

ELEVATE BEYOND LIMITED

Appropriate Policy Document

Supporting Every Step Forward

POLICY INFORMATION	
Version	2.0
Date Issued	September 2026
Next Review	September 2027 (and annually thereafter)
Policy Owner	Sulayman Cham — Founder and Director
Statutory basis	Data Protection Act 2018, Schedule 1, Part 4
Company Number	17222138
Registered Address	Swan Building, 20 Swan Street, Manchester, M4 5JW
Website	www.elevate-beyond.co.uk

This document should be read alongside: GDPR and Data Protection Policy, Backup and Data Retention Policy, Safer Recruitment Policy. This document is required by paragraph 39 of Schedule 1 to the Data Protection Act 2018 wherever an organisation processes special category or criminal offence data in reliance on certain Schedule 1 conditions.

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1. Why This Document Exists

Elevate Beyond processes criminal offence data: DBS certificate information, disclosure outcomes, barred list results, prohibition check results, and safeguarding concerns raised about candidates. That is criminal offence data under Article 10 of the UK GDPR and section 10(5) of the Data Protection Act 2018, and it may only be processed where a condition in Schedule 1 to that Act is met.

Most of those conditions require the controller to hold an Appropriate Policy Document. This is that document. It explains the conditions relied upon, how the data protection principles are complied with, and how long the data is kept.

It is retained until at least six months after processing ceases, is reviewed and updated as necessary, and is made available to the Information Commissioner on request.

2. The Data Processed

Data subjects are candidates and applicants. No criminal offence data is processed about school staff or pupils.

Category	Examples
Criminal offence data (Art 10)	Enhanced DBS certificate number, issue date, level and outcome; DBS Update Service check results; children's barred list results; TRA prohibition check results; self-declarations of convictions or cautions; safeguarding allegations and their outcomes
Special category data	Health information disclosed for reasonable adjustments; ethnicity, religion and sexual orientation where volunteered for equality monitoring

3. Conditions Relied Upon

Elevate Beyond relies on the following conditions in Schedule 1 to the Data Protection Act 2018:

Part 2, paragraph 18 — safeguarding of children and of individuals at risk

This is the principal condition. The processing is necessary to protect children from neglect, physical, emotional or sexual harm, or to protect their physical, mental or emotional wellbeing, and is carried out without the consent of the data subject because seeking consent would prejudice that protection.

Part 1, paragraph 1 — employment, social security and social protection

Relied upon for right to work verification and for obligations arising under employment law.

Part 2, paragraph 10 — preventing or detecting unlawful acts

Relied upon where a disclosure or check reveals conduct that may require referral to the Disclosure and Barring Service, the Teaching Regulation Agency or a local authority designated officer.

Equality monitoring data is processed under Part 1, paragraph 8 — equality of opportunity or treatment — and is held separately from selection records.

4. Compliance with the Data Protection Principles

Lawfulness, fairness and transparency

Candidates are told at registration what checks will be carried out, why, and what happens to the results. The Candidate Privacy Notice sets this out and is issued before compliance begins.

Purpose limitation

Criminal offence data is used only to assess suitability to work with children, to satisfy the requirements of Keeping Children Safe in Education and the Conduct Regulations, and to supply client schools with the confirmations they need for their Single Central Record. It is not used for marketing, profiling or any other purpose.

Data minimisation

We record the certificate number, issue date, level, workforce type and the decision made. We do not retain copies, scans or photographs of certificates after the recruitment decision, and we do not record the detail of disclosed offences unless it is material to a safeguarding decision, in which case the reasoning is recorded rather than the raw disclosure.

Accuracy

Check results are recorded from the source document or the DBS Update Service directly, not from a candidate's account of them. Errors are corrected on discovery and the correction dated.

Storage limitation

See section 5.

Integrity and confidentiality

Access is restricted to Sulayman Cham as Designated Safeguarding Lead and, where operationally necessary, to Mohsin Habashi. Data is held only in the systems named in the Backup and Data

Retention Policy, all of which have multi-factor authentication. Criminal offence data is never held on a personal phone, sent by personal messaging service, or stored in a personal cloud account. Devices are encrypted.

Accountability

This document, the retention schedule and the record of processing activities are reviewed annually by the policy owner.

5. Retention and Erasure

Full detail is in the Backup and Data Retention Policy, which this document should be read alongside.

Data	Retained	Then
DBS certificate copies, scans or images	Not retained after the recruitment decision	Destroyed securely
Certificate number, issue date, level, outcome	For the duration of registration and 6 years after the last assignment ends, subject to the Conduct Regulations 2003 reg 29 minimum	Deleted and the deletion recorded
Update Service check results	Duration of registration plus 6 years after last assignment	Deleted
Self-declarations of convictions	As above	Deleted
Safeguarding allegations, investigations and any DBS referral	Long-term retention, having regard to KCSiE guidance on allegations	Reviewed rather than routinely deleted
Equality monitoring data	Anonymous and aggregated; individual responses not retained	n/a

6. Review

This document is reviewed annually by Sulayman Cham, and immediately following any change to the checks carried out, the systems used, or the conditions relied upon.

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