



## **BOWLS SCOTLAND SECURE HANDLING OF INFORMATION POLICY**

### **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 that 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 an 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 enforce the following practice within our working arrangements.

### **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.

Bowls Scotland will ensure that an individual's consent is given before seeking a disclosure. Before an applicant can be processed, we will seek consent to discuss any information that may come back on the Disclosure with the relevant people at the club. Furthermore, we will ensure that all sensitive personal information that is collated for the purposes of obtaining a disclosure will always be 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.

### **Telephone Results**

When receiving disclosure information by telephone, Volunteer Scotland (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 Bowls Scotland, 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 Bowls Scotland record the information required for our Disclosure Tracking Record.

## **Sharing Information**

Disclosure information will only be shared with those authorised as part of their duties.

## **Record Keeping**

It is Bowls Scotland'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 and clubs the disclosure will be used at.
- 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.

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

## **Retention**

Bowls Scotland 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 in a password protected document in a secure area of the Bowls Scotland server. Only those authorised to see this information in the course of their duties will have access to the information.

## **Destruction/Deletion**

Bowls Scotland 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.

## **Review**

This Policy and associated procedures will be regularly reviewed:

- In accordance with changes in legislation and guidance on the protection of children or following any changes within Bowls Scotland.
- Following any issues or concerns raised about the protection of children within Bowls Scotland.
- In all other circumstances, at least every three years.

Questions about this policy should be directed to:

**Safeguarding Lead Officer and/or Business Operations Manager, Bowls Scotland**

## Club Guidance

The below guidelines are intended to support Club Committee and Wellbeing Protection Officers (WPOs) in relation to the storing and retention of safeguarding information. All information should be kept securely on a cloud-based drive, on a password protected computer or in lock, non-portable drawers.

Type of Document	Who has access	How long to keep.
Consent to share information forms	WPO	These should be retained for the duration of employment/membership and updated if Bowls Scotland review the forms.
Incident Report Forms	WPO	<p>If the case information is relating to a safeguarding incident, including an abuse or position of trust breach or if it may be required in the event of a child abuse claim then it would need to be held indefinitely (but reviewed regularly) as the Limitation (Childhood Abuse) (Scotland) Act 2017 removed the time limit for raising actions for historic child abuse.</p> <p>Information pertaining to a case that would not be required if an investigation were continued or reopened can be removed. (eg general comms to set up a meeting would not form part of an investigation so can be deleted specific information about witnesses or involved parties should be filed.</p>
Case, communications (documents, files and emails)	WPO	As above. Documents and email trails regarding a case should be saved with the other documents and files to help with case chronology if the content provides evidence that could later be required. Emails should be removed from the folder or inbox once saved if required.
Accident Report Forms	WPO	<p>Accident forms relating to minor injuries should be retained for 3 years.</p> <p>Accident forms and other relevant information relating to a reportable incident should be stored for 6 years.</p>
Signed Codes of Conduct	WPO	These should be retained for the duration of employment/membership and updated if Bowls Scotland review the forms.
Social Media Conducts, Coaches Code of Conduct, etc	WPO	These should be retained for the duration of employment/membership and updated if Bowls Scotland review the forms.
Photography Permission Forms	WPO	These should be retained for the duration of employment/membership and updated if Bowls Scotland review the forms.