



centre for psychotherapy and counselling

POLICY ON THE SECURE HANDLING, USE, STORAGE AND RETENTION OF DISCLOSURE INFORMATION

INTRODUCTION

Wellspring will request Disclosure information as part of its selection procedure for certain posts within the organisation. We understand that the information received from Disclosure Scotland may be of an extremely sensitive nature and that we have a responsibility to ensure that it is only available to authorised persons, is stored securely and is disposed of in an appropriate manner.

Wellspring 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 to anyone who wishes to see it on request.

USAGE

We use Disclosure information only for the purpose for which it has been provided. The information provided for an individual for a position within Wellspring is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual. We 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.

HANDLING

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

ACCESS AND STORAGE

We do not keep Disclosure information in 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.

RETENTION

We do not keep Disclosures or Disclosure information for any longer than 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.

DISPOSAL

Once the retention period has elapsed, we will ensure that Disclosure information is immediately destroyed in a secure manner. Wellspring will not keep Disclosure information which is awaiting destruction in any insecure receptacle (eg a waste bin or confidential waste sack). We will not retain any image or photocopy of 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 type of Disclosure
- the position for which the Disclosure was requested
- the unique reference number of the Disclosure
- details of the recruitment decision taken.