

DISCLOSURES AND DISCLOSURE INFORMATION POLICY

Background

As a Company using the Criminal Records Bureau (CRB) service to help assess the suitability of candidates for positions of trust, we are recipients of Disclosure Information and must comply fully with the CRB Code of Practice.

Amongst other things, this obliges us to have a written policy on the correct handling and safekeeping of Disclosure Information.

General Principles

As an organisation using the CRB service to help assess the suitability of candidates for positions of trust, the Company complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure Information.

The Company 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 policy on these matters, which is available to those who wish to see it on request.

Storage and Access

Disclosure Information is never kept on a candidate's 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

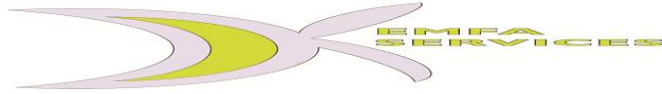
In accordance with section 124 of the Police Act 1997, Disclosure Information is only passed to those who are authorised to receive it in the course of their duties. The Company maintains a record of all those to whom Disclosures or Disclosure Information has been revealed and recognises that it is a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

Use of Disclosure Information

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

Retention

Once a recruitment (or other relevant) decision has been made about a candidate, the Company does 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, the Company will consult the CRB and will give full consideration to the rights of the candidate under the Data Protection Act 1998 before doing so. Throughout this time the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, the Company will ensure that any Disclosure Information is immediately destroyed by secure means, e.g., by shredding, pulping or burning. While awaiting destruction, Disclosure Information will not be kept in any insecure receptacle (eg, waste bin or confidential waste sack).

The Company will not keep any photocopy or other image of the Disclosure Information or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, the Company may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position in relation to which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.