

## **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 purpose for which they are held
- 🎬 accurate and up to date
- 🎬 only kept for as long as is necessary (Information Commissioner's Officer, 2019)

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

When storing child protection records Theatrics will:

- 🎬 ensure we know the reason why we have kept the records about children and/or adults
- 🎬 assess how long we will need to keep the records for
- 🎬 have a plan for how and when the records will be destroyed.

To keep personal information secure, we will:

- 🎬 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.

If we are creating records about the children and/or adults who attend or work at Theatrics, we will make sure the children and/or adults understand what records we hold and why we need to hold them and who might we share their information with. However, if we are keeping records for child protection reasons, we are not required to get consent from the children and/or adults concerned.

### Documenting concerns about children's safety and wellbeing

All concerns about a child or young person's wellbeing brought to the attention of the nominated child protection lead will be recorded. This will 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 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 and by whom
- any action taken to look into the matter
- any further action taken (such as a referral being made)
- the reasons why the organisation decided not to refer those concerns to a statutory agency (if relevant).

The nominated child protection lead will ensure the report is factual and that any interpretation or inference drawn from what was observed, said or alleged is recorded clearly. All records will be signed by the person making the report.

#### Storage of child protection records

- Information about child protection concerns and referrals will be kept in a separate child protection file for each child. The child protection file will be created as soon as the nominated child protection lead becomes aware of any concerns.
- All child protection records will be kept separately from any general records of the child and will be marked accordingly.

#### Retention periods: child protection records

In accordance with the Northern Irish Government all child protection records will be kept until the child's 30<sup>th</sup> birthday (Department of Education, 2016)

Theatrics will work under the guidance, policy and procedures of the schools we work within.

### Recording concerns about adult behaviour

Theatrics will take all allegations raised about an adult or volunteer very seriously. We will keep clear and comprehensive records of all allegations, 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

All records will be kept in the person's confidential personnel file. A copy will not be given to the individual and will only be shown to other parties on a 'need to know' basis.

In accordance with the Department of Education, records will be kept until the adult reaches the age of 65 or for 10 years – whichever is long. This applies to volunteers and paid staff.

If allegations are found to be malicious, they will be destroyed immediately.

### Support with record retention and storage

In the case of legal proceedings Theatrics will seek legal advice about the retention and storage of all records.

In cases where a vulnerable adult or child is involved, Theatrics will seek the advice of their social worker or local social services.

### Disclosure and barring checks

Theatrics will not store copies of disclosure or barring check certificates unless there is a dispute about the results of the check.

It is the responsibility of all members of CAST to be able to provide information of disclosure or barring checks when requested by CAST or any outside agencies.

#### Destruction of child protection records

When the retention period is finished, confidential records will be incinerated or shredded in the presence of a member of the organisation, and any electric versions will be purged.

Theatrics will seek advice of local child protection services before destroying any records.