



# Record Keeping and Retention Policy

## Procedures and Guidelines

### Policy Statement

Accurate, proportionate records are kept by Healthwatch Oldham (HWO) in order to:

- Provide a high quality service to patients and the public in Oldham
- To ensure that feedback can be provided.
- To ensure good support and supervision to volunteers
- To comply with all employment, charity and company legal requirements
- To comply with quality assurance systems.

All records are made and held in accordance with the principles of the Data Protection Act 1998 and the new GDPR data protection legislation introduced on the 25<sup>th</sup> May 2018. HWO ensures that their activities, whether solely or as part of another organisation, are covered by their registration with the Information Commissioners Office.

Records are retained for the period specified in the procedure below, and with the exception of items that must be stored permanently, are then safely destroyed.

## Procedure

1. All paper based records are held securely in a locked filing cabinet. These include, HR files, finance files, signed consent forms, and complaints etc.
2. Electronic files are kept securely, are password protected and regularly backed up. All laptops are encrypted with a password process.
3. Members of the public who choose to engage with HWT are informed that their comments will be stored on a secure database and that personal information will be kept confidential and will not be shared unless consent has been given. When asking for consent to pass on personal details HWT will always confirm how the information will be used and passed on.
4. When DBS checks are requested, HWO keep a record of the DBS reference number and the date the check was completed on the relevant volunteer or staff file, but do not keep a copy of the DBS check.
5. HWO complies with the requirements of company law and records are maintained and retained in accordance with the retention summary below. HWO also complies with the Statement of Recommended Practice (SORP) in relation to its financial record keeping and reporting; and all financial records are retained in accordance with the retention summary below.
6. HWO is part of the Action Together family of services, and Action Together stores insurance policies and employer's liability insurance certificates and records relating to the ownership, or leasehold of premises securely in line with the retention summary below.
7. Confidential hard copy records that are waiting to be destroyed are kept securely and are shredded or if required disposed of using a reputable company.
8. Electronic records should be destroyed in line with the retention schedule below.

**SUMMARY:****Retention of Records by Healthwatch Oldham****Employment**

In general, the staff records (including those of volunteers) should be retained for **6 years after the end of employment**, but need only contain sufficient information in order to provide a reference (e.g. training and disciplinary records). Copies of any reference given should be retained for 6 years after the reference request. Director's files should be retained for 6 years.

Application form	Duration of employment and +6 years after employment ceases
References received	As above
Sickness and maternity records	As above
Annual leave records	As above
Unpaid leave/special leave records	As above
Records relating to an injury or accident at work	12 years
References given/information to enable a reference to be provided	6 years from end of employment
Recruitment and selection material (unsuccessful candidates)	2 years after recruitment of successful candidate
Disciplinary records	Duration of employment and +6 years after employment ceases
Statutory Maternity Pay records, calculations, and certificates	As above
Redundancy details, calculation of payments and refunds	7 years from date of redundancy

**Note:** if an allegation has been made about the member of staff, volunteer or Director the staff record should be retained until they reach normal retirement age or for 10 years, if that is longer. E.g. around Safeguarding.

<b>Record of Comments and other evidence, e.g. observations, interviews, enter and view notes.</b>	
Comments recorded on the HWO database	Delete all comments over 6 years old
Other paper based comments recorded on the database.	1 year (This is in case there is a query regarding an entry on the database)
Comments and or other evidence, e.g. observation records that have <b>not</b> been recorded on the database.	Destroy after 3 years
Signed consent forms	Destroy after 6 years (in line with comments on the database above)
Information/Advice/Guidance Forms (IAGF) <ul style="list-style-type: none"> <li>• Individual record</li> </ul>	2 years + current
<b>Consultation</b>	
Surveys and summaries of findings	5 years after closure
Enter and View visits: <ul style="list-style-type: none"> <li>• Reports</li> <li>• Correspondence</li> <li>• Complaints</li> </ul>	Permanent 3 years + current 6 years
<b>Reports</b>	
HWO reports	Permanently
<b>Correspondence</b>	
General Complaints	6 years
Correspondence with the public or external organisations which cannot be linked and stored with other records	

relating to a specific process e.g. a Case File/ Project File/ Information, advice & guidance request/ Group/ Meeting/ Request for Information under legislation: <ul style="list-style-type: none"> <li>• General correspondence letters</li> <li>• General correspondence email</li> </ul>	Archive for one year then destroy if no further action
Financial records	6 years (public funded Companies)
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than 3 years after the end of the financial year to which they relate
Payroll records (also overtime, bonuses, expenses)	10 years
Pension contribution records	6 years
Pension Scheme Investment Policies	12 years from any benefit payable under the policy
Contract (including any variations to the contract and performance reports)	6 years after expiry
Minutes of Board of Trustees/Directors	Permanently
Governing Documents	Original to be kept permanently
Statutory Registers	Permanently
Rental or Hire Purchase Agreements	6 years after expiry
Subject Access requests	Closure + 5 years
Freedom of Information requests	Closure + 1 year
Records that do not support a business process i.e. there is no existing place for them in a filing structure and none will be created. This applies to filing structures for paper and electronic formats (including e-mail):	

<ul style="list-style-type: none"> <li>• Catalogues, trade journals, suppliers' promotional material</li> <li>• Course/ seminar/ conference invitations</li> <li>• News/events</li> <li>• Telephone message slips</li> <li>• Non-acceptance of invitations</li> <li>• Trivial messages or notes that are not related to HWB business (especially emails)</li> <li>• Requests for stock information such as maps, plans or advertising material</li> <li>• Out-of-date distribution lists</li> <li>• Working papers which lead to a final report</li> </ul>	<p>Destroy as soon as any use has ceased</p>
<p>Photographs - local</p>	<p>3 years</p>
<p><b>HWO NHS Complaints Advocacy Service</b></p>	
<p>Case files</p>	<p>Destroy 3 years after the case has closed</p>

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