

Volunteer Cornwall Data Security and Protection Policy

Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information 2024

Introduction

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, Volunteer Cornwall complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It 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.

Responsibilities

Responsibility for the implementation, monitoring and development of this policy lies with the Chief Executive. Day to day operation of the policy is the responsibility of senior managers.

Storage and Access

Disclosure information will never be 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.

Handling

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. We maintain a record of all those to whom Disclosures or Disclosure Information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

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.

Retention

Once a recruitment, or other relevant, decision has been made, we do not keep Disclosure 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. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult with the DBS about this and will consider the Data Protection and Human Rights individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately suitably destroyed by secure means, i.e., by shredding, pulping, or burning. While awaiting

destruction, Disclosure information will not be kept in any insecure receptacle (e.g., waste bin or confidential waste sack). We 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 decision taken.

Acting as an Umbrella Body

Before acting as an umbrella body, we will take all reasonable steps to ensure that organisations can comply fully with the DBS 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 DBS Code of Practice and in full accordance with this policy. We will also ensure that any body or individual, at whose request applications for Disclosure 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.

Complaints

Any employee who has concern regarding the application of this policy should normally make use of Volunteer Cornwall's grievance procedure.

Signed: 

Date:

Chief Executive
Volunteer Cornwall

Due Review: 04/25