

# **Policy on Confidentiality and Security of Disclosure & Barring Service (DBS) Disclosures**

Warwickshire County Council is a Registered Umbrella Body with the Disclosure & Barring Service and as such is responsible for:

- Controlling access to the information on the DBS Disclosure.
- Ensuring the security of that information, storing and destroying the information and ensuring that the necessary identification checks of the applicant have been made.
- Ensuring DBS Disclosures are received, handled and interpreted in compliance with the Code of Practice and follow any guidance issued by the DBS.

Warwickshire County Council DBS Lead Countersignatory and additional Countersignatories have undergone vetting checks to assess their suitability to undertake the above roles and responsibilities. Warwickshire County Council can confirm that these staff are entitled to ask exempted questions; and are able to comply with the relevant obligations of the Code of Practice. A written record of the names of these staff is available on request.

### **Sensitivity of Disclosure Information**

All information disclosed by the DBS or DBS applicants is sensitive personal information and Warwickshire County Council recipients of Disclosure information will treat such information with care and responsibility.

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 recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Security and Storage**

All Disclosure information will be kept securely online using the DBS E-Bulk system or HR-ER, and only those entitled to see it in the course of their duties will have access. Hard copy documents will be kept in locked, non-portable storage containers. Keys or combinations for such storage units will not be freely available within Warwickshire County Council and access will be restricted to named individuals.

### **Retention of Disclosure Information**

Notification of clear DBS Disclosures will be received online via E-Bulk. A record of this will be stored securely on HR-ER.

Hard copy disclosure information will be destroyed by suitably secure means, i.e. shredding, pulping or burning. They will not be kept in any insecure receptacle whilst awaiting destruction.

Warwickshire County Council also complies fully with its obligations under the Data Protection Act and other legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

Disclosure certificates with information will be retained securely on the individuals electronic file with the express written consent of the applicant. The certificate and any related risk assessment notes will be stored and processed in accordance with the Data Protection Act 1998. Personal information will be treated confidentially and will not be disclosed to any third party except; (i) with the prior agreement of the applicant, or (ii) as required by law.

## **Validity**

Disclosures carry no absolute guarantee of accuracy. Where a prospective employee or volunteer disputes the information provided in a Disclosure, that dispute will need to be resolved before Warwickshire County Council can reach a recruitment decision or conduct a final risk assessment for existing workers. In the final analysis, if it should prove impossible to resolve matters by other means, a fingerprint check may be sought, via the DBS, in order to determine whether the record in question relates to the applicant.

## **Fraud**

If Warwickshire County Council suspects that a Disclosure has been tampered with or suspect that the Disclosure may not be genuine then immediate contact will be made with the DBS who will confirm whether or not it is valid.

## **Assurance**

Warwickshire County Council will co-operate with requests from the DBS to undertake assurance checks as to the proper use and safekeeping of Disclosure information and will report to the DBS any suspected malpractice in relation to the Code of Practice or any suspected offences in relation to the misuse of Disclosures.

Disclosure certificates with information will be retained securely on the individuals electronic file with the express written consent of the applicant. The certificate and any related risk assessment notes will be stored and processed in accordance with the Data Protection Act 1998. Personal information will be treated confidentially and will not be disclosed to any third party except; (i) with the prior agreement of the applicant, or (ii) as required by law.

### **We are here to help**

Further information and assistance can be obtained by contacting us;  
Resourcing Team, Shire Hall, Market Place, Warwick, CV34 4RL. Email:  
[recruitment@warwickshire.gov.uk](mailto:recruitment@warwickshire.gov.uk) or Tel.: 01926 418125

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