



INFORMATION SHARING

THE RELATIONSHIP BETWEEN CLUBS AND SGBs

Safeguarding in Sport acknowledges the support, co-operation and expertise of Volunteer Scotland Disclosure Services, (formerly CRBS) and the Information Commissioner's Office in reaching this point.

It is everyone's responsibility to ensure that the Fair Processing Notice process operates within the letter and spirit of the Law, but it does mean that designated and trained persons will, when the criteria are met, be able to discuss cases and circumstances directly which will assist towards fairer and more objective decisions being taken.

FAIR PROCESSING NOTICE RE CHILD WELLBEING AND PROTECTION

“The Data Protection Act 2018 (implementation of the General Data Protection Regulation (GDPR) requires that you are informed about how your personal information will be used. For the purposes of child wellbeing/child protection matters, the club may share information about you with the sport's Governing Body in Scotland and/or National (UK) Governing Body where it has been alerted to circumstances that might affect your status as a member of the PVG scheme for regulated work with children and/or protected adults or your suitability to carry out the regulated work role for which you have applied/been appointed or already doing. In the event such sharing is deemed necessary, it will be carried out between the registered Safeguarding Officer(s) in the Club and in the Governing Body.”

Points to note:

- it remains an offence to share disclosure information with a third party or for purposes for which it is not intended.
- confidentiality remains something which must be respected and protected.
- Disclosure Scotland/VSDS Code of Practice re the holding and storing of Disclosure Information remains in place.
- the efficacy of the FPN is dependent on:
 - the SGB being registered with VSDS as an Intermediary Organisation working on behalf of its clubs.
 - a formal relationship between the SGB and its clubs as Secondary organisations, i.e. the SGB and VSDS/Disclosure Scotland will have a full list of the named contacts in each club who are trained to receive Disclosure information.
 - those in CWPO (or equivalent) positions being appropriately trained.
 - VSDS Signatory training
 - Safeguarding and Protecting Children
 - In Safe Hands (+ In Safe Hands 2)

Other aspects to consider:

- there is a need to consider retrospectively introducing the full workforce into the FPN process. This could be achieved 'en masse' if the FPN is approved by the sport through due process e.g. at an AGM. Please note that the FPN is not a permission process requiring individual acceptance. It is a statement of what will happen if certain circumstances arise and criteria are met.
- it is for each sport to put the FPN in place so that it can operate justly and fairly for all.