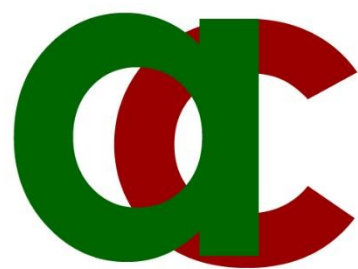


2017

# Disclosure Information Policy



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Revised:

3/8/2017



## Policy for secure storage, handling, use, retention & disposal of disclosures & disclosure information

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### 1. Background

All organizations using the (DBS) Disclosure & Barring Service to help assess the suitability of applicants for positions of trust and who are recipients of Disclosure information must comply fully with the DBS Code of Practice.

This Code places an obligation on such organizations to have a written policy on the correct handling and safekeeping of Disclosure information. The following principles contained within this AC Policy will ensure compliance with the Code in this respect.

### 2. Responsibilities

As an organization using the DBS to help assess the suitability of applicants for positions of trust, AC complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

AC complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosures and Disclosure information and has a written policy on these matters, which is available to those who wish to see it upon request.

### 3. AC Code of Practice

**Storage and access:** Disclosure information is never kept on an applicants personnel file and is always kept separately and securely, in a lockable, non-portable, storage container 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. AC will maintain a record of all those to whom Disclosures or Disclosure Information has been revealed and AC recognises



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 applicants full consent has been given.

**Retention:** Once a recruitment (or other relevant) decision has been made, AC will not keep Disclosure Information for any longer than is absolutely necessary. This is generally for a period of up to 6 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, AC will consult the DBS about this. The DBS will give full consideration to the Data Protection and Human Rights individual subject access requirement before giving consent.

**Disposal:** Once the retention period has elapsed, AC will ensure that any Disclosure Information is immediately 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).

AC 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, AC will keep a record of the date of issue of a Disclosure, the name of the subject, the type of the 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.

#### 4. Revision of Policy

AC reserves the right to amend this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.

