

Data Quality (Record Retention) Policy

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1 Legislative Framework

1. Data Protection Act 1998, GDPR and supporting/complimentary legislation

2 Purpose

The Company is committed to all aspects of data protection and takes seriously its duties, and the duties of its Employees, under the Data Protection Act 1998 and the GDPR. This policy sets out how the Company will clarify the minimum retention period for all care and corporate records for storage in line with current legislation and guidance.

The policy and procedures for all information governance, data and records management are reviewed in preparation for the introduction of the General Data Protection Regulations in May 2018.

3 Scope

All Employees, irrespective of their role within the organisation, are held by the contents of this policy and are required to follow and uphold the values, principals and expected behaviours of the Company when carrying out their duties and responsibilities.

4 Policy Statement

We need to collect and use personal information about people in order to provide our services and carry out our business. These may include members of the public, current, past and prospective employees, clients, customers and suppliers. In addition, we may be required by law to collect and use information. It is the Company's policy that all personal information, whether in paper, electronic or any other format, must be handled in strict confidence and managed in accordance with DPA and associated legislation and guidance.

CareTech has a responsibility to maintain all data and records securely and safely.

Data and records can be held on any type of media including:

- E –mail
- Computerised records
- Digital records
- CD-ROM, Audio, video, CCTV
- Care records – paper, electronic
- Administrative records – HR, Finance, accounts, estates etc.

There are two types of retention categories:

- Records requiring permanent preservation
- Records to be retained for minimum period.

All staff are responsible for storage and confidentiality in their area of activity. All staff are responsible for the safety and security of any person identifiable data or sensitive information. Staff should not normally take records out of the work place but if they are removed they should be placed in vehicles out of sight and locked in a boot of a car. If records are removed from a work environment the principles should be:

If electronic then the laptop/ iPad should be encrypted.

- Records must be signed out and returned to the office/ work base as soon as possible
- Permission should be sought from line manager if records are taken home and should be returned to work base as soon as possible.
- Employees should not carry more records than is needed to undertake the work at that time.

5 Principles of Archiving & Storage

This policy details specific responsibilities in relation to compliance with GDPR.

Once a record is closed it should be placed in suitable storage either for archive or central 'active' storage.

CareTech will seek to centralise in main office sites all records that are active but non-essential to day to day operational care delivery.

Examples of such records are:

- Staff recruitment records.
- Estates / maintenance records (the exception of any necessary certification or guidance).
- Commercial or contract information.
- Historic care documentation.
- Service user documentation not required for the delivery of safe care (for example, daily records over 6 months old)

For the purposes of supporting inspections, Operations staff will need to have access to any active staff records, **they do not need to be physically on the premises.**

As technology develops it is intended to move to an electronic records and document management

procedure.

Records in constant use should be securely kept at the service / unit in lockable cabinets or electronically stored where available.

6 Record Closure Principles

Records should be closed as soon as they cease to be in active use other than for reference purposes. The closure of the records should be documented on the record and dated.

Any public record must not ordinarily be kept for more than 20 years other than for active purposes, e.g. a service user continues to receive a service or an employee remains in employment.

Where records are archived, storage must be:

- In a secure facility of robust construction.
- Documents must be protected from water, damp or pest damage.
- Entry or access should be locked and preferably security key pad controlled.
- Only authorised staff should have access to archived or centrally stored records.
- There should be adequate fire protection in place.

7 Retention of Record Principles

Documents to be retained for 20 years (permanent preservation) will include:

- Major events or incidents.
- Major projects or plans – opening new services for example.
- Any research work.

Documents not requiring permanent preservation but to be retained. This is not active records:

- General correspondence, memo's, e-mails – Maximum of 3 years
- All personal care records (Adults) – 8 years after end of treatment
- Records relating to patients under MHA – 20 years after no further treatment or 8 years after patient's death.
- Records relating to Children & Young people – Until 25th birthday or 8 years after death.
- Service user daily diaries – 3 years
- Activity records that supplement care records – 10 years
- Engineer inspection reports – Life time of installation

- Accounts (Minor e.g. petty cash) – 2 years from completion of audit
- Audit (all including C&R) – 2 years from completion of audit
- Salaries records – 10 years after termination of employment
- Bills / receipts/ cleared cheques – 6 years after end of financial year they relate to
- Personnel files / references / sickness records – 6 years after employee leaves

8 Revision History

Date of next review: June 2019