



# Secure Handling, Use, Retention and Disposal of Disclosures and Disclosure Information Policy

## General principles

As an organisation using the Disclosure & Barring Service (DBS) through the services of Hertfordshire County Council (HCC) as Umbrella Body, to help assess the suitability of applicants for positions of trust, Redbourn Care Group (RCG) aims to comply fully with HCC's advice on the correct handling, use, storage, retention and disposal of Disclosure and Barring information, and with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This policy statement is available to those who wish to see it on request.

## Storage and access

Disclosure information will be handled in accordance with the DBS Code of Practice. Disclosure information is never kept on an applicant's file or personal file and is always kept separately and securely. Printed results will be stored 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.

## Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is passed only to those who are authorised to receive it in the course of their duties. A record is maintained 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 an appointment (or other relevant) decision has been made, certificate information is not kept 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 certificate information for longer than six months, we will give full consideration to the Data Protection and Human Rights of the individual before doing so, in consultation with the Umbrella Body. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

However, RCG will update certification for all current volunteers every 3 years (electronically through the DBS Update Service). In order to complete this mandatory Update process volunteers will be required to grant RCG permission either verbally or in writing. If such permission is not granted then the role of the volunteer will be terminated unless otherwise determined by the Trustees and / or the volunteer agrees to undertake a

new DBS check. The Trustees will maintain a secure record of the information required to carry out this Update every 3 years or as required by RCG's insurers and / or legal advisers and will comply with the Revised Code of Practice for Disclosure and Barring Service Registered Persons (November 2015).

### **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 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 and date of birth of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique certificate number of the Disclosure and the details of the recruitment decision taken in order to complete the 3-yearly Update.

This policy will be subject to review at intervals of two years.

Policy approved and adopted by all Trustees: September 2017

