



## **Policy on the secure storage, handling, use, retention and disposal of disclosures and disclosure information**

### **General Principles**

As an organisation using the Criminal Records Bureau (CRB) disclosure service to assess applicants' suitability for positions of trust, St. Clare's complies fully with the CRB 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 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 on request to those who wish to see it. In this policy 'disclosure information' is defined as all material which is provided by an applicant to be used in preparing and sending an application form to the CRB, and 'disclosure' is defined as the form returned by the CRB showing whether an applicant has or has not got a criminal record.

### **Storage & Access**

Disclosure information is normally not kept on an applicant's personnel file. The information which may be kept relates to an applicant's passport or other confirmation of right to work in the United Kingdom. All disclosure information, if retained, is always kept 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.

### **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. St. Clare's maintains a record of all those to whom disclosure information or disclosures has been revealed and 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 applicant's full consent has been given.

### **Retention**

Once a recruitment or other relevant decision has been made, St. Clare's does not keep disclosure information for any longer than is absolutely necessary with the exception of right to work documents mentioned above. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If it is considered necessary to keep disclosure information for longer than six-months, St. Clare's will give full consideration to the Data Protection and Human Rights Acts relating to the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

### **Disposal**

Once the retention period has elapsed, St. Clare's will ensure that any disclosure information is immediately suitably destroyed by secure means, ie. by shredding, pulping or burning. While awaiting destruction, disclosure information will not be kept in any insecure receptacle, eg. waste bin or confidential waste sack. St. Clare's will not keep any photocopy or other image of the disclosure information. St. Clare's will keep a record of the disclosure from the CRB 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.