



CLUB POLICY: CLUB SECURE DATA HANDLING

Introduction

The purpose of this policy is to provide guidance and instruction on how to appropriately handle personal data associated with the recruitment of volunteers/paid staff in line with the Club's Safer Recruitment Policy. This will provide assurance to members that their personal information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

Usage and Handling of Personal information

Personal information associated with the Safer Recruitment Process will only be requested when necessary and relevant to a particular role. Information provided will solely be used for recruitment purposes. We will ensure that all sensitive personal information that is collated for the purposes of recruitment will be managed confidentially by those involved.

Access and Storage

Care will be taken in relation to personal information, and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation. We recognise that it is a criminal offence to disclose personal information to any unauthorised person. Personal information is only shared with those authorised to see it in the course of their duties.

Personal information will be deleted as soon as the relevant checks and appropriate suitability has been assessed. The information is stored securely as detailed in the Recording of Information section. No photocopy or other image of the personal information will be retained.

Sharing Information

Personal information will only be shared by the club, with those authorised to see as part of the Club's safer recruitment process.

Disclosure information will be used by Scottish Swimming to assess suitability for regulated role being applied for. Please refer to Scottish Swimming's Secure Data Handling Policy. Scottish Swimming will only share the outcome of the suitability decision with the Club but will not share specific information detailed in the disclosure certificate.

Recording of Information

The Club is responsible for keeping accurate information relating to the safer recruitment process. The following information will be collected and recorded securely:

- Self-Declaration forms
- Reference forms
- Personal information for a PVG application
 - Full name
 - Address
 - Date of Birth
 - Role within Club

- Email Address
- ID verification
- Recruitment decision taken

Personal information will be stored in secure conditions as follows: information will be stored in the secure Club cloud-based files until the recruitment decision has been made. Only those authorised to see this information in the course of their duties will have access to the information.

Retention

The Club will not retain personal information relating to the safer recruitment process for longer than is necessary for the purpose for which the information was obtained. Self-declarations, references and copies of ID will be destroyed securely on confirmation of recruitment process outcome.

Destruction/Deletion

The Club will take reasonable steps to ensure that personal recruitment information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images from ID checks 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 volunteers with access to the personal 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 anyone who requests it.