

	<b>Disclosure Policy</b>	<b>IMPL-20</b>	
		<b>Revision:</b>	<b>1.0</b>
		<b>Date:</b>	<b>01/08/2019</b>
		<b>Approved by</b>	<b>GK</b>

## DISCLOSURE OF PERSONAL & DPA CONTROLLED INFORMATION & PREVIOUS CONVICTIONS POLICY

**Campbell & Kennedy Maintenance Ltd** set strict criteria on the use and release of any information relating to any individual within the Campbell & Kennedy organization.

As an outsourced partner we realize, and accept, that the sharing of certain confidential information may well be required, on occasion, as part of a shared responsibility in respect of the delivery of agreed contracts and services. However, notwithstanding this, such information will only be passed over subject to the following conditions: -

Any, and all, requests for confidential (personal) information must be requested through [operations@ckmaintenance.co.uk](mailto:operations@ckmaintenance.co.uk) or via the HR Business Manager. All request recipients will be vetted prior to the dispatch of any information to ensure that they have been approved (by Campbell & Kennedy Maintenance Ltd) to receive such personal information and that the storage of such, when dispatched, complies to both Campbell & Kennedy Maintenance standards (CKM Data Security Policy), Non-disclosure agreements and the Data Protection Act. No information will be sent to any non- approved recipients without the approval of the relevant Department Manager or Campbell & Kennedy Maintenance Company Director.

### **Subject Access Requests**

In keeping with Campbell & Kennedy Maintenance's Data Protection Policy, all subject access must be made in writing only to Managing Director of Campbell & Kennedy Maintenance Ltd.

### **Previous Convictions**

If previous convictions have been noted on any disclosure returned to Campbell & Kennedy Maintenance Ltd then, dependent on the conviction, employment/engagement may be terminated with immediate effect.

#### **Immediate Termination/Employment Rejection**

- Any conviction noted that had not been declared to Campbell & Kennedy Maintenance at time of interview, engagement or on the (signed) pre-disclosure disclaimer form.
- Sexual offenders/on sexual offenders register
- Drug related offences – supply and distribution
- Class A&B possession
- Violence/Assault/GBH/ABH
- Aggravated Theft/Burglary/handling stolen goods
- Serious Fraud/white collar financial crime
- Firearms/weapon offences
- Harassment/stalking offences
- Miscellaneous petty theft offences
- Motoring offences (depending on role)
- Going equipped for stealing
- Blackmail
- Perjury
- Libel
- Obscene publication

The following conviction(s) and types are referred to the Department Manager for consideration.

*Note: Although employment may not be terminated, upon the discretion of the Manager, you may be subject to increased monitoring and management.*

- Admonishment(s)
- Caution(s)
- Civil offences (public order)
- Class C drug offences (possession only)
- Motoring offences (depending on role – License Checks Completed by Managed Services)
- Miscellaneous (non-custodial) criminal convictions

The above criteria also applies for any convictions that arise during employment/engagement with Campbell & Kennedy Maintenance Ltd. Disclosures are re-checked annually.

The response SLA for turnaround information requests is 5 working days (from acknowledged receipt of request to electronic delivery) subject to all receipt criteria being in order.

***Discretion to vary procedure(s) noted in this policy can only be granted by the (Campbell & Kennedy Maintenance) HR Business Manager and authorized delegates.***