PINEAPPLE PARTNERS

DBS Certificate Handling Policy

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1. Purpose

Because we place people into roles with children and adults at risk, Pineapple Partners processes Disclosure and Barring Service (DBS) certificates and the information they contain. Criminal records information is among the most sensitive data there is, and this policy sets out how we handle it in full compliance with the DBS Code of Practice and data protection law.

2. General principles

- Disclosure information is used solely for the recruitment decision it was obtained for, never for any other purpose.
- It is seen only by people who need it as part of their duties, and it is never shared with anyone not entitled to it, doing so can be a criminal offence.
- Having a criminal record does not automatically bar anyone from work with us: see our Recruitment of Ex-Offenders policies.

3. Storage and access

Certificates and any notes of their content are kept separately from the candidate's general file, in lockable, non-portable storage or an access-restricted digital equivalent. A record is kept of everyone to whom disclosure information has been revealed.

4. Handling and usage

We record the certificate reference number, the date of issue, the level of check and the recruitment decision. Where a client is legally entitled to verify a check, we confirm the outcome rather than routinely copying the certificate. Discussion of certificate content is limited to what the recruitment decision requires.

5. Retention

Once a recruitment or suitability decision is made, we do not keep certificate information for longer than necessary, in line with the DBS Code of Practice this is generally no more than six months. If, exceptionally, a longer period is genuinely needed, for example an ongoing dispute, we consult the DBS before retaining it and keep the same security throughout. What we may keep long-term is the bare audit trail: the fact and date of a check, its level, and the reference number.

6. Disposal

When the retention period ends, certificate information is destroyed securely: paper shredded, digital copies erased. No copy, image or note of the content is kept beyond the audit trail described above, and disposal is controlled so certificates cannot be read or reconstructed while awaiting destruction.

7. Umbrella body use

If we act through, or as, an umbrella body for DBS checks, we ensure every body we deal with observes this policy and the Code of Practice, and we make this policy available to anyone asked to complete a DBS application.

8. Review

The Compliance Manager owns this policy. It is reviewed annually and whenever the DBS Code of Practice changes.