

SECURE DATA HANDLING POLICY

Safeguarding Guidance Document



Introduction

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 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 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.

Scottish Cycling will ensure that an individual's consent is given before seeking a disclosure. 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.

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. These email certificates will be deleted as soon as the relevant checks have been done and the information stored on our database as detailed in the storage section. 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.

Sharing Information

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

Record Keeping

It is Scottish Cycling's responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our Database:

- Date of issue of disclosure
- Name of subject
- Disclosure type/level
- Club for which the disclosure was requested
- Unique reference number of disclosure

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- Position for which the disclosure was requested (please note this will no longer be detailed on the digital disclosure)
- Recruitment decision taken

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

Retention

Scottish Cycling 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.

Storage

Disclosure information will be stored in secure conditions as follows: information will be stored in the secure Scottish Cycling cloud-based files until the recruitment decision has been made. Only those authorised to see this information in the course of their duties will have access to the information.

Destruction/Deletion

Scottish Cycling 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, member of staff or volunteer who requests it.