

# **The Scout Association**

## **Secure Storage, Handling, Use, Retention & Disposal of Information**

## **Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information Including use of The e-Bulk Service**

This policy for the Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information Including Use of The e-Bulk Service is provided in order to comply with current regulations. The Scout Association as the registered body and the DBS retains the right to call unannounced to check that adherence to the policy is being maintained.

**General Principles:** As an organisation using the Disclosure and Barring service via our Registered Broker we agree to comply fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. We also comply fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of Disclosure information.

**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 who is not entitled to receive it.

**Access:** We are aware that System access is only granted to authorised personnel and therefore restrictions to access data is only individuals who are involved in the recruitment decision along with The Scout Association and DBS support team.

**Scanning/copying of DBS information:** The Scout Association will only scan/copy a Disclosure Certificate with the permission of the applicant.

**Printing of DBS information:** We are aware that permitted and non-permitted communication of DBS result information (verbal, written, email, etc.) is only by individuals who are involved in the recruitment decision for The Scout Association and the DBS support team who will have access to DBS information.

We are also aware that the DBS result information can only be successfully printed once and is only available with username and password protection to prevent unauthorised access or modification.

Readable copies will be printed for the purpose of presenting them to the relevant industry, regulatory inspector at the time of an inspection; this may include Auditor/Inspectors from the DFE/OFSTED/CQC/CSSIW/FSA (where applicable).

**Forwarding of electronic DBS Result information:** We know that the forwarding of DBS result information is not permitted on the system and that documents cannot be saved into any format outside of the online system and cannot be stored separately electronically, emailed or distributed etc.

## Private & Confidential

**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.

**Loss of Documents:** If we lose documents we are aware that this must be reported to the DBS support team stating what has been lost, how, what format and by whom. Failure by anybody to comply with the storage requirements could result in:

- Non-compliance notice being issued and a 14 day mandatory requirement to adhere to the set procedures and provide evidence of this.
- Suspension of the ID checker.
- Suspension or termination of the entire online account.
- Also, we are aware that in all instances where personal information has been lost the Disclosure and Barring Service will be informed of this occurrence as it is considered a serious DPA violation.

**Storage:** We are aware that scanned/copied DBS Results will be kept online for a maximum of 6 months or up until the point that we print the result and confirm that it has been printed correctly.

We confirm that all result information, whether a DBS Disclosure Certificate, Electronic result information, Printed result information or scanned/copied result information must be handled in accordance with the DBS Code of Practice and we ensure that every user is provided with a Policy statement for the secure handling and storage of disclosure information, as well as full access to the DBS Code of Practice.

**Retention:** Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. 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 any circumstances, it is considered necessary to keep Disclosure information for longer than six months and for a term of no longer than 12 months that this must be done in agreement with The Scout Association and the applicant and we will consult the DBS about this and will give full consideration to the data protection and human rights of the individual before doing so.

**Disposal:** Once the retention period has elapsed, we will ensure that any Disclosure information is immediately 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).

Where there has been any scan or photocopy of an applicants DBS certificate and an image, copy or representation of the contents has been held that this information will be destroyed by secure means or purged from the system at the required juncture or after the required period, unless the applicant has given The Scout Association permission to hold their information.

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.

## **Private & Confidential**

**Incomplete Applications:** If online applications are not completed in full, they are removed from the system in compliance with the DPA. A 20 day reminder message and 30 day prompt is provided to the RB DBS support team to cancel them and after 90 days automatic system removal and data purge occurs.

**Adherence to Policy:** Responsibility for the implementation, monitoring and development of this policy lies with our Lead Countersignatory to ensure that this policy is implemented.