

## DISCLOSURE POLICY & PROCEDURE

### General Principles

As an organisation we use Capita for DBS checks to help assess the suitability of applicants for positions of trust, we comply fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclose 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 and has a written policy on these matters.

### Storage & Access

Disclosure information is kept securely, in a lockable filing cabinet 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 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. This procedure is also relevant to any committee member Disclosure.

### Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. We will 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 name of the person who requested it. 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. by shredding & 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.

A record is kept of when checks are requested from Capita – these are usually returned in two weeks.

The Administrator is the person authorised to request all disclosures.

Every year, in September, all staff are required to sign a form stating that nothing has happened to them, in the previous twelve months which would stop them from receiving a satisfactory DBS check or from working with children. Although there is no legal requirement to do, New Millside considers the safeguarding of children to be of the utmost importance for this reason we require all employees to complete a DBS check every 3 years.

Members of the Committee are also required to have a DBS check carried out but this is carried out directly, via the Administration Manager. Applications must be made immediately upon being voted on to the committee. The 'nominated person' is authorised to check DBS request forms and the identification provided before it is sent to OFSTED. The suitability letter is received by the Nominated Person and the disclosure number must be submitted by the committee member to the Administration Manager immediately upon receipt from OFSTED. Members of the committee are also required to complete a mid-term declaration annually, immediately after each AGM, stating that nothing has changed, which would warrant a further DBS check. These are held securely by the Administration Manager. For any members of the committee in office for more than 3 years, a further DBS check would need to be carried out every 3 years. Committee members will not be privy to any information about children in the setting until their DBS is cleared.