



LIONS CLUBS INTERNATIONAL, MD105 (ENGLAND AND WALES) - POLICY STATEMENT ON THE SECURE HANDLING, USE, STORAGE AND RETENTION OF DISCLOSURE INFORMATION

1. General Principles - As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of volunteers for positions of trust working with vulnerable people, Lions Clubs International MD 105 (England and Wales) complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters which will be made available to all applicants for CRB Disclosure.

2. Access and Storage – Disclosure information is kept securely, in lockable, non-portable storage containers. Access to storage units is strictly controlled to authorised and named individuals, who are entitled to see such information in the course of their duties. These nominated people are normally the MD Vulnerable Persons' Policy Officer (and/or Deputy) and MDHQ Administrator. In cases where a disclosure needs to be reviewed as to the volunteers suitability to work with vulnerable persons the MD Legal Adviser, MD Insurance Adviser and Contact Governor may also be given access to the specific Disclosure but without access to the name of the person.

3. Handling - Lions Clubs International MD105 (England and Wales) recognises that, under section 124 of the Police Act 1997, it is a criminal offence to disclose Disclosure information to any unauthorised person. We maintain a record of all those to whom Disclosure or Disclosure information has been revealed as described in Section 2 above.

4. Usage - We use Disclosure information only for the purpose for which it has been provided. The information provided by an individual for a position within Lions Clubs International MD105 (England and Wales) is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual.

5. Retention - We do not keep Disclosures or Disclosure information for any longer than is required - in general, this is no longer than six months. This is to allow for the resolution of any disputes or complaints. Disclosure information will only be retained for longer than this period in exceptional circumstances, and after consultation with CRB. Specifically any disclosure received which, after review by the Officers listed in Section 2 above, renders the applicant unsuitable to work with vulnerable persons, will be retained for the duration of that person as a member of the organisation. The same conditions relating to secure storage and access will apply during any such

period. Administrators of Disclosure information will keep a record of the issue date of the Disclosure information, the name of the subject, the type of Disclosure and the unique number issued by the CRB.

6. Disposal - Once the retention period has elapsed, we will ensure that Disclosure information is immediately destroyed in a secure manner i.e. by shredding, pulping or burning. Lions Clubs International MD105 (England and Wales) will not keep Disclosure information which is awaiting destruction in any insecure receptacle (e.g. a waste bin or confidential waste sack). We will not retain any image or photocopy or any other form of the Disclosure information. However, notwithstanding the above, administrators of Disclosure information will keep a record of the issue date of the Disclosure information, the name of the subject, the type of Disclosure and the unique number issued by the CRB.

7. Acting as Umbrella Body - Before acting as an Umbrella Body (i.e. a body which countersigns applications for Standard or Enhanced Disclosures on behalf of other organisations), Lions Clubs International MD105 (England and Wales) will take all reasonable steps to ensure that the organisation on whose behalf we are acting can comply with the CRB Code of Practice, and in full accordance with this policy. We will also take all reasonable steps to satisfy ourselves that they will handle, use, store, retain, and dispose of Disclosure information in full compliance with the Code of Practice, and in full accordance with this policy. We will also ensure that any body or individual at whose request applications for Disclosures are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.