



Policy – DBS Handling

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DBS Handling Policy

This policy applies to all staff and volunteers recruited by the Salisbury Diocesan Board of Finance (DBF), all those holding a Bishop's Licence or Permission to Officiate, those employed by the Bishop and candidates within the discernment process.

This policy does not apply to staff and volunteers recruited by parishes, Salisbury Cathedral or other organisations situated within the Diocese of Salisbury. Each of these needs to confirm that they have adopted their own version of this policy prior to accessing the Thirtyone:Eight E-bulk DBS system provided through Salisbury DBF.

1. Policy summary

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, this policy sets out how Salisbury Diocesan Board of Finance (DBF) complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

2. Purpose

The aim of this policy is to ensure that all those handling DBS certificate information understand and fulfil their responsibilities under the law.

3. Approach

3.1 Storage and Access

The DBF uses the company Thirtyone:Eight to process DBS checks. The Thirtyone:Eight 'E-Bulk' platform records the date a check has been completed, and if any disclosure information is contained within the check. A recruitment (or other relevant) decision can then be made. The date a DBS was completed is stored within the Diocesan Database, the Contact Management System (CMS). Members of staff who have the required level of access can view the date of completion of a DBS check.

No copies of DBS certificates are made or stored.

Details of any blemished checks and associated risk assessments are saved separately within the Safeguarding Casework Management System (My Concern). This can only be accessed by members of the Diocesan Safeguarding Team involved in safeguarding casework and individuals such as the Safeguarding Regional Lead who supervises the casework.

3.2 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. A record is kept 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. The DBF will not share individual's disclosure information. It is the responsibility of each individual applicant to share their own disclosure information with their parish or any other organisation, if required.

3.3 Usage

Disclosure information must only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

A disclosure certificate must be for the correct workforce only and at the correct level. i.e. a person recruiting for a role in the child workforce at enhanced level should not ask to see a certificate for child and adult workforce at enhanced plus Barred List level as the certificate may include information that the recruiter is not entitled to see.

3.4 Retention

When a DBS check has been completed, this is recorded on the Thirtyone:Eight 'E-bulk' platform. This platform records if any information has been disclosed under the relevant sections. If there is 'no information' this means the DBS check is clear. The E-bulk platform records the date the check was complete, and that no information was found on the person's criminal record. Thirtyone:Eight will retain the DBS result for a period of six months, after which it will be securely archived. The date of the completion of the check is recorded within the Diocesan database, CMS. This system is compliant with GDPR legislation in the UK and in the Bailiwick of Jersey and Guernsey.

No copies (including photocopies or downloads) of DBS certificates will be made or retained.

If there is a disclosure on the DBS check, please see below regarding 'blemished DBS checks'.

3.5 Blemished DBS checks

If a DBS check contains a disclosure of a criminal offence or other information this is referred to as a 'positive' or 'blemished' check. In this case, the recruiter will be notified by Thirtyone:Eight that the certificate contains information which needs to be viewed before a recruitment decision can be made. The recruiter is required to contact the applicant and see a copy of the check. The recruiter views a copy of the certificate and passes this information to a member of the casework team within the Diocesan Safeguarding Team (DST). The DST invites the candidate to complete a risk assessment which is used to inform advice given regarding recruitment decisions.

If the applicant does not allow the check to be viewed, or does not take part in the risk assessment, then their application is terminated, and they cannot start or continue in their role.

This process and any outcomes are recorded within the secure Casework Management System used by the DST. According to the Church of England record retention policy this information is held for 75 years¹. If the candidate has a personnel file such as a Clergy Personnel File (previously called a 'Blue File'), outcomes will also be recorded here.

4. Approve & Review

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| Policy applicable to | <i>Staff and volunteers recruited by the Salisbury Diocesan Board of Finance (DBF), all those holding a Bishop's Licence or Permission to Officiate, those employed by the Bishop and candidates within the discernment process.</i> |
| Approved by | Diocesan Safeguarding Advisory Panel (DSAP) |
| First Approved date | 2/12/26 |
| Policy owner | Head of Safeguarding |
| Next review date | Annual |
| Previous review date | N/A |

5. Revision History

| Version No. | Revision Date | Previous Revision Date | Summary of Changes |
|-------------|---------------|------------------------|--------------------|
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¹<https://www.churchofengland.org/sites/default/files/2024-03/safeguarding-records-retention.pdf>