

Management of Records Policy

Policy statement

In the process of developing FUNdays Club's safeguarding policies, procedures and processes, the organisation has developed a policy for the management of records - which includes the retention, storage and destruction of records that relate to the welfare of a child, as well as safeguarding records relating to staff.

Creating records

When there are concerns relating to a child's welfare or safety, records will be created using FUNdays Club's **Reporting Concerns about a Child Form** - and which are available for FUNdays Club's **DSO**.

FUNdays Club staff are trained to complete the relevant sections of the form and to sign against these at each stage of the procedure. Further information relating to creating these records can be found in this **Safeguarding Handbook** in the sections relating to **Child Safeguarding**.

As a minimum the following information will be recorded:	
Record	<ul style="list-style-type: none"> ▪ Date and time of incident/disclosure. ▪ Parties who were involved, including any witnesses to an event. ▪ What was said or done and by whom. ▪ Any action taken by the organisation to look into the matter. ▪ Any further action taken. ▪ Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency. ▪ Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such. ▪ Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details. ▪ The record must be signed by the person making it.

Retention of records

Once a record has been created it will be retained and stored in line with the **Principles of Recording & Storing Information**, the **Data Protection Policy** and the **Confidentiality Policy** outlined in this **Safeguarding Handbook**.

FUNdays Club will always ensure that personal information held will be:	
1.	Adequate, relevant and not excessive for the purposes for which they are held.
2.	Accurate and where necessary kept up to date.
3.	Not kept for longer than is necessary for its purposes.

FUNdays Club will use the following good practice guidelines relating to the retention and storage of records:	
a.	Information about concerns, allegations, and referrals will not be kept in one concern log, but will instead ensure that information or items relating to individuals are kept in separate files.
b.	Compile and label files carefully.
c.	Files containing sensitive or confidential data will always be locked away and access to the keys will be strictly controlled.
d.	A key log will be kept so that it is possible to see who has accessed a locked cabinet including when and what files have been accessed.
e.	Access to records will be limited to FUNdays Club staff in named safeguarding roles who either need to know about the information in those records and/or who manage the records/files e.g. SSM, DSO .
f.	When files are to be stored long term, arrangements will be made for the keys to be passed from outgoing named safeguarding role holders to their successors.
g.	When records are stored electronically files will be password protected, which only limited FUNdays Club safeguarding staff will have access to.
h.	Should any part of FUNdays Club cease operating - or otherwise close down - arrangements will be made for the ongoing management of records in compliance with this Management of Records Policy .

Management of Records Policy continued...

Retention periods of records

FUNdays Club has developed its retention of records policy by using the guidance contained within the [Data Protection Act 2018: Guidance to Social Services \(2000\)](#) which is considered by the [Child Protection in Sport Unit](#) as best practice. The guidance states that:

"Where no legal requirement to retain information beyond the closure of the record exists, an organisation will need to establish its own retention periods. Normally, personal information should not be held for longer than six years after the subjects last contact with the organisation".

Exceptions to the six year period will occur when records:

1.	Need to be retained because the information in them is relevant to legal action that has been started
2.	Are required to be kept longer by law
3.	Are archived for historical purposes e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority. Where there are legal proceedings relating to records, FUNdays Club will seek the appropriate legal advice about the retention period of the particular records.
4.	Consist of a sample of records maintained for the purposes of research.
5.	Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
6.	Are held in order to provide, for the subject, aspects of their personal history e.g. where a child might seek access to the file at a later date and the information would not be available elsewhere.

Where files are kept for longer than the above six year period, FUNdays Club will clearly mark the file with the reasons for the extension period. In all other circumstances, FUNdays Club will adhere to the retention period guidance provided by the [Child Protection in Sport Unit](#) as follows:

Type of Record	Retention Period
Child welfare concerns that FUNdays Club refers on to the Multi-Agency Partnership or the Police e.g. this would include concerns about physical, sexual, emotional or neglect of a child; disclosures from a child about being abused; or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person who has been abused by another young person.	The referral should be acknowledged in writing by children's social care and your organisation keeps this on file. Records will be kept for six years after the last contact with the service user unless any of the exemptions listed earlier apply - or if FUNdays Club is required to comply with any other statutory requirements.
Child welfare concerns that FUNdays Club decide, after consultation, do not necessitate a referral to children's social care or the Police . In such circumstances, FUNdays Club will make a record of the concern and the outcome e.g. where a child has been bullied, overly pushy parents or a very distressed child where the distress is unrelated to child abuse.	FUNdays Club will destroy the record a year after the child concerned ceases to use the service unless the child are continuing to use the services of the organisation.

Management of Records Policy continued...

Retention periods of records continued...

Type of Record		Retention Period	
	<p>Concerns about people (paid and unpaid) who work with children i.e. allegations, convictions, disciplinary action and/or any inappropriate behaviour towards children e.g. where an employee has breached the Code of Conduct then a record of the behaviour, the action taken and outcome will be recorded.</p>		<p>HR files and training records - including disciplinary records and working time records - will be retained for 6 years after employment ceases.</p> <p>FUNdays Club will keep records for a longer period if any of the following apply:</p> <ul style="list-style-type: none"> ▪ There were concerns about the behaviour of an adult who was working with children where they behaved in a way that has harmed, or may have harmed, a child ▪ The adult possibly committed a criminal offence against, or related to, a child ▪ The adult behaved towards a child in a way that indicates that they are unsuitable to work with children. <p>In these circumstances records will be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.</p>
	<p>DBS certificates obtained as part of the vetting process.</p>		<p>DBS certificates have a statutory defined retention period and therefore must be destroyed after six months unless specific permission has been given to retain them longer. However, FUNdays Club will keep a record of the date of the check, the reference number and the decision about vetting and the outcome.</p>

Destruction of records

When records are due for destruction (by reference to the above table), FUNdays Club will either incinerate or shred them. This will be carried out in the presence of another FUNdays Club Safeguarding staff member, or be entrusted to a firm specialising in the destruction of confidential material. This action will be taken at the same time as the electronic record is purged from FUNdays Club systems.

If records are not to be shredded immediately, then FUNdays Club will ensure that all confidential records will be held in a secured plastic bag; labelled as confidential and locked in a cupboard or other secure place.

Reviewed & Updated: September 2021

FUNdays Club will review this **Management of Records Policy** and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children; following a safeguarding incident within FUNdays Club (or one which directly concerns or affects FUNdays Club); and/or following a significant organisational change.