

TITLE OF BRIEFING NOTE: **Guidance on Handwritten Notes/Personal Data**

REPORT OF: **Daniel McCormick, Business Support Manager**

DATE OF REPORT: **13 June 2023**

Purpose of the report

To outline Guidance to staff on the recording and retention of handwritten notes and personal data.

Background

As part of the Corporate Data Protection Group, guidance has been circulated to highlight some of the risks associated with Practitioners in Children's Services taking notes by hand. A number of FOI requests have been received for Children's Services to respond to in connection with handwritten notes, and how the data protection principles of accuracy, storage limitation (retention) and confidentiality (security) are applied.

Where handwritten notes are used to record interaction with Service Users, this presents a risk of personal data breaches because of their portable nature e.g. they can be misplaced, copied or viewed by unauthorised persons.

Proposal and/or Issues for consideration

The proposals below are for Practitioners to abide to, should handwritten notes be made by Employees, thus reducing the risk of a data breach occurring:

- Requirement to anonymise handwritten notes as far as possible where Practitioners are choosing to write e.g. use initials of children, family members, professionals etc as opposed to full names. **No details of home addresses/identifiable details to be recorded within the handwritten notes.**
- Handwritten notes from home visits or interaction with children and families to be typed into the electronic social care system within a period of **seven working days**, and then destroyed.
- Handwritten notes from Meetings, Conferences or Reviews with children and families to be typed into the electronic social care system within a period of **twenty working days**, and then destroyed.
- Notebooks are not to be left unattended within office workspaces, cars or personal vehicles etc.
- Promote the use of electronic equipment where possible e.g. using iPads, Laptops etc which are securely locked to individual users of the devices

Risks/Potential Implications

- Rise in Data Breaches should handwritten notes be used on a regular basis.
- Handwritten notes being emailed through to Business Support could create further discrepancy during Subject Access Requests e.g. illegible handwriting

Consultees:

The following officers have been consulted on the preparation of this report:

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