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Secure Storage, Handling, Use, Retention, Disposal of Disclosures and Disclosure & Barring information

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1. INTRODUCTION

This guidance refers to the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information.

The DBS [code of practice](#) states that all registered bodies must have a written policy on the correct handling and safekeeping of DBS certificate information.

It also obliges registered bodies to make sure that a body or individual, on whose behalf they are countersigning applications, has a written policy.

2. GENERAL PRINCIPLES

As an organisation using the DBS checking service to help assess the suitability of applicants for positions of trust, Rhondda Cynon Taf Council complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

3. STORAGE AND ACCESS

Certificate 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.

Electronic Disclosure & Barring information will be kept on a secure electronic password protected system. Access to the E-bulk system will be limited to Registered Users only, via an account number and password unique to the user, maintained by the Registered Body. All electronic data will be stored securely in line with the Council's Information Security Policy.

4. 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. The Council maintains a record of all those to whom Disclosures or Disclosure & Barring information has been revealed and the Council recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it. This applies to electronic and paper format.

Organisations such as the Council, which are inspected by the Care Quality Commission (CQC) or Ofsted / Estyn, and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain the certificate for the purposes of inspection.

In addition, organisations that require retention of certificates in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate. This practice will need to be compliant with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.

5. USAGE

Disclosure & Barring 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.

6. RETENTION

Once a recruitment (or other relevant) decision has been made, the Council does not keep Disclosure & Barring information for any longer than is absolutely necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits (see point 4).

7. 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 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 unless it falls under the examples in point 4. 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 certificates and the details of the recruitment decision taken.

Electronic disposal will be via the Capita electronic deletion system. Electronic information will always be retained within the password protected system until secure electronic deletion.

7. 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.

Further information on the DBS's Code of Practice can be found on the DBS Website at [Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](http://www.gov.uk)