

Secure storage, handling, use, retention and disposal of disclosure information

The following is the Staffordshire County Council policy statement 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 help assess the suitability of applicants for positions of trust, Staffordshire County Council 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 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. Electronic disclosure information is held on the Staffordshire County Council SAP HR/Payroll system which is protected with a secure password and accessible only to those authorised to view it in the course 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. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we ensure information is marked 'strictly confidential'. Staffordshire County Council 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 decision has been made, we do not keep Disclosure information (electronic or paper/hardcopy) 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.



If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months, we will consult the CRB about this and will give full consideration to Data Protection and the Human Rights of an individual 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, we 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 (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 contents of a Disclosure. However, we will 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.

For disposal of electronic Disclosure results and information, the e-bulk system automatically deletes the record in line with the CRB retention guidelines above; automatically archiving only the minimum information as laid out in the CRB Code of Practice and the same as the paper process.

Before acting as an Umbrella Body (processing Disclosure information on behalf of other employers), we ask employers to sign an agreement to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure information in full compliance with the CRB Code and in full accordance with this policy. We also ensure that any body or individual, at whose request applications for Disclosure are countersigned, has such a written policy and, if necessary will provide a model policy for that body or individual to use or adapt for this purpose.

