

Data Handling and Record-Keeping Policy

Introduction

The following guidelines on retention and destruction of information were issued by the CCSA and adopted by CACS.

Retention of Data

Under data protection law, personal data should be kept for no longer than is necessary for the purpose for which it is held. However, data protection law does not contain any prescriptive time limits for holding personal data.

The table below sets out the suggested retention periods for each type of information which may be held relating to safeguarding issues:

Scenario	Retention Period	Rationale for Retention Period
Cases/situations that, although reported to the Catholic Church, do not involve case management by the Church. (All records relating to enquiries and actions in respect of individuals that are referred to other organisations and there is no ongoing safeguarding case management role for the Church. These might include allegations against individuals in different denominations and parishioners who require welfare support from statutory authorities.)	One year, or for as long as necessary to respond to any ongoing queries (e.g. from the authority that the information has been passed to). A summary record including date, name of individual and action taken is to be retained indefinitely.	The person against whom allegations have been made holds no role within the Church, either as an office holder or a volunteer. If referred to another body, they will hold their own, more detailed, safeguarding record. The summary record is retained to demonstrate that the referral was received and acted on.

All records relating to information about an individual referred to the safeguarding office that does not constitute a safeguarding matter or require any ongoing action.	A summary record including date, name of individual and action taken is to be retained indefinitely where the person concerned is a member of clergy, and for twelve months for all others.	The information does not constitute a safeguarding matter or require any further action. The summary record is retained to demonstrate that the information was received and considered.
Case files in the name of the alleged perpetrator that are likely to include but are not restricted to: • CM1 – referral form • Case recording log • Chronology of significant events • Case summaries (excluding final summary when main file records are being deleted) • Letters/emails/texts/ other electronic messaging sent and received • Minutes of meetings • IRA2 Risk Assessment Agreement and any agreement between commissioned assessor / investigator and person being assessed / investigated • Safeguarding plans	For clergy and religious, 85 years from date of birth, or date of death if later. At the end of the relevant period, a summary record of the case file will be retained indefinitely. For all other church roles (e.g., volunteers, office holders) 25 years from the date their role ceases, or at least 6 years after the date of death of the accused person if this is sooner. At the end of these retention periods, a summary record of the case file will be retained until the 85th birthday of the accused person. The summary record should include the following details about the accused: • Full name • Date of birth • Date of death (if applicable) • Role • Date of ordination (employment)	Clergy and religious generally have a lifelong relationship with the Church, and dioceses and religious congregations have vicarious liability for their actions whilst within the Church, even after they have left the Church. We know that people often do not tell the Church about alleged abuse for many years after it is said to have occurred. For these reasons, full case files concerning religious and clergy are to be kept until the accused person's 85th birthday (or death if later), and summary files are to be kept indefinitely. In respect of other roles, the Limitation Act 1980 provides a limitation period of three years for personal injury claims from the date of the incident, or from the claimant's 18th birthday if the incident occurred prior to that date. However, judges have an unfettered discretion under the Limitation Act to allow a claim to proceed outside of these timescales. We know that people often do not tell the Church about alleged

• Risk information framework • Reports (e.g. risk assessments, psychological, psychiatric, investigative) • National review template forms • Legal and restricted information which must be kept in a separate section of the file.	• Movement between dioceses/religious congregations • Summary of safeguarding issues/convictions • Record of DBS checks/other checks (e.g. testimonials) • Summary of actions taken by the Church • Name of alleged victim(s) • DOB of alleged victims	abuse for many years after it is said to have occurred. For this reason, we keep full files until 25 years after the role ceases and summary files until the 85th birthday of the accused person.
Parish or other event/activity-related records. Records are likely to include but are not restricted to: • Photo 1: Parental consent to use of images • Case 2: Approval of events form • Case 4: Parental consent for an activity • Case 5: Session recording sheet • Case 6: Incident report form*	Three years after the event/activity ceases. *In the case of an incident report form involving an adult, the form will be kept for three years following the date of the incident. In the case of an incident involving a child, the form will be kept for 21 years from the date of the incident.	Records need to be kept in case of incidents occurring at events. The general limitation period for personal injury claims is three years from the date of incident or three years from a child's 18th birthday, if a child has been injured. Incidents may not be reported contemporaneously, so these records need to be kept for three years post-event/activity in case a claim is made. Where an incident has occurred, the record should be kept for the full limitation period. NB: If a safeguarding file is opened in relation to an incident, the IRF may be transferred onto that file

		and the retention period for that file will apply.
Personnel-related files and records. Records are likely to include, but are not restricted to: • Electronic entries on the CSSA DBS Database DBS 1: Volunteer registration form* • DBS 2: Volunteer reference form • DBS 3: ID verification form** • DBS 4: Safeguarding self-declaration form*** • DBS 5: Withdrawal of consent to undertake DBS Online Update Service checks • DBS 9: Confidentiality agreement for individuals handling DBS disclosure information and accessing the national database • DBS 10: Counter-signatory agreement between Catholic dioceses/religious congregations in relation to the	10 years and one day after the person leaves their role, or six years after the person's death. *Where a case file is opened, the entries on the DBS Database (e.g. date of check and existence of a risk assessment) should be recorded on the case file before the electronic record is destroyed. **Existing DBS 3 forms can be destroyed when a new form is completed. ***Existing DBS 4 forms can be destroyed when a new disclosure application has been completed and any queries about disclosure content and prior self-disclosure have been resolved.	We know that people often do not tell the Church about concerns or abuse for many years after it is said to have occurred. For this reason, we retain records on volunteers and safeguarding roles for a ten-year period after they leave their role, or at least six years following death if this is sooner.

provision of DBS disclosures		
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provision of DBS Disclosures ● DBS 11: Request for a new counter-signatory to be added to the CSSA Registered Body account ● DBS 12: Request for removal of a counter-signatory from the CSSA Registered Body account ● DBS 13: Ebulk user exit form ● DBS 14: Ebulk end-user agreement ● Blemished DBS disclosure risk assessment form ● CASE 1: Written agreement for volunteers which indicates that they have read and understood their job description and agree to adhere to national safeguarding procedures ● Case 9: Declaration that the volunteer has understood the safeguarding procedures ● Testimonials of suitability		
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• Form 1: Supervision agreement Form 3 – record of supervision • Form 4: Record of individual case discussion • Form A: Preparation by role holder for appraisal • Form B: Preparation by supervisor for appraisal • Form C: Annual appraisal summary		
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Policy prepared by the CACS Safeguarding Team.

