

**ST MICHAELS AND ALL ANGELS
BAMPTON**

**POLICY FOR SAFEGUARDING
CHILDREN AND VULNERABLE ADULTS**

Approved by PCC on 17 July 2017

For review 17 July 2018

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Reference documents:

Diocese of Exeter website

Promoting a Safer Church (2017)

Protecting all God's Children (2010)

Children Act 2004

Author: Liz Redfern Designated Safeguarding Officer on behalf of the PCC

1.0 Background and Principles : Safeguarding children and vulnerable adults is the responsibility of us all

1.1 The Parochial Church Council (PCC) of St Michael & All Angels Parish Church, Bampton recognises its responsibility to safeguard and promote the welfare of children and vulnerable adults within the legal framework of the Children Act 1989 and current Diocesan guidance. Anyone under the age of 18 is considered to be a child/young person.

1.2 We aim to create a safe and respectful environment within which children and young people and vulnerable adults can thrive and this church can operate with the help and security of clear guidance.

1.3 We are therefore committed to:

- Promoting a Safer environment and culture
- Safely recruiting, supporting and training all those with any responsibility related to children, young people and vulnerable adults within the Church
- Responding promptly to every safeguarding concern or allegation
- Caring pastorally for victims/survivors of abuse and other affected persons
- Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons
- Responding to those that may pose a present risk to others.

1.4 This policy and guidelines are for the use of all clergy, volunteers paid staff and visitors. It will be shared with the parents and carers of the children, young people and vulnerable adults involved in church activities.

1.5 The definitions of how terms are used can be found in appendix 1.

2.0 POLICY - The Specific Responsibilities of the PCC

2.1	We will adopt and implement a Safeguarding Children Policy, accepting as a minimum the House of Bishop's policy on Safeguarding Children. This will be supported by the additional diocesan procedures and recommended good practice, while being responsive to local parish requirements.
2.2	We will appoint at least one coordinator to work with the incumbent and the PCC, whose role will be to implement safeguarding policies and procedures. The coordinator will ensure that any concerns about a child/young person or the behavior of an adult are referred to the diocesan safeguarding adviser. The coordinator will either be an appointed member of the PCC or have the right to attend meetings, and will regularly monitor the implementation of the safeguarding policy in the parish. This position will not be held by the incumbent or their spouse.
2.3	We will consider appointing someone, different from the coordinator, to be a children's/young person's advocate.
2.4	We will display the policy in our church premises where children's/young people's activities take place, along with the contact details of the coordinator or advocate, along with the telephone numbers for Childline and Parentline Plus.
2.5	We will ensure that all those authorised to work with children and young people as employees or volunteers are suitably recruited in accordance with safer recruitment practice, including the use of criminal records disclosures and registration with the relevant vetting and barring schemes and that they are trained in accordance with Diocesan Guidance and supported in their role.
2.6	We will require the designated safeguarding officer to maintain records of volunteers, their appropriate training and DBS status to ensure regular updating in accordance with Diocesan Guidance (appendix x)
2.6	We will ensure that there is appropriate insurance cover for all activities involving children and young people undertaken in the name of the parish.
2.7	We will review the implementation of the Safeguarding Children and Young People policy, procedures and good practice, at least annually.
2.8	We will respond without delay to every complaint made which suggests that an adult, child or young person may have been harmed; we will co-operate with the police and local authority in any investigation.

3.0 POLICY - Safeguarding Children and Young People and Vulnerable People during church activities, on site and during visits

On site
3.1 Everyone is responsible for children while on these premises and must make sure that health and safety guidelines are adhered to.
3.2 Everyone working with children should be encouraged to attend the required level of training.
3.3 Wherever possible, steps should be taken that a worker is not left alone with a child.
3.4 Under no circumstances should visitors be allowed to wander around the premises unaccompanied when children and young people are present.
3.5 Appropriate adult:child ratios should be observed at all times. The following ratios of adults to children should be adhered to for all church groups. 0 to 2 years - 1 adult to 3 children. 2 to 3 years - 1 adult to 4 children. 3 to 8 years - 1 adult to 8 children. 8 years + - 1 adult to 10 children.
3.6 People working with children should be alert to strangers frequently waiting outside a venue with no apparent purpose.
3.7 Children should not be collected by people other than their parents unless written notification has been received.
3.8 If a child is not collected after a session it is reasonable to wait approximately half an hour for a parent or carer to arrive. If the parent or carer cannot be contacted, Social Services or the police should be contacted and asked to assist.
3.9 Careful consideration will need to be given to ensure the safety of children as they leave the premises.
Visits and trips
3.10 Appropriate Health and safety guidelines must be adhered to for all visits and trips.
3.11 All activities must be risk assessed and properly insured.
3.12 All vehicles hired for outings must be insured, roadworthy and fitted with seatbelts.
3.13 All drivers should travel with at least one escort. Drivers and escorts should have up to date DBS checks and have been subject to appropriate recruitment procedures. All drivers and escorts should agree to abide by these guidelines.
3.14 A roll call will be taken at the start of the journey and again before commencing the return journey. If travelling in more than one vehicle, children will be encouraged to travel in the same vehicle there and back.
3.15 The leaders of trips will carry the contact numbers for the home organisation and emergency services in the event of an alert being necessary.
3.16 If a child goes missing on a trip, staff should instigate an immediate search. If the child cannot be found within half an hour, the appropriate security staff and police

should be notified. If, having notified the security staff and police, the child cannot be found, the parents/carers will be notified immediately.

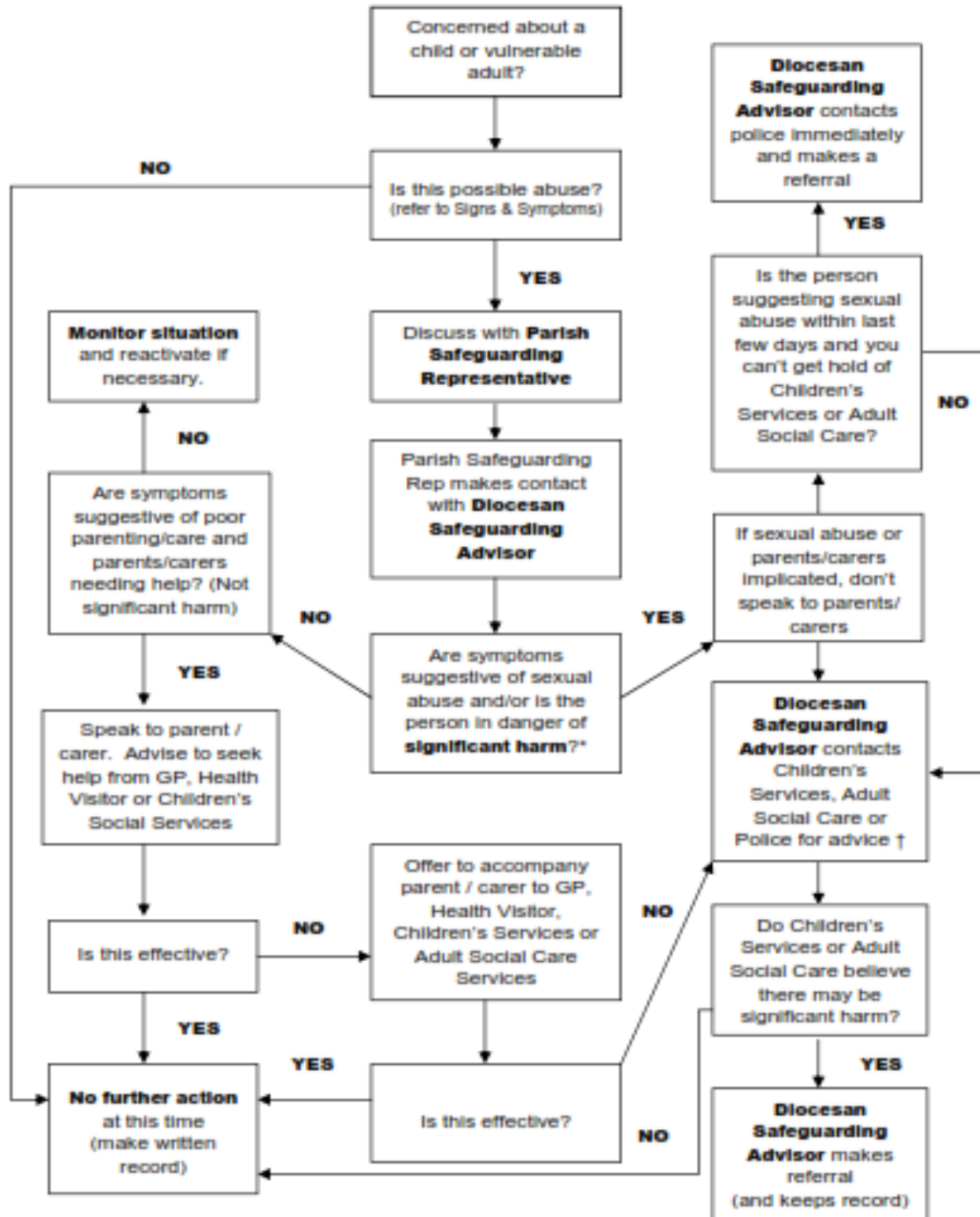
3.17 If a child is missing, the care of the remaining children is paramount. It is imperative that they return to the home site as quickly as possible, while a senior leader remains at the visit to coordinate contact between security staff and the child's parents/carers.

Use of premises by other organisations

3.18 In the event that a room or rooms on the premises are used by other organisations, the letting agreement should ensure that the hiring organisation works to approved child protection procedures and/or that they read and agree to abide by these guidelines.

The flow chart below provides overall guidance.

FLOWCHART FOR RESPONDING TO CONCERNS ABOUT A CHILD OR ADULT AT RISK



* Refer to safeguarding policy for guidance on 'significant harm'

† Where concerns are about an adult, due attention must be given to any wishes expressed about reporting following an assessment of their ability to make informed decisions and give informed consent.

4.0 POLICY – What to do if you suspect abuse is taking place

4.1 Guidelines on how to recognize possible abuse are contained in Appendix 3

4.2 It is important that any individual who suspects or is worried that a child or vulnerable adult is being abused or may be at risk of abuse, is able to make that concern known in a clear and concise manner without delay. The Diocese therefore provides the following guidance:

- In the first instance, where safeguarding concerns relate to a member of the laity, contact should be made within 24 hours with the Parish Safeguarding Officer (Liz Redfern)
- A written record must be made, signed and dated detailing the concern, allegation or disclosure. This must be passed to the Parish Safeguarding Officer and/or Diocesan Safeguarding Advisor (or Assistant) to assist in the decision-making process
- The Parish Safeguarding Representative will consult with the Parish Priest/Vicar and the Diocesan Safeguarding Advisor to determine what action may need to be taken
- It should be noted that if making contact with any of the above becomes problematic and risks delay causing the potential for greater or further harm, the concern should be escalated to the next step to achieve a timely response to safeguarding matters
- If the safeguarding concern relates to a member of the clergy (or other person in a position of trust and responsibility), contact should be made within 24 hours directly with the Diocesan Safeguarding Advisor (or Assistant). A written record must be made in the same manner. The Diocesan Safeguarding Advisor will then consult with necessary parties to facilitate a prompt and effective response.

4.3 Where a report is made in relation to another person with responsibility within the local church, this is a potential form of 'whistleblowing'. For further advice please speak to the Diocesan Safeguarding Advisor or the Diocesan Director of Human Resources on 01392 294943

5.0 How to handle your concerns

5.1 In the event that a child/vulnerable adult makes an allegation or disclosure of abuse by an adult or another child or young person, it is important that you:

- Listen to them and/or closely observe their presentation and behavior.
- Let them know that you take what they are saying seriously.
- Do not attempt to question or interview them yourself.
- Let them know that you will need to tell someone else in order to help them. Do not promise to keep what they tell you secret.
- Inform your designated child protection officer and/or the Diocesan Safeguarding Adviser as soon as possible.
- Make a written record of the incident or events.

Who to contact

5.3 All child and vulnerable adult protection concerns should be acted upon immediately. If you are concerned that a child/vulnerable adult might be at risk or is actually suffering abuse, you should tell the designated safeguarding officer within your church. You may also wish to speak to the Diocesan Safeguarding Adviser.

Parish Safeguarding Officer	Liz Redfern	01398 331540 or 07966 260058
Diocesan Safeguarding Advisor		01392 294912 or 01392 294929

Email: safeguarding@exeter.anglican.org

In an emergency situation, contact Social Services or the police directly.

Devon County Council Social Services

Adult Safeguarding 0345 155 1007 or Children's Safeguarding 0345 155 1071

Police: 999

5.3 The responsibility for investigating allegations of abuse, whether they result from a disclosure from a child or the concerns of an adult, lies with social workers and the police. It is normally the responsibility of your designated child protection officer to make a referral to these agencies, but if you judge the situation to be an emergency and/or you require advice in the absence of the designated officer, you must report your concerns directly, using the contacts listed above.

5.4 Social Services will advise you when or whether to inform the child's parents or carers about any concerns. If they decide to pursue a child protection investigation, you should:

- Work closely and collaboratively with all professionals involved in the investigation, in order to keep the child safe.
- Attend a child protection conference if you are invited. You will be asked to provide information about your involvement with the child, which is why it is important to keep records of your concerns.

APPENDIX 1

DEFINITIONS

This document is written with particular reference to two groups in society, children, and adults who may be vulnerable.

A **child** is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout this document.

Working Together to Safeguard Children 2010 states:

The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders' Institution, does not change his or her status or entitlement to services or protection under the Children Act 1989. (Working Together, 1.19)

The term **safeguarding** covers vetting and safer recruitment, safer working practices, responding to concerns, working with partner agencies, dealing with allegations against those responsible for children and other matters that may be relevant. The term **child protection** is used for responding to concerns where it appears that a child may have been harmed.

Vulnerability may change with time and according to circumstance. All human beings are subject to change and chance happenings which may affect their capacity to manage themselves and their situation. All human beings have different strengths and weaknesses: all have different capacities and disabilities. While some people may appear to be strong, we know that no-one is invulnerable and at different times in our lives and in different circumstances strengths can change and grow, diminish or disappear. Some people, because of their physical or social circumstances, have higher levels of vulnerability than others, and it is our duty as Christians to recognise this and support those who are vulnerable in a way that affords them as much independence and autonomy as possible. We must do this in a way that allows compassion and empathy without undermining dignity.

The term **vulnerable adult** refers to:

Any person aged 18 and over "**who is, or may be, in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to take care of him or herself or unable to protect him or herself against significant harm or serious exploitation**".

[`Promoting a Safe Church policy 2006 and No Secrets' 2000]

The DBS (Disclosure and Barring services) definition is more restrictive and that may affect applications for Criminal Records Clearance - if in doubt consult with the Diocesan office.

Some of the factors which may increase vulnerability include:

- Sensory or physical disability or impairment;
- A learning disability;
- A physical illness;
- Mental ill health (including dementia), chronic or acute;
- Addiction to alcohol or drugs;
- Failing faculties in old age;
- A permanent or temporary reduction in physical, mental or emotional capacity brought about by

Appendix 2 Overview of Safeguarding Training Requirements

C0 Basic Awareness	C1 Foundation	C2 Leadership	C3 Clergy and Lay Ministers	C4 Senior Staff
<p>Recommended for anyone who needs a basic level of safeguarding awareness</p> <p>This course can be completed as a stand-alone module, but is also designed as an introductory course for anyone intending to complete training at a higher level.</p>	<p>Required for anyone who has safeguarding responsibilities or who has contact with children, young people or adults who may be vulnerable.</p> <p>This course can be completed as a stand-alone module or can be combined with C2. It is a pre-requisite for C2.</p>	<p>Required for anyone who has safeguarding leadership responsibilities or responsibility for activities involving children, young people or adults who may be vulnerable.</p> <p>C1 is a pre-requisite for completion of this module.</p>	<p>Required for those holding a licence, commission, authorisation, permission to officiate from a Bishop – Ordained and Lay.</p> <p>This is a stand-alone course.</p>	<p>Required for senior staff who have key roles in safeguarding policy, strategy and practice.</p> <p>This is a stand-alone course.</p>
<p>Modules C1 and C2 provide an equivalent level of training to module C3. The main difference, reflecting the different target audiences, is the content and focus of the case studies completed.</p>				
<p>Available online. Refreshed every 3 years by a revised C0 module</p>	<p>Delivered via a half-day (morning) face-to-face training session. Refreshed every 3 years by the C5 module</p>	<p>Delivered via a half-day (afternoon) face-to-face training session. Refreshed every 3 years by the C5 module</p>	<p>Delivered via a full-day face-to-face training session Refreshed every 3 years by the C5 module</p>	<p>Delivered by the National Safeguarding Team – by invitation only. Refreshed every 3 years by a revised C4 module</p>

APPENDIX 3

GUIDELINES - Recognising signs of abuse

It can often be difficult to recognise abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Children may behave strangely or seem unhappy for many reasons as they move through the stages of childhood, or their families experience changes. It is nevertheless important to be familiar with things that can indicate that abuse is taking place and know when there is a need to seek further consultation. These guidelines can also be useful when thinking about vulnerable adults.

Someone can abuse a child by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Abuse can be carried out by someone known to a child or by a complete stranger.

If you are worried about a child it is important that you keep a written record of any physical or behavioral signs and symptoms which suggest they may be a victim of abuse. In doing this you can monitor whether or not a pattern emerges and provide evidence to assist any investigation if required.

Signs & Symptoms of Abuse

The following should be used as indicators only that a child may be experiencing some form of abuse. They are not exhaustive lists and should not be used as a definitive guide as to whether abuse has or is being suffered. However, in using these signs as a guide, the presence of any of these signs should cause us to stop and consider the possibility that a child may be being abused.

Physical Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<p>Bruises, black eyes and broken bones are obvious signs of physical abuse, but they are not the only ones. Other signs include:</p> <ul style="list-style-type: none">• injuries that the child cannot explain or explains unconvincingly• untreated or inadequately treated injuries• injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen• bruising which looks like hand or finger marks• cigarette burns, human bites	<p>Sometimes if a child is being physically abused they may show changes in behaviour, such as:</p> <ul style="list-style-type: none">• becoming sad, withdrawn or depressed• having trouble sleeping• behaving aggressively or being disruptive• showing fear of certain adults• showing lack of confidence and low self-esteem• using drugs or alcohol

Emotional Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none">• speech disorders• delayed physical development• substance abuse• ulcers, severe allergies	<ul style="list-style-type: none">• habit disorder (sucking, rocking, biting) antisocial, destructive• neurotic traits (sleep disorders, inhibition of play)• passive and aggressive - behavioural extremes• delinquent behaviour (esp. adolescents)• developmentally delayed

Neglect

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none">• abandonment• unattended medical needs• consistent lack of supervision• consistent hunger, inappropriate dress, poor hygiene• lice, distended stomach, emaciated• inadequate nutrition	<ul style="list-style-type: none">• regularly displays fatigue or listlessness, falls asleep in class• steals food, begs from classmates• reports that there is no carer at home• frequently absent or late• self-destructive• school dropout (esp. adolescents)• extreme loneliness and need for affection

Sexual Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none">• pain, itching, bruising or bleeding in the genital or anal areas• genital discharge or urinary tract infections• stomach pains or discomfort walking or sitting• sexually transmitted infections• pregnancy	<ul style="list-style-type: none">• a marked change in the child's behaviour. For eg, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start with inexplicable physical ailments• a young person may refuse to attend school or have difficulty concentrating so schoolwork is affected• they may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities.• they may start using sexually explicit behaviour or language, not appropriate for their age• the child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an

Appendix 4

Allegations made against members of staff or volunteers

Organisations that work, or come into contact with children and young people, need to be aware of the possibility that allegations of abuse will be made against members of their staff or volunteers. Allegations can be made by children, young people or parents and they can also be made by other concerned adults. Allegations can be made for a variety of reasons. Some of the most common are:

- Abuse has actually taken place.
- Children can misinterpret your language or your actions because they are reminded of something else.

All allegations should be brought to the notice of Rev Kevin Chandra or Liz Redfern (Safeguarding Officer) immediately. In cases where the allegation is made against this person, the complainant should approach a more senior official or take the following action him or herself:

Make sure that the child in question is safe and away from the person alleged to have abused a child.
Contact social services in the team relevant to where the child lives.
Contact the parents or carers of the child if advised to do so by the social worker/officer in charge of allegations.
Irrespective of any investigation by Social Service or the police, you should follow the appropriate disciplinary procedure. Consideration must be given as to whether the member of staff or volunteer should be suspended from duty while the investigation is carried out.
Consider whether the person has access to children anywhere else and whether those organisations or groups need to be informed.
Act upon the decisions made in any strategy meeting.

All incidents should be investigated within the organisation after any external investigation has finished, reviewing practice and putting in place any additional measures based on lessons learned.

Support

It is important that you also develop support systems for the person who faces an allegation. If your place of worship/learning has a management committee, it could be that a member is nominated to fulfill this role. As well as providing support through listening and through prayer, this person could advise on appropriate outside help, such as counseling or legal services.

Appendix 5

POLICY - Safer Recruitment

The application of rigorous procedures for the recruitment of any staff or volunteers who come into contact with children and young people, both directly and indirectly, can reduce the likelihood of allegations of abuse being made that are founded. As an absolute minimum, the following standards should be followed:

All prospective workers (paid and unpaid) should complete an application form which asks for details of their previous employment and for the names of two referees.
All prospective workers (paid and unpaid) should have a new disclosure barring (DBS) before they start employment with you – anyone who refused to adhere to this should not be employed.
All prospective workers (paid and unpaid) should be interviewed to establish previous experience of working in an environment where there is contact with children, and perceptions of acceptable behavior.
Nobody should start work before references have been received. Referees should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment.
All appointments to work with children should be subject to an agreed probationary period.
New members of staff should be clear about their responsibilities and wherever possible, work to an agreed job description.
These guidelines should be available to everyone and fully discussed as part of an induction process.

Appendix 6

Parish Recruitment of Ex-Offenders Policy

The Diocese of Exeter uses the Disclosure and Barring Service (DBS) to assess the suitability of both volunteers and applicants for employment in positions of trust. We comply fully with the DBS Code of Practice and undertake to treat all volunteers/applicants fairly. We undertake not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

Having a criminal record will not necessarily bar a volunteer/applicant from working within the diocese. This will depend on the nature of the position and the circumstances and background of the offences.

Where appropriate and justified under the current regulations, volunteers and applicants who are offered employment will be asked to apply for a check of their criminal record from the Disclosure and Barring Service before the appointment is confirmed. Enhanced Disclosures will include details of cautions, reprimands or final warnings, as well as convictions, and also information relating to police enquiries and pending prosecutions. An Enhanced Plus check will also involve a check against the barred list(s) for regulated activity with children and/or adults. It is illegal for a person who is on the appropriate barred list to apply to undertake regulated activity, just as it is illegal for an organization knowingly to enable such a person to undertake regulated activity on its behalf.

Applicants for employment or contractors

- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- For those positions where a Disclosure is required, all application forms and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is to form part of the recruitment process, all applicants called for interview will be encouraged to provide details of their criminal record at an early stage in the application process through a Confidential Declaration form. Such information should be sent, under separate and confidential cover, to a designated person within the Diocese of Exeter. We guarantee that this information will be seen only by those who need to see it as part of the recruitment process.
- For posts not involving regulated activity or otherwise including contact with children and young people, we will only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 as part of the application process. For those posts that do involve regulated or other related activity, **applicants will be asked whether they have any convictions, cautions, reprimands or final warnings which would not be filtered in line with current guidance.**
- The person designated to assess the implications of any convictions with respect to the

They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

- At interview, or in a separate discussion, we will 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 the withdrawal of an offer of employment.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request or can be viewed on the [Diocesan website](#).
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Volunteers

- Those involved in the recruitment of volunteers will make it clear to a candidate whenever a Disclosure is required.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request.
- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- All Disclosure applicants will be invited to provide details of any criminal record at an early stage through a Confidential Declaration form.
- We guarantee that Disclosure information will be seen only by those who need to see it as part of the recruitment process.
- The person designated to assess the implications of any convictions with respect to the post applied for (normally the DSA or the Director of Human Resources), will have been suitably trained to identify and assess the relevance and circumstances of offences. They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

We undertake to discuss with a volunteer any matters revealed in a Disclosure which relate directly to the position for which they have offered themselves. The welfare of children and vulnerable adults will always be our first concern.

Appendix 7

POLICY Storage, Handling, Use, Retention and Disposal of Disclosures and Information

Introduction The PCC will comply fully with the DBS 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 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This written policy is available on request to all those who wish to see it.

Storage and Access Disclosure information is never kept on an applicant's personal file and is always kept separately and 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.

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

If a party other than the Diocese requests the passing on of Disclosure information, advice will be sought from DBS before doing so.

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.

Retention Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months after the decision has been taken, we will consult the DBS about this. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail. The DBS will be informed immediately if a Disclosure document, or additional information provided by the police, is mislaid or lost.

Disposal Once the retention period has elapsed, or sooner, Disclosure information will be destroyed by shredding. We will not retain any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

Notwithstanding the above, a record will be kept of: the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested (including the designated workforce; child, adult or both), the position for which the Disclosure was requested, the unique reference number of the Disclosure, and the details of the recruitment decision taken.