



CHILD PROTECTION RECORDS RETENTION AND STORAGE POLICY

Guiding principles of records management

Under the **UK GDPR** and **Data Protection Act 2018**, all records containing personal information must be:

- **Adequate, relevant and limited** to what is necessary for the purpose collected (data minimisation).
- **Accurate and kept up to date.**
- **Retained only for as long as necessary** for the lawful purpose (storage limitation).
- **Processed lawfully, fairly and transparently**, with individuals informed about how their data is used.
- **Stored securely**, protecting confidentiality, integrity and availability.

The introduction of UK GDPR (2018) and subsequent updates (2024–2026) **does not change the established safeguarding retention periods**, but it **does** strengthen expectations around:

- documented retention schedules
- secure storage and access controls
- regular review and deletion/anonymisation
- accountability and audit trails
- transparency with children, parents and staff

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.
- Ensure individuals understand what information we hold, why, our lawful basis, and who we may share it with (privacy notices).
- Maintain appropriate technical and organisational measures to keep personal data secure.

To keep personal information secure, we should:

- Compile and label files carefully and consistently.
- Keep files containing sensitive or confidential data secure and allow access strictly 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.
- Ensure digital systems meet UK GDPR security standards, including encryption, access controls and audit trails.

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 well-being



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 and dated 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), 2024-2026 and IICSA-aligned guidance).

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, 2024=2026; 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/enhances/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 this policy and our records management practice annually, ensuring alignment with:

- UK GDPR and Data Protection Act 2018
- ICO guidance (updated 2026)
- KCSIE 2026
- Working Together to Safeguard Children (2023)
- IRMS Toolkit (2024–2026)
- Any new statutory or regulatory requirements

This policy was last reviewed on: 01 September 2026

Signed:

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