



Disclosure Information Policy

General Principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, St Margaret's Lee Church complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and Access

Certificate information should be kept securely, in lockable, nonportable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. Electronic disclosure information is held on a secure password protected system accessible only to those authorised to view it in the course of their duties

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 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 certificate information for any longer than is necessary, giving full consideration to the General Data Protection Regulation, 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 agreed retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

For disposal of electronic certificate results, the system automatically deletes the result after six months.

Thirtyone:eight acting as an umbrella body

We accept that the Thirtyone:eight Disclosure Service, as our umbrella organisation, has a responsibility to ensure, as far as possible, that we comply with all the requirements in the DBS Code of Practice, this and other policy statements, and in other DBS procedures and processes. We undertake to keep Thirtyone:eight informed of any changes in our organisation, personnel or practices which could materially affect our ability to work within these expectations.

Equal Opportunities Statement

1. St Margaret's Lee Church is a Christian organisation committed to social justice and resolutely opposed to discrimination in society. We are committed to providing services on a fair and equitable basis, regardless of race, ethnicity, religion, life-style, sex, sexuality, physical/mental disability, offending background or any other factor. No person requiring services from St Margaret's Lee Church will be treated less favourably than any other person on any grounds.
2. In employment we actively seek to recruit with the right mix of talent, skills and potential, promoting equality for all, and welcome applications from a wide range of candidates. We select all candidates for interview based on their skills, qualifications, experience and commitment to the values and purposes of the organisation.
3. As an organisation seeking to deliver services within a Christian context, some posts can only be filled by Christians. Restrictions within this context need to be reflected within any job descriptions and advertising for both paid and voluntary posts and kept under regular review. The nature of these posts or the context in which they are carried out, and their link to the ethos of the organisation, give rise to a genuine occupational requirement (GOR) for the post-holders to be Christians. All staff in these posts are required to demonstrate a clear personal commitment to the Christian faith. This policy is implemented under Employment and Race Directives issued by the government and ACAS guidance.
4. As an organisation using the Disclosure and Barring Service (DBS) Disclosure Service to assess applicants' suitability for positions of trust, St Margaret's Lee undertakes to comply fully with the DBS Code of Practice and to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of disclosure on the basis of conviction or other information revealed.
5. A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is

required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered a position.

6. Where a Disclosure is to form part of a recruitment process, we encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover to the recruiter within the organisation and we guarantee that this information will only be seen by those who need to see it as part of a recruitment process.

7. Unless the nature of the position allows the organisation to ask questions about your entire criminal record, we only ask about “unspent” convictions as defined in the [Rehabilitation of Offenders Act 1974](#)..

8. We ensure that all those in the organisation who are involved in the recruitment process have been suitably trained to identify and assess the relevance of circumstances of offences. We will also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders e.g. the [Rehabilitation of Offenders Act 1974](#)..

9. At interview, or in separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is relevant to the position sought could lead to withdrawal of an offer of employment or voluntary work.

10. We make every subject of a DBS Disclosure aware of the existence of the Code of Practice and make a copy available on request.

11. We undertake to discuss any matter revealed in a disclosure with the person seeking a position before withdrawing a conditional offer of employment.

12. Having a criminal record will not necessarily bar you from working with us. It will depend on the nature of the position and the circumstances and background of your offences.

+ Agree to comply with UK data protection legislation, GDPR, and the DBS Code of Practice: DBS Code of Practice