



Safeguarding GDPR Policy Statement

Secure storage, handling, use and disposal of disclosures and disclosure information

September 2020

The Diocesan Board of Finance Safeguarding Department complies fully with the DBS Code of Practice and the Data Protection Act (1998) regarding the correct, storage retention; handling; use and disposal of Disclosures and Disclosure information held electronically and in paper format.

- Diocesan Safeguarding Officers and Parish Disclosure Officers are to be informed of the following requirements as part of their GDPR induction training and up-to-date information is available [on the Diocese of Canterbury website here](#).
- Diocesan employees will attend in-house GDPR training organised and run by the Data Protection Officer. In addition, new starters receive a copy of the ICT policy (Data Protection), which forms part of the Employee Handbook as part of their induction and which is accessible at any time via a Staff Share folder. HR retain and organise records in line with the Regulations and HR Professional Guidelines.

Data Storage Limitation / Retention / Disposal

- Diocesan Safeguarding Office and Parishes/organisations may retain personal information for the minimum amount of time required for recruitment; DBS certificate application; and renewal purposes to allow for consideration or resolution of any disputes or complaints.
- Only electronic and/or paper records are to be kept of: the date of issue; the name of the subject; type of Disclosure; the position for which the Disclosure was requested; the unique reference number; and details of the recruitment decision and case assessments taken where appropriate.
- Retaining Disclosure information in paper format, is discouraged, however if Disclosure information needs to be held in a paper format these documents must be kept securely, in lockable, non-portable, storage containers.
- Disclosure information held in an electronic format must be kept securely and password protected.
- No photocopy or other image of the Disclosure certificate is retained for more than 6 months. Disclosure information held in paper format is to be shredded and securely disposed of through confidential waste.
- While awaiting destruction, Disclosure information in paper format is to be kept in secure receptacles.





- Electronic copies of any other personal information or data obtained must be completely deleted from all data bases other than that detailed above in italics.
- In line with the Church of England Safeguarding Records: Joint Practice Guidance, safeguarding case files will be held for a maximum of 75 years and after which paper and electronic files will be destroyed.

Data Access

- Access to personal data is strictly controlled and limited to those who are entitled to see it as part of their safeguarding 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.
- A record is maintained 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.

Supporting Documents

- DBS Code of Practice:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf
- General Data Protection Act:
<https://www.gov.uk/data-protection>
- Police Act 1997 Section 124:
www.legislation.gov.uk/ukpga/1997/50/section/124
- Data Storage Limitation/Retention:
<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/storage-limitation/>
- Safeguarding Records: Joint Practice Guidance for the C of E and Methodist Church:
<https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20joint%20practice%20guidance%20-%20safeguarding%20records.pdf>

