



# Strathmore Rugby Football Club

## Secure Handling of Disclosure Information Process

### **Purpose**

As part of the Safer Recruitment Process, PVG checks are undertaken for those in Regulated Roles for the purpose of assessing individual's suitability for paid and/or voluntary work.

This policy is to provide guidance and instruction on how to appropriately handle disclosures for those at the club who will have access to them and to provide assurance that disclosure information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

### **Terminology**

For the purpose of this policy, PVG Scheme Records and Updates, and Basic and disclosures will be referred to as *disclosures*.

### **Commitment:**

In accordance with the Scottish Government Code of Practice, for registered persons and other recipients of disclosure information, SRFC 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.

SRFC will ensure that an individual's consent is freely given before seeking a disclosure. We will also 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.

Consent is also taken by Scottish Rugby for sharing information returned on a disclosure, this is taken at the point the application is made. An individual has the right to withdraw consent at any time.

Should consent be withdrawn then the recruitment process will be terminated at that point as the Safer Recruitment process cannot be completed without the consideration of all information including Disclosure information and other relevant safeguarding information. A person cannot be appointed to a *Regulated Role* without the completion of the *Safer Recruitment process*.

If an individual is delivering a *Regulated Role* and withdraws consent to share Disclosure/Safeguarding information, then they will be immediately removed from that role and if relevant, conduct in sport proceedings will be initiated.

### **Processing**

As a member club we are required to make all Disclosure check requests via our Sports Governing Body Scottish Rugby, who carry out the application process with Disclosure Scotland.

Scottish Rugby will receive the Disclosure certificate information and are responsible for making the suitability decision in relation to the disclosure information.

### **Sharing Information**

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

### **Storage**

SRFC process all PVG requests via Scottish Rugby and as part of that process do not receive the PVG disclosure certificate directly. These are received, handled, stored and disposed of by Scottish Rugby and further information on the Scottish Rugby Secure handling of PVG disclosure information can be found on the website <https://scottishrugby.org/clubs-and-schools/safeguarding/>

When SRFC is provided with disclosure information during a suitability decision meeting or a copy of a PVG Disclosure certificate by the individual applicant, the information will be stored in secure conditions as follows:-

### **Personal Records**

SRFC do not keep disclosure information on an individual's personnel file. It 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 electronic certificates are 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 role descriptor for which it was requested, the unique reference number of the disclosure, the Scottish Rugby suitability decision and our appointment decision along with any conditions or restricts placed. The same conditions relating to secure storage and access apply irrespective of the period of retention.

## **Record Keeping**

It is Scottish Rugby'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 the disclosure was requested
- Recruitment decision taken, including any restrictions or conditions placed

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

## **Retention**

We will not retain disclosure information (hard copy or electronic) for longer than is necessary for the purpose for which the disclosure record was obtained. PVG disclosures 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 all reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images or communications with disclosure 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 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.

Simon C Jones



Vice President

10<sup>th</sup> June 2024

Robert Baldie



President

10<sup>th</sup> June 2024