POLICY ON THE SECURE HANDLING, USE, STORAGE AND RETENTION OF DISCLOSURE INFORMATION

Policy Owner: Head Office
Governance Oversight: Grand Council
Applies to: Staff, examiners, Teacher Members, contractors, volunteers and visitors
Review Cycle: Annual or following significant change
Last updated: 18th July 2026

Policy statement

International Performing Arts & Theatre (I-PATH) uses the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust. I-PATH complies with the DBS Code of Practice and with applicable data-protection and human-rights law in relation to the secure handling, use, storage, retention and disposal of DBS certificate information.

I-PATH uses DDC as its DBS checking partner. This arrangement does not remove I-PATH's responsibility to ensure that any certificate or disclosure information received, viewed, recorded or otherwise handled by I-PATH is managed in accordance with this policy.

1. Purpose and scope

This policy applies to all I-PATH employees, officers, examiners, contractors, consultants, volunteers and any other person authorised to handle disclosure information on I-PATH's behalf. It covers information contained in, derived from or recorded about a DBS certificate, whether held on paper, electronically or communicated verbally.

For this policy, "disclosure information" includes the certificate itself; any copy, scan, photograph, screenshot, note or summary of its contents; and correspondence or risk-assessment material that reveals information contained in it. A minimal DBS audit record, as described in section 7, is not treated as a retained copy of the certificate.

2. Responsibilities

- The Chief Executive Officer is the policy owner and is accountable for organisational compliance.
- The designated DBS Lead administers checks, controls access, maintains the DBS audit record and ensures timely secure disposal.
- Recruiting or appointing managers may receive only the information they genuinely need to make and document a suitability decision.
- Every authorised recipient must preserve confidentiality, follow this policy and immediately report any suspected loss, unauthorised access, disclosure or misuse.

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3. Secure storage and access

Access to disclosure information is strictly controlled and limited to people who are entitled to see it as part of their duties. Access will be granted on a need-to-know basis, reviewed when roles change and removed promptly when no longer required.

Paper records

- Paper certificates or records will be kept in a locked, non-portable cabinet or container within secure premises.
- Keys or access codes will be held separately and restricted to authorised personnel.
- Disclosure information will not be left unattended on desks, in meeting rooms, in vehicles or in any other insecure location, and will not be placed in an ordinary bin or unsecured confidential-waste sack.

Electronic records

- Electronic disclosure information will be stored only in an approved, access-controlled I-PATH system using appropriate authentication, encryption and device-security controls. It must not be stored on personal devices, personal email accounts, removable media or unapproved cloud services.
- Access permissions will be restricted to authorised roles. Where available, access and changes will be logged and auditable.
- Certificates must not be routinely copied, scanned, photographed or downloaded. Any temporary electronic copy that is exceptionally necessary must be protected to the same standard and securely deleted as soon as its purpose has been fulfilled.
- Disclosure information must not be sent by ordinary email or other insecure messaging. Where transfer is necessary, an approved secure method must be used and the recipient's identity and authority must be verified first.

4. Handling and sharing

In accordance with section 124 of the Police Act 1997, disclosure information will be disclosed only to people authorised to receive it in the course of their duties. I-PATH recognises that passing disclosure information to a person who is not entitled to receive it may constitute a criminal offence.

- The identity and authority of an intended recipient must be checked before information is shown, discussed, transmitted or released.
- Only the minimum information necessary for the task or decision will be shared.
- Discussions will take place privately and records will not be visible or audible to unauthorised people.
- I-PATH will maintain a record of each authorised person or role to whom certificate information has been revealed, together with the reason and date, where disclosure information is shared beyond the DBS Lead.
- Any request from an external organisation or individual must be referred to the DBS Lead. Information will not be released unless there is a lawful basis and the recipient is entitled to receive it.

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5. Permitted use and fair decision-making

Disclosure information will be used only for the specific purpose for which it was requested and for which the applicant has been informed. It will not be used for unrelated purposes or disclosed more widely than necessary.

Information will be considered fairly, lawfully and proportionately, alongside I-PATH's recruitment of ex-offenders policy and the requirements of the role. A criminal record or other disclosed information will not automatically prevent appointment. Any assessment will consider relevance, seriousness, circumstances, pattern, time elapsed, evidence of rehabilitation and the safeguards available. The applicant will be given an opportunity to discuss relevant information before a final adverse decision is made, subject to any legal restriction.

6. Accuracy and data minimisation

I-PATH will check that disclosure information relates to the correct applicant and will not retain or circulate unnecessary detail. If the applicant disputes information on a certificate, I-PATH will follow the appropriate DBS dispute process and, where appropriate, pause the suitability decision pending resolution.

7. Retention

Once a recruitment, appointment or other relevant decision has been made, I-PATH will keep the DBS certificate and any copy or representation of its contents only for as long as necessary. The normal maximum retention period is six months from the decision. This allows time for the consideration and resolution of any dispute, complaint or safeguarding audit requirement. Secure storage and strictly controlled access will continue throughout that period.

If, in exceptional circumstances, I-PATH considers retention beyond six months necessary, it will consult DDC and/or DBS as appropriate, document the reason and lawful basis, define and approve a specific extended retention period, and give full consideration to the individual's data-protection and human-rights interests. The need for continued retention will be reviewed regularly.

After certificate information has been destroyed, I-PATH may retain a minimal audit record containing only:

- the applicant's name;
- the date the check was requested and completed;
- the type and level of check requested;
- the position or activity for which the check was requested;
- the DBS certificate number and date of issue;
- whether the certificate was satisfactory or whether a suitability/risk assessment was required; and
- the recruitment or suitability decision and the date it was made.

The minimal audit record will not reproduce convictions, cautions, police information, barred-list information or any other substantive certificate content. It will be retained in accordance with I-PATH's applicable retention schedule and privacy information, then securely deleted.

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8. Secure disposal

When the retention period expires, disclosure information will be destroyed immediately by secure means. Paper records will be cross-cut shredded, pulped or destroyed through an approved confidential-destruction service. Electronic records, including temporary files and locally synchronised copies, will be securely deleted from active systems and, where technically applicable, handled through the organisation's backup-retention and deletion processes so that they are not restored into ordinary use.

No photocopy, scan, photograph, screenshot, transcription or other representation of the certificate or its contents will be kept after disposal. Material awaiting destruction must remain protected to the same standard as live disclosure information.

9. Data breaches and misuse

Any actual or suspected loss, unauthorised access, disclosure, alteration, misuse or insecure disposal of disclosure information must be reported immediately to the DBS Lead and the Chief Executive Officer. I-PATH will contain and investigate the incident, preserve relevant evidence, assess the risk to affected individuals, and make any notifications required to the Information Commissioner's Office, DBS, DDC, affected individuals or other authorities within the applicable timescales. Deliberate or negligent misuse may lead to disciplinary or contractual action and may also constitute a criminal offence.

10. Training, monitoring and assurance

People authorised to handle disclosure information will receive appropriate confidentiality, data-protection and DBS handling guidance. I-PATH will periodically review access permissions, retained records and disposal activity, cooperate with DBS or DDC assurance activity, and address any identified non-compliance. Suspected malpractice relating to the DBS Code of Practice will be escalated appropriately.

11. Related documents and authoritative guidance

- I-PATH Recruitment of Ex-Offenders Policy.
- I-PATH Data Protection and Privacy documentation, retention schedule and information-security procedures.
- I-PATH Safeguarding and Child Protection Policy.

This policy will be reviewed annually and sooner if the law, DBS guidance, I-PATH's systems or its DBS checking arrangements materially change.

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