



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

General Principles

Avon House School uses Atlantic Data as an umbrella body for the purpose of obtaining Disclosure checks from the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust.

We comply fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information and also comply fully with the obligations under the Data Protection Act 2018 (DPA) and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This written policy is available to those who wish to see it on request.

Storage & Access

Disclosure information is never permanently retained on an applicant's personnel file. It is held securely in lockable filing during the appointment process 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 only passed to those who are authorised to receive it in the course of their duties. Records of the Enhanced Disclosure certificate number and issue date are kept within a database with strict access to staff who 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 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, 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 subject before doing so. 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 Disclosure information is immediately destroyed by secure means such as shredding. While awaiting destruction, Disclosure information will be kept in a secure receptacle. 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 this, we will keep a record of the date of issue of a Disclosure, the name of the subject and the unique reference number of the Disclosure on the school's single central record database with strict access to those who are entitled to see this information as part of their duties.

Reviewed September 2018 EB/NB

Reviewed July 2019 NB

Reviewed August 2020 NB