



Data Retention Policy

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DATA RETENTION POLICY

1. Introduction

Daisy Chain holds a great deal of important information that is crucial to the running of the organisation. Data we hold must be available and accessible and usable upon demand by an authorised entity. It is important that any personal data is securely erased or anonymised when the purposes for which it is kept no longer exist, in order to comply with the GDPR.

2. Scope

The Data Retention Policy applies to data held by all members of the workforce regardless of the form in which it is held. It applies throughout the lifecycle of the information from creation through storage and utilisation to disposal.

The policy applies to all members of the workforce who are given access to data held by Daisy Chain. It includes all devices including removable media/portable devices and paper-based records.

With regards to electronic systems, it applies to use of Daisy Chain owned facilities and privately/externally owned systems when connected to the Daisy Chain network directly or indirectly. The policy applies to all Daisy Chain sites owned/licensed data and software, be they loaded on to Daisy Chain or privately/externally owned systems, and to all data and software provided to Daisy Chain.

'Owned' is deemed to include leased, rented or on-loan.

3. Policy awareness and guidance on data retention

The Data Retention Policy will be made available to all members of the workforce via the Office Manual.

Please refer to the Appendix in this document to find out how long certain types of data are to be retained.

4. Disposal of Information

Daisy Chain workforce members have an obligation to dispose of personal, confidential, and business critical information in a secure manner. This includes ensuring that all backups and copies are included in the destruction of records.

Any data category which is not referred to in this policy should be referred to Martin Shuttleworth, Operations Manager and Risk Owner.

5. Legal and Contractual Requirements

Daisy Chain will abide by all relevant legislation related to the holding and processing of information. Data protection legislation defined as; (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998.

6. Responsibilities

The Risk Officer and CEO are responsible for the Data retention policy. The Risk Officer is Martin Shuttleworth and CEO is Neeraj Sharma.

Martin Shuttleworth, IAO (Information Asset Owners), are responsible for ensuring that information used is managed and used in accordance with the Data Retention Policy.

Any member of the workforce who is concerned around data retention concerning an information asset should report to their manager or the Information Asset Owner.

7. Third party contractors

Daisy Chain should have appropriate contracts with third parties who are storing, processing or transmitting data covered by this policy so that the applicable retention period is adhered to.

8. Maintenance

The Data Retention Policy will be monitored and maintained and reviewed at least annually and whenever a significant event occurs which requires its revision. Daisy Chain should also regularly audit and monitor their approach towards the secure disposal of data.

Appendix A

Type of record	Retention period
Personnel files of employed and volunteer staff including training records and notes of disciplinary and grievance hearings	6 years from the end of employment
Application forms/interview notes for paid and volunteer staff	6 months from the date of the job advertisement
Facts relating to redundancies where less than 20 redundancies	6 years from the date of redundancy
Facts relating to redundancies where 20 or more redundancies	6 years from the date of the redundancies
Payroll records, Income Tax and NI Returns, including correspondence with tax office	At least 3 years after the end of the tax year to which the records related
Statutory Maternity and Paternity Pay records and calculations	3 years after the end of the tax year in which the maternity period ends
Statutory Sick Pay records and calculations/ Sickness records	There is no longer a specific statutory retention period. Advise keep records for a minimum of 3 months after the sickness ends.
Wages and salary records	3 years
Individual pension entitlement and contribution history	As long as there is a member or dependant liability
DBS checks for staff and volunteers	6 years after end of employment
Accident books, and records and reports of accidents	3 years after the date of the last entry
Health Records for staff and volunteers	During employment/ volunteer engagement
Health Records where reason for termination of employment relates to health, including stress related illness	3 years
Examination, testing, monitoring and control records:	Review 5 years after last action
Medical records kept by reason of the Control of Substances Hazardous to Health Regulations 1999	40 years
Health and Safety Training, guidance, and instructions: Risk assessment reports and reviews:	Review 3 years from date superseded The HSE recommends 40 years for personal records

Building related risk assessments	http://www.hse.gov.uk/health-surveillance/record-keeping/index.htm A recent example is the claim relating to exposure to asbestos dating back a number of years with no records available.
Contractual records	6 years
References received for staff and volunteers	1 year
Annual leave records	2 years
Annual appraisal/assessment records Volunteer supervision notes	5 years 3 months after volunteer leaves
Records relating to promotion, transfer, training, disciplinary matters	1 year from end of employment/volunteer engagement
References given information to enable references to be provided	5 years from reference/ end of employment
Summary of record of service eg: name, position held, dates of employment	10 years from end of employment
Records relating to accident or injury at work	12 years
Board & Committee papers held by Trustees -email/paper copies	1 month
Recruitment Information for unsuccessful candidates	7 months from the date they were notified that they were unsuccessful
Information relating to Senior Managers	6 years
COVID-19 Risk Assessments	Permanently
Employability Liability Insurance Claims	40 years
Successful tender applications	Permanently
Legacies	4 years from the date of death (unless expression instruction is received from probate)
Grant Reports	7 years after service delivery has ceased (plus current financial year)
Gift Aid Data	6 years
Trustee Meeting Minutes	10 years from the date of the meeting
Property Information	Permanently
Leases	12 years after the lease has been entered into

Accounts	6 years from the end of the financial year, plus the current year.
Financial Audits	Permanently

Service Users Records

Daisy Chain are data controllers in relation to service users' records stored on Daisy Chain's systems. In these cases, Daisy Chain should follow the service user data retention schedule below.

Low risk	6 years	All service users record apart from the high-risk categories below.
High risk	16 years	Any case that has been subject to a serious complaint, insurance claim, Safeguarding incident or serious incident.
		Any case relating to building works or surveyors' reports on the purchase of property or relating to property.

Appendix B

BOX NO.	DEPARTMENT & CONTENTS	DESTROY DATE	COMMENTS
<u>FINANCE</u>			Must keep 7 years
F01	<ul style="list-style-type: none"> • Invoices June 2010-May 2011 • P45's/P60's 2010/2011 	JAN 2019	<i>(+6 months after year end for audit purpose)</i>
F02	<ul style="list-style-type: none"> • Payroll April 2010 – March 2011 • End of Year Printouts 31/6/2010-31/5/2011 	JAN 2019	
F03	<ul style="list-style-type: none"> • Invoices June 2011 – May 2012 • Statements June 2011 – May 2012 	JAN 2020	
F04	<ul style="list-style-type: none"> • Trading Accounts 1/6/2011 – 31/5/2012 • Payroll 1/4/2011 – 31/3/2012 • Processed Cash + Chqs 1/6/2011 – 31/5/2012 	JAN 2020	
F05	<ul style="list-style-type: none"> • Statements June 2012 – May 2013 • Income Cash+ Chqs June 2012 – May 2013 • Purchase Invoices 2012/13 (no.26646-30606) • Payroll April 2012 – March 2013 • Cheque Books/Paying In Books 2012-2013 • Sponsor Forms gift aid 2012-2013 • Donation Envelopes gift aid 2012-2013 	JAN 2021	
F06	<ul style="list-style-type: none"> • Statements June 2013 – May 2014 • Purchase Invoices 2013/14 (no.30607-35763) • Receipt Books 2011-2014 • Mileage Claim Forms • Cheque Books/Paying In Books 2013-2014 	JAN 2022	
F07	<ul style="list-style-type: none"> • Placement Invoices 2013-2014 • Accounts 2012-2013 • Income 2013/2014 • Processed Cash+Chqs June 2013 – Oct 2013 • Sponsor forms gift aid 2013 • Donation forms gift aid 2013 • Purchase Invoices 2014/15 (no.34019-37200) 	JAN 2023	
F08	<ul style="list-style-type: none"> • Bank Statements June 2014 – April 2105 • Purchase Invoices 2014/15 (no.37206-41652) • Bank Reports Reconciled July 2014-June 2015 • Cheque Books/Paying In Books 2014-2015 • Sponsor Forms gift aid 2014/2015 • Donation Envelopes gift aid 2014/2015 • Syndicate Agreement for lotto 	JAN 2023	
F09	<ul style="list-style-type: none"> • Purchase Invoices 2015/16 (no.40036-44887) • Paying In Books 2015-2016 • Receipt Books 2015-2016 • Sponsor forms gift aid 2015-2016 • Donation Envelopes gift aid 2015-2016 	JAN 2024	
F10	<ul style="list-style-type: none"> • Year End 2013/14 & 2014/15 • Sales Invoices 2014/15 (no. 958-1637) • Donation Envelopes gift aid 2016 • Receipt Books & Paying In Books 2016 • Shop Invoices 2015/2016 • Auditors Queries 2015/1016 	JAN 2024	
F11	<ul style="list-style-type: none"> • Purchase Invoices 2015/16 (no.42234-52794) 	JAN 2024	
F12	<ul style="list-style-type: none"> • Sales Invoices 2015/16 (no. 1605-2567) • 2015/16 Income (no.38269-52073) 	JAN 2024	

	<ul style="list-style-type: none"> • Receipt Books 2017 • Paying In Books 2017 • Donation Envelopes gift aid 2017 		
F13	• Shop Income 2015/2016	JAN 2024	
F14	<ul style="list-style-type: none"> • 2017-18 Purchase invoices • 2017-18 Income Invoices • 2017-18 Bank Statements 	JAN 2026	
F15	• June 2016-March 2018 – shop till receipts	JAN 2026	
F16	• April 2018 to March 2019 – shop till receipts	JAN 2027	
F17	<ul style="list-style-type: none"> • 2016-17 Purchase Invoices • 2016-2017 Journals • 2010- 31/5/2016 Journals • 2015-2016 Bank Statements 	JAN 2025	
F18	<ul style="list-style-type: none"> • 2017-18 Budget Reports • 2017-18 Management Accounts • 2017-18 Income Invoices • 2016-17 Sales Invoices • 2016-17 Income Invoices • 2016-2017 Bank Statements • Prior to 2016 Gift Aid Accounts 	JAN 2026	
F19	<ul style="list-style-type: none"> • 2018-2019 Remittances • 2018-2019 Income • 2009-2019 Links • 2016-2017 Income • 2006-2019 Coffee Shop • Miscellaneous 	JAN 2027	
F20	• 2019-2020 Shop Till Receipts	JAN 2028	
F21	• 2019-2020 Shop Till Receipts	JAN 2028	
F22	<ul style="list-style-type: none"> • 2018-2019 Purchase Invoices • 2018-2019 Bank Statements • 2018-2019 Sales Invoices 	JAN 2027	
F23	•		

<u>OPERATIONS</u>			
OPS01	• Accident Reports 2011-2013	Do Not Destroy	Keep – in case of future claims
<u>FUNDRAISING</u>			
FUN01	<ul style="list-style-type: none"> • Photo's 2004-2010 • Old Newsletters/Leaflets • Events Jacob + family 	Do Not Destroy	Keep – History
FUN02	• Sponsored Bricks (on Day Centre Wall)	Do Not Destroy	Keep - History
<u>CARE</u>			Keep for 5 Years
C01	April 2013 – 2014 files:- <ul style="list-style-type: none"> • Activity Day Records • Social Club Reports & Attendance • Child/Student Care Records (names reference list on Care Team Data) 	APR 2019	
C02	April 2014 – 2015 files:-	APR 2020	

	<ul style="list-style-type: none"> • Saturday Activity Day Records • Social Club Reports & Attendance • Child/Student Care Records (names reference list on Care Team Data) 		
C03	April 2015 – 2016 files:- <ul style="list-style-type: none"> • Saturday Activity Day Records • Social Club Reports & Attendance • Child/Student Care Records (names reference list on Care Team Data) 	APR 2021	
C04	April 2016 – 2017 files:- <ul style="list-style-type: none"> • Activity Day Records • Social Club Reports & Attendance • Child/Student Care Records (names reference list on Care Team Data) 	APR 2022	
C05	<ul style="list-style-type: none"> • Positive Behaviour Support Records 	DO NOT DESTROY	Keep – evidence
C06	<ul style="list-style-type: none"> • Care Plans 2013-2019 • Medical details • Sibz • Adult Club • Activity Day Apr-Oct 2017 	APR 2024	
C07	<ul style="list-style-type: none"> • Care Plans various • Sat Activity Day Mar-Sept 2018 • Sibz • Club Registers 	APR 2024	
C08	<ul style="list-style-type: none"> • Tuesday TEEN Registers 2018-19 • 8-11 Holiday Clubs • Care Plans A-B up to 2020 (pre-electronic) 	Jan 2025	
C09	<ul style="list-style-type: none"> • Care Plans C-E up to 2020 (pre-electronic) 	JAN 2025	
C10	<ul style="list-style-type: none"> • Care Plans J-K up to 2020 (pre-electronic) 	JAN 2025	
C11	<ul style="list-style-type: none"> • Care Plans L-M up to 2020 (pre-electronic) 	JAN 2025	
C12	<ul style="list-style-type: none"> • Care Plans Mc-N up to 2020 (pre-electronic) 	JAN 2025	
C13	<ul style="list-style-type: none"> • Care Plans F-I up to 2020 (pre-electronic) 	JAN 2025	
C14	<ul style="list-style-type: none"> • 		
C15	<ul style="list-style-type: none"> • 		
<u>HUMAN RESOURCES</u>			Keep for 5 Years
HR01	<ul style="list-style-type: none"> • Leavers Files 	JAN 2026	
HR02	<ul style="list-style-type: none"> • Leavers Files 	JAN 2026	
HR03	<ul style="list-style-type: none"> • HR Timesheets Oct 2017-2019 	JAN 2026	