

## **Plumpton College**

### **Policy for Safeguarding Children and Vulnerable Adults**

#### **1. Scope and Purpose**

- 1.1 The policy applies to all children, young people and vulnerable adults studying at Plumpton College, children and young people being provided with College services or activities directly under the supervision or management of College staff and employees of the College.
- 1.2 The policy does not apply where services or activities are provided separately at the College by another body. Where possible however, assurances will be sought from the body concerned that it has appropriate policies and procedures in place in regard to safeguarding children. Arrangements should be in place to liaise with the body concerned on these matters where appropriate.
- 1.3 This policy has been impact assessed to ensure that it does not adversely affect students or staff on the grounds of sex, transgender, marital or civil partnership status, racial group, nationality, sexual orientation, religion or belief disability or age.
- 1.4 Safeguarding covers more than child protection and is integral to all College policies and procedures. This policy should be read in conjunction with other College policies and procedures and in particular the staff disciplinary policy, student disciplinary policy, recruitment and selection policy, harassment policy, acceptable use of computer policy, whistleblowing policy, the health and safety policy and work experience checks and procedures.
- 1.5 Safeguarding matters are also included in the student anti-bullying and anti-harassment policy. The policy and procedure must also be considered in the context of the five outcomes of 'Every Child Matters'. These are:
  - i. Being healthy;
  - ii. Staying safe;
  - iii. Enjoying and achieving;

- iv. Making a positive contribution;
- v. Achieving economic well being.

1.5 Safeguarding is defined as:

- “Protecting children from maltreatment; preventing impairment of children’s
- health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully”.

(Dept for Education & Skills, 1998 - Safeguarding Children and Safer Recruitment in Education)

**2. General Policy Statement**

2.1 Plumpton College has a statutory and moral duty to safeguard the welfare of children and vulnerable adults receiving education, training and care at the College.

2.2 Every member of staff has a responsibility to ensure they are fully aware of the safeguarding policy and procedures and to immediately report any concerns that arise regarding the protection of children and vulnerable adults.

2.3 Throughout these policies and procedures, reference is made to “children and young people”. This term is used to mean “those under the age of 18”. The governing body recognises that some adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and for the protection of vulnerable adults. (The CRB definition of a vulnerable adult is provided at Annex B).

2.4 The purpose of this document is to outline the policy and procedures for safeguarding children at the College and aims to:

- Promote safe practices and challenge poor and unsafe practice;
- Ensure staff receive adequate training and supervision;

- Identify instances in which there are grounds for concern about a child's or vulnerable adults welfare and take action to keep them safe; and,
- Take appropriate action to prevent unsuitable people working with children and young people and vulnerable adults.

2.5 The governing body is committed to ensuring that the College:

- Provides a safe environment for children and young people to learn in
- Identifies children and young people who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that such children and young people are kept safe at the College.

2.6 In pursuit of these aims, the governing body will approve and regularly review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of children and young people and the promotion of a safe environment for the children and young people learning within the College
- Aiding the identification of children and young people at risk of significant harm, and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- Ensuring the safe recruitment of staff

2.7 In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the relevant Government Department, the Independent Safeguarding Authority (ISA) and other relevant bodies and groups. The procedures have been developed in cooperation with the Local Authority Designated Officer (LADO).

2.8 The College will refer concerns that a child or vulnerable adult might be at risk of significant harm to the LADO.

2.9 The Principal and all college staff will receive training adequate to familiarise them with child protection issues and responsibilities and the College procedures and policies. All staff and residents on campus over the age of 18 (excluding students) are subject to CRB checks.

2.10 There will be a senior member of the College management team with special responsibility for child protection issues (the designated child protection officer), two trained deputy designated child protection members of staff and a designated governor for child protection issues.

### **3. Types of Abuse**

3.1 The governing body recognises the following as definitions of abuse:

Physical abuse – physical abuse causes harm to a child’s person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Neglect – neglect is the persistent or severe failure to meet a child or young person’s basic physical and/or psychological needs. It will result in serious impairment of the child’s health or development.

Sexual abuse – sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.

Emotional abuse – emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child’s or young person’s behaviour and emotional development, resulting in low self worth. Some level of emotional abuse is present in all forms of abuse.

Financial abuse - financial abuse takes many forms, from denying someone access to funds, to making someone solely responsible for money while the other person is handling money irresponsibly. Money becomes a tool by which the abuser can further control the victim.

#### **4. Designated persons with responsibility for child protection**

##### **4.1 Senior staff member with lead responsibility**

The designated senior child protection officer with lead responsibility for child protection issues is Mr Des Lambert, Principal, Tel 01273 892033.

4.2 He has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the College.

4.3 He has received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board (LSCB), and will receive refresher training at least every two years. He should keep up to date with developments in child protection issues.

4.4 The senior child protection officer is responsible for securing arrangements for:

- Overseeing the referral of cases of suspected abuse or allegations to the LADO
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents of children and young people within the College are aware of the College's child protection policy
- Liaising with the LADO and other appropriate agencies
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils
- Liaising with employers and training organisations that receive children or young people from the College on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in child protection issues and are aware of the College child protection procedures.

4.5 The senior child protection officer will speak to the designated governor on an ad hoc basis regarding safeguarding processes and issues arising. The senior

child protection officer will provide any significant in-year problems will be brought to the attention of the Corporation including reporting at the earliest opportunity any deficiencies in the policy or procedure.

- 4.6 The senior child protection officer will provide, in conjunction with the designated governor for child protection, an annual report to the Academic Committee setting out how the College has discharged its duties, including a report on the training that staff have undertaken, significant risks and the number of any child protection allegations and incidences (with no reference to individuals) that have occurred during the year. The Corporation will pursue any key issues arising from the report when it considers the minutes of the Academic Committee meeting where the report was considered.

**4.7 Other designated staff members**

The two deputy designated members of staff with responsibility for child protection issues are Mr James Hibbert, Head of Student Services, Tel 01273 892037 and Ms Jenny Codling, Residential Services Officer, Tel 01273 890454 Ext 285.

- 4.8 The deputy child protection officers:

- Report to the senior member of staff with lead responsibility
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to child protection
- Have particular responsibility to be available to listen to children and young people studying at the College
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.
- Have received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board (LSCB) and will receive refresher training at least every two years

**4.9 Designated Governor**

The designated member of the governing body with responsibility for child

protection issues is Dr Stan Stanier. Dr Stanier is contactable via Jenny Brooker, Clerk to the Corporation, Tel 01273 892083.

4.10 The role of the Designated Governor is:

- To act as a sounding board for the senior and deputy child protection officers on safeguarding issues;
- To monitor the effectiveness and efficiency with which the safeguarding function is carried out, particularly by Student Services;
- To vet that the processes by which safeguarding risks are identified and managed are both robust and free from undue bureaucracy;
- To consider and make recommendations on the safeguarding implications of new and revised policies and
- To ensure that their views on the above are reflected in the senior child protection officer's annual report on safeguarding under para 4.6

4.11 To assist in these duties, the designated Governor shall receive appropriate training.

4.12 In line with the procedures set out within the Instrument and Articles of Government for staff suspension and disciplinary matters, the Principal, staff and student governors are not eligible to be nominated as designated governors. In the light of their potential role during procedures involving allegations of abuse, the Chair of Vice Chair are not eligible to be nominated as designated governors.

## **5. Role of the governing body**

5.1 The governing body is responsible for ensuring that the college has effective policies and procedures in place, and for monitoring the college's compliance with them. The governing body does not have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff).

## **6. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns**

6.1 The College acknowledges that making an allegation of child abuse or misconduct against an individual is likely to be a distressing experience. It is recognised that the person making an allegation must be protected from harassment or detriment arising from the allegation.

6.2 All staff have a duty of care to the children and young people studying at Plumpton College. If a member of staff suspects a case of potential child abuse or misconduct, this should be discussed with either the senior or deputy child protection officers at the earliest opportunity. The designated officers will be able to advise and support the staff member and potentially investigate the issue.

6.3 In the event that a child tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the child, but question normally and without pressure, in order to be sure that you understand what they are telling you.
- Do not put words into the child's mouth.
- Reassure the child that by telling you, they have done the right thing.
- Inform the child that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the child said, did and your questions etc.
- Preserve any evidence relating to the claim.
- Take into consideration any child's disability or other special need, including age and gender, any communication difficulties and any religious, cultural or ethnic background.
- Staff should not investigate concerns or allegations themselves, but should report them immediately to the Principal, the Head of Student Services or Residential Services Officer. Staff receiving allegations of abuse out of normal college hours should contact the Principal.
- All allegations will be investigated as quickly as possible.

6.4 The senior and deputy child protection officers should refer to the red Child Protection Procedures folder held by the Head of Student Services for advice on information to be taken from the child and action to take. **Where the allegation is considered to be serious or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the senior child protection officer should immediately discuss the matter with the relevant Children’s Services Duty and Assessment Team.**

## **7. Reporting and Dealing with Allegations of Abuse against Members of Staff**

7.1 The College recognises that due to the nature of frequent contact with children and young people, a staff member or person working on behalf of the College may have an allegation of child abuse or misconduct made against them. The College recognises that an allegation may be made for a variety of reasons and the facts of the allegation may or may not be true.

7.2 It is essential that complaints are dealt with fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supporting the person who is the subject of the allegation.

7.3 Whilst the welfare of the child is the paramount concern, it is recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the College will do so with sensitivity.

### **7.4 Receiving an allegation from a child**

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines in Part 6 of the policy for dealing with disclosure. The allegation should be reported immediately to the Principal. If the Principal is the person against whom the allegation is made, the report should be made to the Corporation Chairman via the Clerk to the Corporation. To whomever the allegation is reported to is termed the designated person.

7.5 The designated person will:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- Record information about times, dates, locations and names of potential witnesses.

#### 7.6 **Initial assessment**

The designated person should make an initial assessment based on the information received, consulting with the trained deputy child protection officers and LADO as appropriate.

7.7 Where an allegation is considered to be a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the children services duty and assessment team 01323 747373 and to the LADO.

7.8 It is important that the designated person does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

7.9 Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the College disciplinary procedures. There may be issues of 'suitability' for employment raised
- The allegation can be shown to be false because the facts alleged could not possibly be true.

#### 7.10 **Enquiries and investigations**

Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power

to direct the College to act in a particular way. However, the College should assist the agencies with their enquiries.

7.11 The College may hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal procedures shall conform to College disciplinary procedures. At all stages of the procedure, the need to maintain confidentiality will be paramount. Information circulation will be minimised to that which is necessary to ensure a fair investigation.

7.12 If there is an investigation by an external agency, the designated person will normally be involved in the discussions and will ensure the College gives every assistance with the agency's enquiries. The designated person will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The designated person shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

7.13 Subject to consultation with the Police or other investigating agency, the designated person shall:

- inform the child/children or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- inform the Chair of Governors and the designated Governor of the allegation and the investigation.

7.14 The designated person shall keep a written record of the action taken in connection with the allegation.

### 7.15 **Suspension of staff**

Suspension should not be automatic. In respect of staff other than the Principal, suspension can only be carried out by the Principal. In respect of the Principal, suspension can only be carried out by the Chair of Governors (or in his/her absence, the vice chair).

7.16 Suspension may be considered at any stage of the investigation. It is a neutral act, not a disciplinary sanction and shall be on full pay. Consideration should be given to alternatives e.g. paid leave of absence, agreement to refrain from attending work, change of, or withdrawal from, specified duties.

7.17 Suspension should only occur for a good reason. For example:

- where a child is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

7.18 Prior to making the decision to suspend, the designated person should interview the member of staff. This should occur in consultation with the appropriate agencies. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

7.19 The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a trade union representative (if they are a member of a trade union), or a colleague. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

7.20 During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so will not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but give the opportunity for the member of staff to make representations about

possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

7.21 If the designated person considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, will be provided and sent, in accordance with the College Disciplinary procedure.

7.22 Where a member of staff is suspended, the designated person should address the following issues:

- the Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal
- where the Principal has been suspended, the Chair of Governors will need to take action to address the management of the College
- at the Principal's discretion, the parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension
- senior staff who need to know of the reason for the suspension should be informed
- depending on the nature of the allegation, the Principal should consider whether a statement to the students of the College and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

7.23 The Principal shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted. Where appropriate the LADO may give advice about suspension but the decision remains with the Principal.

7.24 The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

7.25 The suspension should remain under review in accordance with the College disciplinary procedures.

**7.26 The disciplinary investigation**

This procedure is separate from the disciplinary procedure, which may be used following the results of the investigation under this procedure. Alternatively, an incident may be so serious, or there may be sufficient evidence to proceed straight away with the disciplinary procedure. Any disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

7.27 The investigating officer will notify the member of staff of:

- The disciplinary charge against him/her.
- That a management investigation is taking place
- That a management investigation interview will take place with them
- That they are entitled to be accompanied or represented by a trade union representative or colleague.

7.28 The manager investigating the allegations will:

- gather all the relevant facts promptly;
- take statements from all parties and witnesses involved;
- collect documentation relating to the allegation.

7.29 The manager will then determine whether there is substance to the allegation.

The decision taken will be communicated to the member of staff who has been investigated. If it is decided that a disciplinary hearing will take place, this will follow the process outlined in the Disciplinary procedures, including the right of appeal.

7.30 Every effort will be made to manage cases to avoid any unnecessary delay.

The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation.

7.31 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made

for the member of staff to return to work. It may be appropriate to offer counselling.

7.32 The child or children making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to College of the member of staff (if suspended).

7.33 The designated officer should give consideration to what information should be made available to the general population of the College.

**7.34 Action in respect of false allegation**

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LADO in order that other agencies may act upon the information.

7.35 The senior child protection officer shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

7.36 In the event that an allegation is shown to have been deliberately invented or malicious, the senior child protection officer should consider whether any disciplinary action is appropriate against the person who made the accusation.

**7.37 Records**

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

7.38 The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future Criminal Records Bureau (CRB) Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. Records will be maintained in line with the disciplinary policy. (Also see Annex B - Statement on the handling and safekeeping of CRB Disclosure information).

#### 7.39 **Dismissal/Resignation**

If a member of staff is dismissed or resigns before the disciplinary process is completed, the College has a statutory duty to inform the Independent Safeguarding Authority and the member of staff will be advised of this.

7.40 The fact that a person tenders their resignation, or ceases to provide their services, will not prevent an allegation being followed up in accordance with this policy. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children including any in which the person concerned refuses to co-operate with the process.

7.41 Wherever possible the person should be given full opportunity to answer the allegation and make representations. However, if the person does not cooperate, the process should continue. It may be difficult, however, to reach a judgement on whether the decision can be regarded as substantiated based on all the information available. It may also not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

#### 7.42 **Confidentiality**

Every effort should be made to maintain confidentiality within the College and guard against unwanted publicity while allegations are being investigated. In accordance with the Association of Chief Police Officers (ACPO) guidance, the police will not normally provide any information to the Press that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.

#### **7.43 Monitoring Effectiveness**

Following an allegation made against a member of staff, the senior child protection officer and designated governor should complete a review at the conclusion of the investigation and any disciplinary procedures. They should consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies and/or which should be drawn to the attention of the LADO. Consideration should also be given to the training needs of staff.

### **8. Recruitment and Selection Procedures (see also The Recruitment and Selection Policy)**

8.1 The College has recruitment and selection procedures. In respect of this policy, they should take account of the following:

- They should apply to staff, volunteers and agency staff who may work with children and vulnerable adults.
- The post should be clearly defined and the key selection criteria for the post should be identified.
- Vacancies should be advertised widely in order to ensure a diversity of applicants.
- Applicants are required to complete an application form and sign to declare the information they have provided is to be true. Where submissions are by email, the applicant has deemed to have accepted the declaration.
- Application forms are reviewed and any gaps in employment or other missing information are highlighted.
- Documentary evidence of academic/vocational qualifications is obtained.
- Professional and character references are obtained using standard college documentation for successful candidates and reference sources verified.
- A variety of selection techniques are used (e.g. qualifications, previous experience, interview, reference checks).

- Criminal Records Bureau disclosures (enhanced where appropriate) are completed for all employees, which are treated sensitively and confidentially. This will be replaced by ISA checks in 2010.

## **9. Status of this Policy and Procedure**

9.1 The operation of this policy and procedure will be kept under review by the Principal. The Residential Services Sub Committee will monitor the role of the Student Services Department role and performance in regard to safeguarding. The policy will be reviewed every three years by the Academic Committee.

- Approved By: Corporation
- Date of Approval: Tuesday 30 March 2010
- Frequency of Review: Annually by the Senior Management Team and every Three Years by the Corporation having been first considered by the Academic Committee.
- Date of Next Review: March 2013

## **Annex A**

### **The Criminal Record Bureau Definition of a Vulnerable Adult**

A vulnerable adult is a person who is aged 18 years or older and:

- is living in residential accommodation, such as a care home or a residential special school;
- is living in sheltered housing;
- is receiving domiciliary care in his or her own home;
- is receiving any form of health care;
- is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999;
- is in contact with probation services;
- is receiving a welfare service of a description to be prescribed in regulations;
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity);
- is receiving direct payments from a local authority/HSS body in lieu of social care services;
- requires assistance in the conduct of his or her own affairs.

## **Annex B – Statement on the handling and safekeeping of CRB Disclosure information**

### **Introduction**

It is a requirement of the Criminal Record Bureau's Code of Practice that all Registered Bodies must have a written policy on the correct handling and safekeeping of Disclosure information. It also obliges Registered Bodies to ensure that a body or individual, on whose behalf they are countersigning Disclosure applications, has a written policy.

### **Policy Statement**

#### **General principles**

All staff and over 18 year olds resident on campus (who are not Plumpton College students) are subject to a CRB check.

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for positions of trust, Plumpton College complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

#### **Storage and access**

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties, i.e. Human Resources Officer (as CRB signatory).

#### **Handling**

In accordance with section 124 of the 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 to pass this information to anyone who is not entitled to receive it.

## **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.

## **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.

Before the disclosure is destroyed, a record will be kept detailing the date the disclosure was obtained, the level of disclosure and the unique reference number. The central record of disclosures will include staff, volunteers and governors and will be maintained by the HR Officer. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

## **Disposal**

Once the retention period has elapsed, 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.