

UK Umbrella Service Limited Policy Statement on the Secure Storage, Handling, Use, Retention & Disposal of Disclosure Information (Basic applications)

General principles

As a Responsible Organisation (RO) using the Disclosure and Barring Service (DBS) to help our clients assess the suitability of applicants for positions of trust, UK Umbrella Service Limited (UKUS) complies fully with the DBS Basic Check Processing Standards 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 2018, General Data Protection Regulation and other relevant legislation:

- in relation to the circumstances in which it seeks criminal records information;
- by being concise, clear and transparent about how it obtains and uses such information, and how (and when) it is deleted once it is no longer required; and
- by ensuring the correct handling, use, storage, retention and disposal of DBS certificates and certificate information.

UKUS complies with its data protection obligations, including in relation to criminal records information, and for monitoring compliance with those obligations and with our policies. If you have any questions or comments about the data protection content of this policy or if you need further information, you should contact the DPO at admin@ukdbschecks.com

Storage & Access

Paper form Disclosure information is always kept separately and securely, in lockable, nonportable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

UKUS utilises an online system developed by Cantium Business Solutions (EmploymentCheck) for processing e-DBS applications and all information is therefore stored on their servers. These servers containing sensitive information are stored in accordance within ISO27001 standards, They are in secure, locked areas to prevent unauthorised access. This information is stored for monitoring purposes only. Access to these systems is strictly controlled and only granted to those who need this as part of their duties.

All other emails or documents recording the disclosure information that are held by any of the authorised staff involved in decision making, will be securely deleted, or destroyed immediately upon the risk assessment being completed.

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 Disclosure information has been revealed as part of the Risk Assessment process and we recognise that it is a criminal offence to pass this information to anyone who is

not entitled to receive it. We only share Disclosure information with those who require this as part of their duties.

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 disclosure has been received and a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This is 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 DBS about this and give full consideration to the Data Protection and Human Rights of the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Personal information kept within the EmploymentCheck online system is purged after a period of 6 months from the date the application is archived as outlined in our Privacy Notice.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information whether this be paper form or on-line information is immediately and suitably destroyed by secure means or deleting within the EmploymentCheck online system. While disclosure documentation is waiting to be disposed of we will ensure that this is kept in a secure lockable, non-portable storage container or securely within the on-line system. We will not keep any photocopies or other images of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of:

- Application ID
- Username
- Forename
- Surname
- ID Verifier Username
- Type of check required
- DBS Application Reference
- Disclosure number
- Disclosure issue date
- Recruitment decision
- Position for which certificate was requested

Acting as a Responsible Organisation

Before acting as an Responsible Organisation (one which oversees Basic DBS applications and receives Disclosure information on behalf of other employers or recruiting organisations), we will take all reasonable steps to ensure that they can comply fully with the DBS Basic Check Processing Standards. We will also take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure information in full compliance with the DBS Basic Check Processing Standards and in full accordance with this policy. We will 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.