

## Policy statement on the Secure Handling, Holding, Storage, Retention & Destruction of Disclosures and Disclosure Information

### Introduction

It is a requirement of the Codes of Practice for the disclosure checking services for England & Wales (DBS), Northern Ireland (Access NI); and Scotland (PVG Scotland) that all registered bodies have a written policy on the correct handling and safekeeping of disclosures and disclosure information.

It also obliges registered bodies to ensure that a body or individual, on whose behalf they are countersigning disclosure applications, has a written policy.

### General Principles

As an organisation using disclosure checking services to help assess the suitability of applicants for positions of trust, the Prince's Trust complies fully with the various Codes of Practice\*\* (See links below) for DBS (England & Wales); Access NI (Northern Ireland) and PVG Scotland (Scotland) regarding the secure handling, holding, storage, retention and destruction of disclosures and disclosure information.

The Prince's Trust also complies fully with its obligations under the General Data Protection Regulation (GDPR), The Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, holding, storage, destruction and retention of disclosures and disclosure information. We will provide a copy of this policy to anyone who requests to see it.

### Handling

In accordance with section 124 of the Police Act 1997, disclosures and 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 and disclosure information has been revealed and it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

### Usage

Disclosures and 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.

### Storage and Access

We do not keep disclosures and disclosure information on an individual's personnel file. It is kept securely in an electronic file, or in lockable, non-portable storage containers and with both, access is strictly controlled and limited to those who are entitled to see it as part of their duties.

### Retention

We do not keep disclosures or disclosure information for any longer than is necessary and will not retain any paper or electronic images. Retention of disclosures and disclosure information is generally for a period of up to six months, to allow for the consideration and

resolution of any disputes or complaints. Or, the date an individual ceases to undertake regulated work for The Prince's Trust, whichever is sooner.

We will however record the date of issue, the individual's name, the disclosure type and the position/purpose for which it was requested, the unique reference number of the disclosure and details of the recruitment decision taken.

If, in very exceptional circumstances, it is considered necessary to keep disclosures and disclosure information for longer than six months, we will consult the relevant disclosure checking service about this and will give full consideration to the General Data Protection Regulation, Data Protection and Human Rights of the data subject before doing so.

At all times we will ensure the safe and secure storage and strictly controlled access to such records.

### **Disposal**

Once the retention period has elapsed, we will ensure that any disclosures and disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, disclosures and disclosure information will be stored securely in lockable, non-portable, storage containers.

### **Umbrella Bodies**

We will take all reasonable steps to satisfy ourselves, that Umbrella Bodies acting on our behalf (an umbrella body being a registered body which countersigns applications and receives disclosure information on behalf of other organisations), will handle, hold, store, retain and destroy disclosures and disclosure information in full compliance with the relevant codes of practice and in full accordance with this policy.

We will also ensure that any umbrella body or individual for whom applications or requests are countersigned, has an effective policy in place, which as a minimum achieves the same as this policy.

### **Related Policies and Documents**

Recruitment Statement

Policy – Recruitment of Ex-Offenders

Codes of Practice – please select appropriate link:

For England and Wales: [DBS England & Wales](#)

For Scotland: [PVG Scotland](#)

For Northern Ireland: [Access NI Northern Ireland](#)