



**South Gloucestershire and Stroud Academy Trust (SGS-AT)**

**Secure handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates information policy and procedure**

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Please contact the SGS-GS Human Resources Department**

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<b>Job Title/Role:</b>	Head of Human Resources
<b>Ref. No.:</b>  <b>Q/P 144</b>	<b>Date of this Version:</b> October 2019  <b>Review date:</b> October 2022  <b>Upload to Sharepoint?</b> Yes  <b>Upload to SGS-AT Website?</b> No
<b>Approved by:</b>	SGS-AT Board of Trustees
<b>Date:</b>	16 October 2019

## Mandatory Initial Equality and Diversity Impact Screening

Main aim and purpose of the policy:						
Is this policy (or its constituent parts) relevant to a general equality duty? (please tick)	This policy development will assist in the elimination of unlawful discrimination and/or harassment of identified Groups?		Implementation of this policy will promote equal opportunities for identified Groups?		Implementation of this policy will promote positive attitudes and participation between Groups?	Implementation of this policy will promote good relations between Groups?
<b>Age</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Gender Reassignment</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Race or Ethnicity</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Religion or Belief</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy/ Maternity</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sex</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Carers/ Care givers</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Persons in care</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Specify any Groups for which there is evidence or reason to believe that some Groups or individuals could be affected differently:						
None						
How much evidence is there:	None	A little	Some	A lot		
<b>Is there any concern that the policy may operate in a discriminatory way?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	None	A little	Some	A lot		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Assessed relevance to equality (tick one row only)	High	Med	Low	None	Brief reason for this assessment	
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Race or Ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Marriage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Pregnancy/ Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Carers/ Care givers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
What is the next step? (tick one only)	What priority level is this policy?			Has the Policy been sent for Full EQIA, or do you believe the policy should have a Full EQIA?		
	High <input type="checkbox"/>	Medium <input checked="" type="checkbox"/>	Low <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
<b><i>I am satisfied that an initial screening has been carried out on this policy/procedure and a full Impact Assessment is not required</i></b>						
<b>Completed by:</b> Helen Edmunds <b>Position:</b> Head of Human Resources <b>Date:</b> October 2019						

# **Secure handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates information policy and procedure**

## **1. Introduction**

- 1.1. As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, SGS Academy Trust (SGS-AT) complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.
- 1.2. It also complies fully with its obligations under the General Data Protection Regulations (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

## **2. Storage and access**

- 2.1. Individuals' personnel records contain details of the level of DBS check, the disclosure number and date the disclosure was issued. This information is also recorded on the employee's school's 'Single Central Register'.
- 2.2. Access to the information is strictly controlled and limited to those who are entitled to see it as part of their duties.

## **3. Handling**

- 3.1. In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties.
- 3.2. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **4. Usage**

- 4.1. Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## **5. Retention**

- 5.1. Once a recruitment (or other relevant) decision has been made, we do not keep certificate 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.
- 5.2. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, 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.
- 5.3. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

## **6. Disposal**

- 6.1. Once the retention period has elapsed, we will ensure that any certificate information is immediately destroyed by secure means, i.e. by deletion of the records.
- 6.2. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).
- 6.3. We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate.
- 6.4. However, notwithstanding the above, we may keep a record of:
  - the date of issue of a certificate,
  - the name of the subject,
  - the type of certificate requested,
  - the position for which the certificate was requested,
  - the unique reference number of the certificate, and
  - the details of the recruitment decision.