

Disclosure and Barring Service Data Storage Policy

1 Introduction

- 1.1 The University of Manchester, via the services of Atlantic Data Limited as our Registered Body of the Disclosure and Barring Service (DBS) uses the service to help assess the suitability of applicants for degree programmes, volunteering opportunities and/or jobs that will bring them into contact with children and vulnerable adults/vulnerable groups. As a recipient of certificate information, the University is obliged to comply fully with the DBS's Code of Practice. Amongst other things, this obliges the University to have a written policy on the correct handling and safekeeping of certificate information.

2 Scope

- 2.1 This policy is applicable to all staff and students for whom DBS checks need to be made.

3 General Principles

- 3.1 The University of Manchester complies fully with the DBS 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 UK General Data Protection Regulation and Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

4 Storage & Access

- 4.1 The University treats certificate information as special categories of personal data as defined by UK data protection law. Consequently, certificate information is never kept on a student's personal file or a staff member's personnel file. This information is always kept securely, in lockable, non-portable, storage containers or in a password protected electronic document with access strictly controlled and limited to those who are entitled to see it as part of their duties.

5 Handling

- 5.1 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. The University of Manchester maintains a record of all those to whom certificates or certificate information has been revealed and it is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

6 Usage

- 6.1 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.

7 Retention

- 7.1 The University will keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested (enhanced/standard; workforce; barred list), the degree programme/volunteering opportunity/role for which the Disclosure was requested, the unique reference number of the certificate and the details of the admissions/recruitment decision taken. This information is always kept securely, in lockable, non-portable, storage containers or in a password protected electronic document with access strictly controlled and limited to those who are entitled to see it as part of their duties. The University's Records retention schedule provides information regarding retention periods for both staff and student checks.

<http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=6514>

Please also see footnote below ¹

- 7.2 In principle, the University will not keep copies of certificates, however the University will keep copies of certificates to assist in making a relevant recruitment or other decision. The University will then only keep copies of certificates where this is pertinent to the decision, to allow for the consideration and resolution of any disputes or complaints. The University will keep a record of this decision.
- 7.3 If, in very exceptional circumstances, it is considered necessary to keep certificate copies for longer than six months, the University will give full consideration to the individual's right to privacy before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

8 Disposal

- 8.1 The University will ensure that any DBS certificate information is destroyed by secure means, e.g. by shredding or electronic deletion. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). The University will not keep any photocopy or other image of the certificate or any copy or representation of the contents of the certificate.

¹ Organisations which are inspected by the Care Quality Commission (CQC) or Ofsted, and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain the certificate for the purposes of inspection.

In addition, organisations that require retention of certificates in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate. This practice will need to be compliant with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.

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