

ZWIĄZEK HARCERSTWA POLSKIEGO
ZARZĄD OKRĘGU w WIELKIEJ BRYTANII
POLISH SCOUTING ASSOCIATION (UK Region) Ltd.

Registered in England and Wales No.: 08352009,
Registered Charity England and Wales: 1155288, Scotland: SC045348
Registered Office: 23-31 Beavor Lane, London W6 9AR



Polish Scouting Association (UK Region) Ltd
Secure Handling of Disclosure Information Policy

Introduction

The Polish Scouting Association (UK Region) Ltd (PSA UK Region) is fully committed to compliance with the requirement of processing all Personal Data (including Special Categories of Personal Data including Disclosure Data) about Data Subjects in accordance with the UK Data Protection Act 2018, which implements the General Data Protection Regulation 2016/679 (GDPR) standards as amended on 31 January 2021. This includes the Privacy and Electronic Communications Regulations (PECR) UK that governs the electronic communication sector in the UK.

PSA UK Region will therefore follow procedures that aim to ensure that all members, employees, or other servants of PSA UK Region who have access to any Disclosure information and personal data held by or on behalf of PSA UK Region, are fully aware of and abide by their duties and responsibilities under the Act and this policy.

Statement of Policy

In order to operate efficiently, PSA UK Region has implemented this policy, to provide guidance and instruction on how to appropriately handle disclosures for those who will have access to them and to provide assurance to Volunteer Scotland Disclosure Services (VSDS) and our members, employees 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 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 individual's suitability for paid and/or voluntary work.

The PSA UK Region regards and adheres this policy in accordance with the Scottish Government Code of Practice, for registered persons or other recipients of disclosure information we will ensure the following practice:

The PSA UK Region regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the PSA UK Region and those with whom it interacts. To this end the PSA UK Region fully endorses and adheres to the Principles of Data Protection as set out in the UK General Data Protection Regulation.



Requesting Disclosures

PSA UK Region will only request disclosures when necessary and relevant to a particular member's position when joining the organisation and the information provided on a disclosure will only be used for recruitment purposes.

PSA UK Region will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, PSA UK Region will seek a member's consent and will take advice from VSDS to ensure it is appropriate to use the disclosure for a purpose other than recruitment. Furthermore, PSA UK Region 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

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

Storage

Disclosure information will be stored in a secure condition as follows:

A. Digital Certificates

Care will be taken in relation to electronic disclosure information. PSA UK Region will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation. PSA UK Region restricts access to digital certifications to those who are entitled to see it in the course of their responsibilities/duties. All electronic data is securely stored and where necessary password access controlled, using cloud storage, email and local devices as appropriate.

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

B. Paper Disclosures

Paper documents are not retained. If one is received it will be kept in a lockable and non-portable storage unit, and immediately securely destroyed after registering all necessary information.

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

Telephone Results

When receiving disclosure information by telephone, VSDS staff will only convey information detailed in disclosures accessed by PSA UK Region 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 PSA UK Region, 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 PSA UK Region record the information required for our Disclosure Tracking Record.



Record Keeping

PSA UK Region has the 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
- Name of subject
- Disclosure type/level
- Unique reference number of disclosure
- Position for which the disclosure was requested (please note this will no longer be detailed on the digital disclosure)
- Whether we received a digital or paper disclosure or if we received the information by telephone
- Where the disclosure is stored
- Recruitment decision taken

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

Retention

PSA UK Region 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

PSA UK Region will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, ie. shredding. 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 members 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.

Additional Information

If you require further information pertaining our Data Protection policy and our processes, we can be reached at the following email address: dataprotection@zhpwb.org.uk .

If you require further information regarding our Safeguarding procedures, please contact us at the following email address: safeguarding@zhpwb.org.uk .

Policy adopted by the Trustees of the PSA UK Region on 3rd December 2022

