
Storage, handling, use, retention and disposal of DBS, PVG and Access NI disclosures

General Principles

As an organisation using the DBS, PVG and Access NI checking service to help assess the suitability of applicants for positions of trust, NSPCC complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

We comply fully with our obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information. This policy is available to all candidates at the application stage and existing staff via the NSPCC Intranet.

Storage and access

Certificate information, i.e. disclosure reference number is kept in a secure HR system and is only accessible by the system administrators.

Handling

In accordance with section 124 of the Police Act 1997, certificate 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 certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Certificate information is only used for the purposes of recruitment and continuous employment 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 certificate information for any longer than is necessary.

In case of unsuccessful recruitment, this is generally for a period of 18 months after recruitment has been completed, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances,

if it is considered necessary to keep certificate information for longer, we will consult the vetting body about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.

In cases of re-checkin of existing staff and volunteers, the information will remain on the employee file for 3 years (NSPCC standard re-checking interval) after which a new check will be requested.

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 certificate information is destroyed by secure means, for example by shredding, pulping, burning, or deletion. While awaiting destruction, certificate information will be kept securely.

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, we will keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken as part of the employee personal file.

Acting as an umbrella body

As an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of certificate information in full compliance with the code of practice and in full accordance with this policy.

We will also ensure that any body or individual, at whose request applications for certificates 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.

Supporting information

Nation	Regulatory body	Link
England & Wales	DBS	https://www.gov.uk/government/publications/dbs-code-of-practice
Northern Ireland	Access NI	https://www.nidirect.gov.uk/publications/accessni-code-practice
Scotland	PVG	https://www.mygov.scot/disclosure-code-of-practice/