



## CHILD PROTECTION RECORDS RETENTION AND STORAGE POLICY

### Guiding principles of records management

According to Data Protection principles, records containing personal information should be:

- Adequate, relevant and not excessive for the purposes of which they are held.
- Accurate and up-to-date.
- Only kept for as long as is necessary (Information Commissioner's Office, 2019).

The introduction of the General Data Protection (GDPR) in 2018 does not change the way child protection records should be stored and retained.

We at Munchkin Sports must:

- Know the reason why we are keeping records about children and/or adults.
- Assess how long we need to keep the records for.
- Have a plan for how and when the records will be destroyed.

To keep personal information secure, we should:

- Compile and label files carefully.
- Keep files containing sensitive or confidential data secure and allow access on a 'need to know' basis.
- Keep a log so we can see who has accessed the confidential files, when, and the titles of the files they have used.

When creating records about the children and/or adults that take part in our sessions, we must make sure they understand what records we hold, why we need them and who we might share their information with.

### Concerns about children's safety and wellbeing

If a member of staff has concerns about a child or young person's welfare or safety, it's vital all relevant details are recorded. This must be done regardless of whether the concerns are shared with the police or children's social care.

We will keep an accurate record of:

- The date and time of the incident/disclosure.
- The date and time of the report.
- The name and role of the person to whom the concern was originally reported and their contact details.
- The name and role of the person making the report (if this is different to the above) and their contact details.
- The names of all parties who were involved in the incident, including any witnesses to an event.
- What was said or done by whom.



- Any actions taken to look into this matter.
- Any further action taken (such as a referral being made).
- The reasons why we have decided not to refer those concerns to a statutory agency (if relevant).

The report must be factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such. The record should always be signed by the person making the report.

### **Storage of child protection records**

- Information about child protection concerns and referrals should be kept in a separate child protection file for each child, rather than in one 'concern log'. The child protection file should be started as soon as you become aware of any concerns.

### **Retention periods: child protection records**

Child protection records should be kept until the child is 25 (Information and Records Management Society (IRMS), 2016).

In some cases, records should be kept for longer periods – see the 'Exceptions' section below for more information.

### **Recording concerns about adult behaviour**

Sometimes concerns might be raised about an adult who works or volunteers with children. This could be because they've:

- Behaved in a way that has harmed, or may have harmed, a child.
- Committed a criminal offence against, or related to, a child.
- Behaved in a way that indicated they are unsuitable to work with young people.

We will keep clear and comprehensive records of all allegations made against adults working or volunteering with children, including:

- What the allegations were.
- How the allegations were followed up.
- How things were resolved.
- Any action taken.
- Decisions reached about the person's suitability to work with children.

### **Storing records relating to adults**

Records relating to concerns about an adult's behaviour should be kept in the person's confidential personnel file and a copy should be given to the individual.

### **Retention periods: concerns about adults**



If concerns have been raised about an adult's behaviour around children, the general rule is that we should keep the records in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education, 2018). This applies to volunteers and paid staff.

We will keep the records for the same amount of time regardless of whether the allegations were unfounded. However, if we find that the allegations are malicious we will destroy the record immediately.

Information will be kept for this length of time even if the person stops working or volunteering for the organisation.

In some cases, records should be kept for longer periods.

### **Exceptions**

In some cases, records should be kept for longer periods of time. For example, if:

- The records provide information about a child's personal history, which they might want to access at a later date.
- The records have been maintained for the purposes of research.
- The information in the records is relevant to legal action that has been started but not finished.
- The records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the company).

Where there are legal proceedings we will seek legal advice about how long to retain the records.

Some records are subject to statutory requirements and have a specific retention period. This includes records relating to:

- Children who have been 'looked after' by the local authority.
- Adopted children.
- Registered foster carers.
- Residential children's homes.

We must keep any records that could be needed by an official inquiry. Inquiries will issue directions for records to be retained and these must be followed.

### **Disclosure and barring checks**

We will not store copies of disclosure and barring check certificates unless there is a dispute about the results of the check. Instead, a confidential record will be kept of:

- The date the check was completed.
- The level and type of check (standard/enhanced/barred list check and the relevant workforce).
- The reference number of the certificate.
- The decision made about whether the person was employed (with reasons).



If there is a dispute about the results of a check, you may keep a copy of the certificate for no longer than six months.

#### **Destruction of child protection records**

When the retention period is finished, confidential records should be incinerated or shredded in the presence of a member of the company or entrusted to a firm specialising in the destruction of confidential material. At the same time any electronic versions of the record must be purged.

If not shredded immediately, all confidential records must be held in a secured plastic bag, labelled as confidential and locked up in a cupboard or other secure place.

If Munchkin Sports closes down, we must make arrangements for the ongoing management of records. This includes the review, retention and disposal of records.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 28 February 2025

Signed:

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