisers. Speaking to meetings, advising in private afterwards. At most 1 day per month (except JP).	Only Basic possible
Partnership volunteers	Meeting clients but no advice. Few will be in receipt of health or social care.	Only Basic possible
Trustee/Treasurer	With access as signatory to the bank accounts.	Only Basic possible
Trustee	Not an account signatory	Only Basic possible

Appendix B: GDPR Criminal Records processing: Legitimate Interests Assessment

1. Purpose

Rainbow Migration collects (just prior to appointment and a suitable intervals during their employment), considers and then stores (as evidence of their consideration against future challenges and changes) details of the criminal records of identified employed positions in Rainbow Migration for the purposes of:

1. safeguarding clients (especially vulnerable adults and children), other staff and volunteers of the organisation from abuse of any kind, and
2. safeguarding the financial or data resources (including private information about vulnerable adults or children) of Rainbow Migration from job applicants or job holders who pose an unacceptable risk as evidenced by their offending history.

2. Necessity

Rainbow Migration has duties of care towards clients, staff and volunteers and as a charity a duty to protect its charitable resources. Collecting criminal records data will enable us to exclude or remove someone from whose history of offending shows them to be unsuitable for employment in the role whether through showing previous offending behaviour that shows an unacceptable risk of harm, or that shows other reason why they might be unsuitable (for example because their actions would reasonably undermine confidence in the integrity of the work or Rainbow Migration itself, or through revealing lies or misleading information in a job application).

Many of Rainbow Migration's clients are vulnerable or marginalised. That may be because of mental health issues, poverty, language, educational or cultural barriers, age, sexual orientation or gender identity or through their situation such as being in a legal crisis or being a victim of discrimination or past persecution. As their details are confidential, they will often be seen in a private setting with no other witness present to detect or deter abuse. Additionally, as a small organisation staff and volunteers may often be on their own for some of the time at Rainbow Migration so supervision to prevent or detect abuse may be absent.

Access to our bank accounts is by 2 signatories but 1 person with authority is in a stronger position to convince a second to make a payment which is fraudulent and would give access to money belonging to the charity. All staff and office volunteers have physical access to our petty cash float. We have a duty to safeguard our charitable funds.

Collecting criminal records is one method by which complete information about the suitability of job or role applicants is sought, including taking of references, but without the information an accurate assessment of all relevant risks is likely to be impossible as other sources such as referees may not have a complete understanding themselves or may have a hidden motive to hide this information (such as wishing to aid the person leaving employment with them).

The purpose of safeguarding cannot be achieved another way.

3. Balance

We will limit the checks to only those roles where there is potentially a significant risk and for candidates who are being offered a role on a conditional basis. The number of disclosures is therefore kept to a minimum.

Criminal records data will only be used for employment decisions where it is relevant and fairly in accordance with our policy and where there is no alternative way of safeguarding Rainbow Migration, its clients, staff and volunteers from harm. Disclosure will be kept to the minimum number of necessary people in the course of their duties for Rainbow Migration. Gatekeeping to our employed and volunteer roles is particularly important given the difficulty of providing close supervision to deter or detect abuse.

Only a small number of trustees are required to have access to our bank accounts as signatories and the treasurer is the only post for which it is inextricably connected to their role. Other trustees need not volunteer to become a signatory so may not require a DBS check.

The processing in this policy is considered necessary as the purpose of collecting criminal records data outweighs the individual person's right to privacy.

Appendix C: Criminal record information for job adverts

Basic check required:

Job advert

Owing to the nature of the work [with vulnerable adults] [being a signatory to our bank account], the successful applicant will be required at the point of conditional job offer to disclose all unspent criminal records and subsequently to undergo a basic DBS check. See our website [link] for more information.

Website

If a role includes some unsupervised access to vulnerable clients (possibly including occasionally children) and/or being a signatory to our bank account, the successful applicant will be required to declare any convictions which are not yet spent under the Rehabilitation of Offenders Act 1974 at the point of conditional job offer. The term 'convictions' is used to refer to any sentence or disposal issued by a court. This declaration should not be made until after interview and if we have made a job offer that is conditional on the applicant making the declaration. The applicant will also then be required to agree to a basic check (unspent

convictions only) from the Disclosure and Barring Service (DBS) which Rainbow Migration will pay for.

Cases where there are past convictions will be looked on an individual basis, taking into account any relevant details. If necessary, we may arrange a face-to-face discussion with the applicant to obtain further details. An assessment will be made by our Human Resources Subcommittee of all the circumstances to assess any risk and decide if the applicant is a suitable candidate, in line with our DBS and Consideration of Offences Policy. We will consider any information disclosed before confirming an offer of employment.

Any information disclosed will be treated in the strictest confidence and kept securely in line with our DBS and Consideration of Offences Policy and Data Protection Policy.

Standard or enhanced check required:

Advert

Owing to the nature of the work [with vulnerable adults] [giving regulated immigration advice], the successful applicant will be required at the point of conditional job offer to disclose all spent and unspent criminal records and subsequently to undergo [a standard] [an enhanced] DBS check. See our website [link] for more information.

Website

If a role includes unsupervised advice to vulnerable clients (possibly including occasionally children) or the role is regulated by the Office of the Immigration Services Commissioner (OISC), the successful applicant will be required to declare any convictions which are under the Rehabilitation of Offenders Act 1974 that are not yet spent and any spent convictions that are not currently filtered by the Disclosure and Barring Service (DBS) at the point of conditional job offer. The term 'convictions' is used to refer to any sentence or disposal issued by a court. This declaration should not be made until after interview and if we have made a job offer, which is conditional on the applicant making the declaration. The applicant will also be required to agree to a standard or enhanced check (spent convictions other than those filtered) from the DBS which Rainbow Migration will pay for.

Cases where there are past convictions will be looked on an individual basis, taking into account any relevant details. If necessary, we may arrange a face-to-face discussion with the applicant to obtain further details. An assessment will be made by our Human Resources Subcommittee of all the circumstances to assess any risk and decide if the applicant is a suitable candidate, in line with our DBS and Consideration of Offences Policy. We will consider any information disclosed before confirming an offer of employment.

Any information disclosed will be treated in the strictest confidence and kept securely in line with our DBS and Consideration of Offences Policy and Data Protection Policy.

Appendix D: Self-Declaration forms

Criminal record self-disclosure: spent and unspent (for roles that require a standard or enhanced DBS check)

The information provided by you will be considered in line with our 'Policy on DBS and consideration of offences'.

Your name	
Role this applies to	
Self-Disclosure The role you have applied for is exempt from the Rehabilitation of Offenders Act which means that Rainbow Migration are entitled to know about any unspent convictions or cautions AND any SPENT convictions or cautions which are not eligible to be filtered by the DBS. Do you have any convictions or cautions that would not currently be filtered by the DBS? Filtering identifies and removes protected convictions and cautions so that they are not disclosed on a DBS certificate. Yes No (circle as appropriate) Additional guidance – The term 'convictions' is used to refer to any sentence or disposal issued by a court. The term 'cautions' includes reprimands and final warnings. You do not need to disclose anything that would be currently filtered from the Police National Computer by the Disclosure & Barring Service. If you're not sure if your convictions or cautions are filtered, you can find out more from hub.unlock.org.uk/filtering . If you have answered 'Yes', there are two ways of providing further details. (a) Provide the offence dates, dates of conviction/caution, offence types and sentences received below	

(b) Provide further details (as above) on a separate document by ticking the box and attaching the details in an envelope attached to this completed form.

“By signing below, I confirm that the information I have provided on this form (and attached, if applicable) is accurate. I understand that this information will not necessarily prevent me from being employed in the role above, and that I will be given an opportunity to discuss any concerns you might have before you make a final decision on my suitability for the role. I understand that failure to disclose information that Rainbow Migration has requested could result in disciplinary proceedings or dismissal.”

Signed

Date

Once completed, please return marked CONFIDENTIAL to:
Leila Zadeh or Dane Buckley (whichever will be your line manager)
Rainbow Migration, 7-14 Great Dover St, London, SE1 0EH

Criminal record self-disclosure: unspent (for roles that require a basic DBS check)

The information provided by you will be considered in line with our 'Policy on DBS and consideration of offences'.

Your name	
Role this applies to	
Self-Disclosure	
<p>Do you have any unspent convictions? Yes No (circle as appropriate)</p>	
<p>Additional guidance – Please tick “Yes” if you have any convictions that are not yet spent under the Rehabilitation of Offenders Act 1974. The term ‘convictions’ is used to refer to any sentence or disposal issued by a court. If all your convictions are spent, you can tick “No”. If you’re not sure if your convictions are unspent or spent, you can use a tool available at www.disclosurecalculator.org.uk and read guidance at hub.unlock.org.uk/roa.</p>	
<p>If you have answered ‘Yes’, there are two ways of providing further details.</p>	
<p>(a) Provide the offence dates, dates of conviction/caution, offence types and sentences received below</p>	

(b) Provide further details (as above) on a separate document by ticking the box and attaching the details in an envelope attached to this completed form.

“By signing below, I confirm that the information I have provided on this form (and attached, if applicable) is accurate. I understand that this information will not necessarily prevent me from being employed in the role above, and that I will be given an opportunity to discuss any concerns you might have before you make a final decision on my suitability for the role. I understand that failure to disclose information that Rainbow Migration has requested could result in disciplinary proceedings or dismissal.”

Signed		Date	
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Once completed, please return marked CONFIDENTIAL to:
Leila Zadeh or Dane Buckley (whichever will be your line manager)
Rainbow Migration, 7-14 Great Dover St, London, SE1 0EH