

# Confidentiality Policy

Last review: January 2022 | Next review: January 2025



## Confidentiality and the secure storage, handling, use, retention and disposal of Disclosures and Disclosure information

### 1. General principles

**The Democracy School** is a research-led learning organisation which complies fully with both the UK's Criminal Records Bureau Code of Practice (CRB) regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information, and the UK Code of Market and Social Research. The School also complies fully with the obligations under the UK Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. All information disclosed during a client engagement (research, consultancy etc) will assure personal confidentiality unless there is either a safeguarding issue that must be reported, or a threat to security.

### 2. Storage and access

Disclosure information is kept securely, in a lockable storage container with access strictly controlled and limited to those who are entitled to see it as part of their duties.

### 3. Handling

In accordance with section 124 of the UK Police Act 1997, Disclosure 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 Disclosures or Disclosure information has been revealed and it is a **criminal offence** under English law to pass this information to anyone who is not entitled to receive it.

### 4. 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.

# Confidentiality Policy

Last review: January 2022 | Next review: January 2025



## 5. Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This is generally for a period of up to six months to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the CRB about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

## 6. Disposal

Once the retention period has lapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.