

Holborn Church's Policy for Handling DBS Information

1. Purpose

This policy outlines the proper handling, storage, and disposal of Disclosure and Barring Service (DBS) information within Holborn Church to ensure compliance with legal obligations and best practices in safeguarding.

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.

To note: 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.

2. Scope

This policy applies to all church staff, volunteers, and trustees who have access to DBS certificates or related information.

3. Handling of DBS Information

- DBS information will only be accessed by authorised individuals who require it for legitimate safeguarding purposes.
- Information from DBS certificates will not be disclosed to any unauthorised party.
- Details of DBS checks will only be used for the purpose for which they were requested.

4. Storage of DBS Information

- Physical copies of DBS certificates must be stored securely in a locked, non-portable cabinet with restricted access.
- Electronic records must be password-protected and stored in a secure system with access limited to authorized personnel.
- A record of the DBS check (e.g., date of issue, certificate number, and outcome) may be kept, but the certificate itself should not be retained beyond necessary use.

5. Retention and Disposal

- DBS certificates will not be retained for longer than six months after a decision has been made regarding the role applied for.
- After the retention period, DBS information will be securely destroyed (e.g., by shredding physical copies or permanently deleting electronic files).
- A minimal record of the check (date, certificate number, and decision) may be kept for audit purposes.

6. Confidentiality and Data Protection

- All DBS information will be handled in line with data protection legislation, including the UK GDPR and Data Protection Act 2018.
- Unauthorised sharing or misuse of DBS information will be treated as a serious disciplinary matter.

7. Acting as an umbrella body

Before acting as an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that eSafeguarding will handle, use, store, retain and dispose of certificate information in full compliance with the [code of practice](#) and in full accordance with this policy.

8. Responsibility and Review

- Holborn Church's safeguarding officer or appointed lead is responsible for implementing and monitoring this policy.
- This policy will be reviewed annually or when necessary to reflect changes in legislation or best practices.

By adhering to this policy, Holborn Church ensures compliance with legal obligations while upholding its commitment to safeguarding all individuals within its community.

Updated February 2025

Anita French

(Safeguarding Lead at Holborn Church)