The United Reformed Church

Policy on the handling, use, retention and disposal of DBS certificates





Introduction

All individuals or organisations using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust and who are recipients of DBS certificate information must comply fully with the DBS Code of Practice. Amongst other things, this obliges them to have a written policy on the correct handling, use, storage, retention and disposal of DBS certificates and certificate information. As an organisation using the Disclosure and Barring Service (DBS) checking service we have adopted the following policy.

General principles

The United Reformed Church complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the General Data Protection Regulation (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.

Storage and access

Certificate information should be kept securely either on The United Reformed Church database or, in the instances of DBS checks that contain content, on the case management system, with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

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. 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.

Usage

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.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Safequarding

Risk assessment recommendations and a safeguarding agreement / risk management plan arising in cases of a DBS disclosure with content will be retained in line with the URC's record retention schedule.

Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means.

We will not ordinarily keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate unless for safeguarding purpose. However, not withstanding 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 certificates and the details of the recruitment decision taken.