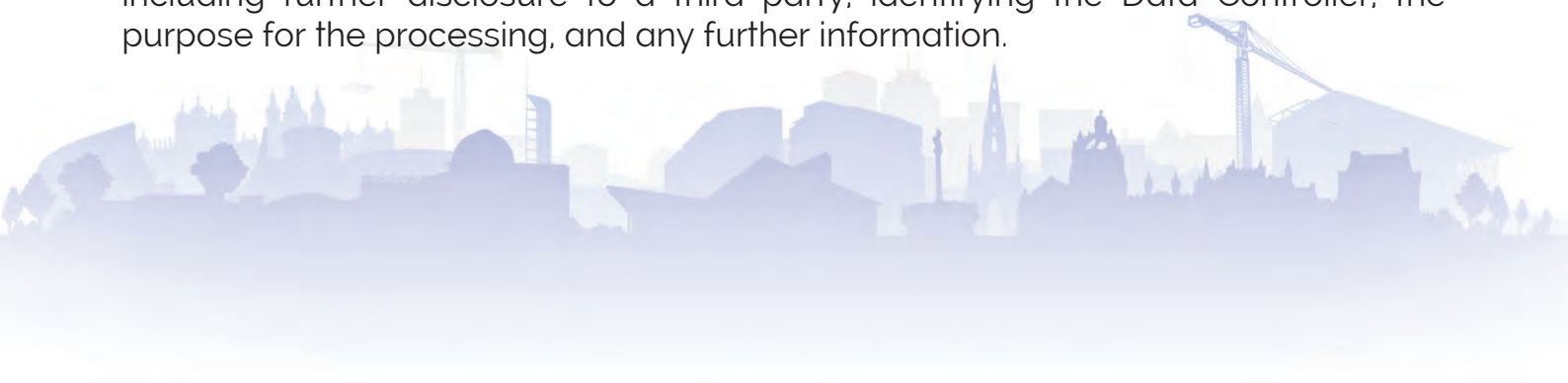


Disclosure Scotland Policy

Overall Statement of Principles

The Ogilvie Group complies fully with the Code of Practice issued by the Scottish Executive regarding the correct handling, holding and destroying of Disclosure information proved by Disclosure Scotland under Part 5 of the Police Act 1997, for the purpose of assessing applicants' suitability for employment purposes, voluntary positions, licensing and other relevant purposes. It also complies fully with the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

The Ogilvie Group use Disclosure information only for the purpose for which it has been provided. The information provided is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual. We notify the individual of any non-obvious use of the data, including further disclosure to a third party, identifying the Data Controller, the purpose for the processing, and any further information.



The Ogilvie Group recognises that it is a criminal offence to divulge Disclosure information to any unauthorised person. We, therefore, only pass Disclosure information to those who are authorised to see it in the course of their duties.

The Company will not keep Disclosure information in an individual's personnel file. The information is kept securely in a lockable, non-portable unit and is strictly controlled to authorised individuals, namely Ogilvie Group Directors and the HR Dept, who are entitled to see such information in the course of their duties.

The Ogilvie Group will not keep Disclosures or Disclosure information for any longer than is required. Where Disclosures refer to employees working at premises where there are children present, the Disclosure will be held for that period of time and then destroyed. All other Disclosure will be held for the shortest period of time possible and no longer than 90 days.

Once the retention period has elapsed the Company will ensure that Disclosure information is destroyed by shredding. This will be done by HR and up to that point it will remain in a secure unit. The Ogilvie Group will not retain any image or photocopy or any other form of the Disclosure information. We will, however, keep a record of the date of the issue of the Disclosure, the Disclosure type, the reason the Disclosure was requested and the unique reference number of the document. This information will be held by HR and available to Ogilvie Group Directors.

By order of the Board
Ogilvie Group

