

CRB/ISA Policy Statement

for the secure storage, handling, use, retention and disposal of Disclosures and Disclosure information

GENERAL PRINCIPLES

As a responsible organisation wishing to uphold our legal obligations we use the Criminal Records Bureau (CRB) Disclosure and Information Safeguarding Authority (ISA) services to help assess the suitability of applicants for positions of trust. To this end PETA Limited complies fully with the CRB and ISA Codes 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 data protection policy, which is available on the Company Intranet.

STORAGE AND ACCESS

Disclosure information is 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.

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.

In the event that a positive CRB/ISA check is received for any person who has applied for a CRB/ISA Disclosure at the request of PETA Ltd (ie current employee, prospective employee or volunteer) the Director will undertake an initial risk assessment which will take into consideration:

- ▲ The nature of the offence (see Appendix A)
- ▲ The nature of the role within PETA Ltd
- ▲ The elapsed time since the conviction or warning or other matter indicated on the CRB/ISA check
- ▲ Evidence of the individual's conduct or employment record since the conviction or warning or other matter indicated on the CRB/ISA checks

The Director will, if it is deemed necessary, discuss the offence(s) or any other matter that might be relevant to the role with the department manager and/or the individual concerned (or, having been apprised of the situation, the department manager will discuss the matter with the individual). Failure to reveal any information relevant to the position could result in a withdrawal of the employment offer or lead to invoking the Company's Disciplinary Procedure.

Where a positive CRB/ISA result is received by PETA Ltd, the Director will review whether the individual should be employed by or remain employed by (as appropriate) the Company. In the case of an existing employee, consideration may be given to alternative employment within the Company if this is deemed viable or appropriate. No decision regarding continuing or terminating employment or the offer of employment will be taken without the Director having discussed the matter with the individual's department manager and the individual concerned.

All positive CRB/ISA results and consequent risk assessments will be treated with discretion and any necessary discussions will be confidential; at no point will any person who does not need to know the result/content of the CRB disclosure be advised of or involved with any risk assessment that is considered necessary by the Director.

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. Further CRB/ISA disclosures and/or self-disclosures will be required from time to time as appropriate and depending upon requirements of external bodies, such as the LSC.

RETENTION

Once a recruitment (or other relevant) decision has been made/confirmed, we do not keep Disclosure information for any longer than is 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, we will consult the CRB/ISA about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

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 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 contents of a Disclosure. However, notwithstanding 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, the unique reference number of the Disclosure and the details of the recruitment decision taken.

Appendix A

If an applicant, volunteer, new recruit or existing employee has an offence in the following categories, these could be deemed as risk to the Company:

High Risk	Assault including actual bodily harm and grievous bodily harm Possession with intent to supply of Class A, B or C drugs Sex Offences Child Protection issues Prison sentences over six months Repeated offences in the medium category Affray Fraud including money laundering Offences involving weapons
Medium Risk	Possession of Class C drugs Fraud including money laundering Malicious damage and criminal damage Theft including handling stolen goods Drink Driving offences Trespass with Intent to Steal Taking without consent Aggravated speeding offences Repeated offences in the minor category
Low Risk	Shoplifting and minor theft offences Parking, speeding offences

All offences listed also include the offence of “attempted” as a prefix to the offence.