

Retention of Information Policy

The Data Protection Act 2018 and now the General Data Protection Regulations (2018) requires that we retain personal data no longer than is necessary for the purpose we obtained it for. Ensuring personal data is disposed of when no longer needed will reduce the risk that it will become inaccurate, out of date or irrelevant. The Act does not set out any specific minimum or maximum periods for retaining personal data. Instead, it says that personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

It means that we will need to:

- review the length of time we keep personal data
- consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it
- securely delete information that is no longer needed for this purpose or these purposes
- update archive or securely delete information if it goes out of date.

Personal data will need to be retained for longer in some cases than in others. How long we retain different categories of personal data should be based on individual business needs. A judgement must be made about:

- the current and future value of the information
- the costs, risks and liabilities associated with retaining the information
- the ease or difficulty of making sure it remains accurate and up to date.

The appropriate retention period is also surrounding circumstances, any legal or regulatory requirements or agreed industry practice. At the end of the retention period, or the life of a particular record, it should be reviewed and deleted, unless there is some special reason for keeping it.

Patient Files

There are many different types of NHS file that may enter the Practice and as such many become part of the Scanning Policy implemented within the Practice. The following is a brief list of some of the correspondence that may be received and how it is processed by the Practice.

GP Records	All information is for the lifetime of the patient before being transferred to PCSE
Prison Health Records	Discharge summaries are sent to the Practice and are scanned onto the patients file
Family records	Please be aware of the possibility of third party information
Complaints	Stored separately from the SystemOne file
Ambulance Service Records	Filed into the Lloyd George as the paperwork cannot be scanned onto the patients file

Adopted Persons Records	Extra care must be taken to ensure that only the relevant carers have access to information from this file. In some cases a completely new NHS number will be provided and relevant information will be transferred to the new file before the old file is closed.
Transgender records	Extra care must be taken once a certificate for gender reassignment is received. On occasion a new NHS number may be required and then care must be taken to transfer relevant information from the previous gender file to the new file. Consultation with the patient may sometimes be required in order to transfer everything required. Consultation must be made between the Caldicott guardian and the Safeguarding Leads in order to ensure that a sensitive approach is used throughout this process.

Business files

Staff

Please be aware that a file on staff can be retained for up to 20 years. The recommended timeframe is to review the requirement 6 years after the person has left or upon their 75th birthday.

In the staff file the following information is recommended:-

- Name (including previous names)
- Date of birth
- Address (including previous)
- Contact number
- Next of kin
- Allergies
- Positions held
- Pay band/hourly rate
- Start and end date
- Reason for leaving
- Sites worked at
- Training/certificates (where relevant)
- Disciplinary record in brief – cases files can be stored separately

Email

All employees should purge their emails at regular intervals. Any retained emails must be relevant to their position. Emails purporting to specific business files should be stored with the actual file for ease of access.

Website/Intradoc

Should be reviewed and updated at regular intervals to check for relevance and to archive out of date information.

Paper business files

Should be accessible for audit and be stored in a locked or secure storage unit.

Digital business files

Files should be stored in an accessible format for those individuals who are authorised to access them. These files may require a password for reasons of security. Any emails relating to these emails should be stored with them.

Appraisal

A record or series of information cannot be automatically destroyed or deleted. Any potential future use must be appraised firstly. It must be decided if the business use of the document has ceased to exist. Once a decision has been made then the outcome will be:-

- Destroy/delete file
- Retain for a longer period
- Transfer to a place of deposit under the Public Records Act 1958

Retention timeframe

Please note that this is the **minimum** timeframe recommended under current guidelines. Anything with P.O.D. after them are in reference to the Public Records Act 1958 which require additional storage at the earliest convenient time for the Practice.

Unsuccessful applicants	1 year
Clinical Diaries	2 years
Death certificate counterfoils	2 years
Timesheets	2 years
Debtor (records cleared)	2 years
Petty cash	2 years
Accounts	3 years
Confidentiality Agreements	3 years
Recorded telephone conversations	3 years
Clinical audits	5 years
Public consultations	5 years (P.O.D)
Committees/group meetings	6 years
Intranet site	6 years (P.O.D)
Patient information leaflets	6 years (P.O.D)
Press release/important internal communications	6 years (P.O.D)
Duty roster	6 years
Contracts that are sealed or unsealed	6 years
Tenders	6 years
Building work	6 years
Debtor (records not cleared)	6 years
Donations	6 years
Expenses	6 years
Financial records of transactions	6 years
Fraud case files	6 years

Freedom of information requests	6 years
Website	6 years (P.O.D)
Benefactions	8 years
Non serious incidents	10 years
Equipment monitoring/testing/maintenance	10 years
Salaries paid to staff	10 years
Superannuation records	10 years
Complaints	10 years
Tribunal/litigation records	10 years
Contracts financial approved suppliers documentation	11 years
Equipment maintenance logs	11 years
Leases	12 years
Contracts financial approval files	15 years
Board meetings	Up to 20 years
Clinical protocols	25 years
Final annual accounts report	P.O.D. as soon as possible
Staff records	6 years after leaving the organisation or on their 75 th birthday
Policies, strategies and operating procedures including business plans	Lifetime of the organisation plus a further 6 years. Could transfer to P.O.D. at any point