

Handling of Disclosure Information

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

Policy Statement

1. General principles

As an organisation using the Disclosure & Barring (formerly CRB) checking service to help assess the suitability of applicants for positions of trust, Strictly Education 4S Ltd complies fully with the [DBS Code of Practice](#) regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the General Data Protection Regulation, Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information.

Strictly Education 4S Ltd also require that schools, colleges and other organisations for whom we act as an 'umbrella organisation' follow this policy and we will take all reasonable steps to satisfy ourselves that they handle, use, store, retain and dispose of disclosure information in full compliance with the DBS Code.

2. Storage and access

Paper disclosure information is kept securely, in lockable, non-portable, storage containers. Electronic disclosure information is held within secure password protected systems. Access to all disclosure information is strictly controlled and limited to those who are entitled to see it as part of their duties.

3. 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 DBS information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

4. 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.

5. Retention

Data Held by Strictly Education 4S Ltd

Once a recruitment (or other relevant) decision has been made, disclosure information is not held by us for any longer than is necessary. This includes copies of any documents that have been used to verify an individual's ID. This is generally for a period of up to three 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 this, 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. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

The only exception to the above is where a document has also been used to verify an individual's right to work in the UK, e.g. passport. A copy of such documentation must be kept on the employee's personal file.

Data Held Within the Electronic Application System

This refers to applications submitted via <https://disclosure.capitarvs.co.uk/strictlyeducation4s/>.

Applicant and disclosure information held **within the electronic application system** is stored online for maximum retention periods as shown below.

<p>DBS certificate result information (this does not include any criminal record information)</p>	<p>Archived after six months</p>
<p>Completed applications</p>	<p>Purged after four years</p> <p>At this stage applications are still available within the system but are stripped down to a skeleton record with most personal and sensitive data deleted. Vital data is kept to provide proof that a check has been undertaken.</p>
<p>Completed applications</p>	<p>Permanently deleted after seven years</p> <p>At this stage data is deleted and is irrecoverable.</p>

6. Disposal

Once the retention period has lapsed, we will ensure that any DBS information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, DBS information will be kept in a secure receptacle (e.g. confidential waste sack). We will not keep any photocopy or other image, including electronically, of the DBS certificate or any copy or representation of the contents.