

Handling of DBS Information Policy

St Peter's, Colchester

Adopted by the PCC: [tbc]

Review date: [3 years]

Policy owner: The Parochial Church Council

1. Purpose

This policy explains how St Peter's handles Disclosure and Barring Service certificate information.

DBS checks help St Peter's assess the suitability of people for roles involving children, young people, vulnerable adults, safeguarding responsibility, pastoral trust, or other regulated or sensitive responsibilities.

The Parochial Church Council has responsibility for the governance and oversight of St Peter's, including safeguarding, safer recruitment, data protection and the proper handling of sensitive personal information.

As disciples of Jesus Christ, we seek to be faithful in all that we say and do. That includes protecting the vulnerable, handling sensitive information carefully, treating people fairly, and using information only for proper purposes.

This policy is intended to ensure that DBS certificate information is handled securely, confidentially, lawfully, fairly and in accordance with DBS requirements, data protection law, safeguarding responsibilities and St Peter's safer recruitment arrangements.

2. Scope

This policy applies to DBS certificate information received or considered by St Peter's in connection with:

- employment;
- volunteering;
- ministry roles;
- pastoral care;
- children's and youth work;
- work with vulnerable adults;
- PCC, trustee or governance roles where relevant;
- any other role for which a DBS check is required or considered appropriate.

This policy applies, as relevant, to:

- clergy, staff and volunteers involved in safer recruitment;
- the Parish Safeguarding Officer and Safeguarding Team;
- the Vicar;
- churchwardens;
- the Church Administrator;
- those authorised to process or view DBS-related information;
- PCC members or others involved in role-suitability decisions, where necessary and appropriate.

This policy should be read alongside St Peter's Safeguarding Policy, safer recruitment arrangements, Volunteer Policy, Ministry Role Descriptions, Staff Handbook, Data Protection Policy, Privacy Notice and Data Retention Policy.

3. General principles

St Peter's will comply with the DBS Code of Practice and relevant guidance concerning the secure handling, use, storage, retention and disposal of DBS certificate information.

St Peter's will also comply with its obligations under UK data protection law and other relevant legislation relating to sensitive personal information.

DBS certificate information will be:

- used only for the purpose for which it was requested;
- handled fairly and proportionately;
- treated as highly confidential;
- accessed only by those entitled to see it as part of their role;
- stored securely where temporary storage is necessary;
- retained only for as long as necessary;
- destroyed securely when no longer required;
- not used to discriminate unfairly against a person.

A DBS check is only one part of safer recruitment. Role suitability may also involve application information, references, interview or conversation, safeguarding training, role description, supervision, conduct, experience, maturity, and other relevant information.

4. Requesting DBS checks

DBS checks will only be requested where they are appropriate for the role and level of responsibility.

Before a DBS check is requested, St Peter's should consider:

- the nature of the role;
- whether the role involves children, young people or vulnerable adults;
- whether the role is eligible for a DBS check;
- the appropriate level of check;
- whether barred-list information may lawfully be requested;

- the requirements of the relevant Ministry Role Description;
- safer recruitment and safeguarding guidance;
- any advice from the diocese or safeguarding bodies where needed.

Applicants should be told why a DBS check is required, what level of check is being requested, how information will be used, and how DBS certificate information will be handled.

5. Use of DBS certificate information

DBS certificate information will only be used for the specific purpose for which it was requested and for which the applicant has given appropriate consent.

DBS certificate information may be used to help assess suitability for a role, employment, volunteering, ministry, safeguarding responsibility or other position of trust.

St Peter's will not refuse a role or opportunity solely because a DBS certificate contains information. Any information disclosed must be considered fairly, carefully and proportionately, taking account of:

- the nature of the information;
- the relevance to the role;
- the seriousness of the matter;
- the age of the information;
- the circumstances;
- any pattern of behaviour;
- safeguarding implications;
- the person's explanation, where appropriate;
- legal and diocesan guidance;
- the safety and welfare of children, young people, vulnerable adults and others.

Where DBS information raises a concern, St Peter's may seek advice from the diocesan safeguarding team, DBS, Thirtyone:eight, legal advisers, or another appropriate body.

6. Access and confidentiality

Access to DBS certificate information will be strictly limited to those who are entitled to see it as part of their duties.

This may include, where appropriate:

- the Parish Safeguarding Officer;
- the Vicar;
- the Church Administrator or safer recruitment administrator;
- the churchwardens;
- members of the Safeguarding Team;
- diocesan safeguarding advisers;
- others directly involved in a safer recruitment or role-suitability decision, where access is necessary and lawful.

DBS certificate information must not be shared more widely than necessary. It must not be discussed casually, circulated unnecessarily, included in general PCC papers, stored in ordinary personnel or volunteer files, or shared by email or messaging platforms unless there is a clear and secure reason to do so.

Where information needs to be discussed for a decision, only the minimum necessary information should be shared.

Those who handle DBS certificate information must understand that unauthorised disclosure may be unlawful and may be treated as a serious breach of trust, confidentiality and data protection responsibilities.

7. Storage

DBS certificate information should not normally be copied or stored by St Peter's.

Where temporary storage is necessary, DBS certificate information must be kept securely, with access strictly controlled and limited to those entitled to see it as part of their duties. DBS guidance says certificate information should be kept securely in lockable, non-portable storage, with strictly controlled access.

Electronic storage, where unavoidable, must be secure, access-controlled and limited to authorised people only.

DBS certificate information must not be stored in ordinary shared folders, unsecured email, WhatsApp, personal devices, open desks, insecure filing cabinets or locations accessible to unauthorised people.

St Peter's may keep a record that a DBS check has been completed, including the date of issue, applicant's name, role, type of check, certificate number, recruitment decision and renewal date where appropriate. This record should not include a copy of the certificate or unnecessary details of its contents.

8. Retention

Once a recruitment, appointment or role-suitability decision has been made, DBS certificate information should not be kept for longer than necessary.

DBS guidance indicates that certificate information should usually be retained for no longer than six months, to allow for the consideration and resolution of any disputes or complaints.

If, in exceptional circumstances, it is considered necessary to keep DBS certificate information for longer than six months, St Peter's will seek appropriate advice and give careful consideration to data protection, safeguarding and the rights of the individual.

Throughout any retention period, DBS certificate information must remain securely stored with strictly controlled access.

St Peter's may retain a record of the check and decision, but should not retain copies of DBS certificates or unnecessary representations of certificate contents.

9. Disposal

When DBS certificate information is no longer required, it must be destroyed securely.

Paper records should be shredded or otherwise securely destroyed. Electronic records should be permanently deleted from relevant systems, including any temporary storage or downloads, as far as reasonably practicable.

DBS certificate information must not be placed in ordinary waste, recycling, unsecured confidential waste sacks, open bins, ordinary email archives, shared folders or insecure storage while awaiting disposal.

A record may be kept of:

- the date of issue of the certificate;
- the name of the applicant;
- the role for which the check was requested;
- the type and level of check;
- the unique certificate number;
- the recruitment or role-suitability decision;
- the date of decision;
- the renewal or recheck date where relevant.

10. Fair treatment and recruitment of people with convictions

St Peter's will use DBS certificate information fairly and proportionately.

Having a conviction, caution or other information on a DBS certificate does not automatically prevent someone from working, volunteering or serving at St Peter's.

St Peter's will consider the relevance of any information to the specific role and responsibilities involved, with particular regard to safeguarding, trust, vulnerability, contact with children or vulnerable adults, pastoral responsibility, money, keys, confidential information, governance and public representation.

Where required, St Peter's will make available appropriate information about how it considers applicants with criminal records or disclosed information.

Decisions should be made carefully, proportionately, without unfair discrimination, and with appropriate safeguarding, diocesan, legal or HR advice where needed.

11. Portability, update service and renewals

St Peter's will follow current DBS, Church of England, diocesan and parish safeguarding guidance concerning whether an existing DBS check may be accepted, whether the DBS Update Service may be used, and when DBS checks should be renewed.

A DBS certificate obtained for another organisation or role should not automatically be accepted for a role at St Peter's.

Where the DBS Update Service is used, St Peter's must have appropriate consent and must ensure that the check is suitable for the role, workforce and level required.

Renewal periods and recheck arrangements should follow St Peter's safeguarding and safer recruitment practice and any relevant Church of England or diocesan requirements.

12. Concerns, breaches and misuse

Any concern about the handling, storage, use, sharing, retention or disposal of DBS certificate information should be reported promptly.

Depending on the nature of the concern, it may need to be reported to:

- the Parish Safeguarding Officer or Safeguarding Team;
- the Vicar;
- the churchwardens;
- the Church Administrator;
- the PCC Standing Committee;
- the diocesan safeguarding team;
- the diocesan data protection adviser or registrar;
- the Information Commissioner's Office;
- DBS;
- insurers or statutory authorities where required.

Misuse, unauthorised disclosure, careless handling, unfair use or inappropriate retention of DBS certificate information may be treated as a serious matter and may be handled under safeguarding, conduct, employment, complaints, whistleblowing, data protection or other relevant procedures.

13. Responsibilities

The PCC is responsible for ensuring that St Peter's has appropriate arrangements for the handling of DBS certificate information.

The Parish Safeguarding Officer, Vicar, churchwardens, Church Administrator and those involved in safer recruitment are responsible for following this policy and ensuring that DBS certificate information is handled securely and appropriately.

Those involved in recruitment, appointment or role-suitability decisions must use DBS information only for proper purposes and must maintain appropriate confidentiality.

14. Related policies and documents

This policy should be read alongside, where applicable:

- Safeguarding Policy;

- Safer Recruitment arrangements;
- Volunteer Policy;
- Volunteer Agreement;
- Ministry Role Descriptions;
- Code of Conduct;
- Welcome, Dignity and Fair Treatment Policy;
- Equal Opportunities Policy;
- Staff Handbook and employment policies;
- Data Protection Policy;
- Privacy Notice;
- Data Retention Policy;
- IT Security Policy;
- Complaints Policy;
- Whistleblowing Policy;
- relevant Church of England, diocesan and DBS guidance.

15. Review

This policy will be reviewed by the PCC every three years, or sooner if required by changes in law, DBS guidance, Church of England guidance, diocesan guidance, safeguarding requirements, data protection requirements, parish practice or governance need.

The PCC is responsible for ensuring that this policy remains legally responsible, pastorally wise, practically useful, and consistent with St Peter's safeguarding, safer recruitment and data protection practice.

Handling of DBS Information Policy

St Peter's uses DBS checks where appropriate to help assess suitability for roles involving children, young people, vulnerable adults, safeguarding responsibility, pastoral trust or other sensitive responsibilities.

DBS certificate information is highly sensitive and must be handled carefully, securely and confidentially.

St Peter's will use DBS certificate information only for the purpose for which it was requested, and only by those who are entitled to see it as part of their role.

DBS certificate information will not normally be copied or stored by St Peter's. Where temporary storage is necessary, it will be kept securely and retained only for as long as necessary.

Once the relevant recruitment or role-suitability decision has been made, DBS certificate information should usually be destroyed within six months. St Peter's may keep a record of the check, certificate number, role, decision and renewal date, but should not keep a copy of the certificate.

DBS information will be considered fairly and proportionately. A conviction or other information on a DBS certificate does not automatically prevent someone from working, volunteering or serving at St Peter's.

Concerns about the handling or misuse of DBS information should be reported promptly.