

CCPAS EBulk Statement of Fair Processing

Please retain this document for your records. It should also be made available for applicants to read.

By accessing the CCPAS E-Bulk website and providing CCPAS and our agent with your personal details, you agree to accept and be bound by the terms of the CCPAS statement of fair processing which is summarised below.

CCPAS has worked closely with the DBS and their agent to produce a new online disclosure system, e-Bulk, which replaces the standard paper forms and allows you to complete your application at any location with internet access.

Our online service is committed to protecting the privacy of our users. When you supply any personal information to this site, CCPAS and our agent as the data processor working on behalf of our client (the data controller) has legal obligations towards you in the way we deal with your data as follows:

1. We will hold your personal information on our systems for as long as needed to meet the service you have requested, and remove it in the event that the purpose has been met.
2. We will ensure that all personal information supplied is held securely, in accordance with the Data Protection Act 1998.
3. We will provide a safe and secure experience for users of this site.
4. We will ensure that the information you submit to us remains private, and is only used for the purposes set out below.

Fair Processing Principles

- Your personal information is only processed with your knowledge
- Only information that we actually need is collected and processed
- Your personal information is only seen by those who need it to do their jobs
- Personal information is retained only for as long as it is required
- Decisions affecting you are made on the basis of reliable and up to date information
- Your information is protected from unauthorised or accidental disclosure
- Inaccurate or misleading data will be corrected as soon as possible
- Procedures are in place for dealing promptly with any dispute.

All information requested is used solely for the purpose of producing a Criminal Record Disclosure and is collected, stored and processed by CCPAS, our agent and the DBS in accordance with the Data Protection Act 1998. We will treat your personal information as confidential and we will not disclose it to any third party except: (i) with your prior agreement; (ii) as necessary for providing our e-bulk online disclosure service to you; or (iii) as required by law.

Any organisation which uses the CCPAS e-Bulk online disclosure services is required to become a member of CCPAS and as such they must:

- Abide by the DBS Code of Practice
- Abide by the Data Protection Act 1998
- Have a policy for secure storage, handling, use, retention and disposal of Disclosures and Disclosure Information
- Have an Equal Opportunities Policy

The CCPAS e-Bulk solution is hosted within an ISO27001, Capita owned data centre and all components of the service are protected by intrusion detection and intrusion prevention devices. Completed applications are fully encrypted and securely transferred to the DBS using the e-Bulk Interface.

E-Bulk User Agreement

All organisations using the E-bulk system must agree to:

1. Ensure that all users follow the instructions as contained in the CCPAS guidance.
2. Not proceed with any online DBS check until the applicants have completed a self declaration/confidential declaration form.
3. Ensure that all User Accounts and other details are kept safe and secure.
4. Not share User Account Details with any party not explicitly authorised by CCPAS.
5. Request CCPAS to withdraw the Account details from any user acting in a malicious manner or otherwise outside of the DBS Code of Practice or users no longer authorised to access the System.
6. Not divulge the User Account details to CCPAS or any third party except for support purposes.
7. Ensure that any DBS checks requested or carried out are justified and allowable as per the DBS Code of Practice and other relevant legislation.
8. Ensure that Disclosures are not kept any longer than necessary to make a suitable decision and in all cases not longer than 6 months from the date of issue (other than in relation to social care or OFSTED registered settings where audit requirements mean that Disclosure results must be retained as per inspectors requirements as agreed by the DBS).
9. Ensure identity verification is done with due diligence and in full compliance with the DBS Code of Practice, or any other applicable guidance or legislation.
10. Comply with any new or revised DBS guidance of or as otherwise notified by CCPAS or other relevant legislation.
11. Inform applicants that access to information supplied by and relating to them is given to CCPAS and their IT provider as the broker (who at all times have to comply with strict security procedures laid-down by the DBS).
12. Acknowledge that CCPAS can hold no responsibility and will not support Users accessing the service if any issue of liability arises from use of the Customer's or User's equipment.
13. Ensure that User computers have appropriate up to date anti-virus software, anti-malware, and an active firewall.
14. Ensure the utmost security of the e-bulk system and encourage all users to use as secure an email address as they can. (Email addresses which are created for an organisation or church are preferable to online email accounts such as yahoo or hotmail. If this is the only email address you have then please ensure that you use a password that is deemed to be 'strong' rather than a 'weak' password. Strong passwords are those made up of random letters and numbers e.g. 5Kf67gg. Weak passwords are those that contain names or phrases e.g. the name of your son or pet animal. Please do not divulge your email passwords or log in details to anyone else.)
15. Ensure all Users have received appropriate training to use the System.
16. Not use the System in a manner that may harm or impair any other party's use of it.
17. Not use the System in an attempt to gain unauthorised access to any service, network, account or data by any means.