BASMOM Policy in relation to the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information

1. Interpretation

1.1 In this Policy:

(i) "BASMOM" means the Association of British Members of the Sovereign Military Order of St John of Jerusalem of Rhodes and of Malta (company 05039938) including its group company Order of Malta Volunteers Ltd (company 9801949: "OMV" where separately referred to).

(ii) "DBS" means Disclosure and Barring Service.

(iii) "GDPR" means General Data Protection Regulations.

(iv) "DPA" means Data Protection Act.

1.2 This Policy has been prepared to accord with relevant pre-existing BASMOM and OMV policies relating to safeguarding, data protection and privacy (listed in the Schedule).

2. General principles

2.1 As an organisation using the DBS checking service to help assess the suitability of applicants for positions of trust, BASMOM seeks to comply fully with:

(i) The DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf

(ii) Its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request (see Appendix).

3. Storage and access

3.1 Certificate information in physical form is kept securely in lockable, non-portable, storage containers with access controlled and limited to those who are entitled to see it as part of their duties.

3.2 Certificate information in electronic form is similarly kept securely stored.

4. Handling

4.1 Certificate information is only passed to those who are authorised to receive it in the course of their duties.

4.2 BASMOM maintains a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

5. Usage

5.1 Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

6. Retention

6.1 Once a recruitment or other relevant decision has been made, BASMOM does not keep certificate information for any longer than is necessary.

6.2 Retention in accordance with clause 6.1 is intended to allow *inter alia* for the consideration and resolution of any disputes or complaints, or for the purpose of completing safeguarding audits.

6.3 Throughout this time, the usual conditions regarding safe storage and strict control of access will prevail.

7. Disposal

7.1 Once the retention period has elapsed, BASMOM will ensure that DBS certificate information is destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

7.2 With regard to certificates, we will keep a photocopy or other image of the certificate or a copy or representation of the contents of a certificate, in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits.

7.3 In addition to the above, we will keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision taken.

Approved by all signatories - 21 February 2024
This Policy will be reviewed by 19 April 2027

SCHEDULE

BASMOM including OMV:

https://www.orderofmalta.org.uk/wp-content/uploads/2020/02/UNIFIED_SAFEGUARDING_POLICY_JULY_2019.pdf

BASMOM as interpreted separately from OMV:

http://www.orderofmalta.org.uk/downloads/DATA_PROTECTION_POLICY.pdf).

https://www.orderofmalta.org.uk/wp-content/uploads/2020/02/CONFIDENTIALITY_POLICY.pdf

https://www.orderofmalta.org.uk/wp-content/uploads/2020/02/BASMOM_PRIVACY_STATEMENT.pdf

OMV as interpreted separately from BASMOM:

https://www.omv.org.uk/wp-content/uploads/Data-Protection-Poicy-Jan-2018-to-Jan-2021.pdf