

SAFE STORAGE, RETENTION AND HANDLING OF INFORMATION

Introduction

All individuals or organisations using the Disclosure and Barring Service (DBS) [Formerly the Criminal Records Bureau (CRB) Disclosure service] to help assess the suitability of applicants for positions of trust and who are recipients of Disclosure information must comply fully with the DBS Code of Practice. Amongst other things, this obliges them to have a written policy on the correct handling and safekeeping of Disclosure information. As an organisation on whose behalf the WDBF Safeguarding Registry are countersigning Disclosure applications, has adopted this written policy.

General principles

In consideration of our use of the DBS Disclosure Service, to help assess the suitability of applicants for positions of trust, we agree to comply with the DBS Code of Practice, Data Protection Act and other legislation in regard to the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information including any electronic information.

Storage & Access

Disclosure Information will never be kept on an Applicant's personnel file and will always be kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Electronic disclosure information is held on a secure password protected system accessible only to those authorised to view it in the course of their duties.

Handling

In accordance with section 124 of the Police Act 1997, Disclosure Information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosure Information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure Information is only used for the specific purpose for which it was requested and for which the Applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary, whether in electronic or paper format. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months, we will consult the Diocesan Safeguarding Registry who will seek advice from the DBS giving full consideration to the Data Protection rights and Human Rights of the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will continue to apply.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure Information is immediately suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure Information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of Disclosure Information or any copy or representation of the contents of Disclosure Information. However, we may keep a record of the date of issue of Disclosure Information, the name of the subject, the type of Disclosure Information requested, the position for which Disclosure Information was requested, the unique reference number of Disclosure Information, and the details of the recruitment decision taken.

For disposal of electronic Disclosure results and information, the system automatically deletes the record in line with DBS retention guidelines above, automatically archiving only the minimum information as laid out in the DBS Code of Practice and in line with the paper process.

Relationship with WDBF Safeguarding Registry as an Umbrella Organisation.

We accept that the Safeguarding Registry, as our umbrella organisation, has a responsibility to ensure, as far as possible, that we comply with all the requirements in the DBS Code of Practice, this and other policy statements, and in other DBS procedures and processes. We undertake to keep the Safeguarding Registry informed of any changes in our organisation, personnel or practices which could materially affect our ability to work within these expectations.