

Policy on use, storage and dissemination of information revealed in a Disclosure

General Principles

1. The RAD uses the services of an Umbrella Body currently Due Diligence Checking Ltd (DDC) to obtain criminal record checks from the Disclosure and Barring Service (DBS), Disclosure Scotland and AccessNI (for Northern Ireland) to check relevant Vetting and Barring Lists to assist with the overall assessment of an applicant's suitability for employment or freelance engagement where the employment is categorised as a regulated activity relating to children, where the employee is responsible for regularly training, teaching, instructing, caring and/or supervising children or vulnerable adults.
2. The RAD complies fully with DBS and Disclosure Scotland's Codes of Practice, and other authorising bodies regarding the correct handling, use, storage, dissemination and disposal of Disclosures and Disclosure information.
3. The Royal Academy of Dance also complies fully with its obligations under the Data Protection Act and other relevant legislation related to the safe handling, use, storage, retention and disposal of Disclosure information.

Storage and Access

4. Disclosure information is not kept on an applicant's personnel or student file and is always kept separately and securely in lockable, non-portable storage with access strictly controlled and limited to those who are entitled to see it as part of their duties, which includes Human Resources staff (for employees and other workers) and Faculty of Education Registry staff (for students).

Handling

5. DDC Ltd will only reveal Disclosure content to the Head of HR (employees and workers) and the Registrar (students) who are authorised to receive such information as part of their duties.
6. In accordance with section 124 of the Police Act 1997, Disclosure information is only then passed to those who are authorised to receive it in the course of their duties. The RAD maintains 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.

Usage

7. 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

8. Once a recruitment/selection decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to 6 months, to allow for the consideration and resolution of any disputes or complaints. If there are very exceptional

circumstances when Disclosure information is kept for longer than 6 months the Royal Academy of Dance will consult with DDC Ltd and will give full consideration to Data Protection legislation and Human Rights. During an extended retention period, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

9. Once the retention period has elapsed, the Royal Academy of Dance will ensure that any Disclosure information is immediately destroyed by HR staff (employees and workers) and Registry staff (students) using secure means such as shredding. While awaiting destruction, Disclosure information will be kept in a secure receptacle.
10. DDC Ltd and the Royal Academy of Dance 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 / selection decision made.

Policy Review

11. This policy will be reviewed by senior management and the Head of HR on a regular basis, to incorporate changes to legislation and in accordance with the RAD's Recruitment and Selection Policy and any other relevant policies which may change or be introduced.

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