



# **Sewing2gether All Nations: Caring, Creating, Connecting Safeguarding Policy 2023**

**Keeping children, young people and vulnerable adults safe**

# About Sewing2gether All Nations

## **Address:**

60 Greenock Road  
Paisley  
Renfrewshire  
PA3 2LE

**Email:** [sewing2getherallnations@gmail.com](mailto:sewing2getherallnations@gmail.com)

**Web address:** [www.sewing2getherallnations.co.uk](http://www.sewing2getherallnations.co.uk)

Charity registered in Scotland SC052445

Public Liability Insurance with Ansvar Insurance

## **Sewing2gether All Nations exists:**

(a) To promote the welfare and relieve the needs, particularly, but not exclusively of those who have become displaced persons, trafficked, refugees or asylum seekers, currently residing in Scotland; through promoting both social and skills-based opportunities including creative skills workshops to such persons that are in need of emotional and practical support.

(b) To promote equality and diversity, reduce isolation, promote friendships and support structures through empowering said persons by promoting shared experiences and activities celebrating diversity within a multicultural Scotland which will enable them to access and participate in all aspects of civil society.

(c) To advance environmental protection by reducing landfill waste and preserving resources by reusing disposed-off textiles and other such landfill waste by accepting donations at our hub in Renfrewshire, and transforming said textile waste within creative skills workshops, and passing on recycled items to said persons.

## **We provide:**

Sewing and Creative Workshops  
Drop-in Cafe for the Refugee Community  
Advocacy and Signposting  
Travel Empowerment Programme  
Life Skills Coaching

Sewing2gether All Nations does not currently provide services or activities exclusively for children and / or young people, however the children of participants are often present with family members at our activities or contribute to the conversation as part of our advocacy and support services.

More information about these services can be found on our website:

**[www.sewing2getherallnations.co.uk](http://www.sewing2getherallnations.co.uk)**

This policy is based on the 10 Safe and Secure safeguarding standards published by the Churches' Child Protection Service (CCPAS) and guidelines produced by thirtyone:eight and Welcome Churches.

## Safeguarding considerations

Refugees and asylum seekers have the same fundamental rights to safety and protection as any other person and the fact that their citizenship status may not have been resolved does not alter this. All organisations working with refugees and asylum seekers need to be alert to their safeguarding responsibilities in undertaking this work.

Although safeguarding principles remain the same for all vulnerable groups, the way that these principles are applied to refugees and asylum seekers may be different, depending on the particular context of the individual or family concerned.

From a safeguarding point of view, refugees and asylum seekers are not necessarily vulnerable and their autonomy should be respected. They are, after all they have gone through, survivors, and shouldn't be treated as victims. However, refugees and asylum seekers may face certain risks associated with their particular experiences and circumstances. For safeguarding to be effective at the local level there needs to be good communication and sharing of expertise and specialist knowledge between staff and volunteers and local sources of advice and support for those working with these groups.

Some of the particular issues when working with refugees and asylum seekers include:

- **Experience of trauma**

Some refugees and asylum seekers have experienced extreme trauma prior to their arrival in the UK, either in their country of origin (linked to their reasons for leaving their home country) or during what is often a frightening and dangerous journey. Organisations should be prepared to work with people who are likely to suffer from Post-Traumatic Stress Disorder. Training should be sought if this is an area for which they feel ill-equipped.

- **Classified as vulnerable**

Refugees coming through a government resettlement programme are likely to have been highlighted as extra 'vulnerable' in order to come to the UK. Priority is given to those who cannot be supported effectively in their region of origin: women and children at risk, people in severe need of medical care and survivors of torture and violence amongst others. It is important to note that even though refugees may have been classified as vulnerable for the purposes of refugee resettlement this does not necessarily mean that they are vulnerable in a safeguarding sense.

- **Unaccompanied children**

Asylum-seeking children who are unaccompanied are in a highly vulnerable situation and there is specific guidance from the government about how they may be protected. Unaccompanied asylum-seeking children become the responsibility of children's social care on arrival in the UK. Once they turn 18, if they have not yet been granted asylum, they will be transferred to the general National Asylum Support Service (NASS). This transition can create significant stress on the young person.

- **Disputes over age**

Sometimes there may be a dispute about a young person's age (i.e. whether they are under 18 and therefore legally a child or not) and there are rules about how a young person's age may be determined in the absence of documentation. Young people in this situation may be placed in unsuitable accommodation (i.e. with other adults they are not related to) and may need help to access legal advice.

- **Mental health**

Asylum seekers can feel stressed and under pressure whilst awaiting on the outcome of their asylum case. This can impact their mental health and the decisions they make day-to-day, adding to their vulnerability. If an asylum case is particularly complicated, individuals can sometimes face destitution if they have no further recourse to public funds.

- **Unaware of expectations**

Newly-arrived refugees and asylum seekers may not be aware of the standards expected of parents in the UK. Examples of this can include leaving children alone at a young age and not using car seats when travelling.

- **Cultural practice**

Refugees may bring beliefs, cultural and religious practices with them from their country of origin that contribute towards abuse. This can include disciplinary practices towards children which may be relatively common in their country of origin, such as physical discipline, that are illegal in the UK. Additionally, there may be deeply held views about family relationships and gender roles which may make abuse more difficult to identify.

- **Unsuitable accommodation**

Situational risks faced by refugees and asylum seekers include being placed in unsuitable accommodation with unrelated individuals from different cultural backgrounds to their own. Women can also be at risk from being seen by single men within their language community as potential partners. Unreported domestic abuse may also be an issue among adults, who may not be aware that the situation they are in (or have been in) would be classed as a form of abuse in the UK.

- **Human trafficking**

The global movement of people in an unstable and highly unequal global environment brings further risks for refugees and asylum seekers. These include people trafficking, modern slavery, forced marriage and radicalisation. Refugees and asylum seekers may also be at a higher risk of female genital mutilation, and other harmful cultural practices.

- **Financial abuse**

For adults, financial abuse can be an issue, particularly if they experience language barriers. For example, when people have English as a second language, it can be difficult for them to distinguish between important letters that come through the post, and junk mail. Refugees can also be more vulnerable to financial abuse if they disclose financial information to volunteers.

## Declaration

- Any work done with refugees and asylum seekers by Sewing2gether All Nations sessional workers and volunteers are subject to the organisations safeguarding policy.
- All safeguarding concerns should be referred to the Safeguarding Coordinator who will respond to them in line with the Safeguarding Policy.
- All sessional workers and volunteers should be familiar with the Safeguarding Policy and should receive Safeguarding Training that takes account of the particular vulnerabilities and risks associated with working with refugees and asylum seekers.
- Recruitment of workers and volunteers to work with refugees and asylum seekers should be undertaken in accordance with safer recruitment principles subject, where appropriate, to satisfactory PVG Membership.

### Refugees and Asylum Seekers Volunteering

We encourage refugees and asylum seekers to volunteer within our projects.

- We acknowledge asylum seekers may have difficulty obtaining PVG Membership.
- Asylum seekers generally are not allowed to undertake paid work in the UK.
- Asylum seekers are allowed to volunteer, but they should not carry out work that replaces a work position.

We undertake to endorse and follow all national and local safeguarding legislation and procedures, provide on-going safeguarding training for all its workers, and will regularly review the operational guidelines, ensure that the premises meet the requirements of the Disability Discrimination Acts 1995 & 2005 and all other relevant legislation, and that it is welcoming and inclusive, support the assigned Safeguarding Co-ordinator in their work, and in any action they may need to take in order to protect children and vulnerable adults.

We recognise the need to provide a safe and caring environment for children, young people and vulnerable adults. We acknowledge that children, young people and vulnerable adults can be the victims of physical, sexual and emotional abuse, and neglect. We have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”.

We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.”

# Definitions

## Definition of a refugee?

The UN Convention Relating to the Status of Refugees definition:

“Any person who owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.”

By definition, refugees are likely to have suffered torture, or cruel, inhuman or degrading treatment or punishment. Refugees and asylum seekers may have reported such areas of abuse on their asylum claim.

### Refugee:

In the UK, the term ‘refugee’ is used in a slightly different way to the UNHCR definition. In the UK, the term ‘refugee’ is used to describe a person who has had their claim for asylum approved by the UK Home Office. They are permitted to live and work in the UK, subject to the length of visa they have been given.

### Asylum Seeker:

In the UK, an asylum seeker is someone who has claimed asylum upon arrival in the UK, and is still awaiting approval (or rejection) of their asylum claim by the UK Home Office. They are usually supported through the National Asylum Support Service (NASS) and are not generally allowed to work or claim benefits in the UK.

## Definition of vulnerable adult / adult in need of protection

In Scotland, the Adult Support and Protection (Scotland) Act 2007 defines an adult at risk as someone who is over the age of 16:

- unable to safeguard their own well-being, property, rights or other interests,
- at risk of harm,
- and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

## Definition of a child

The legal definition of a child is someone under the age of 18. The Children (Scotland) Act 1995 similarly defines a child as someone under 18.

Throughout this policy when we refer to a child our meaning (unless otherwise stated) is a person under the age of 16.

Social Services Departments (SSD)/Police will determine the legislation which applies in any situation referred to them; either the Adult Support and Protection (Scotland) Act 2007 or the Child (Scotland) Act 1995.

## Categories of Abuse

- **Physical abuse:**

this includes assault, hitting, smacking, pushing, force feeding, biting, inappropriate restraint, poor manual handling, deprivation of liberty, misuse of medication;

- **Emotional / Psychological abuse:**

this includes verbal abuse, threats to harm or abandonment, rejection, humiliation, intimidation, coercion, mental cruelty, isolation, denial of human rights, denial of appropriate services and support, cyber bullying;

- **Sexual abuse:**

this includes inappropriate touching, rape, sexual assault, sexual activities where there is no consent, subjection to pornography, sexual abuse through social media (sexting, inappropriate images), sexual harassment, sexual teasing;

- **Sexual exploitation:**

this includes exploitative situations, contexts and relationships where the adult receives affection, inclusion or some sort of reward (often food, drugs, alcohol, gifts or money) as a result of performing sexual activities

- **Financial or material abuse:**

this includes theft, fraud, telephone and internet scamming, misuse of other's benefits, coercion in relation to financial affairs, property, wills or possessions;

- **Neglect and acts of omission:**

this includes ignoring medical, emotional or physical care needs, failure to provide access to health service, lack of physical or emotional care, lack of personal care, access to hygiene, withdrawal of food, heating or medication;

- **Self-neglect:**

this includes neglect of personal hygiene, nutrition, hydration, medicine, squalor and hoarding and ignoring health needs thus endangering safety and well-being;

- **Organisational abuse:**

this includes neglect and poor care practice in an organisation, policies and procedures that deny human rights e.g. lack of privacy, dignity, hygiene facilities, misuse of medication, denial of medical care.

- **Domestic abuse:**

this was defined by the Home Office in 2013 as 'an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been an intimate partner or family member - regardless of gender or sexuality'. This includes so called 'honour-based violence', forced marriage;

- **Female Genital Mutilation**

(FGM) is a form of domestic abuse and whilst there is a mandatory requirement to report any girl at risk of, or who has had, FGM as a child protection referral- there is no requirement for an automatic referral of an adult – however, this may be an indicator that children in the family may be at risk of possible FGM;

- **Modern slavery:**

this includes slavery, trafficking, forced and compulsory labour and domestic servitude. There is a national framework to assist in the identification of victims and referral to services known as the National Referral Mechanism (NRM).

- **Discriminatory abuse:**

this occurs when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. It can feature in an abuse of an adult at risk where the abuse is motivated by the perpetrator's prejudice towards that adult's gender, ethnicity, disability, gender identity, age, sexuality, religion, culture, class etc.

- **Forced marriage:**

this is a term used to describe a marriage in which one or both of the parties is married without their consent or against their will.

A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party in identifying a spouse. In a situation where there is concern that an adult at risk is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the Safeguarding Adults process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as urgent action may need to be taken.

- **Hate crime:**

This is a form of discriminatory abuse although it often also includes other abuse such as physical or psychological. It is a criminal offence committed against a person or their property that is motivated by hostility to their protected characteristics (listed above). Hate crime includes lack of respect, exclusion from services, swearing and name-calling, treating someone less favourably due to their ethnicity or other characteristics

- **Mate crime:**

There is an increasing awareness that adults at risk may be targeted by people who they consider to be friends. This may be a particular issue if someone is disabled and has difficulty in understanding the nature of the relationship or recognising abuse, or if there are cultural differences and misunderstandings. Adults at risk may be targeted by people who befriend them in order to abuse them financially or in other ways.



# Recognising and Responding to Abuse

The following signs may or may not be indicators that abuse has taken place, particularly within children, but the possibility should be considered.

## PHYSICAL SIGNS OF ABUSE

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls, rough games, etc
- Injuries which have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, etc
- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures etc which do not have an explanation which would normally be seen as consistent with being caused by an accident by a member of the public
- Cuts/scratches/substance abuse

## INDICATORS OF POSSIBLE SEXUAL ABUSE

- Any allegations made by a child concerning sexual abuse
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
  - Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders – anorexia, bulimia

## EMOTIONAL SIGNS OF ABUSE

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/aggression, extreme anxiety.
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying

It is often difficult to recognise abuse and/or exploitation. Staff and / or volunteers should be alert to changes in a client's disposition or demeanour. Staff and / or volunteers may see abuse occur, or may also overhear indications of abuse or exploitation, or be informed directly.

## **Actions and Reporting on Abuse or Exploitation – Children**

### **Respond: Record: Refer:**

If a child or young person appears to have a suspicious physical injury or symptom of neglect, assigned Safeguarding Co-ordinator will contact Social Services for advice in cases of deliberate injury, or where concerned about the child/ young person at risk safety. In cases involving children, the parents should not be informed by the organisation in these circumstances.

Where emergency medical attention is necessary it will be sought immediately. The assigned Safeguarding Co-ordinator will inform the doctor of any suspicions of abuse.

In circumstances other than medical emergencies, speak with the parent/carer and suggest that medical help/attention is sought for the child/adult at risk. The doctor (or health visitor) will then initiate further action, if necessary.

If appropriate the parent/carer will be encouraged to seek help from the Social Services Department.

Where the parent/carer is unwilling to seek help, if appropriate, the assigned Safeguarding Co-ordinator will offer to go with them. If they still fail to act, the assigned Safeguarding Co-ordinator should, in cases of real concern, contact Social Services for advice.

A secure record of all concerns and actions taken should be made.

In the event of allegations or suspicions of sexual abuse, the assigned Safeguarding Co-ordinator will:

Contact the Social Services duty social worker or Police or Child/Adult Protection Team directly. The Safeguarding Officer will NOT speak to the parent (or anyone else).

Under no circumstances will the assigned Safeguarding Co-ordinator attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the assigned Safeguarding Co-ordinator is to collect and clarify the precise details of the allegation or suspicion and to provide this information to the Social Work Department, whose task it is to investigate the matter under Section 47 of the Children (Scotland) Act 1995 and relevant Adult Protection legislation.

Whilst allegations or suspicions of sexual abuse will normally be reported to the assigned Safeguarding Co-ordinator, their absence should not delay referral to the Social Work Department.

Exceptionally, should there be any disagreement between the person in receipt of the allegation or suspicion and the assigned Safeguarding Co-ordinator as to the appropriateness of a referral to the Social Work Department, that person retains a responsibility as a member of the public to report serious matters to the Social Work Department, and should do so without hesitation.

The Chair of the Board of Trustees will support the assigned Safeguarding Co-ordinator in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.

## **Actions and Reporting on Abuse or Exploitation – Vulnerable Adults**

### **Respond:**

When a service user of Sewing2gether All Nations discloses abuse it is important that the person disclosing the information is treated sympathetically.

The staff member / volunteer will need to outline the steps that they will take with or on behalf of the participant and inform them that they will need to share this information with their line manager / supervisor or another agency to get the most appropriate support.

The staff member / volunteer must not investigate or ask leading questions. The decision must come from the service user to tell, explain and describe what has happened.

### **Record:**

A record of the conversation should be made in agreement with the participant.

### **Refer:**

Discuss with your line manager / supervisor, and decide on which external referral route is most appropriate e.g. social services, MARAC (*A Multi-Agency Risk Assessment Conference is a local meeting where representatives from statutory and non-statutory agencies meet to discuss individuals at high risk of serious harm or murder as a result of domestic abuse*) or the police, or emergency services.

Many service users of Sewing2gether All Nations will have experienced abuse in the past, and this often will have happened in their country of origin, and may wish for no action to be taken, or indeed action may not be possible or practical. Then we will continue to work with the participant and seek the most appropriate support.

### **Respond:**

Staff / volunteers who suspect abuse or exploitation should share this with their line manager / supervisor at the earliest opportunity.

### **Record:**

This must be recorded in a way which gives precise details of the injuries or allegation.

### **Refer:**

Agreement should be made on any immediate action that should be taken to protect a person who is in imminent danger of serious injury/abuse.

If immediate action needs to be taken then the police should be called.

If there is knowledge concerning a threat to life, suicide or indications of serious injury, then the emergency services will be immediately contacted.

In cases of domestic violence and honour based violence it is important to involve Social Services Multi Agency Risk Assessment Conference or MARAC. (if in doubt ring your local MARAC team for advice). Honour based violence is always considered high risk.

Living in a home where domestic abuse happens can have a serious impact on a child or young person's mental and physical wellbeing, as well as their behaviour. Parents who suffer domestic abuse don't always realise how it affects their child. They might think that because their child doesn't see what's happening that they're not affected. Domestic abuse can have a very serious impact on a child's behaviour and wellbeing, even if they're not directly harmed themselves. Children witnessing domestic abuse is recognised as 'significant harm' in law.

In initial accommodation for asylum seeking women there is a mechanism that allows the Home Office to fund specialist refuge accommodation for people at risk of abuse who are eligible for asylum support. The following steps should be taken in order to request refuge accommodation for such cases:

1. Encourage the woman to contact the 24hr National Domestic Violence helpline to obtain specialist advice on the options available to her. The helpline can advise on the availability of refuge accommodation.

2. Should the woman want to access refuge accommodation, contact one of the following to request Home Office funding for a refuge place.

- Migrant Help – via their helpline
- Accommodation provider (Mears)
- The regional Home Office Asylum Safeguarding Hubs

The Home Office will then authorise the funding and contact the relevant refuge provider confirming the placement and payment rates.

An allegation of abuse/exploitation by a staff member or volunteer would be treated as an alleged act of Gross Misconduct by Sewing2gether All Nations. The assigned Safeguarding Co-ordinator and Chair of the Board of Trustees must be made aware of the situation as soon as possible

If the suspicions in any way involve the assigned Safeguarding Co-ordinator then the report should be made to the local Social Services department or Police as appropriate.

**This policy was accepted by the Board of Trustees on 20<sup>th</sup> September 2023 and is due for review in 2025.**

## APPENDIX 1 - Referrals Policy of Sewing2gether All Nations

This policy is relevant to all those involved in making recruitment/disciplinary decisions in our organisation.

When a volunteer or member of staff is permanently removed from a regulated work position, there are certain circumstances where our organisation must notify the Protection Unit at Disclosure Scotland that this has happened. This is called "Making a Referral". If we would have permanently removed the individual, the actions detailed in this policy will continue to apply (even if a member of staff or volunteer leaves their regulated work position prior to any action being taken, irrespective of the reason that they leave).

Two conditions must be met before we let Disclosure Scotland know that something has happened.

**Condition 1** – A person has been permanently removed / removed themselves from regulated work

**Condition 2** – At least 1 of the following 5 grounds apply

- Caused harm to a child or protected adult
- Placed someone at risk of harm
- Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

When both of these conditions have been met, it is a legal requirement that we must let Disclosure Scotland know by making a referral within 3 months of the permanent removal of the individual.

Where there is an historical allegation of harm or inappropriate behaviour about someone who is no longer in regulated work with us but which we believe would, in all probability, have led to the 2 conditions being met, we will consider whether we want to make a referral but the legal responsibility applies only after 28 February 2011 when PVG was first introduced.

Where it is necessary to make a referral, this process will be carried out by Corinne Watt. In their absence, the referral process will be carried out by Debbie Orr.

Those who are in a position which may involve carrying out disciplinary action which may result in the removal from regulated work or dismissal of someone in regulated work must ensure they notify Corinne Watt or, in their absence, Debbie Orr of the legal requirement to make a referral where the conditions above have been met.

Failure to make a referral where required, may result in our organisation being prosecuted. It is therefore essential that those involved in carrying out disciplinary action notify Corinne Watt or Debbie Orr when both conditions for making a referral have been met.

# **APPENDIX 2 - Secure Handling of Disclosure Information**

## **Policy of Sewing2gether All Nations**

The purpose of this policy is to provide guidance and instruction on how to appropriately handle disclosures for those who will have access to them and to provide assurance to Volunteer Scotland Disclosure Services and our staff and volunteers that their disclosure information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

For the purpose of this policy, PVG Scheme Records, PVG Scheme Record Updates, Standard and Enhanced disclosures will be referred to as disclosures.

This policy is for organisations enrolled with Volunteer Scotland Disclosure Services to access disclosures for the purpose of assessing individual's suitability for paid and/or voluntary work.

In accordance with the Scottish Government Code of Practice, for registered persons and other recipients of disclosure information, we will ensure the following practice.

### **Requesting Disclosures**

Disclosures will only be requested when necessary and relevant to a particular post and the information provided on a disclosure will only be used for recruitment purposes.

Our organisation will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, we will seek their consent and will take advice from VSDS to ensure it is appropriate to use the disclosure for a purpose other than recruitment. Furthermore, we will ensure that all sensitive personal information that is collated for the purposes of obtaining a disclosure will be always managed confidentially by those involved in the disclosure process.

### **Sharing Information**

Disclosure information will only be shared with those authorised to see it in the course of their duties.

### **Storage**

Disclosure information will be stored in secure conditions as follows:-

### **Digital Certificates**

Care will be taken in relation to electronic disclosure information, and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation.

Access to digital certificates will be restricted to those who are entitled to see it in the course of their duties. Digital Certificates will be stored on a password protected Google Drive. Data is encrypted in-transit and at-rest. No photocopy or other image of the disclosure information will be retained.

### **Paper Disclosures**

Paper documents will be kept in lockable and non-portable storage units. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties.

No photocopy or other image of the disclosure information will be retained.

## Telephone Results

When receiving disclosure information by telephone, VSDS staff will only convey information detailed in disclosures accessed by our organisation to our enrolled signatories once they have correctly answered the relevant security questions.

Failing to provide the correct answers to the required security questions will result in VSDS withholding the required information and may lead to an investigation being carried out to establish why our enrolled signatory was unable to provide the required security information. Once the disclosure information has been shared with us, VSDS will shred the disclosure.

VSDS does not keep a record of any information contained on the disclosure. When receiving a telephone result, it is essential that we record the information required for our Disclosure Tracking Record.

Further advice about secure handling can be found in the code of practice.

## Record Keeping

It is our organisations responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our Disclosure Tracking Record:

- Date of issue of disclosure
- Name of subject
- Disclosure type/level
- Unique reference number of disclosure
- Position for which the disclosure was requested (please note this will no longer be detailed on the digital disclosure)
- Whether we received a digital or paper disclosure or if we received the information by telephone
- Where the disclosure is stored
- Recruitment decision taken

We will not record whether there was any vetting information as the code of practice prohibits this.

## Retention

We will not retain disclosures for longer than is necessary for the purpose for which the disclosure record was obtained. PVG disclosures will be destroyed securely on receipt of an updated PVG disclosure, and they will not be retained beyond the last day that a scheme member is carrying out regulated work for our organisation.

## Destruction/Deletion

We will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images from digital certificates 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 staff with access to disclosure 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 any applicant, member of staff or volunteer who requests it.

# SEWING2GETHER ALL NATIONS

## Example Disclosure Tracking Record

Details of application form								Disclosure Certificate				Recruitment Decision	
Name of Applicant	Date of Birth	Level of Disclosure	Position	Signatory	Date Requested	Email/Paper form	Date Recorded	Certificate Number	Membership Number	Digital/Paper copy stored	Date Destroyed	Yes/No	Date