

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 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 who 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 freely given before seeking a disclosure. Before using disclosure information for any other purpose, we will seek their consent 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 in a secure online storage provider and shared only with those required to administer PVG checks.

## **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. All electronic certificates are stored with double authentication.

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 and will be stored electronically with double authentication.

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

## **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
- Date PVG should be updated
- Name of Applicant
- Disclosure type/level
- Unique reference number of disclosure
- Position for which the disclosure was requested
- Recruitment decision taken

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

## **Retention**

We will not retain disclosure information (hard copy or electronic) for longer than is necessary for the purpose for which the disclosure record was obtained. PVG disclosures 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 all reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images or communications with disclosure information 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, member of staff or volunteer who requests it.