



**CAMANACHD
ASSOCIATION**
COMANN NA CAMANACHD

**THE GOVERNING
BODY FOR SHINTY**

SECURE DATA HANDLING POLICY

Safeguarding Guidance Document

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 out staff and volunteers that their disclosure information will be handled, used, stored and destroyed appropriately 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.

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.

The Camanachd Association will ensure that an individual's consent is given before seeing a disclosure. We will ensure that all sensitive personal information that is collated for the purposes of obtaining a disclosure will be 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.

Digital Information & 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. Certificates will be received by email, the tracking information detailed below will be noted and the recruitment decision made. The electronic certificate will then be deleted once the recruitment decision has been made.

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

Storage

Disclosure information will be stored in secure Camanachd Association cloud-based Drive until the recruitment decision has been made. Only those authorised and required to administer the PVG check will have access to the disclosure information.

Keeping Record

It is the Camanachd Association'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
- Position for which the disclosure was requested (please note, this will no longer be detailed on the digital disclosure)
- Recruitment decision taken

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

Retention

Camanachd Association 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

The Camanachd Association will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding or burning. Electronic 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 appropriate training and support to help them comply with both the 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.