

Policy for the Secure Storage, Retention, Handling, Use and Disposal of Disclosures and Disclosure Information 2026

Summary

The International British Theatre School (IBTS) is committed to ensuring that all DBS disclosure information is handled, stored, retained, and disposed of in full compliance with the **DBS Code of Practice (2024)**, **UK GDPR**, and the **Data Protection Act 2018**.

This policy ensures that sensitive criminal record data is processed lawfully, fairly, and securely to protect individuals' rights and to demonstrate robust safeguarding and safer recruitment practice.

1. General Principles

IBTS uses the **Disclosure and Barring Service (DBS)** checking service to assess the suitability of applicants for positions of trust involving contact with children.

The organisation complies fully with the DBS Code of Practice and all relevant data protection legislation.

Disclosure information will:

- Be used only for its intended purpose.
- Be handled in accordance with data protection law.
- Be stored securely and confidentially.
- Be retained only for as long as necessary.
- Be destroyed securely after the retention period.

A copy of this policy is made available to any applicant or employee upon request.

2. Secure Storage and Access

- All DBS certificate information is kept securely in a **lockable, non-portable cabinet** or secure encrypted digital storage.
 - Access is strictly controlled and limited to authorised staff involved in the recruitment and safeguarding process.
 - It is a **criminal offence** under section 124 of the **Police Act 1997** to pass DBS information to anyone not entitled to receive it.
 - IBTS maintains a record of all those to whom disclosure information has been revealed.
 - Ofsted, local authorities, and safeguarding auditors may be legally entitled to view certificates for inspection purposes.
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3. Handling of Disclosure Information

- Disclosure information will only be shared with those authorised and trained to receive it in the course of their duties.
 - Disclosure information will not be copied, emailed, scanned, or stored electronically unless through a secure, encrypted system.
 - Where IBTS acts as an **umbrella body**, the organisation will ensure that any partner or school handles DBS data in compliance with this policy.
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4. Use of Disclosure Information

- Disclosure information will be used solely for assessing an applicant's suitability for employment, volunteering, or contractual work involving children.
 - Information will not be used for any other purpose without the applicant's explicit consent.
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5. Retention

- DBS certificates and related information will be kept **no longer than necessary**, typically for a period of up to **six months** following a recruitment decision.
 - Retention beyond this period will occur only where necessary for the resolution of a dispute, safeguarding audit, or legal requirement.
 - During this time, all storage and access conditions remain in force.
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6. Disposal

- Once the retention period has elapsed, DBS certificate information will be **securely destroyed** by shredding, pulping, or secure digital deletion.
 - While awaiting destruction, disclosure information will not be stored in an insecure receptacle.
 - IBTS will not keep photocopies or scans of DBS certificates. However, the following details may be retained:
 - Date of issue
 - Name of subject
 - Type and level of disclosure
 - Position applied for
 - Certificate reference number
 - Recruitment decision outcome
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7. Acting as an Umbrella Body

Before countersigning DBS applications on behalf of other schools or partner organisations, IBTS will:

- Take reasonable steps to ensure those bodies handle certificate information in accordance with the DBS Code of Practice and this policy.
 - Provide model policy templates for partners to adopt if necessary.
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8. Review and Oversight

- This policy is reviewed annually or following any update to DBS or data protection legislation.
 - The Director is responsible for ensuring all staff handling disclosure information are appropriately trained.
 - All data handling processes will be monitored to ensure continued compliance with UK GDPR and Ofsted's safer recruitment requirements.
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Reviewed: 15 November 2025

Next Review Due: 15 November 2026

Policy Owner: Ben Whiteside, Director
International British Theatre School