

Policy on the Secure Handling, Use, Storage, Retention & Disposal of AccessNI Information

General Principles

As an organisation using AccessNI to help assess the suitability of applicants for positions of trust, BCM International NI will comply fully with **AccessNI's Code of Practice** regarding the correct handling, use, storage, retention and disposal of Disclosure applications and Disclosure information. We will also comply fully with obligations under the Data Protection Act 2018 and other relevant legislative requirements with regards to the safe handling, storage, retention and disposal of AccessNI Disclosure Information.

Storage and Access

AccessNI Disclosure information will 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.

Handling

If an Enhanced check is returned with notification of a disclosure, the Data Protection Officer (DPO) (or designated deputy) will ask to see the applicant's electronic certificate and will record the recruitment decision made as a result (not the offence). In accordance with section 124 of the Police Act 1997, AccessNI Disclosure information will only be passed to those who are authorised to receive it in the course of their duties. We will maintain a record of all those to whom AccessNI Disclosures or Disclosure information has been revealed. We recognise it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

AccessNI Disclosure information will only be 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 appointment, regulatory or licensing) decision has been taken, we will not keep AccessNI Disclosure information for any longer than 90 days after this. We will comply with AccessNI's Code of Practice requirement to ensure that it is not retained longer than is required for the specific purpose of taking a decision on the applicant's suitability. We will keep a record of the date of issue of an AccessNI Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the AccessNI unique reference number of the AccessNI Disclosure Certificate and the details of the recruitment decision.

Disposal

Once the retention period has elapsed, we will ensure that any AccessNI Disclosure information is destroyed by shredding. While awaiting destruction, AccessNI Disclosure information will be kept in a secure place. We will not keep any photocopy or other image of the AccessNI Disclosure or any copy or representation of the contents of an AccessNI Disclosure or any other relevant non-conviction information supplied by police.

General

- 1. BCM NI undertakes to ensure that all staff with access to Access NI Disclosure information are made aware of this policy and have received training and support.
- 2. BCM NI undertakes to make a copy of this policy available to any applicant who requests to see it.
- 3. BCM NI will co-operate with AccessNI to undertake assurance checks when requested.