

Disclosure, Secure Handling, Storage & Recruitment Policy

(Including Disclosure Information, Recruitment of Ex-Offenders, Child Protection, and Protected Adults)

1. Policy Statement

Emma's Explorers Out of School Service is committed to safeguarding the welfare of children and vulnerable groups in our care. We are also committed to the fair and lawful handling of disclosure information in accordance with:

- **Disclosure Scotland Code of Practice**
- **Data Protection Act 2018 and UK GDPR** (ICO requirements)
- **Care Inspectorate's Safe Recruitment Through Better Recruitment guidance**
- **Protection of Vulnerable Groups (Scotland) Act 2007**

This policy outlines our procedures for the secure storage, handling, use, retention, and disposal of disclosure information, the recruitment of ex-offenders, and the safeguarding of children and protected adults.

2. Secure Storage, Handling, Use, Retention & Disposal of Disclosure Information

We comply fully with the Disclosure Scotland Code of Practice and ICO data protection principles when handling disclosure information.

Storage

- All disclosure information (digital or physical) is stored securely.
- Physical documents are kept in a locked, non-portable cabinet within a secure area.
- Electronic records are encrypted and stored on password-protected systems with restricted access.

Handling

- Access to disclosure information is strictly limited to individuals authorised in line with their specific duties (e.g. Lead Signatory, recruitment officer).
- Disclosure information will never be shared with unauthorised persons.

Use

- Disclosure information is only used for the specific purpose for which it was requested.
- It will not be used unfairly or retained beyond the stated purpose.

Retention

Emma's Explorers
Date – 05/2025
Review Date – 05/2026

- Disclosure information is kept for no longer than is necessary (typically not exceeding 90 days) after a recruitment decision.
- Any exceptions will be justified and documented in accordance with data protection law.

Disposal

- Physical records are destroyed by cross-cut shredding.
- Digital records are securely deleted using data-erasure software.
- Only a record of the disclosure check date, level, reference number, and decision outcome (e.g. “suitable for employment”) will be retained in staff files.

3. Recruitment of Ex-Offenders

We comply with legislation on the fair treatment of individuals with criminal records.

- Having a criminal record does not automatically prevent someone from working with us.
- All applicants are informed in advance when a role requires a disclosure or PVG check.
- We only ask for disclosure information where it is both proportionate and relevant to the role.
- Disclosures will be assessed fairly and confidentially, with the opportunity for the applicant to provide context.
- All information will be handled in line with our equal opportunities and non-discrimination policies.

4. Child Protection Policy

We are committed to the protection of children in line with the National Guidance for Child Protection in Scotland (2021).

- All staff and volunteers engaged in regulated work with children must join the **PVG Scheme (Children)**.
- Roles and responsibilities are clearly defined and risk assessed.
- Staff receive safeguarding and child protection training at induction and at regular intervals thereafter.
- All concerns, disclosures, or allegations are acted on immediately and reported to the designated Child Protection Lead.
- Procedures align with the **GIRFEC (Getting It Right for Every Child)** framework and local authority reporting requirements.

5. Protected Adults Policy

Though our primary service is childcare, we also recognise the need to safeguard any **protected adults** encountered in a care or community setting.

- Staff undertaking regulated work with protected adults must be PVG Scheme members (Adults or Both, as applicable).
- We conduct role-based risk assessments to determine the level of contact.
- Appropriate adult safeguarding procedures are in place to respond to concerns, with designated leads trained in adult protection.


6. Training and Awareness

- All staff are made aware of this policy and receive data protection and safeguarding training relevant to their role.
- The Lead Signatory receives specific training on handling disclosure information and responsibilities under the Disclosure Scotland Code of Practice.

7. Review and Responsibility

- This policy is reviewed annually, or sooner if legislation or best practice changes.
- The **Lead Signatory** is responsible for policy enforcement and ensuring compliance with Disclosure Scotland, ICO, and Care Inspectorate requirements.

Signed:


Mrs Emma Taylor
Provider & Service Manager
05/2025