

# **Rushmoor Borough Council**

## **Policy on handling DBS Disclosure information**

### **General principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Rushmoor Borough Council will comply fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It will also comply 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 certificate information. The Council has a written policy on these matters, which is available to those who wish to see it on request.

### **Storage and Access**

Certificate information will be kept securely, in lockable, non-portable, storage containers, or on an electronic document management system 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, certificate information will only be passed to those who are authorised to receive it in the course of their duties. We will maintain a record of all those to whom certificates or certificate information has been revealed and note that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Where we carry out checks as an umbrella body on behalf of registered care homes which are inspected by the Care Quality Commission (CQC), organisations which are inspected by Ofsted or establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW), we may retain the certificate until the next inspection. Once the inspection has taken place the certificate should be destroyed in accordance with the code of practice.

### **Usage**

Certificate information will only be 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 certificate 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, complaints or appeals.

If, in very exceptional circumstances, it is considered necessary to keep certificate 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.

The usual conditions regarding the safe storage and strictly controlled access will prevail at all times.

### **Disposal**

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping, burning or deleting from the system. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

Once the retention period has elapsed, 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 (an umbrella body being a registered body which countersigns applications and receives certificate 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 certificate information in full compliance with the code of practice and in full accordance with this policy.

We will also ensure that any body or individual, at whose request applications for DBS 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.