

St Neots Evangelical Church

A Guide to Safeguarding



For those working with
Children and Young People (0-17) and
Adults with care and support needs



Last update - March 2019

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This document is based on a model child protection policy supplied by the **Churches Child Protection Advisory Service** - a project of **PCCA Child Care**. A copy of the policy and all amendments will be filed with 31:8. This policy must not be copied by other churches / organisations without the written agreement of 31:8.

Introduction

Within the Church family it is widely recognised that there is a need to care for one another. Children / adults with care and support needs are, of course, particularly vulnerable and therefore need the added protection that their age demands. Jesus himself had a real concern for children, telling the disciples *Let the little children come to me... for the kingdom of God belongs to such as these* (Luke 18:16).

Sadly, with the abuse of children so widespread in society today, it is important that Churches have in place the structures

- to prevent child abuse
- to deal with concerns about possible abuse
- to liaise where necessary with the statutory child care authorities
- to deal with child abuse

as well as provide pastoral care and support for both the victims and perpetrators of that abuse.

Churches have a calling to work with the weak, the hurting and those who are in spiritual need. Child abusers certainly fall into this category and therefore it is likely that, unbeknown to others, there may well be abusers in the Church already. Abusers are also aware that Churches are places where children / adults with care and support needs can be considered to be in a secure environment. To this end, Churches can be - and are - actively targeted by abusers. Therefore it is vital that we put into place those policies and practices which will protect

- **the Church**
- **those who work with children / adults with care and support needs**
- **the children / adults with care and support needs themselves**

It is important to stress from the outset that the responsibility for the welfare of the children within the Church rests with the whole Church family and not just those who are paid, or volunteer, to work with children directly. The children and those who work directly with them need to know that their care and support is an integral part of the whole Church's way of life.

Over recent years voluntary organisations, including Churches, have responded to the questions raised by child protection issues and to Government initiatives by preparing Child Protection policies. This document has therefore been prepared as a response to these matters for those people who are working with children and young people at

St. Neots Evangelical Church.

It has been put together with the support of the **Churches' Child Protection Advisory Service** and is designed :

- To help the Church in its appointment, training and supervision of those working with children / adults with care and support needs
- To help those working with children / adults with care and support needs by providing guidelines on good practice as well as guidance on how to recognise and respond to abuse.
- To protect children / adults with care and support needs within the Church by laying down guidelines for their care and supervision.
- To help the Church support victims of abuse
- To help the Church work with child abuse offenders

*The basis for the document is the summary of recommendations from the Home Office booklet **Safe from Harm***

Home Office Summary Of Recommendations

Extracted from **Safe from Harm**, a code of practice for safeguarding the welfare of children in voluntary organisations in England and Wales. Published by the Home Office in 1993.

- 1 Adopt a policy statement on safeguarding the welfare of children.
- 2 Plan the work of the organisation so as to minimise situations where the abuse of children may occur.
- 3 Introduce a system whereby children may talk with an independent person
- 4 Apply agreed procedures for protecting children to all paid staff and volunteers
- 5 Give all paid staff and volunteers clear roles which are understood and agreed upon.
- 6 Use supervision as a means of protecting children.
- 7 Treat all would-be paid staff and volunteers as job applicants for any position involving contact with children.
- 8 Gain at least one reference from a person who has experience of the applicant's paid work or volunteering with children.
- 9 Explore all applicants' experience of working or contact with children in an interview before appointment.
- 10 Find out whether an applicant has any conviction for criminal offences against children.
- 11 Make paid and voluntary appointments conditional on the successful completion of a probationary period.
- 12 Issue guidelines on how to deal with the disclosure or discovery of abuse.
- 13 Train paid staff and volunteers, their line managers or supervisors, and policy makers in the prevention of child abuse.

St. Neots Evangelical Church

Policy statement on children, young people and adults with care and support needs and the church.

The statement in the box was agreed by the Church at a meeting held on 30th November 1999 and will be read out annually at a Church meeting in September.

- As members of this Church, we commit ourselves to the nurturing, protection and safekeeping of all, especially children and adults with care and support needs
- It is the responsibility of each one of us to prevent the physical, sexual and emotional abuse of children and adults with care and support needs, and to report any abuse discovered or suspected.
- We recognise that our work with children and adults with care and support needs is the responsibility of the whole Church
- The Church is committed to supporting, resourcing and training those who work with children and adults with care and support needs, and to providing supervision.

The Church is committed to following the Home Office Code of Practice, *Safe From Harm*, and has issued the guidelines and procedures in booklet form.

Each worker with children or adults with care and support needs must know the recommendations and undertake to observe them. Each shall be given a copy of the Church's agreed procedures and good practice guidelines.

Supervision of Children's Workers and Practice Guidelines

Workers with children and young people should:

- Not be alone with a child where the activity cannot be seen. In practice, this may mean leaving doors open or working with other groups. *(In a counselling situation with a young person, where privacy and confidentiality are important, try to ensure that another adult knows where the interview is taking place and with whom. If possible, another adult should be in the building and the young person should be aware of this. Where possible, counselling should be with a member of the same sex.)*
- Treat all children & young people equally, with the respect and dignity that befits their age; watch their language, tone of voice and where they put their body.
- Not engage in any of the following:
 - invading the privacy of children when they are showering or toileting
 - rough, physical or sexually provocative games
 - making sexually suggestive comments about or to a young person
 - inappropriate and intrusive touching of any form
 - any scapegoating, ridiculing or rejecting a child or young person.
- Learn to control and discipline children without using physical punishment
- Ensure that another adult is present if, for example, a young child has soiled their underclothes and needs to be thoroughly washed.
- Not let youngsters involve them in excessive attention-seeking that is overtly sexual or physical in nature.
- Not invite a child or young person to their home alone; instead, they should invite a group, or ensure that someone else is in the house. They should also make sure that the parents know where their child is.
- Not give lifts to children or young people on their own, other than for short journeys. If a child or young person is alone they should be asked to sit in the rear of the car and go with a driver of the same sex.
- Not, where possible, share sleeping accommodation with children or young people if a group is taken away on a residential trip.
- Be prepared to speak to other children's workers, their leaders or the Advisors about any conduct that causes them concern.
- Seek advice and training about building relationships with children and young people, both face to face and by electronic means.
- It is recommended that each group keeps a Log Book to record the names and times of all children and adults present at a session. This book would also record any significant incidents and anyone who witnessed, heard or responded in any way should record details, sign and date the logbook.

It is recognised that, in certain situations, it may not be possible - or appropriate - to follow these guidelines to the letter. Workers must, however, be sure to protect themselves and the children with whom they work whilst fostering an atmosphere of loving care and concern as befits a Church.

Definitions of and Guidelines for Recognising Abuse

*The following behavioural signs may be indications of child abuse, but they should **not** be taken in isolation.*

Definition of / Indicators of possible Physical Abuse

Actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child - includes hitting, shaking, squeezing, burning, biting, administering poisonous substances, suffocating / drowning, and excessive force (e.g. in feeding or changing a baby). It also includes Munchausen's syndrome by proxy (Meadows disease) where a parent (almost always a mother) or a carer invents symptoms of a physical disorder in the child and then seeks medical help while persisting with the abuse in order to gain attention for self.

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body in places which are not normally exposed to falls, rough games etc.
- Injuries which have not received medical attention.
- Instances where children are kept away from the group inappropriately.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns, fractures etc. which do not have accidental explanation.
- Cutting / slashing / substance abuse.

Definition of / Indicators of Possible Sexual Abuse

Actual or likely involvement of dependent, developmentally immature children or adolescents in sexual activity they do not fully comprehend or to which they are unable to give informed consent.

- Any allegations made by a child concerning sexual abuse.
- Child with excessive pre-occupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play.
- Sexual activity through words, play or drawing.
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.

Definition of / Indicators of possible Emotional Abuse

Actual or likely severe adverse effect on the emotional development of a child caused by persistent or severe emotional ill-treatment or rejection. All abuse involves some emotional ill-treatment.

- Changes or regressions in mood and behaviour, particularly where a child withdraws or becomes clinging. Also depression / aggression.
- Nervousness / frozen watchfulness
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and / or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away / stealing / lying

Definition of / Indicators of possible Neglect

Persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

- A persistent unkempt appearance.
- Looking ill-cared-for and unhappy.
- Being withdrawn or aggressive.
- Lingering injuries or health problems.
- Clothes that are worn for a long period.
- The child may be dirty and smell.

Guidelines For Responding To Abuse

Children very rarely confide matters of abuse immediately to complete strangers. More often, they choose to place their trust in an adult with whom they have built up a good relationship over a period of time. Their group leader may well be that person.

Nothing can adequately prepare a person for listening to a child disclose a matter of abuse, but the following is a list of guidelines that should help.

General Points

- Keep calm
- Look at the child directly
- Be honest
- Say that you will need to tell someone else - don't promise confidentiality
- Be aware that the child may have been threatened
- Never push for information
- Never examine a child to look for signs of abuse

Helpful Things To Say Or Show

- Accept what the child says (however unlikely the story may sound)
- Be positive, warm and loving.
- I am glad you've told me
- It's not your fault
- I will help you

Avoid Saying

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- Never make false promises
- Never make statements such as *I am shocked, Don't tell anyone else, etc.*

Concluding

- Reassure the child they were right to tell you
- Let the child know what you are going to do next and that you will let them know what happens.
- ***Immediately refer the situation to a Church Advisor.***

Please Note

Once a child has talked about abuse, the worker and Advisor may need to consider whether or not it is safe for a child to return home to a potentially abusive situation. On rare occasions it might be necessary to take immediate action to contact the Social services and / or Police to discuss putting into effect safety measures for the child so that they do not return home.

Make notes as soon as possible (preferably within an hour of the interview), writing down exactly what the child said and when he/she said it and what was happening immediately beforehand (e.g. a description of the activity). Record dates and times of these events and when you made the record. Keep all hand written notes, even if subsequently typed up, for an indefinite period.

Finally, ensure that you receive prayer and support for yourself.

The Role of the Advisor

It is important to introduce a system whereby children may talk to independent persons. Access to such a person gives children and young people more rights and reduces the potential for undiscovered abuse. In Church, these persons would have the title of **Advisor**.

Their function would be to act as a voice for the welfare of the children and young people in all aspects of Church life. In particular, they will want to establish contact with the children and young people through existing organisations and groups, although they will not currently be involved with any children's / youth work. They might be invited to visit such groups and, in any case, their names should be made known to the children and young people. They will be available to listen and respond to whatever the children and young people choose to share with them.

In reality, it is far more likely that a disclosure will be made to a familiar group leader and the group leader should then pass on this information to an Advisor *and an Advisor alone* at the earliest opportunity. It is then the responsibility of this Advisor to inform the appropriate agencies as necessary and then to work with these agencies as required. The Advisor will also want to inform one of the Elders that an enquiry is underway so that adequate pastoral support can be provided for both the alleged perpetrator and the victim of any abuse and also for their families, (see below for details).

The Advisors will also be available to those who work with the children and young people and to listen to any concerns or issues that they might raise.

The Advisors therefore need to be trustworthy people who are able to keep matters confidential and to act without bias or prejudice when dealing with matters of abuse. The Advisor will act, following the guidelines laid out, for the good of the child and this concern will take priority over all other needs.

The Elders will appoint a male and a female advisor. Their roles are identical and therefore the children and young people will be able to choose the advisor that they wish to see. This system also allows for the policy to be implemented fully when one advisor is ill or away or, less likely, is personally or closely involved with the subjects of an allegation.

It must be stressed that the Advisor's role is to co-ordinate a response to disclosures of abuse, not to manage the implementation of the Child Protection policy which will be the responsibility of the Children's Co-ordinator, acting on behalf of the Elders.

Guidelines for the Advisor are given in a separate booklet

The Children's Co-ordinator

It is the role of the Children's Co-ordinator to:

- Ensure that the Child Protection policy is being implemented.
- Oversee the Applications of Group Leaders
- Hold copies of all the Agreement Forms

Advisors and Contact Numbers

As a part of its commitment to children and young people the Church has appointed two Advisors, a male and a female, whose role will be:

- To be available to the children and young people
- To liaise with volunteers and paid workers in matters of child protection
- To be the link person(s) with outside agencies when such matters arise

It is, however, the responsibility of the Elders, via the Children's Co-ordinator, to ensure that the Church's Child Protection policy is being implemented effectively.

The Male Advisor is:

Richard Carding
18 Mill Hill Road,
Eaton Ford
St Neots,
PE19 1SF

Tel 01480 700927

The Female Advisor is:

Adrienne Dunn
18 London Lane
Great Paxton
PE19 6RH

Tel 01480 477051

All concerns must be reported immediately to one of these Advisors who have been appointed by the Elders to act on their behalf in referring allegations or suspicions of neglect or abuse to the statutory authorities. They may get confidential advice on the situation from 31:8 and may also inform an Elder and may be required by conditions of the Church Insurance Policy to inform the Insurance Company.

If the suspicions in any way involve either Advisor than contact the other Advisor. If the suspicions in any way implicate both Advisors, then the report should be made in the first instance to

PCCA Churches' Child Protection Advisory Service (hereafter 31:8)

PO Box 133,
Swanley,
Kent.
BR8 7UQ
Tel 01322 660011 or 01322 667207
Helpline (24 hours) 0845 120 45 50

Alternatively contact **Cambridgeshire Children's Services** – Tel 0345 045 5203 in normal office hours.

Outside of these contact the **Emergency Duty Team (EDT)** – Tel 01733 234 724

Or contact **the local police (Child Protection Team)**, Tel 101 and speak to Cambridgeshire Police

Suspicions will not be discussed with anyone other than those nominated above

Additional Matters

Working with Offenders

Where someone attending Church is known to have abused children, then whilst existing friendship to the individual, the Church, in its commitment to the protection of all children will discuss boundaries that the person will be expected to keep. These are likely to include:

- not being alone with a child
- declining offers of hospitality from Church members where there are children present in the home
- agreeing to a formal contract

Helping victims of Abuse

As a Church we are committed to supporting victims of abuse and encouraging them in their faith. The ways in which this is actively worked out will vary in each case but the Church will positively and actively provide practical support and help.

Discipline

Whilst working with children, it is important to maintain discipline so that the children can be cared for in a safe environment. At times, it may be necessary to discipline individual children but this discipline should never take the form of a physical punishment. Children should always be disciplined out of love, not anger.

If it becomes necessary to physically restrain a child then this must take the form of holding with the aim of preventing the child from either effecting harm upon themselves or to others. This restraint should use the minimum necessary force and should only be exercised until the child is sufficiently calm to be released.

Policy regarding data protection

The general SNEC **GDPR compliant** data protection policy is found at <http://www.snec.org.uk/policies/privacy-notice>.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>
Contact:

If you would like to discuss anything in this privacy notice, please contact the Data Protection Compliance Manager (dataprotection@snec.org.uk).

For the purposes of safeguarding, we securely store keep leader data for a period of 7 years before destroying it. We securely retain any documentation regarding safeguarding concerns for a period of 50 years from the reception of that documentation or if the child is under 18, for 50 years with from the date of the child's 18th birthday

Policy regarding Images of children and young people

In all instances, leaders will not take pictures or films of children / young people at any church run event without informing the parents and responding to any concerns. Parental consent will be required to distribute or publish these images either in electronic or physical form outside of the church building.

Policy Relating to Transporting Children and Young People

Drivers should be over 21 and have held a full driving licence for at least three years.

The vehicle being used for transportation must be roadworthy. The driver must produce a valid driving licence, MOT certificate (where applicable) and proof of adequate insurance.

Consent for the trip must be obtained from parents/carers who should be made aware of transportation arrangements.

All those transporting children and young people as part of church events should go through the church appointment / checking procedure, even if they are only transporting children. (i.e. they are not children's or youth workers). The reason for this is that those transporting children will have substantial contact with the children and young people.

An adult will not transport a child of either sex alone on a church organised event or activity.

Guidelines for using electronic communication with YP.

We recognise that in today's society, electronic communication ((this includes email, texting, facebook, twitter and other online messaging services) is a integral and normal part of life of children / YP. We also recognise that this give us new and good opportunities to communicate with children / YP and their parents both to disseminate information and also build relationships with them. We also recognise that these channels of communication need to be used carefully and with the safety of children / YP and leaders paramount.

As part of SNEC's commitment to the safety of children / YP in our care, and those involved with youthwork, SNEC recommends that those involved with children's / youth work read and implement 31:8' guidelines on safely using electronic communication (<http://www.31:8.co.uk/Documents/Help!%20Communicate.pdf>) If a leader has any doubts about how to implement these, we would suggest speaking to one of the churches' child protection officers for further advice.

We will disclose to parents any electronic means that we use to communicate with their children and will offer parents the opportunity to ask us not to communicate with their child using a particular medium with their child if they express the desire for that not to take place.

Allegations of Physical Abuse

In the event of a child making an allegation of physical abuse, it may be necessary to liaise with an Advisor. In extreme situations this would need the immediate involvement of the statutory authorities as it may not be safe for the child to return home.

Allegations of Sexual Abuse

Allegations of sexual abuse are extremely difficult to prove as there is rarely any physical evidence. In the event of a child making an allegation, however, it will be necessary for the worker to contact an Advisor immediately as it will almost certainly be necessary to contact the statutory authorities without delay. The majority of Abusers are people who actually live with or are well known to the child and it may therefore be necessary to prevent the child from returning to an abusive situation.

Appointment Of Volunteers

When a person is being considered for a role of working with children, then the following procedures should apply.

1. The Group Leader brings the name of a potential volunteer who has an appropriate passion, gifting and character to the attention of the Elders for their approval.
2. The Group Leader interviews the candidate clearly outlining the role and responsibilities the position with that person and invites them to visit the group if they have not done so already.
3. If the Group Leader still wishes to invite they give the name of the volunteer and a contact email address to the CP officers of the church
4. The CP officers send the volunteer application form to the candidate for them to complete. The group leader completes section A of the recommendation form and passes it on to the child protection officer.
5. Upon receipt of this application form in order to conform to the DBS code of practice takes up the referees. They satisfy themselves that the referee(s) support the volunteer's application.
6. All existing and new Appointments are subject to a DBS (Disclosure and barring service) registration and check where applicable.
7. Upon successful completion of the above process, the appointment is confirmed for a probationary period of three months and the Elders are informed of the decision.

Those currently already working with children / youth / vulnerable adults will need to go through Stages 4 - 7 only.

Please Note:

- This whole procedure is designed to build in protection for the worker and the Church, as well as for the children and young people.
 - The filling in of an Application Form and the seeking of a referee's support in no way suggests a lack of trust in the applicant. It is just best practice.
 - This procedure applies equally to adults and those under 18 who are working with younger children within the Church.
 - The signing of the Application / Agreement Form commits the applicant to abide by the Church's Policy & Practice on Child Protection and the Group Leader to provide the Applicant with (verbal or written) guidelines of the key responsibilities.
 - The signing of the form also commits the Group Leader to provide support, training and regular reviews for the applicant.
 - Where an applicant is new to the Church, a second reference will be taken up.
 - The declaration of an offence will not necessarily disqualify an applicant, though clearly offences of a sexual or violent nature against children or adults will do so.
- * The interview may well be an informal discussion rather than a formal interview. The Group Leader, however, must be satisfied the applicant:
1. is willing and able to meet the commitments of the position
 2. understands and shares the aims of the group
 3. agrees to abide by the Church's Child Protection policy

Temporary Helpers

We will Endeavour to DBS check all temporary helpers however this may not always be possible in the time given. Therefore when additional helpers are needed on a temporary basis, (such as covering a holiday or sickness absence or for short term projects such as Holiday Clubs), these will not need to go through the process outlined above. As a consequence, however, they should not be left alone with nor take sole responsibility for a child or group of children. The Group Leader will provide more specific guidance on how such volunteers can best be used. SNEC recognise that these leaders will not count when calculating the child / adult ratio necessary for good practice.

Policies Relating to the Use of Criminal Records Information

A. Equal Opportunities

1. This organisation is committed to providing a vital, practical response to the needs of those we serve, regardless of race, religion, lifestyle, sex, sexuality, physical/mental disability, offending background or any other factor.
2. As an organisation using the Disclosure and Barring Service to assess applicants' suitability for positions of trust, the church (organisation) undertakes to comply fully with the DBS Code of Practice and to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of disclosure on the basis of conviction or other information revealed.
3. We actively promote equality of opportunity for all, with the right mix of talent, skills and potential, and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications, experience and commitment to the values of the organisation.
4. A Disclosure is only requested after a thorough risk assessment as indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered a position.
5. Where a Disclosure is to form part of a recruitment process we encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover to the recruiter within the organisation and we guarantee that this information will only be seen by those who need to see it as part of a recruitment process.
6. Unless the nature of the position allows St Neots Evangelical Church to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined by the Rehabilitation of Offenders Act 1974.
7. We ensure that the Recruiter for our organisation will liaise with 31:8 for advice and help with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
8. At interview, or in separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment of voluntary work.
9. We give every subject of a DBS Check a copy of the DBS Code of Practice.
10. We undertake to discuss any matter revealed in a DBS enquiry with the person seeking a position before withdrawing a conditional offer of employment.

Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.

B. Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure of Information

1. **General Principles.** As an organisation using the DBS service to help assess the suitability of applicants for a position of trust, St Neots Evangelical Church complies fully with the DBS Code of Practice regarding the correct handling, use, storage and disposal of Disclosures and disclosure information (both DBS disclosure and voluntary disclosure). It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, retention and disposal of disclosure information and has a written policy on these matters, which is available to all those who wish to see it on request. **We also comply with the GDPR regulations with regard to storage and handling of data.**
2. **Storage and access.** Disclosure information is never kept on an applicant's personal file and is always kept separately and securely, with access strictly controlled and limited to those who are entitled to see it as part of their duties.
3. **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 have been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.
4. **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.
5. **Retention.** Once a recruitment (or other relevant) decision has been made, we receive an electronic notice through the 31:8 online disclosure procedure. The Safeguarding officers have access to this for as long as the information is on the system. This disclosure information will not be disclosed to anyone else or be printed off by the safeguarding officers at any time unless we are required to do so by the relevant authorities. If, in very exceptional circumstances, it is considered necessary to do this, we will consult the 31:8 Disclosure Unit, who in turn will discuss this with the DBS and will give full consideration to the Data Protection and Human Rights individual subject access requirements before doing so. Throughout this time the usual conditions regarding safe storage and strictly controlled access will prevail.
6. **Disposal.** Once the retention period has elapsed, we will ensure that any Disclosure information is immediately suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the disclosure or any copy or representation of the disclosure. However, notwithstanding the above, you may keep a record of the date of the issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.
7. **Our relationship with 31:8 as an umbrella organisation.** We accept that the 31:8 Disclosure Unit as our umbrella organisation has a responsibility to ensure, as far as reasonably practicable, that we comply with all the requirements made upon us in the DBS Code of Practice, this and other policy statements, and in other DBS procedures and processes. We undertake to keep 31:8 informed of any changes in our organisation, personnel or practices which could materially affect our ability to work within these expectations.