

CSAS policy on the secure 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 positions of trust, CSAS fully complies with the CRB 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 and this written policy is available to those who wish to see it on request.

1.2 For these purposes, "CSAS" includes its agents in each Diocese and in the Conference of Religious ("CoR") who act as Counter-Signatories in processing Disclosure Applications. They will hold information locally.

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. 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.

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, we do not keep Disclosure information 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, we will consult the CRB about this and will give full consideration to the Data Protection and Human Rights of the person 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, 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 will keep a record of the date of issue of a Disclosure, the name of the subject, the type of the 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.

7 ACTING AS A REGISTERED BODY

7.1 Before acting as a Registered Body i.e. countersigning applications and receiving Disclosure information on behalf of the Catholic Community in England & Wales, we will take all reasonable steps to ensure full compliance with the CRB Code of Practice. We will take all reasonable steps to satisfy ourselves that the handling, use, storage, retention and disposal of Disclosure information is in full compliance with the CRB Code and in full accordance with this policy.