Secure Handling of Disclosure Information Policy

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. DACYP is registered with the Information Commissioner's Office (ICO).

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 (VSDS) 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 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.

Digital disclosure records will be viewed on the secure DACYP admin laptop computer. The disclosure will be reviewed as soon as possible and as soon as the recruitment decision has been made a record of the decision will be entered into the Disclosure Tracking Record which is now part of the database on the DACYP laptop computer.

No photocopy or other image of the disclosure information will be retained.

Record Keeping

It is our organisation's responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded in our database:

- 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
- Recruitment decision taken
- Date when the PVG will be renewed

The Disclosure Tracking record will be kept on the DACYP laptop computer and cloud storage with multi-factor authentication.

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

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 the email address where it was received.

We will ensure that all staff and management 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, member of staff or volunteer who requests it.