



CLUB SAFEGUARDING DATA POLICY

CLUB POLICY DOCUMENT

Introduction

This policy is designed to support the decision making process of Club Committees and in particular Wellbeing & Protection Officers (WPOs) in relation to the storing and retention of safeguarding information. It also gives advice on what information should be passed from an outgoing WPO to the incoming WPO.

Document	Where to Store	Who has access	How long to keep
Role application, appointment & induction forms	Securely on a cloud based drive, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	Until person leaves role
Self-Declaration Form	Securely on a cloud based drive, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	<p>These should be either securely scanned and stored on a password protected file or alternatively stored as a paper copy in a locked filing cabinet.</p> <p>If a volunteer requires a PVG, then the self dec and reference forms should be reviewed and stored securely until the PVG comes back as complete. At that point a spreadsheet can be updated to reflect that the Self Dec and references were reviewed and accepted, noting the date and name of referees. These forms can then be disposed of.</p> <p>If a volunteer does not require a PVG, then once the committee reviews the self dec form and references, then a spreadsheet can record that the forms were received, and satisfied your requirements, noting the date and name of referees. Then the forms can be disposed of.</p>
Reference Forms	Securely on a cloud based drive, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	As per Self-Declaration form information above



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Incident Report Forms	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer	If the case information is relating to a safeguarding incident, including an abuse or position of trust breach or if it may be required in the event of a child abuse claim then it would need to be held indefinitely (but reviewed regularly) as the Limitation (Childhood Abuse) (Scotland) Act 2017 removed the time limit for raising actions for historic child abuse. Information pertaining to a case that would not be required if an investigation were continued or reopened can be removed. (eg general comms to set up a meeting would not form part of an investigation so can be deleted; specific information about witnesses or involved parties should be filed.)
Case communication (Documents & Files)	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer	As above
Case communication (within emails)	Securely within a password protected email account of saved Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer	Documents and email trails regarding a case should be saved with the other documents and files to help with case chronology if the content provides evidence that could later be required. Emails should be removed from the folder or inbox once saved if required.
Accident Report Forms	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	Accident forms relating to minor injuries and those non RIDDOR reportable should be retained for 3 years. Accident forms and other relevant information relating to a RIDDOR reportable incident should be stored for 6 years.
Signed Codes of Conducts	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	12 months. These should be completed annually.



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Social Media & other adherence Forms	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	12 months. These should be completed annually.
Photography Permission Forms	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	12 months. These should be completed annually.
Video Permission Forms	Securely on a cloud based platform, or on a password protected computer etc	Wellbeing & Protection Officer or appointed club person	12 months. These should be completed annually.
EDI Reporting Forms	Securely on a cloud based platform, or on a password protected computer etc	Lead Referee/ Event Director, Wellbeing & Protection Officer or appointed club person	Once form has been submitted to Scottish Swimming (within 48 hours of the event). The form should be securely retained for no more than 12 months.

Definition of Secure: Kept in a locked place with restricted access. If at WPO's home can be stored in for example, a locked desk drawer or attic. If in a general office, documents must be in a locked filing cabinet with no other key holders. If an electronic version is stored, it should be password protected.

How to dispose: Shred, burn or delete if electronic copy