



Rickmansworth Waterways Trust
Disclosure and Barring Service (DBS) Data
Policy

Document Number P05

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Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure information

General principles

As an organisation using the Criminal Records Bureau (CRB) Disclosure and Barring service checks (DBS) to help assess the suitability of volunteers for our work with children or vulnerable adults, Rickmansworth Waterways Trust 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 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This written policy on these matters is freely available on request to those who wish to see it.

Storage and access

Disclosure information is kept securely in electronic format on a password protected computer **or in a locked cabinet if in paper form** in compliance with our documented data protection policy. Access is strictly controlled by the General Manager and Education Programme Manager and limited to those **individuals** 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 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

For most purposes of the Trust it is enough to record the date on which a Disclosure was received: we do not expect to retain Disclosure information once a recruitment (or other relevant) decision has been made. Retention, where considered necessary, will generally be 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 appears necessary to keep Disclosure information for longer than six months, we will consult the DBS and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. printed information 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.



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Obligations toward our Umbrella Body

RWT does not act as an umbrella body, but is under the umbrella of Three Rivers District Council (HR Dept). We acknowledge that they must satisfy themselves that we will handle, use, store, retain and dispose of Disclosure information in full compliance with the DBS Code and in full accordance with this policy. We will ensure we maintain, and provide to TRDC, this written policy as they may direct.