



## **Policy Statement: Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information**

### **General principles**

As an organisation using the Disclosure and Barring Service (DBS) checking procedure and the Disclosure Scotland PVG Scheme to help assess the suitability of applicants for positions of trust, Instill Education complies fully with the DBS Code of Practice and the Disclosure Scotland PVG Code of Practice (as appropriate) regarding the correct handling, use, storage, retention and disposal of Disclosures, Disclosure information or Scheme Records ( in this note, together called “Disclosure Information”). It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the 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.

### **Storage and access**

Disclosure Information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who need and are entitled to see it as part 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 Disclosures or Disclosure Information has been revealed and 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 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 or Disclosure Scotland (as appropriate) about this and will give full consideration to the data protection and human rights of the

individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

### **Disposal**

Once the retention period has elapsed, we will ensure that any Disclosure Information (including any copies) is immediately destroyed by shredding. 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 Information or any copy or representation of the contents of Disclosure Information. However, notwithstanding the above, 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 the Disclosure Information was requested, the unique reference number of the Disclosure Information or the person concerned and the details of the recruitment decision taken.

### **Acting as an Umbrella Body**

Before acting as an Umbrella Body (one which countersigns applications and receives Disclosure Information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure Information in full compliance with the DBS Code or the Disclosure Scotland Code (as appropriate) and in full accordance with this policy. We will also ensure that any body or individual, at whose request applications for Disclosure Information are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

### **Related Policies:**

#### **Safeguarding Policy**

Child Protection policy  
Recruitment and selection policy (England and Wales)  
Health and Safety policy (in Health & Safety Manual)  
DBS Policy – Recruitment of Ex-offenders  
Recruitment of Ex-offenders (England & Wales)  
Anti-Bullying Policy

Reviewed January 2017

To be reviewed January 2018