



A Scottish Charitable Incorporated Organisation

SECURE HANDLING OF DISCLOSURE INFORMATION

BACKGROUND

The purpose of this policy is to provide guidance and instruction on how to handle disclosures appropriately for those who will have access to them and to provide assurance to Volunteer Scotland Disclosure Services (VSDS) and Strathcare volunteers that their disclosure information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

For the purpose of this policy, PVG Scheme Records, PVG Scheme Record Updates, Standard and Enhanced disclosures will be referred to as disclosures.

This policy is for organisations enrolled with Volunteer Scotland Disclosure Services to access disclosures for the purpose of assessing individual's suitability for paid and/or voluntary work.

In accordance with the Scottish Government Code of Practice, for registered persons and other recipients of disclosure information, we will ensure practice as set out below.

REQUESTING DISCLOSURES

Disclosures will only be requested when necessary and relevant to a particular post and the information provided on a disclosure will only be used for recruitment purposes.

Strathcare will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, Strathcare will seek the person's consent and will take advice from VSDS to ensure it is appropriate to use the disclosure for a purpose other than recruitment. Furthermore, Strathcare will ensure that all sensitive personal information that is collated for the purposes of obtaining a disclosure will be always managed confidentially by those involved in the disclosure process.

SHARING INFORMATION

Disclosure information will only be shared with those authorised to see it in the course of their duties.

STORAGE

Digital Disclosures

It is not appropriate for Strathcare to store disclosures digitally for the following reasons:

- Strathcare does not have a network, shared drive or IT support.
- Signatories use their own devices, which vary (PC, laptop, tablet, mobile phone).
- Apart from a password protected area of the public website there is no shared safe space online.

Therefore no disclosure information will be stored online or on individual devices.

Paper Disclosures

Strathcare will hold paper copies of volunteers' disclosure certificates for the duration of their time with Strathcare.

The Lead Signatory for Strathcare will print one copy of each digital disclosure when received by email, record details of the certificate on a tracking database, and permanently delete the digital copy.

The printed certificate will be stored in a lockable and non-portable storage unit.

Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties.

RECORD KEEPING

It is Strathcare's responsibility to keep accurate information about disclosures it has accessed. The following information will be recorded on its Disclosure Tracking Record:

- Date of issue of disclosure
- Name of subject
- Disclosure type/level
- Unique reference number of disclosure
- Position for which the disclosure was requested (please note this will no longer be detailed on the digital disclosure)
- Whether we received a digital or paper disclosure or if we received the information by telephone
- Where the disclosure is stored

- Recruitment decision taken

Strathcare will not record whether there was any vetting information as the Code of Practice prohibits this.

RETENTION

Strathcare will not retain disclosures for longer than is necessary for the purpose for which the disclosure record was obtained. PVG disclosures will be destroyed securely on receipt of an updated PVG disclosure, and they will not be retained after a scheme member leaves the organisation.

DESTRUCTION / DELETION

Strathcare will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images from digital certificates will also be deleted permanently from the email address where it was received.

Strathcare will ensure that all staff with access to disclosure information are aware of this Policy and have received training and support to help them to comply with both this Policy and the Code of Practice. A copy of this Policy will be made available to any applicant or volunteer who requests it.

ADMINISTRATION

The Chair of Strathcare is responsible for the administration, revision, interpretation, and application of this Policy. The Policy will be reviewed annually and revised as needed.

APPROVED BY TRUSTEES NOVEMBER 2024