

19. Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information Policy

Version number	Dates produced & approved	Reason for production & revision	Author	Locations	Proposed new review date
V1.0	Jan 2010	First adopted	Cttee	Dropbox.com	
V2.0	Oct 2015	Reviewed	K Jones	Dropbox.com Website	Oct 2016
V3.0	Sept 2017	Reviewed, updated & version controlled	K Coupe & S Huxley-Reynard	Dropbox.com Website	2019/20
V4.0	Sept 2018	Update re GDPR	K Coupe	Dropbox.com website	2020
V5.0	Jan 2023	Reviewed and updated as follows: • details of who has access to DBS information; • inclusion of “Associated Policies & Procedures” section as per Safeguarding Audit 2022 section 175/157	K Coupe	Dropbox.com Website	Feb 2025

General principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, North Nibley Pre School 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 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

Storage and access

Disclosure information should be kept 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.

The Setting Support Officer ensures that any DBS paper documentation is kept securely in a lockable cabinet in a locked room. Access to this information is strictly restricted. The Administrator is responsible for the setting’s Single Central Register (SCR) which contains DBS information. This is held electronically and backed up weekly. Access is restricted to the Setting Support Officer and Chair, on request.

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 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 is immediately destroyed by secure means, eg. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (eg. 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.

Legal framework

- General Data Protection Regulations 2018
- Human Rights Act (1998)

Further guidance

- Information Sharing: Guidance for practitioners providing safeguarding services (DfE 26 March 2015)

Associated Policies & Procedures

- 29 Safer Recruitment
- 36 Data collection and information sharing