

# Policy Statement on Handling of Disclosure Information

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## **DOCUMENT STATEMENT:**

All Translink Group Corporate Procedural Documentation Policies should be consistent in terms of development, approval, implementation, communication, control and review in line with these guidelines.



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**Version Control:**

<b>Main Contributors/ Co- authors:</b>			
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1.0		09.06.2008	
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1.1	HR Compliance & Governance Officer	06.07.2023	Update to Data protection legislation. Added paragraph about consent with changes to how certificates are issued.

**1. Introduction**

Throughout this Policy, the words ‘Translink’ ‘Company’ and/or ‘the Group’ refer to all corporate entities under the ownership of the Northern Ireland Transport Holding Company (NITHC). This includes the parent company and each subsidiary either individually or taken together as a group.

**2. General Principles**

As an organisation using Access Northern Ireland to help assess the suitability of applicants for position of trust, Translink complies fully with Access NI’s Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure Applications and Disclosure Information. We also comply fully with its obligations under the Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, storage, retention and disposal of Disclosure information.

**3. Consent**

As we no longer receive a copy certificate from AccessNI, written consent will be obtained from the applicant when requesting and retaining a (copy of a) Disclosure certificate.

**4. Storage and Access**

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.

**5. Handling**

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure Information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **6. Usage**

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

## **7. Retention**

Once a recruitment or PCV licence renewal decision has been taken, we do not keep Disclosure information/certificates for any longer than is necessary. Information/certificates will not be retained but destroyed once a decision has been made.

## **8. Disposal**

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any unsecured receptacle (e.g. waste bin or confidential sack). We will not keep any photocopy or other image of the Disclosure or any copy of representation of the contents of a Disclosure or other relevant non-conviction information supplied by Police but not included on the Disclosure. However, despite the above, we may keep a record of the date of issue of a disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested/reason requested, the Access NI unique reference number of the Disclosure Certificate and the details of the recruitment/PCV licence renewal decision taken.