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| **Barnardo’s**  |
| **Children’s Services and Business Line Policy** |

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### Children’s Services and Business Lines Data Protection Policy

**4. The Retention, Archiving and Deletion of Records Policy**

**Date:** 31/7/18

**Review Date:** 31/7/19

**Policy Owner:** Pat Greene

**Distribution:** For internal communication, may be used externally if required, for example for tender submissions.

#### **Purpose**

Barnardo’s Corporate Data Protection Policy provides the overarching policy framework which enables all staff and volunteers who are acting on behalf of Barnardo’s to comply with the legal requirements of the **GDPR and the** **Data Protection Act 2018.** Beneath the Corporate Policy are a number of individual policies and procedures that provide more detailed policy and guidance for specific departments within Barnardo’s.

This is the fourth of five policies that apply specifically to the **Barnardo’s Children’s Services and Business Lines.** This policy isconcerned withthe retention, archiving and deletion of records containing information about service users, foster carers, adopters and sheltered lodgings providers.

The GDPR Principles require that personal data processed for any purpose must not be kept for longer than is necessary and that files and records must not be used for any purpose other than that for which consent has been given. This policy sets out the requirements in relation to the management of records containing personal data, retention periods and the process for the deletion and destruction of data when no longer needed for the purpose for which it was obtained and the process for the archival of data.

Adoption records are exempt from the provisions of the GDPR and Data Protection Act but are covered by the requirements of this policy.

#### Scope

This policy applies to all staff, as and when workers, volunteers, agency staff, external consultants and interns deployed in Children’s Services and Business Lines. It applies to all records whether these are electronic or hard copy and includes photographs and audio and video recordings. It includes personal information in relation to service users, carers, adopters and supported lodgings providers.

This policy sets out how long records containing personal data must be retained for and the process for deletion and archiving.

#### Roles and Responsibilities

**Regional/National/Commercial Directors/Heads of Business:**

* To ensure that the policy is implemented

**Assistant Directors Children’s Services/Assistant Heads of Business/Head of Operations:**

* To ensure thatstaff are implementing the policy

**Service Managers:**

* To ensure that the Data Protection Policies are implemented within services, and that staff understanding their responsibilities

**All staff and volunteers:**

* To operate within the requirements of the policy

**Management Information Officers/ Business Support Unit:**

* To provide advice and support to staff to enable them to implement this policy
* To obtain external legal advice if required regarding the application of the Data Protection Act

#### Definitions

**Personal data** – data which relate to a living individual who can

be identified—

* from those data, or
* from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

**Sensitive personal data** is information about a person’s physical or mental health, sexual life, racial or ethnic origin, religious beliefs, political opinions and the commission of offences and related prosecution.

#### Policy

##### **Retention of service user and carers’ records**

1. When a service user or carer’s record is closed the appropriate retention period must be recorded on the file using the **Table of Service User and Carer Record Retention Periods**, see appendix 1 to this policy. Any contractual, statutory or regulatory requirements must be adhered to.
2. If records held on Content server SUR the case File Closure Details and Retention fields on the core data form must be completed. If records are held on other systems the retention date must be recorded using the agreed process.
3. Services recording on the commissioner’s recording system must follow the policy and procedures of that agency in relation the retention, archiving and deletion of records. Managers must ensure that these are set out in the [Service Recording Protocol](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/243934841) and that the staff who are using those systems understand the requirements.
4. Paper records must not duplicate the electronic case file unless there is a statutory, regulatory or contractual requirement to do so. If there is no statutory, regulatory or contractual requirement to retain an original document, documents must be scanned onto the electronic case file and the originals returned or destroyed.
5. If a paper record is maintained the same criteria for the retention period as that for the electronic record must be used and at case closure the file must be clearly labelled with the retention date.
6. The paper record must not be used to store creative material originated by the service user, unless this is part of a therapeutic intervention and cannot be scanned onto the electronic Case File.
7. Wherever possible, personal documents must be returned to the service user or their carer.
8. Photographs and video or audio recordings must be added to the service user record or held securely as required by the [Children's Services and Business Lines Recording Policy](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/240683953).
9. Closed electronic case files in open file rooms, and any related paper files, will be managed by the service manager with responsibility for the file room.

10. When a service closes any paper records that are due to be archived will be transferred to Making Connections.

11. When a service closes any paper records that are not due to be archived will be transferred to the relevant Regional/National/Business Line offices, who will manage any Subject Access and Information Sharing requests and ensure that the records are securely destroyed when the retention date is reached.

12. Subject Access and Information Sharing Requests in relation to closed file rooms and archived records will be managed by Making Connections.

##### **Deletion of records when the retention period is reached**

1. Closed records, must be reviewed quarterly and any records reaching the retention date must be deleted or securely shredded.
2. Photographs, audio or video recordings held on encrypted memory sticks or other storage devices must be reviewed quarterly and deleted or securely destroyed when the retention period has been reached.

##### **Archiving of records**

1. Closed case files that require archiving must be sent to Making Connections, a list of these is included in section 1.2 of the Procedures and the **Retention Grid for Service Users, Carers and Adopters’ Records,** see appendix 1**.**
2. Making Connections are responsible for responding to Subject Access Requests and Information Sharing Requests about archived records.

##### **Adoption Records**

1. The storage, retention and access in respect of adoption records is governed by specific legislation, see **Associated guidance and documents** below.
2. Adoption records are exempted from the DPA under an exemption order (see [Statutory Instrument 2000 No. 419](http://www.opsi.gov.uk/si/si2000/20000419.htm), amended by [Statutory Instrument 2000 No. 1865](http://www.opsi.gov.uk/si/si2000/20001865.htm), and SI [Adoption and Children Act 2002 Consequential Amendments Order 2005](http://www.opsi.gov.uk/si/si2005/uksi_20053504_en.pdf)). These Statutory Instruments exempt adoption records, held by an Adoption Agency, from the subject access provisions of section 7 of the DPA.
3. The exemption order applies to all records i.e. those held before, during and after an adoption order. This means that individuals (adopted people, birth relatives, adoptive parents and prospective adoptive parents) are not able to use the DPA to insist on access to the records held about them. However Data Protection Principles do apply to the way that Adoption Agencies keep and process information about individuals.

#### Procedures

##### **Service User and carers records**

* 1. **Management of closed case files and associated photographs, and video and audio recordings**

Action: Staff in services

1. Paper records, photographs, and video and audio recordings must be scanned onto the case file unless there are statutory, regulatory, contractual or technical reasons why they must be maintained.
2. A record of closed paper files, photographs, video and audio recordings must be maintained, which includes the retention date and the date that the record was deleted or shredded. The [Closed Paper Files and Records Log](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/253260959) should be used to record these.
3. Closed paper files, photographs, video and audio recordings must be stored in a locked filing cabinet and audited at least annually to ensure that the records are secure.
4. Closed paper files, photographs, video and audio recordings must be reviewed quarterly, see **Guidance on Quarterly Review of Records in Guidance and Associated Documents** section below, and those that have reached the retention date must be securely shredded or destroyed.
5. Closed electronic files must be managed by the CSM responsible for the file room in which the closed files are located.
6. Closed electronic files must be reviewed quarterly, see Guidance on Quarterly Review of Records in Guidance and associated documents below.
7. A list of the records that have reached the retention date must be sent to surdeletion@barnardos.org.uk and a copy of the list must be retained by the service.

9. When a service closes the paper records that are required to be archived, see section 1.2, must be sent to Making Connections.

10. The closed paper files, photographs, video and audio recordings that are not due to be archived must be sent to the regional/national/business line office. The completed [Closed Paper Files and Records Log](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/253260959) must be sent with the records.

11. All electronic case files in closed file rooms are maintained by Information Services and made available only to those with a specific and legal purpose to see them.

Action: Staff in regional/national/business line Offices

1. The closed paper files, photographs, video and audio recordings that are not due to be archived must be retained securely in the regional/national/business line office for the minimum retention period.

2. Closed paper files, photographs, video and audio recordings must be reviewed quarterly, and those that have reached the retention date must be securely shredded or destroyed.

3. Requests for access to records from closed services must be via the regional, national or business line office or Making Connections for records that have been archived.

4. Each request to view a closed record must be recorded on the case file.

5. Services, regional, business line or national offices or Making Connections must maintain these as a record of requests for information and other contacts if there is no casefile available.

* 1. **Archival of closed case files**

**Action: All staff**

1. Where there is a requirement that records must be kept for a prolonged period any paper files must be sent to Making Connections to be archived. This will include
* Adoption records when an adoption order has been made
* Looked After Children / Residential Care/Leaving Care
* Foster Care
* Residential Special School
* Children subject to a Safeguarding Plan or placed on the Child Protection Register while Barnardo’s are working with them
* Children’s Rights where the child is in care, except in Scotland where all Children’s Rights records must be archived
* Short term breaks and respite care
1. The paper files must be sent to Making Connections six years after closure of the case file, following the Guidance for Archiving Paper Records in the Associated Guidance section below. (Please note that in 2017 and 2018 there is a planned transfer of all paper records due for archival to Making Connections).
2. The service or regional/national office is responsible for all costs involved in the secure transfer of paper files to Making Connections.
3. The service or regional/national office must contact Making Connections to agree an appropriate date for the records to be transferred.
4. [The Case File for Archiving Front Sheet](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269347831) or the [Case File for Arching Front Sheet (Family Files)](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269353104) must be fully completed for the subject/s of the case file and placed inside the case file as the first page.
5. Case files must be arranged and listed in alphabetical birth name order prior to transfer to Making Connections.
6. The Form to be added) must be fully completed 7. All of the case files being sent to Making Connections must be recorded on the [List of Case Files sent to Making Connections](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269352731) or the [List of Case Files sent to Making Connections (Adoption)](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269347950) and placed inside box 1. A copy of the list must also be e mailed to Making Connections and a copy retained by the service or Regional or National Office.
7. Personal/original documents e.g. birth certificates, photographs, school reports, should wherever possible be returned to the service user or their family. In the event that they cannot be returned, the documents must be placed in an envelope clearly marked with birth name, date of birth and, and secured into relevant file.
	1. **Returning files to commissioner**

**Action: all Staff**

1. Where a commissioner requires the service user record is sent to them, a copy can be retained by Barnardo’s with a clear note of which Local Authority holds the record and the original if a hard copy unless the contract specifically prohibits this. The copy must be deleted or securely shredded when the Barnardo’s retention date is reached.
2. A list of case files returned to the commissioner must be maintained unless this is prohibited in the contract.

##### **2. Post Adoption Records**

**Action: All staff in adoption services**

1. On making an Adoption Order, placing service must inform **Making Connections** using the[Adoption Notification to Making Connections Form](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269648063). The responsibility for making sure this happens, lies with the CSM.
2. Case Files remain with or remain responsibility of the placing service until the **adoptee is 18** including disruptions. The Case File is then sent to Making Connections. The responsibility for making sure this happens, lies with the CSM.
3. Before sending to Making Connections the paper record must be weeded by the placingservice. Any original documents i.e. photographs, certificates etc. should be put in envelopes and clearly marked with 1) the birth name and 2) the adoptive name and sent at the same time as the Case File. (Documents should have been scanned onto the case file). See Section 7.3.1 Adoption Manual 2009.
4. Case Files on Content server should be transferred from the service’s, to Making Connections File Room with information conveyed to Making Connections via the [Making Connections List of Adoption Records for Scanning 2009](http://livelink.barnardos.org.uk/livelink91/livelink.exe?func=ll&objId=162023469&objAction=viewversionheader&vernum=1) Form MC2.
5. Where sending paper records to Making Connections these should be boxed in alphabetical order in the birth name and accompanied by an MC2 form. Consideration must be given to scanning the case file content into the Content server case file.
6. Case Files for adoptees, their adoptive parents(s) and post adoption files should be sent together.
7. Making Connections workers will check paperwork and index cards and then send files to the document storage company to be put on disc.
8. Once on disc original files are returned to Head Office for destruction.
9. Making Connections use the form MC2 to mark index cards with the disc number.
10. Discs to be retained in Making Connections.
11. Where prospective adopters are not approved the file remains in the placing service for 3 years and is then destroyed.
12. Where the approved adopters do not have a child placed with them the file remains in the placing service for 3 years, from date of decision made at Adoption Applicant review that applicants are no longer seeking a placement, and is then destroyed.

##### **Case File Retention Periods**

**3.1 Contractual requirements**

**Action: CSMs**

1. Managers must ensure that they understand the contractual requirements set by commissioners or funders in relation to case file retention, which must always be used unless statutory retention periods apply or there is a longer retention period required by Barnardo’s , in which case an agreed retention period needs to be negotiated.
2. Contractual requirements must be recorded in the [Service Recording Protocol](http://livelink.barnardos.org.uk/livelink91/llisapi.dll/properties/243934841).

**3.2 Table of service user and carer record retention periods**

**Action: All staff**

1. The table of service user and carer record retention periods, see appendix 1, is to be used with this policy.
2. It is a tool to be used by service staff to identify retention periods. The responsibility for setting retention periods lies with CSM/line managers.
3. Retention dates must be added to all case files at closure.
4. File rooms cannot be closed until all of the case files have a retention date added.

**3.3 The Barnardo’s minimum retention period**

**Action: All staff**

1. This applies to records where there is no statutory minimum retention period and no contractual requirements in relation to case file retention. This is a minimum retention period.
2. If on an individual case basis there is a need to retain the case for longer this should be agreed by the CSM. The reason for the case being retained beyond the minimum retention period must be recorded in the case file and the service user informed.
3. If it is not possible to inform the service user the reasons for the change from the minimum period this must be recorded on the case file.

#### Associated guidance and documents

**1. Guidance for Archiving Paper Records**

**Preparing the record**

1. Review the record and remove and shred any duplicates of documents that are held on the electronic file.
2. Complete [The Case File for Archiving Front Sheet](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269347831) or the [Case File for Arching Front Sheet (Family Files)](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269353104) and add to the case file as the first page.

**Preparing the records for transfer**

1. Records must be transferred in a suitable container; this would usually be a box suitable for the size and number of records to be transported. Do not overfill the box and in line with Barnardo’s manual handling policy make sure that it can be lifted by an individual (no more than 5kg per box). Records must be transferred in boxes that are strong enough for the job and not overfilled.  If boxes should split open on route and files should go missing then it would be a data breach.
2. Records must be placed in the box in alphabetical order, e.g. A-C D-F and so on, and each box should be numbered (i.e. Box 1 of 6, Box 2 of 6 etc.). Names of service users should not be written on the outside of the box.
3. List all of the files contained in each box on the [List of Case Files sent to Making Connections](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269352731) or the [List of Case Files sent to Making Connections (Adoption)](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/269347950) form. The list should be continuous, NOT a separate list for each box.
4. When completing the lists please pay particular attention to the spelling of names and correct date of birth.
5. If a person has been known by more than one surname (or forename) this should be added to the relevant box on the list (i.e. Smith AKA Jones)
6. Place a copy of the full list in the first box, keep a sure copy locally and a third copy should be e-mailed to makingconnections@barnardos.org.uk with the subject “Files for Archiving”.
7. Only case records for archiving must be contained in the boxes.
8. Secure the lid of the box with tape, number all boxes (Box 1 of 6, Box 2 of 6 etc.) and make sure each box is clearly marked with the full Making Connections address (Barnardo’s Making Connections, 140 Balaam Street, Plaistow, London, E13 8RD).
9. Any queries should be directed to Making Connections and resolved prior to sending the records.

**Transfer of records**

1. Agree a date for transfer of the records with Making Connections. There will be a planned transfer of records for archiving to Making Connections during 2017 and 2018 and staff will be informed of the period during which they may transfer their records.
2. Use a reputable courier firm to transport the records, such as TNT, see guidance on couriers below. Once the courier has been booked, service is to contact Making Connections to let them know how many boxes are being sent and the ETA.
3. E-mail a copy of the list of records being transferred to makingconnections@barnardos.org.uk with the subject “Files for Archiving” prior to despatch.
4. When Making Connections have confirmed receipt of all of the records, update the record of closed paper files to show that they have been sent to Making Connections.

**Courier Guidance**

1. Always use a reputable courier company who tracks the boxes on route to their destination and if they need to be held overnight keep the records in a secure environment.

2. TNT is our recommended.

3. If TNT is not available in the service location then the service should make arrangements with an alternative company.  Choose a well-established company and check the company website for their security policy.  If this isn’t clear the service need to contact the company directly for more clarification on security arrangements and if in doubt do not use them.

4. All boxes must be clearly marked with the full address of Making Connections (Barnardo’s Making Connections, 140 Balaam Street, Plaistow, London, E13 8RD)

5. All boxes need to be clearly numbered (i.e. Box 1 of 6, Box 2 of 6 etc.)

6. Make sure boxes are fit for purpose and sealed securely.

7. Make sure boxes are not overfilled or too heavy to lift.

##### **2. Guidance for Management of Closed Electronic Records Held in SUR**

1. Run the Discoverer report for each closed cabinet every 3 months.
2. Identify any cases that do not have a retention date.
3. Add the retention date using the guide to retention dates in appendix 1.
4. If the case file was opened before March 2012 and there is data missing from some of the mandatory fields this must be completed to allow the retention date to be saved, use the [Default options to be used for completion of core data forms for closed cases](http://livelink.barnardos.org.uk/otcs/llisapi.dll/properties/225194025).
5. Identify the cases that have reached the retention date.
6. Send the list of case ID numbers and names to the CSM for sign off.
7. CSM to review the list and agree that they can be deleted.
8. Send the list of cases that can be deleted to surdeletion@barnardos.org.uk
9. Open a folder in a confidential service area called *(File room name) Deleted Electronic Case Files* and save the list of case files sent for deletion.

10. If the service closes send the folder containing the closed case files to the Regional/National/Business Line office.

11. If the case file is re-opened at any time the core data form must be checked and any inaccurate fields updated.

#### References

**Adoption Records**

The storage, retention and access in respect of adoption is governed by –

[Adoption and Children Act 2002 (c. 38)](http://www.opsi.gov.uk/acts/acts2002/ukpga_20020038_en_1) & [Adoption guidance: Adoption and Children Act 2002 - Every Child Matters](http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/ig00032)

[The Voluntary Adoption Agencies and the Adoption Agencies (Miscellaneous Amendments) Regulations 2003](http://www.opsi.gov.uk/SI/si2003/20030367.htm)

[The Adoption Information and Intermediary Services (Pre-Commencement Adoptions) Regulations 2005](http://www.opsi.gov.uk/si/si2005/20050890.htm)

[The Adoption Information and Intermediary Services (Pre-Commencement Adoptions) (Wales) (Amendment) Regulations 2005](http://www.opsi.gov.uk/legislation/wales/wsi2005/20053293e.htm)

[The Disclosure of Adoption Information (Post-Commencement Adoptions) Regulations 2005](http://www.opsi.gov.uk/si/si2005/20050888.htm)

[The Access to Information (Post-Commencement Adoptions) (Wales) Regulations 2005](http://www.opsi.gov.uk/legislation/wales/wsi2005/20052689e.htm)[Adoption and Children Act 2002 (c. 38)](http://www.opsi.gov.uk/acts/acts2002/ukpga_20020038_en_1) & [Adoption guidance: Adoption and Children Act 2002 - Every Child Matters](http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/ig00032)

[The Voluntary Adoption Agencies and the Adoption Agencies (Miscellaneous Amendments) Regulations 2003](http://www.opsi.gov.uk/SI/si2003/20030367.htm)

[The Adoption Information and Intermediary Services (Pre-Commencement Adoptions) Regulations 2005](http://www.opsi.gov.uk/si/si2005/20050890.htm)

[The Adoption Information and Intermediary Services (Pre-Commencement Adoptions) (Wales) (Amendment) Regulations 2005](http://www.opsi.gov.uk/legislation/wales/wsi2005/20053293e.htm)

[The Disclosure of Adoption Information (Post-Commencement Adoptions) Regulations 2005](http://www.opsi.gov.uk/si/si2005/20050888.htm)

[The Access to Information (Post-Commencement Adoptions) (Wales) Regulations 2005](http://www.opsi.gov.uk/legislation/wales/wsi2005/20052689e.htm)

#### Compliance

Compliance with this policy will be monitored by the responsible **ADCS** or **AHoB** via the Annual Data Protection audit and sampling of records and as part of on- going quality assurance.

#### Document History

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| --- | --- | --- | --- | --- |
| **Version** | **Date** | **Author** | **Status** | **Comment** |
| 1 | 06/02/17 | Pat Greene | Draft | Awaiting Approval |
| 2 | 1/3/17 | Pat Greene | Final | CSMT Approval 1/3/17 |
| 3 | 30/8/17 | Pat Greene | Final | Replaced previous policy |
| 4 | 23/10/17 | Pat Greene | Final | Retention period for CSE and harmful sexual behavior extended from 6 years to 75th birthday. |
| 5 | 31/7/18 | Pat Greene | Final  | Amended in line with GDPR. |
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Appendix 1

**TABLE OF SERVICE USER AND CARER RECORD RETENTION PERIODS**

**Contractual requirements:** managers must ensure that they understand the contractual requirements set by commissioners or funders in relation to case file retention, which must always be used unless statutory retention periods apply or there is a longer retention period required by Barnardo’s, in which case an agreed retention period needs to be negotiated.

**The Barnardo’s minimum retention period:** applies to records where there is no statutory minimum retention period and no contractual requirements in relation to case file retention. This is a minimum retention period and if on an individual case basis there is a need to retain the case for longer this should be agreed by the CSM. The reason for the case being retained beyond the Barnardo’s minimum retention period must be recorded in the case file and the service user informed. If it is not possible to inform the service user the reasons for this must be recorded on the case file.

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| 1. **Barnardo’s Minimum Retention Periods where there is no Statutory or Contractual Retention Period**
 |
| **Nature of Record** | **Retention period** | **Archiving/Deletion** |
| **Records of service users where no service is delivered.** This includes records of consultations and pre-referral information where there has been no initial assessment. | **1 year from date of last entry on the record.** | Electronic file deleted and paper record securely shredded |
| **Records of individual work with children or adults where there is no statutory retention period.** | * **Cases closed after 6/11/12 - 6 years from closure**
* **Cases closed before 30/11/06- years from closure of the case record**
* **Cases closed after 30/11/06 and before 06/11/12 - 6 years or the subject’s 24th birthday whichever is the longer period**
 | Electronic file deleted and paper record securely shredded after 6 years |
| **Records of group work** | **6 years from closure of the group record.** NB if the group record has been copied to individual case records the group record must be retained until all of the individual case records have reached their retention date. | Electronic file deleted and paper record securely shredded after 6 years |
| **Family Group Recording** | A single retention date must be applied to all of the individual case files and the group file of **6 years.** If statutory or safeguarding retention periods apply to one or more individual in the family group the retention date would be **75 years from the date of birth of the youngest person.** | If 6 year retention period applies electronic case file deleted and paper file shredded when retention date reached.If 75th birthday retention period used, electronic file archived and paper file sent to Making Connections. |
| **Case file including a record of an injury** | **Minimum retention period of 21st birthday.** If the case file includes the record of an injury to a child or youngperson it must be kept at least until their 21st birthday, as they have until then to bring a civil suit. If the injury was the result of deliberate harm the case file must be kept until at least the 25th birthday.  | Case file deleted and paper file shredded when retention date reached unless case file meets criteria for archiving; electronic file to be archived and paper file sent to Making Connections. |
| 1. **Safeguarding**
 |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| Serious Case Review, Case Management Review and Internal Management Review undertaken about subject of a case record | **75 years from date of review** | Paper record sent to Making Connections for archiving 6 years after case closed |
| Childs name placed on Child Protection Register or child is subject to Child Protection Plan while case is open | **75 years from date of birth** | Paper record sent to Making Connections for archiving 6 years after case closed |
| Child’s name removed from the Child Protection Register before the case is opened | **6 years from date of closure** | Electronic file deleted and paper record securely shredded |
| **CSE, Trafficking and Sexually Harmful Behaviour** Records of service users accessing services for CSE, Trafficking and Sexually Harmful Behaviour. Records of Work undertaken by other services where these issues were relevant to the intervention with the young person, such as a homelessness service working with young people or seeking housing to get away from exploitation or a mental health service dealing with the impact on current mental health. | **75 years from date of birth** | Electronic file deleted after 75th birthday, paper records scanned onto electronic case file. |
| **Individual case files from any service** **which might be required for the sexual abuse inquiries.** Records where;* there have been instances of or concerns about sexual abuse or child protection of children in care
* it is recorded that the subject has involvement in or knowledge of child abuse or child sexual abuse
* it is recorded that the subject has engaged in or has a sexual interest in children
 | **All case files to be kept for a minimum retention period of 31st December 2035 due to the requirement of the sexual abuse inquiries in Scotland and Northern Ireland and England. Where case files are accessed as part of the inquiries they must be kept until 75th birthday.** Statutory and safeguarding retention periods must always be used where these apply. | Electronic file deleted and paper file shredded when retention date reached or paper file sent to Making Connections if case file is to be retained until 75th birthday. |
| 1. **ETS Work**
 |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| Records of individual and group ETS work | **Retention period set by the commissioner in the service contract.****If no retention date set by the commissioner, 6 years from date of closure.** | Electronic file deleted and paper record securely shredded. |
| 1. **Statutory Retention Periods - Cymru**
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| **Statutory Retention Periods - Family Placement /Supported Lodgings** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Adoption –** child’s record including adoption counselling. | **100 years from date adoption order made** | Paper record sent to Making Connections for archiving. |
| **Adoption**-adopters’ record - where an adoption order made including placement, post adoption work, support and counselling | **75 years from closure of file** | Paper record sent to Making Connections for archiving. |
| **Adoption-** record where no adoption order made; child’s Residential Children’s Home record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Adoption** – where child die before the age of 18 child’s record including Adoption counselling; Adoption record where no adoption made | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Adoption** *-* prospective adopters - refusal or withdrawal of application to become foster parents | **6 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Adoption** - record where no adoption order made  | **3 years from closure of file** | Electronic file deleted and paper record securely shredded |
| **Fostering** – child’s record | **75 years form date of birth** | Paper record sent to Making Connections for archiving. |
| **Fostering** - child’s record if child dies before the age of 18 | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Fostering** – carer record | **31st December 2035** | Paper record sent to Making Connections for archiving. |
| **Fostering** - potential carer – significant issues which might affect future inquiries | **6 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering** - potential carer - initial visit only | **3 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering -** potential carer - initial inquiry – no other contact | **1 year from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Supported lodgings** - young people’s records - supported lodgings | **75 years from closure of file** | Paper record sent to Making Connections for archiving. |
| **Supported lodgings** - lodging provider’ record | **31st December 2035** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Looked after Children including Children in Residential Children’s Homes and Children / Young people with Residential Supervision Requirements (Cymru)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Looked After Children** – child’s record  | **75 years from date of birth**  | Paper record sent to Making Connections for archiving. |
| **Leaving care service** - service user record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Looked After Children** –service user record if death occurs before age of 18  | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Domiciliary Care (Cymru)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Domiciliary Care** -case record | **Barnardo’s minimum retention period unless the subject also received residential or family based care.** | Electronic file deleted and paper record securely shredded |
| **Statutory Retention Periods - Residential Special School Pupil Record (Cymru)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Residential special school**, pupil record held by Barnardo’s or passed on with receipt from next school if pupil changes schools. Care record retained. | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods** **-** **Day Care and Child Minding (Cymru)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Day Care and Child Minding**  | **6 years from date child left provision** | Electronic file deleted and paper record securely shredded. |
| 1. **Statutory Retention Periods - England**
 |
| **Statutory Retention Periods - Family Placement /Supported Lodgings (England)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Adoption** –child’s record including adoption counselling. | **100 years from date adoption order made** | Paper record sent to Making Connections for archiving. |
| **Adoption** - adopters’ record - where an adoption order made including placement, post adoption work, support and counselling  | **75 years from closure of file** | Paper record sent to Making Connections for archiving. |
| **Adoption** - record where no adoption order made; child’s Residential Children’s Home record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Adoption** – where child dies before the age of 18 child’s record including Adoption counselling; Adoption record where no adoption made | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Adoption** *-* prospective adopters - refusal or withdrawal of application to become foster parents | **6 years from date of last entry** | Electronic file deleted and paper record securely shredded  |
| **Adoption** -record where no adoption order made - minimum and length of time as agency decides is appropriate. In Barnardo’s case 3 years | **3 years from closure of file** | Electronic file deleted and paper record securely shredded |
| **Fostering** - child’s record  | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Fostering** - child’s record - if child dies before the age of 18 | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Fostering** - carer | **Minimum retention 31st December 2035** | Paper record sent to Making Connections for archiving. |
| **Fostering** -potential carer – significant issues which might affect future inquiries | **6 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering** applicants - refusal or withdrawal of application to become foster parents due to significant issues | **6 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering** applicant’s refusal or withdrawal of application to become foster parents  | **6 years from date of refusal or withdrawal of application**  | Electronic file deleted and paper record securely shredded |
| **Fostering** - potential carer - initial visit only | **3 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering** potential carer - initial inquiry – no other contact | **1 year from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Supported lodgings** - young people’s records - supported lodgings | **75 years from closure of file** | Paper record sent to Making Connections. |
| **Supported lodgings** - lodging provider record | **Minimum retention 31st December 2035** | Paper record sent to Making Connections for archiving |
| **Statutory Retention Periods - Looked after Children including Children in Residential Children’s Homes and Children / Young people with Residential Supervision Requirements (England)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Looked After Children** – child’s record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Leaving care service** | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **From date of death if death before age 18** Looked After Children record | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Domiciliary Care (England)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Domiciliary care** - case record  | **Barnardo’s minimum retention period unless the subject also received residential or family based care.** | Electronic file deleted and paper record securely shredded. |
| **Statutory Retention Periods - Residential School (England)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Residential special school** -pupil record held by Barnardo’s or passed on with receipt from next school if pupil changes schoolswith copy retained by Barnardo’s. Care record retained by Barnardo’s | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Residential Family Centre (England)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Residential Family Centre** - case record | **15 years from date of last entry** | Electronic record deleted and paper records securely shredded. |
| 1. **Statutory Retention Periods – Northern Ireland**
 |
| **Statutory Retention Periods - Family Placement /Supported Lodgings (NI)**  |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Adoption –** child’s record including adoption counselling. | **100 years from date adoption order made** | Paper record sent to Making Connections for archiving. |
| **Adoption** -adopters’ record - where an adoption order made including placement, post adoption work, support and counselling  | **75 years from closure of file** | Paper record sent to Making Connections for archiving. |
| **Adoption** - record where no adoption order made; child’s Residential Children’s Home record | **75 years from date of birth**  | Paper record sent to Making Connections for archiving. |
| **Adoption** – where child dies before the age of 18, child’s record including Adoption counselling | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Adoption** - prospective adopters - refusal or withdrawal of application to become adoptive parents | **6 years from date of last entry** | Electronic record deleted and paper records securely shredded. |
| **Adoption** -record where no adoption order made  | **3 years from closure of file** | Electronic record deleted and paper records securely shredded. |
| **Fostering** - child’s record if child dies before the age of 18 | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Fostering** – child’s record | **75 years from date of birth** | Paper record sent to Making Connections for archiving |
| **Fostering** – foster carer record  | **Minimum retention 31st December 2035** | Paper record sent to Making Connections for archiving |
| **Fostering** -Potential carer – significant issues which might affect future inquiries | **6 years from date of last entry** | Electronic record deleted and paper records securely shredded. |
| **Fostering** applicants - refusal or withdrawal of application to become foster parents – significant issues | **6 years from date of last entry or withdrawal of application** | Electronic record deleted and paper records securely shredded. |
| **Fostering** - potential carer - initial visit only | **3 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Fostering** potential carer - initial inquiry – no other contact | **1 year from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Supported lodgings** - carer record | **Minimum retention 31st December 20135** | Paper record sent  |
| **Supported lodgings** - young people’s records - supported lodgings | **75 years from closure of the file** | Paper record sent to Making Connections for archiving  |
| **Statutory Retention Periods - Looked after Children including Children in Residential Children’s Homes and Children / Young people with Residential Supervision Requirements (NI)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Looked After Children** – child’s record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Leaving care service** – child’s record | **75 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Looked After Children** – child’s recordif death before age 18 | **15 years from date of death** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Domiciliary Care (NI)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Domiciliary Care** – case record | **Barnardo’s minimum retention period unless the subject also received residential or family based care.** | Electronic file deleted and paper record securely shredded |
| **Statutory Retention Periods - Residential Special School Pupil Record(NI)**  |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Residential Special School**  | **75 years from date of birth** | Electronic file deleted and paper record securely shredded |
| **Statutory Retention Periods - Residential Family Centre (NI)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Residential Family Centre** - case record | **15 years from date of last entry** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods** - **Day Care and Child Minding (NI)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Day-care and Child-minding** | **6 years from date child left the provision** | Electronic file deleted and paper record securely shredded |
| 1. **Statutory Retention Periods – Scotland**
 |
|  **Statutory Retention Periods - Family Placement/Supported Lodgings (Scotland)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Adoption** Adopters' record; Adoption support record; Fostering record | **100 years From date of Order** | Paper record sent to Making Connections for archiving. |
| **Adoption** Children freed for adoption but not adopted; adopted children; children placed by a Local Authority; fostered children  | **100 years from date of birth** | Paper record sent to Making Connections  |
| **Fostering and Adoption** – case file applicant not approved by panel or approved and carer withdrawal | **25 years from date of decision or date of prospective adopter or carer death if earlier** | Paper record sent to Making Connections  |
| **Adoption** Children freed for adoption but not adopted; children placed by a Local Authority; fostered children who die before the age of 18 | **25 years from date of death if death before age 18** | Paper record sent to Making Connections  |
| **Fostering and Adoption** – case file applicant not approved by panel or approved and carer withdrawal | **25 years from date of decision or date of prospective adopter or carer death if earlier** | Paper record sent to Making Connections for archiving. |
| **Fostering and Adoption** – case file approved carers | **31st December 2035 or 25 years from termination of approval (or death if earlier) whichever is later** | Paper record sent to Making Connections for archiving  |
| **Kinship carers** - case file | **25 years from termination of last placement or date of death of carer if earlier** | Paper record sent to Making Connections for archiving  |
| **Fostering and Adoption** - potential carer – initial interview significant issues which might affect future inquiries | **10 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Prospective adopters** – no adoption order made | **10 years from date of approval** | Electronic file deleted and paper record securely shredded |
| **Fostering and Adoption** - potential carer background preparation | **10 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Private fostering -** case file | **6 years from last action on case** | Electronic file deleted and paper record securely shredded |
| **Fostering -** potential carer - initial visit only | **3 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Potential carer** - initial inquiry – no other contact | **1 years from date of last entry** | Electronic file deleted and paper record securely shredded |
| **Supported lodgings** - young people’s records  | **75 years from closure of file** | Paper record sent to Making Connections for archiving. |
| **Supported lodgings**- carer record | **Minimum retention of 31st December 2035** | Paper record sent to Making Connections for archiving |
| **Statutory Retention Periods - Looked after Children including Children in Residential Children’s Homes and Children / Young people with Residential Supervision Requirements (Scotland)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Looked after Children -** case file for children placed by a Local Authority; children with a residential supervision requirement; children in Residential homes; Through care and Aftercare – all Pathway documentation. | **100 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Looked after Children -** case file for children placed by a Local Authority; children with a residential supervision requirement; children in Residential Children's Homes | **25 years from date of death if death before age of 18** | Paper record sent to Making Connections for archiving. |
| **Statutory Retention Periods - Children’s Rights (Scotland)** |
| **Nature of work** | **Retention Period** | **Archiving/Deletion** |
| **Children’s Rights -** case file | **100 years from date of birth** | Paper record sent to Making Connections for archiving. |
| **Children’s Rights -** case file | **15 years from date of death if death before age 18** | Paper record sent to Making Connections for archiving. |