

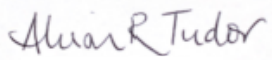


Seagate Secure Handling of Disclosure Information Policy

Version – 1.2

Date of publication – 01.10.2024

Published by Alison Tudor
Church Administrator

Signed  Date 01.10.2024

Approved by Mark Inglis
on behalf of Seagate Elders

Signed  Date 01.10.2024

Approved by Dave Tudor
on behalf of Seagate Trustees

Signed  Date 01.10.2024

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 (VSDS) and our paid 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.

Seagate Church is 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, recipients of disclosure information 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.

We will not request disclosure information for other organisations without first discussing the appropriate process and receiving approval for this from VSDS.

Sharing Information

We will only share disclosure information with those authorised to see it in the course of their duties.

Storage

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

Online Results

A note will be taken of any vetting information which needs to be reviewed. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties. When receiving an online result, it is essential that we record the information required for our Disclosure Tracking Record. No photocopy or other image of the disclosure information will be retained.

Paper Disclosures

Paper documents will be kept in lockable and non-portable storage units. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties. 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.

Emailed Certificates

VSDS ceased emailing disclosures on 10 June 2024.

Care will be taken in relation to emailed disclosure information, and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation.

Access to email disclosures will be restricted to those who are entitled to see it in the course of their duties.

Email disclosures were sent to admin@seagatechurch.org.uk. The disclosure was printed and stored as detailed under the paper disclosures section below. Any downloaded copies and the original email were deleted once the recruitment decision had been made.

No photocopy or other image of the disclosure information was retained.

Record Keeping

It is our organisation's responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our Disclosure Tracking Record with restricted access to the Lead and Additional Signatories:

- Name of Applicant
- Date of Birth
- Level of Disclosure
- Position applied for
- Signatory
- Date Posted/requested online
- Date Processed (application requests only)
- T Reference Number
- Date disclosure issued
- Certificate/Disclosure Number
- PVG Membership Number
- Date Destroyed/Deleted
- Recruitment Decision and date

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.

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 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.

Lost Disclosures

If we lose a physical or emailed copy of a disclosure or any other record of disclosure information, we will notify the scheme member(s) affected, VSDS and the Information Commissioners Office.

Code of Practice

Further instructions and guidance on secure handling of disclosure information can be found in sections 17 to 23 of the Code of Practice and 71 to 100 of the Annex to the Code of Practice.

