

Policy on the Secure Handling, Storage and Retention of Disclosure Information



General Principles

The Scottish Canoe Association (SCA) complies fully with the Code of Practice, issued by Scottish Ministers, regarding the correct handling, holding and destroying Disclosure information provided by Disclosure Scotland under Part V of the Police Act 1997, for the purposes of assessing applicants' suitability for positions of trust. It also complies fully with the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of PVG Disclosure information and has a written policy on these matters. This policy is available to anyone who wishes to see it on request.

Usage

We use PVG Disclosure information only for the purpose for which it has been provided. The information provided by an individual for a position, including voluntary positions, within the (SCA) or its affiliated organisations is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual. We notify the individual of any non-obvious use of the data, including further PVG disclosure to a third party, identifying the Data Controller, the purpose for the processing, and any further relevant information.

Handling

The SCA recognises that, under section 124 of the Police Act 1997, it is a criminal offence to disclose PVG Disclosure information to any unauthorised person. We, therefore, only pass PVG Disclosure information to those who are authorised to see it in the course of their duties.

Where non conviction Disclosure information is provided to the SCA under section 118(5) of the Act by a Chief Constable or Chief Officer of a relevant Police Force and not to the Disclosure Applicant concerned the SCA will not disclose the actual details of the Disclosure information to the Disclosure Applicant but can inform them, if asked that additional information has been provided, should this information affect the recruitment decision, not actual details of the additional information or where it was resourced.

Access, Retention and Disposal

Disclosure information will be stored in a locked non-portable container, until the recruitment decision is made. Only those authorised to see this information in the course of their duties will have access to this container. Disclosure information will be destroyed by shredding. No image or photocopy of the disclosure information may be retained. The SCA will, however, keep a record of the following:

- Date of issue of PVG Disclosure
- Name of subject
- PVG Disclosure type
- Position for which the PVG disclosure was requested
- Unique reference number of PVG disclosure
- Recruitment decision taken

The SCA will ensure that all staff with access to disclosure information are aware of this policy and have received relevant training and support.

Before acting as an Intermediary Organisation [ie a body which processes applications for Enhanced Disclosures on behalf of another organisation], the SCA will take all reasonable steps to ensure that the organisation on whose behalf we are acting can comply with the Code of Practice, published by Scottish Ministers under Section 112(1) of the Police Act 1997 Part V, and in full accordance with this policy.

We will also take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure information in full compliance with the Code of Practice, and in full accordance with this policy. We will also ensure that any organisation or individual at whose request applications for Disclosures are counter signed, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

*Disclosure information means conviction information [spent and unspent convictions] and non conviction information [provided by Chief Constables/Chief Officers of relevant Police Forces] which can be contained in an Enhanced Disclosure Certificate.