

# Policy for the Processing, Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information

This policy is reviewed e.g. biennially in spring

**Approved by Governors** 

14/02/2018

# **GENERAL PRINCIPLES**

As an organisation using the DBS (Disclosure and Barring Service) to help assess the suitability of applicants for positions of trust, Joseph Leckie Academy, complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the processing, safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

### **PROCESSING**

All newly appointed and existing staff, who are being re-checked, are issued with clear instructions for completion of on-line DBS applications.

Existing staff are required to bring correct ID into the office for verification to be completed on line.

Newly appointed staff should have brought ID in on day of interview. If any other documentation is required this is requested in the initial offer letter. Any copied ID for unsuccessful interviewees is shredded after interview. Any copied documentation which is kept for the purposes of ID verification is securely locked way and shredded when DBS is complete.

# STORAGE AND ACCESS

Disclosure information is never kept on an employee's personnel file and is always 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. All DBS information is recorded securely on a single central record.

# **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 Disclosures or 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. 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 DBS about this and will give full consideration to the Data Protection and Human Rights of the individual subject before doing so, throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

# **DISPOSAL**

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately and 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 the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.