



SECURE STORAGE/HANDLING OF DISCLOSURES POLICY

(POLICY STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION & DISPOSAL OF DISCLOSURES & DISCLOSURE INFORMATION)

Principles:

- a. As an organisation using the Disclosure and Barring Service (DBS – previously CRB) to help assess the suitability of applicants for positions of trust, the Let's Play Project complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- b. The Let's Play Project 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 Disclosure information and this written policy (**PP05**) on these matters, which is available to those who wish to see it on request.

1. Policy:

1.1 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.

1.2 Handling:

- a. 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.
- b. The Let's Play Project maintains a record of all those to whom Disclosures, or Disclosure information, has been revealed and recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

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1.3 **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.

1.4 **Retention:**

- a. Once a recruitment (or other relevant) decision has been made, the Let's Play Project does 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.
- b. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months, the Let's Play Project will consult the DBS about this and will give full consideration to the Data Protection and Human Rights individual subject before doing so.
- c. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

1.5 **Disposal:**

- a. Once the retention period has elapsed, the Let's Play Project will ensure that any Disclosure information is immediately suitably destroyed by secure means, i.e. by shredding, pulping or burning.
- b. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).
- c. The Let's Play Project will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.
- d. However, notwithstanding the above, the Let's Play Project may keep a record of:
 - 1) the date of issue of a disclosure,
 - 2) the name of the subject,
 - 3) the type of Disclosure requested,
 - 4) the position for which the Disclosure was requested,
 - 5) the unique reference number of the Disclosure,
 - 6) and the details of the recruitment decision taken.

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