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

Part V of the Police Act 1997 and the Protection of Vulnerable Groups (PVG) Scheme are aimed at helping employers and other organisations assess the suitability of applicants for particular posts and to make safer recruitment decisions in relation to regulated work by providing proportionate access to criminal record information. The PVG Scheme provides for the issue of criminal conviction and relevant vetting information and this information is provided by Disclosure Scotland.

The 1997 Act also provides for a Code of Practice to be published by Ministers governing the use of all information issued in respect of Disclosure checks. The Code requires all recipients of such Disclosure information to comply with the Code and to handle store and dispose of that information appropriately. Registered Bodies are required to have a written policy on the handling, holding storage and retention of Disclosure and PVG information, and to ensure that any body or individual, at whose request applications for Disclosure checks are countersigned, has such a written policy. The following is the policy of the General Synod.

**General Principles**

The General Synod of the Scottish Episcopal Church complies fully with the Code of Practice, issued by Scottish Ministers, regarding the correct handling, holding storage, destruction and retention of disclosure information provided by Disclosure Scotland for the purposes of assessing applicants’ suitability for regulated work. 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 adopted this written policy on these matters. This policy is available to anyone who wishes to see it on request.

**Usage**

The General Synod of the Scottish Episcopal Church uses disclosure information only for the purpose for which it has been provided.

**Handling**

The General Synod of the Scottish Episcopal Church recognises that it is a criminal offence to disclose disclosure information to any unauthorised person. The Church will, therefore, only pass disclosure information to those who are authorised to see it in the course of their duties. The Church will not disclose information provided under section 113B(5) of the Act, namely information which is not included in the disclosure certificate, to the applicant.

**Access and Storage**

The General Synod of the Scottish Episcopal Church does not keep disclosure information on 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**

To comply with the 1998 Act, the General Synod of the Scottish Episcopal Church does not keep disclosure information for longer than necessary after a recruitment (or any other relevant) decision has been taken. In general, for the 1997 Act, this is no longer than six months from the date the relevant decision has been taken, allowing for the resolution of any disputes or complaints. For the 2007 Act, this will be the date an individual ceases to do regulated work for this organisation. The Church will not retain any paper or electronic image of the disclosure information. The Church will, however, record the date of issue, the individual’s name, the disclosure type and the purpose for which it was requested, the unique reference number of the disclosure and details of its decision. The same conditions relating to secure storage and access apply irrespective of the period of retention.

**Disposal**

The General Synod of the Scottish Episcopal Church will ensure that disclosure information is destroyed in a secure manner i.e. by shredding, pulping or burning. The Church will ensure that disclosure information which is awaiting destruction will not be kept in any insecure receptacle (e.g. a waste bin or unlocked desk/cabinet).