

Policy on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure information.

Disclosure information is information contained in criminal record certificates under the Police Act 1997. The DBS Code of Practice sets out obligations for everyone participating in the Disclosure process and is intended to ensure that personal information is:

- Handled and stored appropriately
- Kept only for as long as necessary
- Used fairly and provides assurances to applicants.

City, University of London fully complies with the Code in using, storing, retaining and disposing of Disclosures and Disclosure information. Strict guidelines and controls ensure information is protected throughout the process.

The School of Health Sciences at City, University of London uses an online service in conjunction with Atlantic Data Ltd to send electronic DBS applications directly to the Disclosure and Barring Service (DBS). Access is controlled by a login process, with all information provided through a secure website and all personal data transmitted using encryption.

General Principals

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, City University, Institute of Health Sciences 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 *Data Protection Act 1998* and other relevant legislation pertaining to the safe handling, use, storage retention, and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and 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. An up-to-date list of registered countersignatories is available from the School of Allied Health Sciences Administration Office.

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 Disclosures or Disclosure information has been revealed and we recognise that it is a **criminal offence** to pass this information to anyone that is not entitled to receive it. A countersignatory (or other appropriately delegated person acting in his/her absence) is only allowed to disclose Disclosure information to another member of staff of City University in the course of his/her duties.

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 decision has been made, we do not keep any additional information obtained during this process for any longer than is absolutely necessary (except the outcome). 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 the DBS about this and will give full consideration to the *Data Protection* and *Human Rights* of an individual subject before doing so. Through out this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

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 the Disclosure or any copy or representation of the content of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of 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.