



## **SENSITIVE INFORMATION STORAGE POLICY**

### **1. Policy Statement**

- 1.1. The purpose of this policy is to lay out clear procedures in Great Britain Wheelchair Rugby's policy in regards to case records & disclosures / documents which are dealt with by the Great Britain Wheelchair Rugby's Case Management Group.
- 1.2. The information will be accurate and complete, and kept safely. Great Britain Wheelchair Rugby will ensure that:
  - information on members, held in files, will be kept safely
  - rights and access are identified whilst confidentiality is maintained
  - closed files are retained and stored for the appropriate period of time
  - all policies on case files are publicised
  - files contain relevant information. Relevant standards, and actions taken by GBWR will be included
- 1.3. The paper file is the main record. All information electronically held must be printed off and placed in the manual record in the appropriate section.

### **2. Legislative Framework**

- 2.1. This policy is in line with the statutory framework described in the Data Protection Act 1984, Guidelines 1-8, Revised March 1992, (which sets out the way in which information is gathered, held, recorded and distributed).
  - The Data Protection Act principles code of practice 1996.
  - The Access to Personal Files Act 1987
  - EU Directive on Data Protection 1998

### **3. Definition**

- 3.1. For the purpose of this policy, the term file refers to all cases where information has been kept about an individual member. This includes information held on videos and DVD. This information is kept when Great Britain Wheelchair Rugby has considered it necessary or appropriate to record information.
- 3.2. For the purpose of this document a case is closed once a disciplinary hearing has ruled on the case.

### **4. Policy Principles**

- 4.1. Confidentiality
  - 4.1.1. The policy of the Great Britain Wheelchair Rugby is to be open and honest with members and to allow them to have access to their files, subject to legal restrictions, as set out in the Access to Personal Files in the Safeguarding and Protecting Child Policy and Procedures.
  - 4.1.2. Files will be available only to that GBWR staff that have a direct need to know about the individual who is the subject of a file. All staff that may come into contact with member files must have signed the confidentiality clause within their contract of employment.
- 4.2. Sharing of information



- 4.2.1. Information may need to be shared with external agencies in some circumstances, on a strictly need to know basis. All external agencies and people with whom information is regularly shared must subscribe to the agreed protocols on sharing of information and standards of confidentiality.
- 4.2.2. Case records must show that information has been shared and under what circumstances.
- 4.2.3. Members will in some circumstances be told when information about them is to be shared and the reasons why.
- 4.3. Security
  - 4.3.1. Files will be kept, at all times, in a secure place.
- 4.4. Extent and Legality of Information
  - 4.4.1. Information recorded on file will be obtained and processed fairly and lawfully, and only be held for lawful purposes. All information recorded on files will be legible, verifiable, relevant and adequate, (sufficient to convey a comprehensive picture at the time of writing) without being excessive.
- 4.5. Retention and Storage of Information
  - 4.5.1. Information on file will be kept in a secure place, and only accessed by the appropriate staff and the member where access to their records has been granted.
- 4.6. Equal Opportunities
  - 4.6.1. Case records should identify special needs arising from ethnicity, race, culture, gender, age, religion, language, communication, sensory impairment, disability and sexual orientation. The language used must be anti-discriminatory and demonstrate sensitivity to the needs of all people in the community. Access to records and contribution to records for members with language and communication needs must be facilitated by the provision of interpreting services and all policies pertaining to case records will be available in all the relevant languages.

## 5. Content of Records

- 5.1. In maintaining the quality and content of case recording the staff member will ensure that:
  - they give clear, chronological details of referral, investigation, assessment and decisions made in relation to the case.
  - all decisions are recorded, including who made decisions, when and for what reasons. Any dissenting opinion must also be recorded.
  - when access to a file or document has been given this must be recorded on the case log

## 6. Security of Files

- 6.1. Storage
  - 6.1.1. Files, when not in use, will be kept in filing cabinets that can be locked. No file should be left out of the locked cabinets overnight. Files should not normally be taken home, and should never be left in a car, not even in a locked boot. When a member of staff is working on a file, consideration must be given at all times to the security and the confidential nature of the file, if a file is left unattended for a short period of time the file must be closed.
- 6.2. Computer screens and print outs must be located in positions where passers-by and casual visitors cannot read personal data.
- 6.3. Copies of documentation and printouts should be disposed of in such a way that unauthorised disclosures do not occur. This is usually by shredding before disposal.
- 6.4. Staff must **not** store any member personal information on their home computer.



## **7. File Closure, Retention, Disposal and Destruction**

- 7.1. As an organisation using the Disclosure and Barring Service via The Media Group (TMG) to help assess the suitability of applicants for positions of trust, the Great Britain Wheelchair Rugby complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention, and disposal of Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other pertinent legislation relating to the safe handling, use, storage, retention, and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.
- 7.2. Great Britain Wheelchair Rugby is currently seeking guidance on the length of time that closed case records may be retained. Currently the time limit on all files is 75 years from the date the file is closed.
- 7.3. Any confidential material for destruction needs to be shredded
- 7.4. Great Britain Wheelchair Rugby will store on the Individual DBS database five pieces of information regarding background checks:
- The date the GBWR requests the check
  - The date the check is sent to the DBS
  - The date the GBWR receives the notification that a certificate has been issued by the DBS
  - The Disclosure Certificate number
  - Whether additional information under a separate cover was received as a result of the check.
- 7.5. Record of Offenders
- 7.5.1. Great Britain Wheelchair Rugby shall keep a confidential record of offenders who have been disciplined, barred, restricted or warned.
- 7.5.2. All affiliated organisations, areas and/or clubs shall have the right to have the record checked by written request. Access to the list shall be restricted to designated people (Case Management Team members).
- 7.5.3. Great Britain Wheelchair Rugby will refer details of any person who it is considered are unsuitable to work with children and /or adults at risk to the DBS.
- 7.5.4. Great Britain Wheelchair Rugby has a legal responsibility to report someone to the DBS under the following criteria:
- 7.5.5. GBWR has sacked them because they harmed a child or adult
- 7.5.6. GBWR has sacked or removed them from working in regulated activity because they might have harmed a child or adult
- 7.5.7. GBWR were planning to sack them for either of the above reasons, but the person resigned first.