

Handling of DBS Certificate Information Policy Statement

Name of Organisation: Pony Partnerships CIC

Venue/Address for which policy applies: All venues

Date of last review: 1st September 2025 **Date of next review:** 31st August 2026

Name of author: Danielle Mills

1. General Principles

Pony Partnerships CIC uses the Disclosure and Barring Service (DBS) to help assess the suitability of staff, volunteers, and contractors for positions of trust.

We comply fully with the DBS Code of Practice (2021) and with our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 regarding the handling, use, storage, retention, and disposal of DBS certificates and related information.

This policy applies to all staff, volunteers, contractors, and Directors, and is available to any applicant or member of the public on request.

2. Lawful Basis for Processing

The lawful basis for processing DBS certificate information is:

Article 6(1)(c) UK GDPR – processing is necessary for compliance with a legal obligation (safeguarding requirements).

Article 9(2)(b) UK GDPR – processing is necessary for carrying out obligations in the field of employment and safeguarding.

Processing is also consistent with the requirements of Keeping Children Safe in Education (2025) and safer recruitment legislation.

3. Storage and Access

DBS certificate information is stored securely in lockable, non-portable containers or secure digital systems, with strictly limited access.

Access is restricted to staff who are authorised and require this information as part of their role.

4. Handling

In accordance with section 124 of the Police Act 1997, certificate information will only be shared with authorised persons in the course of their duties.

This may include commissioning organisations where contractually required.

A record is maintained of all those to whom certificate information has been disclosed.

It is a criminal offence to pass this information to anyone not entitled to receive it.

5. Usage

Certificate information will only be used for the specific purpose for which it was requested and with the applicant's consent.

It will not be used for any other purpose.

6. Retention

Pony Partnerships does not retain original DBS certificates beyond the time necessary to verify them.

A record is kept in the Single Central Record (SCR) to evidence compliance with safer recruitment requirements.

Recorded details include:

- the date of issue,
- the name of the subject,
- the type of certificate,
- the position applied for,
- the certificate reference number,
- and the recruitment decision.

7. Disposal

DBS certificates are destroyed securely once verification is complete or, for staff/volunteers, once the period of work ends.

Destruction will be by secure shredding or other permanent method.

No photocopy, scanned copy, or digital image of the certificate will be retained.

8. Data Subject Rights

Under UK GDPR you have the right to:

- Request access to the information we hold about you (subject access request).
- Request correction of any inaccurate or incomplete information.
- Request erasure of your data where retention is no longer necessary.
- Object to processing in certain circumstances.

Requests should be made to info@ponypartnerships.com















