



Thurso Players Child Protection Policy Secure Handling of Disclosure Information Policy

Purpose

The purpose of this policy is to provide guidance and instruction on how to appropriately handle disclosures for those who will have access to them and to provide assurance to Volunteer Scotland Disclosure Services and our staff and 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 to enable Thurso Players, enrolled with Volunteer Scotland Disclosure Services, to access disclosures for the purpose of assessing individual's suitability for membership and subsequent involvement with our Junior section.

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

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.

Our organisation will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, we will seek their consent and will take advice from VSDS to ensure it is appropriate to use the disclosure for a purpose other than recruitment. Furthermore, we 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

Disclosure information will be stored in secure conditions as follows:-

- **Digital Certificates**
 - Care will be taken in relation to electronic disclosure information, and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation.
 - Access to digital certificates will be restricted to those who are entitled to see it in the course of their duties.

- Once a decision on membership has been made the Certificate Reference Number and Issue Date will be recorded so that they can be quoted in any future Removal of Interest request, the digital certificate and email will be deleted.
- No photocopy or other image of the disclosure information will be retained.
- **Paper Disclosures**
 - Once a decision on membership has been made the Certificate Reference Number and Issue Date will be recorded so that they can be quoted in any future Removal of Interest request, the paper disclosure certificate will be securely shredded.
 - No photocopy or other image of the disclosure information will be retained.
- **Telephone Results**
 - When receiving disclosure information by telephone, VSDS staff will only convey information detailed in disclosures accessed by our organisation to our enrolled signatories once they have correctly answered the relevant security questions.
 - Failing to provide the correct answers to the required security questions will result in VSDS withholding the required information and may lead to an investigation being carried out to establish why our enrolled signatory was unable to provide the required security information. Once the disclosure information has been shared with us, VSDS will shred the disclosure.
 - VSDS does not keep a record of any information contained on the disclosure. When receiving a telephone result, it is essential that we record the information required for our Disclosure Tracking Record.

Further advice about secure handling can be found in the code of practice.

Record Keeping

It is our organisations responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our 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
- Date and method
- Membership decision taken

We will not record whether there was any vetting information as the code of practice prohibits this.

Retention

We 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 beyond the last day that a scheme member is carrying out regulated work for our organisation.

Removal of Interest

When a scheme member either leaves Thurso Players or does not renew their membership within 30 days of the due date, a Removal of Interest form will be submitted to Disclosure Scotland to ensure that we do not receive update to which we have no Need to Know.

Destruction/Deletion

We 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 both the email address where it was received and from where it is stored.

We 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 member who requests it.

