



## HIGHLANDS ASTRONOMICAL SOCIETY

### Policy on Secure Storage, Handling, Use, Retention and Disposal of Disclosure Information

#### 1. Introduction

As an organisation using the Disclosure Scotland PVG Scheme and/or basic disclosures to assess applicants' suitability for roles involving vulnerable groups, Highlands Astronomical Society (HAS) complies fully with the relevant legislation, including the Protection of Vulnerable Groups (Scotland) Act 2007, the Police Act 1997, the Data Protection Act 2018, and the UK GDPR. This policy outlines how disclosure information will be handled, stored, retained, and disposed of securely and responsibly.

#### 2. General Principles

HAS undertakes to treat all disclosure information with the utmost confidentiality and in line with the rights of the individual. Disclosure information will only be used for the specific purpose for which it was requested and disclosed.

#### 3. Secure Storage

Disclosure information will be stored securely in a password-protected digital file (or locked cabinet), accessible only to the designated Lead Signatory and those authorised to see it in the course of their duties.

#### 4. Handling

In accordance with Disclosure Scotland guidance and data protection principles:

- Access to disclosure information is strictly controlled and limited.
- It will only be shared with those entitled to see it as part of recruitment or safeguarding processes.
- Staff and volunteers handling such information will be made aware of this policy and their responsibilities.

#### 5. Usage

Disclosure information will only be used for the specific purpose for which it was requested and provided. It will not be used or disclosed in a manner incompatible with this purpose.

#### 6. Retention

Disclosure information will not be kept for longer than necessary. This is generally no longer than 12 months after the decision, unless a dispute is raised or consent is given for a longer



period. Any retention beyond this period will be clearly justified and documented.

## 7. Disposal

Disclosure information will be disposed of securely by:

- Shredding physical copies; and/or
- Permanently deleting digital files in a secure manner.

We will ensure no copies or representations of the disclosure are retained once the retention period has ended.

## 8. Acting Fairly and Transparently

HAS is committed to ensuring that all individuals are treated fairly. We will:

- Make this policy available to applicants at the point of disclosure.
- Discuss any matters revealed in disclosure certificates with applicants.

## 9. Review

This policy will be reviewed every 2 years or sooner if there are changes to legislation or guidance from Disclosure Scotland.

**Date of Approval:** 14/07/2025

**Next Review Date:** July 2027

**Signed:** Lisa Pattenden, Chairperson