

# 1d. SECURE STORAGE AND FAIR SHARING NOTICE

Policy Statement on the Handling and Safe Storage of Disclosure Information and Fair Sharing Notice

## 1. General Principles

The Royal Caledonian Curling Club (the RCCC) 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 Disclosure information and has a written policy on these matters. This policy is available on request to anyone who wishes to see it.

## 2. Usage

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

## 3. Handling

The RCCC recognises that, under section 124 of the Police Act 1997, it is a criminal offence to disclose Disclosure information to any unauthorised person. The RCCC, therefore, only pass Disclosure information to those who are authorised to see it in the course of their duties. The RCCC will not disclose information provided under section 115(8) of the Act, namely information which is not included in the Disclosure, to the applicant.

## 4. Access and Storage

The RCCC do not keep Disclosure information on an individual's personnel file. It is kept securely, in lockable, non-portable storage containers. Access to storage units is strictly controlled to authorised and named individuals, who are entitled to see such information in the course of their duties.

## 5. Retention

The RCCC do not keep Disclosures or Disclosure information for any longer than is required after a recruitment (or any other relevant) decision has been taken. In general, this is no longer than six months. This is to allow for the resolution of any disputes or complaints. Disclosure information will only be retained for longer than this period in exceptional circumstances, and in consultation with Disclosure Scotland. The same conditions relating to secure storage and access will apply during any such period.

## 6. Disposal

Once the retention period has elapsed, the RCCC will ensure that Disclosure information is immediately destroyed in a secure manner i.e. by shredding, pulping or burning. The RCCC will not keep Disclosure information which is awaiting destruction in any insecure receptacle (e.g. a waste bin or confidential waste sack). We will not retain any image or photocopy or any other form of the Disclosure information. We will, however, keep a record of the date of issue of the Disclosure, the name of the subject, the Disclosure type, the position for which the Disclosure was requested, the unique reference number of the Disclosure and details of the recruitment decision taken.

## 7. Umbrella Bodies

Before acting as an Umbrella Body (i.e. a body which countersigns applications for Standard or Enhanced Disclosures on behalf of another organisation), the RCCC will take all reasonable steps to ensure that the organisation on whose behalf it is acting can comply with the Code of Practice, and in full accordance with this policy. It 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. It will also ensure that any body or individual at whose request applications for Disclosures are countersigned, 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.



## 8. Fair Processing Notice – child protection, safeguarding and wellbeing

The following information applies to RCCC professionals, volunteer curling coaches and other volunteers conducting 'regulated work' in Scotland, and whom are members of (or applying for membership of) the Protecting Vulnerable Groups (PVG) Scheme.

The Data Protection Act 1998 requires that you are informed about how your personal information will be used. For the purposes of child protection, safeguarding and wellbeing matters in Scotland, if your club receives information of concern, the club may share information about you with the sport's Governing Bodies in Scotland (The RCCC & British Curling) and the appointed RCCC Welfare Officer and where necessary representatives of the partners within the Scottish Curling Child Protection Panel.

This may be related to, but not exclusively restricted to, where it has been alerted to circumstances that might affect your status as a member of the PVG scheme for regulated work with children or protected adults or your suitability to carry out the regulated work role for which you have applied/been appointed or already doing.

In the event such sharing is deemed necessary, it will normally only be carried out between the registered Child Protection Officers in the Club, Governing Body, and those appointed representatives within the Scottish Curling Child Protection Panel.

### Safe Storage Guidance

Detailed below are guidelines for storing, destroying and accessing records and various other forms related to Recruitment and Child Protection.

DOCUMENT	WHERE TO STORE	WHO HAS ACCESS	HOW LONG TO KEEP	HOW TO DISPOSE
Application Form	Secure	Interview panel	6 - 12 months	Shred
References	Secure	Interview panel	Until person leaves	Shred
Incident Reports	Secure	RCCC/other professional agencies depending on follow up.	Varies, depending on situation. Seek guidance from RCCC	Shred
Accident Forms	Secure	RCCC and possibly insurance company/ other investigation authorities	Varies, depending on situation. Seek guidance from RCCC	Shred
Medical Forms	Secure	Team Manager, Head of Delegation, Coach depending on situation	Varies, depending on situation. Seek guidance from RCCC	Shred

Please note that in Child Protection issues, all documentation may be required for a criminal investigation.

Definition of "secure" - kept in a locked place with restricted access.