



Chiltern Way Academy

Turning Futures Around

Secure Storage Policy

Responsibility for this policy (job title): Business Manager

Responsibility for its review: Principal

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Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of DBS Certificates and Certificate Information

General Principles

As an organisation using the Disclosure & Barring Service [DBS] to help assess the suitability of applicants for positions of trust Chiltern Way Academy complies with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures. We also comply with our obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of DBS Certificates which is covered by this written policy on these matters, which is available to those who wish to see it on request.

Storage and Access

Certificate information is never kept on an applicant'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.

In certain circumstances, as notified by Human Resources, a separate record must be held on the employee's personal file giving details of the DBS Certificate number, date of issue and details of the audit process to agree the clearance of the individual for employment or voluntary work.

Handling

In accordance with section 124 of the Police Act 1997, Certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain an audit record of all those to whom Certificates have 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

Certificate 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, [with the exception of positions regulated by the Commission for Social Care Inspection for which it is 12 months or the date of the next inspection] to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep a Certificate for longer than six months, we will consult the DBS and give full consideration to the General Data Protection Regulation and Human Rights of the individual prior to proceeding. 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 Certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Certificate 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 Certificate or any copy or representation of the contents of a Certificate.

However, notwithstanding the above, we may keep a 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 Certificate 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 Certificate information on behalf of other employers or recruiting organisations], Bucks County Council will take reasonable steps to ensure that the other organisation can comply with the DBS Code of Practice.

The Council will also take reasonable steps to satisfy itself that the other organisation will handle, use, store, retain and dispose of Certificate information in compliance with the DBS Code of Practice and in accordance with this policy. The Council will also require that any body or individual, at whose request applications for Certificates 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.