Adnoddau Ddynol
Human Resources

Storage and Compliance DBS Policy

Document Control	
Document Title	Storage and Compliance DBS Policy
Version Number	2
Owner	Human Resources
Date of Approval	26/08/2026 by Joint Working Group
Approval Mechanism	
Executive Sponsor	CPO
Effective Date	

Title

Contents

1. Purpose 2
2. Scope 2
3. Storage and Access 2
4. Handling and Usage 2
5. Retention 3
6. Disposal 3
7. Acting as an Umbrella Body 3
8. Training and Guidance 4
9. Compliance 4
End of Document. 4

1. Purpose

This policy sets out how Aberystwyth University manages Disclosure and Barring Service (DBS) certificate information and checking service to help assess the suitability of applicants for positions of trust. Aberystwyth complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information, in compliance with:

- The DBS Code of Practice
- General Data Protection Regulation (GDPR) 2018
- Data Protection Act (DPA) 2018
- Other relevant legislation, including the Human Rights Act 1998 and PREVENT guidance

This policy is available to staff, applicants, and other authorised parties on request.

2. Scope

This policy applies to:

- DBS certificate information collected for recruitment or positions of trust
- All personnel responsible for handling, storing, or processing the above information, including staff, volunteers, and third-party partners

3. Storage and Access

- All DBS certificates and safeguarding information must be stored securely in lockable, non-portable containers.
- Access is strictly controlled and limited to personnel authorised to view this information as part of their duties.
- Records of access to DBS certificate information should be maintained to ensure accountability.
- References within this policy to the storage of DBS certificates and certificate information apply equally to physical and electronic records.

4. Handling and Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant’s full consent has been given.

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.

The university may store this information in specific circumstances. For example, organisations inspected by the Care Quality Commission (CQC), Ofsted, or the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain DBS certificates for inspection purposes.

Additionally, where retention of certificates is necessary to demonstrate compliance with 'safer recruitment' practices for safeguarding audits, the university may also retain them. Any retention will be carried out in accordance with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and in line with this policy.

5. Retention

- Information is retained only as long as necessary to:
  - Make recruitment or other decisions
  - Resolve disputes or complaints
  - Complete safeguarding audits
- During retention, all usual conditions for secure storage and controlled access apply.

6. Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate 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 certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

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 they 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.

We will also ensure that any body or individual, at whose request applications for DBS certificates are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

8. Training and Guidance

- Training is mandatory for all staff, students, and volunteers with roles involving safeguarding or handling DBS information.
- Training covers:
  - GDPR and DPA 2018 requirements
  - DBS code of practice
  - Secure handling, storage, and disposal of sensitive data
  - Safeguarding procedures and reporting obligations
- Training frequency:
  - Every three years for designated staff
  - After substantial changes to policies or procedures
- Staff planning activities with children or adults at risk must undertake appropriate mandatory safeguarding training.

9. Compliance

Failure to comply with this policy may result in disciplinary action and could constitute a criminal offence in the case of unauthorised disclosure of DBS information.

End of Document.