



WEST LINKS JUNIOR GOLF CLUB

Secure Handling of Disclosure Information Policy

The purpose of this policy is to provide guidance and instruction on how to appropriately handle disclosure information for those who will have access to it, and to provide assurance to everybody involved 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.

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.

Disclosures will only be requested with the full consent of the applicant. The applicant may withdraw consent at any time. If consent is withdrawn the applicant will no longer be permitted to continue in the regulated role the PVG was sought for. 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.

Sharing Information

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

Storage

Disclosure information will be stored in secure conditions as follows:

- West Links Junior Golf Club does not keep disclosure information on an individual's personnel file. The information is held by Scottish Golf.
- Information required for the disclosure application process (passing on to Scottish Golf) is kept securely.
- The disclosure application process is handled by the West Links Junior Golf Club Safeguarding Officer (or deputy) and no others are involved in collecting information.

Digital Certificates

Digital certificates are issued by Scottish Golf directly to the applicant for the PVG. West Links Junior Golf Club is informed through the Safeguarding Officer of the outcome of the disclosure process only. No certificate is shared with the club.

Details of storage of certificates by Scottish Golf can be seen in Appendix 1.

The Safeguarding Officer will retain information relating to: the date of issue of the PVG certificate; the individual's name, date of birth and email address; the disclosure type and the purpose for which it was requested.

Paper Disclosures

West Links Junior Golf Club will retain information relating to: the date of issue of the PVG certificate; the individual's name, date of birth and email address; the disclosure type and the purpose for which it was requested.

Paper documents will be kept in lockable and non-portable storage units. Access to disclosure information will be restricted to the Safeguarding Officer (and deputy).

Scottish Golf storage policies can be seen in Appendix 1.

Record Keeping

It is Scottish Golf's responsibility to keep accurate information about disclosures. See their policy for details in Appendix 1.

Retention

West Links Junior Golf Club will not retain information relating to disclosures for longer than is necessary for the purpose of which the disclosure record was obtained. PVG disclosure information will be destroyed securely on receipt of updates, and they will not be retained beyond the last day that a scheme member is carrying out regulated work for the club. See the Scottish Golf policy in Appendix 1 for details of what they will retain.

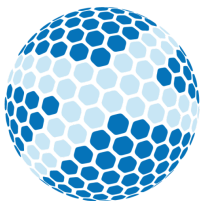
Destruction/Deletion

West Links Junior Golf Club will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning.

The club will ensure that all staff that have 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.

Umbrella Bodies

Scottish Golf is the umbrella body (a body which countersigns applications for Standard or Enhanced Disclosures or makes declarations in relation to PVG disclosure requests on behalf of other organisations) for West Links Junior Golf Club. Their full secure-handling policy is included in Appendix 1.



Scottish
Golf

Appendix 1

SCOTTISH GOLF

Secure Handling of Disclosure Information 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 everybody involved 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.

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.

Disclosures will only be requested with the full consent of the applicant. The applicant may withdraw consent at any time. If consent is withdrawn the applicant will no longer be permitted to continue in the regulated role the PVG was sought for. 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.

Sharing Information

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

Storage

Disclosure information will be stored in secure conditions as follows:

- Scottish Golf does not keep disclosure information on an individual's personnel file.
- Information is kept securely, either in lockable storage containers or electronically with double authentication required.
- Access to storage units and electronically stored information is strictly controlled and is limited to authorised named individuals who are entitled to see such information in the course of their duties.

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. All disclosure information is stored with double authentication.

We will not retain any electronic image of the disclosure information. We will however record the date of issue; the individual's name, date of birth and email address; the disclosure type and the purpose for which it was requested, the unique reference number of the disclosure and details of our decision. The same conditions relating to secure storage and access apply irrespective of the period of retention.

Paper Disclosures

Paper documents will be kept in lockable and non-portable storage units. Access to disclosure information will be restricted to those who are entitled to see it in the course of their duties and will be stored electronically with double authentication.

We will not retain any paper image of the disclosure information. We will however record the date of issue; the individual's name, date of birth and email address; the disclosure type and the purpose for which it was requested, the unique reference number of the disclosure and details

of our decision. The same conditions relating to secure storage and access apply irrespective of the period of retention.

Record Keeping

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

- Date of issue of disclosure
- Date PVG should be updated
- Applicant's date of birth
- Applicant's email address
- Name of applicant
- Disclosure type/level
- Unique reference number of disclosure
- Position for which disclosure was requested
- Recruitment decision taken

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

Retention

We will not retain disclosures for longer than is necessary for the purpose of 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 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 that have 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.

Umbrella Bodies

Before acting as an umbrella body (a body which countersigns applications for Standard or Enhanced Disclosures or makes declarations in relation to PVG disclosure requests on behalf of other organisations) Scottish Golf will take the following steps:

- We will ensure that the organisation on whose behalf we are acting complies with the code and the 1997 and 2007 Acts
- We will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of disclosure information in full accordance with this policy
- We will also ensure that any body or individual for whom applications or requests are countersigned, has such a written policy. If necessary we will provide a model policy for that body or individual to use and adapt for this purpose
- The Data Protection Act 2018 requires that an individual is informed about how personal information will be used. Scottish Golf will only submit applications for a PVG for individuals who have provided written consent. Consent for sharing information is taken at the point the PVG application is made. An individual has the right to withdraw consent at any time.