

# Record Keeping and Confidentiality

The information we store, how we keep it secure and the basis on which it is shared

## Data Protection

To fulfil our safeguarding obligations and the safe, effective running of our ministries, we are required to collect and process personal information. Some of this information, particularly our records of safeguarding concerns raised, may be classed as sensitive data.

The *Data Protection Acts 1998 and 2003: A Guide for Data Controllers* (published by the Data Protection Commissioner) outlines eight principles, stating that we must:

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes [for which it was collected]
8. Give a copy of his/her personal data to an individual, on request

This document outlines the types of information we collect with respect to safeguarding children, young persons and vulnerable adults and the protections we have in place.

## Our Records

Category	Description	Storage	Retention	Access
Safeguarding Reports	Details of safeguarding concerns, disclosures or allegations	Hard copy (Key-locked Safe)	Indefinite <sup>1</sup>	Safeguarding Coordinators
	Copies of referrals to Tusla or An Garda Síochána			
Recruitment Records	Application Forms	Hard copy (Key-locked Safe)	5 years from leaving role	All: Safeguarding Coordinators Garda Vetting Officers  Application Forms and References only: Children’s Work Manager
	eVetting Inviter Forms <sup>2</sup>			
	Criminal Record Declarations	Electronic media (AES-XTS 128-bit encryption)		
	Copies of Identity Documents <sup>2</sup>			
	National Vetting Bureau disclosures			
	Overseas criminal record checks			
Employment and character references	HubSpot CRM (application forms only)			
Registration Forms	Registration forms	Hard copy (Locked cupboard)	2 years from child leaving	Safeguarding Coordinators Children’s Workers
	Activity consent forms			
	Media consent forms			
	Accident records			
Attendance Logs	Registers	Children’s work box	1 year	

<sup>1</sup>The nature of safeguarding allegations mean that these records may be required a significant amount of time into the future. Therefore, these should be retained on an indefinite basis.

<sup>2</sup>The registered organisation applying for vetting disclosures on our behalf may request to audit our inviter forms or identity documents.

Access to these records may also be provided to An Garda Síochána, Tusla or the Health Service Executive on a case-by-case basis to assist with any investigation or enquiry.



### Confidentiality

Effective safeguarding requires the timely exchange of critical information; both internally and with external statutory agencies. To that end, no staff member or volunteer working on behalf of Christ City Church should give an undertaking of secrecy or agree to withhold information relating to the protection or welfare of a child or vulnerable adult. Where there is any doubt, that staff member or volunteer should consult the Designated Liaison Person.

The guiding principle for sharing information is that it should be on a 'need to know' basis. This, and the data protection measures outlined above, are intended to ensure that sensitive information is dealt with lawfully and with due regard for the individuals rights. However, this is not designed to restrict or prevent the exchange of information with those who have a responsibility for safeguarding the welfare of children and vulnerable adults.

Where there is a concern regarding the protection or welfare of a child (even if they cannot be identified), Christ City Church may be required to report this to the Child and Family Agency (Tusla), An Garda Síochána or another statutory agency. Provision of such information to these agencies is not a breach of confidentiality or data protection.

Where there is a concern regarding the protection or welfare of a vulnerable adult, the individual's wishes must be considered. However, where there is a risk to other persons, Christ City Church must act in the best interests of all concerned. The Health Service Executive (HSE) or An Garda Síochána may be consulted in order to determine the best course of action.

For more information about our procedures regarding responding to and reporting safeguarding concerns, refer to the appropriate 'Recognising, Responding and Reporting' section.

## Document History

Version	Author(s)	Date Revised	Comments/Changes
1.0	Stephen Sharpe Leanne Vaughan (reviewer)	18/07/2017	New document
1.1	Stephen Sharpe	02/10/2017	Time-limited records for recruitment