South Gloucestershire and Stroud Academy Trust (SGSAT)

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

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Please contact the Human Resources Department

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Job Title/Role:	Human Resources Advisor
Ref. No.:	**Date of this version:** **30/05/2025** **Review Date:** **30/05/2028** (Subject to any legislative changes) **Upload to website?** **No** **Upload to SharePoint? Yes**
Approved by:	SGSAT Trust Board
Date:	09/07/2025

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

1. Policy Intent

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, the SGS Academy Trust complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of 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. Scope

2.1. This policy and procedure applies to all candidates and all roles within England and Wales that are subject to a Disclosure and Barring Service (DBS) check. This includes, employees, agency workers and volunteers.

3. Storage and Access

3.1. Certificate information is held electronically with access strictly controlled and limited to those who are entitled to see it as part of their duties.

4. Handling

4.1. 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.

4.2. A record is maintained by the Human Resources Department or all those to whom certificates or certificate information has been revealed.

4.3. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

5. Usage

5.1. 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.

6. Retention

6.1. 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.

6.2. 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.

6.3. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

7. Disposal

7.1. 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

7.2. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack)

7.3. We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate

7.4. 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.

8. Policy Implementation

8.1. The SGS Academy Trust is responsible for ensuring the implementation of this policy. All employees are responsible for fulfilling their roles in the implementation as defined by this policy.

9. Enforcement

9.1. Failure to comply with the standards of the policy and procedure outlined in this document may result in disciplinary action. Such disciplinary action may result in dismissal depending on the circumstances.

9.2. If an employee is ever unsure about what action is appropriate to a particular situation, they should seek advice from their line manager.

10. Related Policies, Procedures, Charters, Plans, Guidance and Legislation

- Recruitment of ex-offenders Policy
- Disclosure and Barring Service Guidance
- Data Protection Act 2018
- General Data Protection Regulations (2016/679 EU)
- Police Act 1997
- Human Rights Act 1998

11. Impact

11.1. To ensure that all staff members of SGS Academy Trust are aware and comply with the correct handling, use, storage, retention and disposal of certificate information.

12. Additional useful information

12.1. The Human Resources Advisor will review and monitor the policy and procedures and will recommend and implement approved changes where necessary.

Appendix 1 Equality Impact Assessment 2024-25

POLICY NAME
Secure Handling of DBS Certificate Information Policy
POLICY PURPOSE
This policy documents the correct handling and safekeeping of DBS Certificate Information
LAST REVIEW
Kelly Gillett, SGSC Director of People and Organisational Culture, 04/07/2022
POLICY STATUS
This is an existing, statutory policy.
THIS POLICY WILL AFFECT
• Staff and applicants • Volunteers (including Trustees, Local School Board Members)

Completion details/ EIA owners

EIA completed by:	Moira Foster-Fitzgerald, Chief Operating Officer
Contributors to EIA:	N/A
Date completed:	27 May 2025

Impact analysis

GROUP	POSITIVE IMPACT	NEUTRAL IMPACT	NEGATIVE IMPACT	WHY WILL THE POLICY HAVE THIS EFFECT?
Age		✓		
Disability		✓		
Gender reassignment		✓		
Marriage or civil partnership		✓		
Pregnancy or maternity		✓		
Race		✓		
Religion or belief		✓		

Sex		✓		
Sexual orientation		✓		
The following non-protected characteristics may have a specific impact in our schools e.g.: • English as an additional language • Families with separated parents • Looked-after children • Refugees and asylum seekers • Young carers		✓		

Outcomes

CONSULTATION AND STAKEHOLDER ENGAGEMENT
Following Board review and approval this policy will be discussed with the JCNC
FINAL DECISION ON POLICY
Keep the updated policy without further change.

Monitoring arrangements

MONITORING ARRANGEMENTS
The EIA outcome will be monitored as follows: • In line with the policy review schedule, to ensure policy is reviewed on schedule or following any legislative updates.
DATE OF NEXT POLICY REVIEW
30 May 2028