

Title

***CRB Secure Storage, Handling, Use, Retention
and Disposal of Disclosures Policy***

Type:

Employment Policy

Distribution

All managers and staff via SBC Insite and Schools

Approved by:

Employment & Appeals Committee – 6th April 2009

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Policy:**

n/a

**Contact for
guidance**

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CRB Secure Storage, Handling, Use, Retention and Disposal of Disclosures Policy

Policy Statement

Slough Borough Council is committed to ensuring safe recruitment and best practice to fulfil its safeguarding commitments to children, young people and vulnerable adults.

1. INTRODUCTION

- 1.1 It is a requirement of the CRB's Code of Practice that all Registered Bodies have a written policy on the correct handling and safe keeping of Disclosure information. It also obliges Registered Bodies to ensure that a body or individual, on whose behalf they are countersigning Disclosure applications, has a written policy.
- 1.2 As an organisation using the Criminal Records Bureau (CRB) service to assist with the assessment of suitability of applicants for positions of trust, Slough Borough Council complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosure information
- 1.3 Slough Borough Council is a Registered Body of the CRB.

2. SCOPE

- 2.1 This policy applies to all employees of Slough Borough Council including school-based staff who use Slough Borough Council as the recognised Registered Body. Agency workers are not employed by Slough Borough Council and whilst the Council will specify the clearances it requires it is the agency, as the employer, that must obtain these.

3. STORAGE AND ACCESS

- 3.1 All disclosure documentation is kept securely, in a lockable, filing cabinet within the HR Team with access strictly controlled and limited to those entitled to see this information as part of their duties. The Fostering and Adoption Team, Hackney Carriage and Private Hire Licence applications, which also require a CRB disclosure are kept in a lockable, filing cabinet located within their offices of Slough Borough Council.
- 3.2 For each employee/volunteer subject to a CRB disclosure, the HR database holds a record of the employee/volunteer's name; date of issue of a Disclosure; the type of Disclosure requested; the position for which the Disclosure was requested and the unique reference number. Access is strictly limited to authorised personnel only.

4. HANDLING

- 4.1 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. HR retain a record of all those to whom Disclosures or Disclosure information is revealed and it is a criminal offence to pass this information onto anyone who is not entitled to receive it.

5. USAGE

- 5.1 Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent was given.

6. RETENTION

- 6.1 Once a recruitment decision (or other relevant) decision has been made, the disclosure documentation is not retained for any longer than necessary. This is generally for a period of up to 6 months, to allow for the consideration and resolution of any disputes or complaints. Where staff are subject to CSCI (Commission for Social Care Inspection) Regulations, disclosure information will be retained for three years. In exceptional circumstances, where it may also be considered necessary to keep the disclosure information for longer than 6 months Slough Borough Council will consult with the CRB about this and give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

7. DISPOSAL

- 7.1 Once the retention period has elapsed, Slough Borough Council will ensure that any Disclosure information is destroyed by secure means, ie by shredding. While awaiting destruction, Disclosure information, will be retained within a lockable filing cabinet within the HR Business Partner Team. The HR database holds a record of the employee name; date of issue of a Disclosure; the type of Disclosure requested; the position for which the Disclosure was requested and the unique reference number.

8. ACTING AS AN UMBRELLA BODY

- 8.1 Before Slough Borough Council acts as an Umbrella body (one which countersigns applications and receives Disclosure information on behalf of unregistered bodies, such as schools, People First and other employers where there is a commission of services), all reasonable steps will be taken to satisfy ourselves that these organisations will handle, use, store, retain and dispose of Disclosure information in full compliance with the CRB code and in full accordance with this policy.
- 8.2 Slough Borough Council provides all employers with comprehensive guidance in respect of both our responsibilities in relation to Disclosures before any agreement is entered into.

8.3 As there is no relationship between the unregistered body, Slough Borough Council will forward the disclosure information to the employer for their consideration.

8.4 Further information can be obtained from the HR Business Partner Team on 01753 875726.

Appendix 1

Slough Borough Council has a Borough affiliation with the following organisations/groups and will undertake to act as a registered body for the purposes of countersigning CRB applications:-

- People First
- Independent Schools and Academies
- Volunteer organisations where there have been a commission of services, ie Pitstop

Updated: March 2009