



CRIMINAL RECORDS POLICY

1. Secure storage, handling, use, retention and disposal of Disclosures and Disclosure information.

Background

2. All organisations using the Disclosure and Barring Service (DBS) 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.
3. The Code places an obligation on such organisations to have a written policy on the correct handling and safekeeping of Disclosure information. The following principles contained in this policy will ensure compliance with the Code in this respect.

Responsibilities

4. As a charity using the DBS to help assess the suitability of applicants for positions of trust, Vision 21 Cyfle Cymru complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
5. Vision 21 Cyfle Cymru 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 has a written policy on these matters, which can be found within the staff handbook.

Code of Practice

6. **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.
7. **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.
8. Vision 21 Cyfle Cymru will maintain a record of all those to whom Disclosures or Disclosure information has been revealed and Vision 21 Cyfle Cymru recognises that

it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

9. Vision 21 Cyfle Cymru will reapply DBS disclosures for employees every five years.
10. **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.
11. **Retention:** Once a recruitment [or other relevant] decision has been made, Vision 21 Cyfle Cymru will 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.
12. If in very exceptional circumstances it is considered necessary to keep Disclosure information for longer than six months, Vision 21 Cyfle Cymru will consult the DBS about this. Vision 21 Cyfle Cymru will give full consideration to the Data Protection and Human Rights individual subject access requirement before doing so.
13. **Disposal:** Once the retention period has elapsed, Vision 21 Cyfle Cymru will ensure that any Disclosure information is immediately destroyed by secure means i.e. by shredding, pulping or burning.
14. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle.
15. Vision 21 Cyfle Cymru will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.
16. However, notwithstanding the above, Vision 21 Cyfle Cymru will keep a record of the date of the 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.