

The Scout Association

Secure Storage, Handling, Use, Retention & Disposal of Information (ANI)

Secure Storage, Handling, Use, Retention & Disposal of Disclosures & Disclosure Information

This policy is for the Secure Storage, Handling, Use, and Retention & Disposal of Disclosures & Disclosure Information in order to comply with the current ANI Code of Practice. The Scout Association as the registered body and ANI retains the right to call unannounced to check that adherence to the policy is being maintained.

General Principles: As an organisation using the Access Northern Ireland service The Scout Association fully complies with the ANI Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. We also comply fully with our obligations under data protection legislation, including the Data Protection Act, the General Data Protection Regulation and all other relevant legislation relating to the safe handling, use, storage, retention and disposal of disclosure information.

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 we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Access: System access must only be granted to authorised personnel and therefore only individuals who are involved in the recruitment decisions for The Scout Association have access to the data.

Scanning/copying of ANI information: Where an applicant presents previously completed disclosure certificate and supporting details, for example to access the DBS Update Service, we shall only scan/copy a disclosure certificate with the written permission of the applicant. To scan/copy a disclosure certificate that contains information that we are not entitled to see - either children's barring information or adult barring information - is not permitted and could constitute a breach of the applicant's rights under data protection legislation.

Printing of ANI information: Communication of ANI result information (verbal, written, email, etc.) must only be undertaken by individuals who are involved in the recruitment decision for The Scout Association.

Readable copies will be printed for the purpose of presenting them to the relevant industry, regulatory inspector at the time of an inspection; this may include Auditor/Inspectors from the DFE/OFSTED/CQC/CSSIW/FSA (where applicable).

Forwarding of electronic ANI Result information: Forwarding of ANI result information is not permitted on the system and documents cannot be saved into any format outside of the online system and cannot be stored separately electronically, emailed or distributed etc.

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.

Loss of Documents: In any case where documents are lost, the matter will be treated as a serious DPA violation and will be reported to ANI stating what has been lost, how, what format and by whom. We are aware that failure by anybody to comply with the storage requirements could result in:

- Non-compliance notice being issued and a 14 day mandatory requirement to adhere to the set procedures and provide evidence of this.
- Suspension of the ID checker.
- Suspension or termination of the entire online account.

Storage: We confirm that all result information, whether an ANI Disclosure Certificate, electronic result information, printed result information or scanned/copied result information must be handled in accordance with the ANI code of practice. The Scout Association's website holds our statement of fair processing/privacy statement and the ANI code of practice can be found on www.nidirect.gov.uk

Retention: Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary unless the applicant has given The Scout Association permission to hold their information.

Disposal: Where there has been any scan or photocopy of an applicant's ANI certificate and an image, copy or representation of the contents has been held that this information will be destroyed by secure means or purged from the system at the required juncture or after the required period, unless the applicant has given The Scout Association permission to hold their information. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

Adherence to Policy: Responsibility for the implementation, monitoring and development of this policy lie with our Chief Membership Officer to ensure that this policy is implemented.