



ASSOCIATED CLAN MACLEOD SOCIETIES

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

1. General Principles

1.1. The Associated Clan Macleod Societies (ACMS) occasionally works with children. ACMS has a duty of care to the children it works with and must ensure their safety. After thorough risk assessment of all our work ACMS has determined that:

- All positions with ACMS working with children are positions of trust.
- Applicants, staff and volunteers working with children must be suitable for positions of trust.
- Enhanced Disclosure is both proportionate and relevant to all positions with ACMS working with children.

1.2. ACMS uses the Central Registered Body in Scotland (CRBS) Disclosure Scheme to assess volunteer applicants' suitability for all posts working with children. We comply fully with the CRBS Code of Practice and treat all applicants fairly. We have a written policy on the recruitment of ex-offenders.

1.3. We comply fully with the CRBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. We also comply fully with our obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This is the written policy on these matters.

1.4. The information provided on a disclosure certificate will only be used for recruitment purposes. We will ensure that an individual's consent is given before seeking a disclosure and will seek their consent before using disclosure information for any purpose other than recruitment.

1.5. In accordance with section 124 of the Police Act 1997 Disclosure information will only be shared with those authorized to see it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it. We will ensure that all staff with access to disclosure information are aware of this policy and have received recent relevant training and support.

1.6. Where additional disclosure information is provided to ACMS and not to the disclosure applicant, we undertake not to disclose this information to the applicant but to inform them, if asked and should this information affect the recruitment decision, that additional information has been provided, but not the actual details of the additional information nor where it was sourced.

1.7. ACMS undertakes to make a copy of this policy available to any applicant for a post within ACMS that requires a disclosure.

2. Storage & Access. Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

3. Retention. Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six



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months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months, we will consult the CRBS about this and will give full consideration to the Data Protection and Human Rights issues before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

4. Disposal. Once the retention period has elapsed, we will ensure that any Disclosure information is immediately suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the following:

- Date of issue of a Disclosure,
- The name of the subject
- The type of Disclosure requested
- The position for which the Disclosure was requested
- The unique reference number of the Disclosure
- The details of the recruitment decision taken.

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