

**SOUTHPORT COLLEGE**

**POLICY ON STORAGE, HANDLING, USE, RETENTION AND  
DISPOSAL OF**

**DISCLOSURES AND DISCLOSURE INFORMATION**

**(Reviewed April 2007)**

# **POLICY ON STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION**

## **1. General Principles**

- 1.1. As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for employment within the organisation, or for students to complete work placements as part of their course requirements, Southport College complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. The College also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure 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. Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access 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, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. Southport College recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.
- 3.2. Information requested in order to make recruitment decisions is passed onto Personnel staff by the Personnel & Payroll Manager. It may also be necessary to discuss the information with the applicant's line manager.

## **4. Usage**

- 4.1. 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.

## **5. Retention**

- 5.1. Once a recruitment (or other relevant) decision has been made, Southport College does not keep Disclosure for any longer than is absolutely necessary. This is generally 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, the College will consult the CRB about this and will give full consideration to the Data Protection and Human Rights of individual subjects before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

## **6. Disposal**

- 6.1. Once the retention period has elapsed, Southport College will ensure that any Disclosure information is immediately suitably destroyed by secure means, ie by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (eg waste bin or confidential waste sack). The College will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment/placement decision taken.

## **7. Acting as an Umbrella Body**

- 7.1. Before acting as an Umbrella Body, (one which countersigns applications and receives Disclosure information on behalf of other employers or recruiting organisations), Southport College will take all reasonable steps to ensure that they will comply fully with the CRB Code of Practice. 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 CRB Code and in full accordance with this policy. We will also ensure that any body or individual, at whose request applications for Disclosures 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.
- 7.2. Where this is not possible the College will retain the Disclosure information it has received on behalf of another organisation to ensure compliance with this policy.