

**IMMANUEL CHURCH, CHICHESTER**

**POLICY ON THE  
HANDLING OF DISCLOSURES  
AND DISCLOSURE INFORMATION**

| Approved by the Trustees – day month ~~2012~~2013

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

In consideration of our use of the [Disclosure and Barring Service \(DBS\) CRB Disclosure Service](#), to help assess the suitability of applicants for positions of trust, we agree to comply with the [DBS-CRB Code of Practice](#), Data Protection Act and other legislation in regard to the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information including any electronic information.

## Storage & Access

Disclosure 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.~~ Electronic disclosure information is held on a secure password protected system accessible only to those authorised to view it in the course 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. ~~We maintain a record of all those to whom 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 a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary, whether in electronic or paper format. 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 CCPAS Disclosure Unit who will seek advice from the [CRB-DBS](#) giving full consideration to the Data Protection rights and Human Rights of the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will continue to apply.

## 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 Disclosure Information or any copy or representation of the contents of Disclosure Information. However, we may keep a record of the date of issue of Disclosure Information, the name of the subject, the type of Disclosure Information requested, the position for which Disclosure Information was requested, the unique reference number of Disclosure Information, and the details of the recruitment decision taken.

For disposal of electronic Disclosure results and information, we will delete records in line with [DBS-CRB](#) retention guidelines above, archiving only the minimum information as laid out in the [CRB-DBS](#) Code of Practice and in line with the paper process.

**Our relationship with CCPAS as an Umbrella Organisation.**

We accept that the CCPAS Disclosure Unit, as our umbrella organisation, has a responsibility to ensure, as far as possible, that we comply with all the requirements in the [DBSCR](#) Code of Practice, this and other policy statements, and in other [CRB-DBS](#) procedures and processes. We undertake to keep CCPAS informed of any changes in our organisation, personnel or practices which could materially affect our ability to work within these expectations.