

## Data Retention Schedule Policy for DBS e-Bulk Services

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Approved by: Duncan Horsfall

### 1. Purpose

This document outlines the data retention schedule for Disclosure and Barring Service (DBS) applications processed through e-Bulk services by Aaron's Department Limited, acting as a registered DBS umbrella body. It should also guide client organisations using our e-Bulk platform to create their own policies, ensuring alignment with the DBS Code of Practice, the Data Protection Act 2018 (UK GDPR), and other regulatory requirements.

### 2. Scope

This policy applies to DBS-related records processed through our e-Bulk platform, including:

- DBS application forms
- Certificate information - Identity documentation (where applicable)
- Audit and tracking data
- Correspondence and metadata related to applications

### 3. Retention Schedule

Data Type	Retention Period	Justification	Secure Disposal Method
Copy of DBS Certificate /Electronic result	Max 6 months	DBS Code of Practice (para 53)	Digital deletion; paper shredding; Retention only of minimal metadata: date issued, applicant name, certificate type, purpose/role, unique reference

			number
Application form (Electronic, paper or scanned)	Max 6 months	Audit, error correction, disputes	Digital deletion; paper shredding; Retention only of minimal metadata: date issued, applicant name, certificate type, purpose/role, unique application number, type of documents checked
Right to Work and ID documentation	Up to 2 years, after employment	Home Office Right to Work guidance	As above
Correspondence related to applications	12–24 months	Query resolution, dispute resolution, audit trail.	As above
Metadata / logs (e- Bulk tracking)	Up to 2 years	Audit, misuse prevention	Log rotation or purge
User access logs	12–24 months	Security monitoring	System purge
Summary statistics	Indefinitely	Internal reporting	Not applicable

#### 4. Principles of Retention

Aaron's Department and Client organisations must ensure that data accessed through the e-Bulk system is retained only as long as necessary to fulfil its original purpose. All expired data must be securely and permanently deleted.

#### 5. Responsibilities

Client organisation DPOs: Ensure local retention and deletion practices are aligned. System administrators: Implement appropriate technical controls for data lifecycle. e-Bulk account users: Avoid retaining certificate information beyond the retention period.

#### 6. Exceptions

In exceptional circumstances (e.g. safeguarding cases or legal proceedings), data may be retained longer. Such cases must be documented and reviewed regularly.

## 7. Review

This retention policy will be reviewed annually or in response to any legal or operational changes. Client organisations will be notified of significant amendments.

## 8. Related Documents

Aaron's Department Limited:

- Privacy Policy
- DBS Code of Practice
- ICO Guidelines on Data Retention
- Home Office Right to Work Guidance
- Data Protection Act 2018 (UKGDPR)