

AccessNI Data Protection Policy

Introduction

MCS Personnel Ltd. is a recruitment company based in Belfast and a registered body with AccessNI. This allows us to conduct standard and enhanced AccessNI checks for our clients for temporary roles. This policy outlines our commitment to protecting the privacy and rights of individuals by ensuring the secure handling of all information obtained from AccessNI. This policy is in accordance with the AccessNI Code of Practice and the Data Protection Act 2018.

1. Policy Statement

MCS Personnel Ltd. is committed to protecting the privacy and rights of individuals by ensuring the secure handling of all information obtained from AccessNI. This policy is in accordance with the AccessNI Code of Practice and the Data Protection Act 2018.

2. Scope

This policy applies to all staff, consultants, and third parties who are involved in the AccessNI application process and handle disclosure information on behalf of MCS Personnel Ltd. This policy is also made available to all individuals at the point of requesting them to complete an AccessNI application.

3. Secure Handling, Storage, Retention and Destruction

- **Handling:** All disclosure information is treated as '**sensitive personal data**' and will be handled with the highest level of confidentiality.
- **Storage:** Disclosure certificates and related information will be stored securely, on a password-protected computer system with restricted access.
- **Retention:** We will retain only minimal details for audit purposes — such as the disclosure type, applicant's name, disclosure reference number, date of issue, and the recruitment decision — and no sensitive content from the disclosure itself. Disclosure Certificates, if retained at all, will not be retained for longer than is necessary to make a recruitment decision and will only be retained in soft format.
- **Destruction:** Any disclosure information held electronically will be permanently deleted from all systems and storage devices once the retention period has expired, ensuring it cannot be reconstructed or retrieved.

4. Disclosure of Information

- Disclosure information will only be shared with those who need to see it as part of the recruitment decision-making process.
- It is an offense to disclose information from a disclosure certificate to any person who is not a member, officer, or employee of MCS Personnel Ltd. or our client (where we act as an Umbrella Body), unless a legal exception applies.

- In the case of Umbrella Body clients, we will provide guidance on their obligations under the Data Protection Act 2018 regarding the secure handling and storage of this information.

5. Recruitment of Ex-Offenders

- The company's separate "Policy on the recruitment of ex-offenders" will be used to ensure that any decision made is fair, not discriminatory, and based on the relevance of the disclosed information to the specific role.

6. Malpractice and Auditing

- Any suspected misuse or malpractice related to AccessNI information must be reported immediately to the Compliance Manager.
- MCS Personnel Ltd. will cooperate fully with any audits or inspections conducted by AccessNI to ensure compliance with the Code of Practice.

7. Policy Review

This policy will be reviewed and updated annually, or as required by changes in legislation or the AccessNI Code of Practice.