



Secure Handling of Disclosure Information: Guidance and Policy

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 Create Paisley 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 Disclosures and Level 2 Disclosures issued from 1 April 2025 onwards and PVG Scheme Records and PVG Short Scheme Records, Standard disclosures and Enhanced disclosures issued prior to 1 April 2025 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 Disclosure Scotland 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.

Create Paisley will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, we will seek their consent and will take advice from VSDS to ensure it is appropriate 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

We will only share disclosure information with those authorised to see it in the course of their duties.

Storage

Disclosure information will be stored in secure conditions as follows:

Online Results

A note will be taken of any vetting information which needs to be reviewed. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties. When receiving an online result, it is essential that we record the information required for our Disclosure Tracking Record.

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

We will implement strict access control measures to protect the sensitive information stored in the digital system, ensuring that only authorised signatories can access it.

We will perform regular backups of the digital system to prevent data loss in case of a hardware failure or other unforeseen event.

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, photograph or other image of the disclosure information will be retained.

Telephone Results

When receiving disclosure information by telephone, 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 us, 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 we record the information required for our Disclosure Tracking Record.

Record Keeping

It is Create Paisley's responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our Disclosure Tracking Record:

- Name of Applicant
- Date of Birth
- Level of Disclosure
- Position applied for
- Signatory
- Date Posted/requested online
- Date Processed (application requests only)
- T Reference Number
- Date disclosure issued
- Certificate/Disclosure Number
- PVG Membership Number
- Date Destroyed/Deleted
- Recruitment Decision and date

Retention

We will not record whether there was any vetting information as the Code of Practice prohibits this. VSDS provides a sample tracking document in the guidance and resources section of their website.

We 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

We 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 email 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.

Lost Disclosures

If we lose a physical or emailed copy of a disclosure or any other record of disclosure information, we will notify the scheme member(s) affected, VSDS and the Information Commissioner's Office.