

**Mr Peter Willson**  
**And**  
**Keyhole Clinics Ltd**

## **DATA RECORDS RETENTION POLICY**

**Date 23.12.2020**

## **Data Records Retention Policy**

### **Storage of Data and Records Statement**

1. All data and records will be stored in accordance with the security requirements of the Data Protection Legislation and in the most convenient and appropriate location having regard to the period of retention required and the frequency with which access will be made to the record. This will include the secretary's office at the New Victoria Hospital, The Keyhole Clinics Ltd Office and Hospital Wards when a patient is admitted.
2. Data and records which are active should be stored in the most appropriate place for their purpose commensurate with security requirements. Paper records will be stored in a locked cabinet and digital data on password protected or encrypted media.
3. Data and records which are no longer active, due to their age or subject, should be stored in the most appropriate place for their purpose. This will include The PA's office, The Keyhole Clinics Ltd Office and archived digital files on the Keyhole Clinics Office Computer.
4. The degree of security required for file storage will reflect the sensitivity and confidential nature of any material recorded.
5. Any data file or record which contains personal data of any form can be considered as confidential in nature.
6. Data and records should not be kept for longer than is necessary. This principle finds statutory form in the Data Protection Legislation, which requires that personal data processed for any purpose "shall not be kept for longer than is necessary for that purpose". All groups are required to have regard to the Guidelines for Retention of Personal Data attached hereto.
7. Any data that is to be disposed must be safely disposed of for example by shredding.
8. Special care must be given to disposing of data stored in electronic media. This should be performed by deleting the electronic data and using a programme for the permanent deletion of electronic data.

## **Guidelines for Retention of Personal Data**

If you have any queries regarding retaining or disposing of data please contact  
Keyhole Clinics Ltd  
The New Victoria Hospital  
184 Coombe Lane West  
Kingston-Upon-Thames  
Surrey  
KT2 7EG

Telephone: 020 3376 9324  
Email: [Secretary@keyholeclinics.com](mailto:Secretary@keyholeclinics.com)

### **Types of Data**

### **Suggested Retention Period**

Clinical Records: Adult	<ul style="list-style-type: none"><li>• 8 years after the conclusion of treatment or death</li><li>• Electronic patient records (EPRs) must not be destroyed, or deleted, for the foreseeable future.</li></ul>
Clinical Records: Child	<ul style="list-style-type: none"><li>• Until the patient's 25th birthday or 26th if young person was 17 at conclusion of treatment, or 8 years after death</li><li>• Electronic patient records (EPRs) must not be destroyed, or deleted, for the foreseeable future.</li></ul>
Mentally disordered persons within the meaning of any Mental Health Act	<ul style="list-style-type: none"><li>• 20 years after the date of last contact between the patient or client or service user and any health or care professional employed by the mental health provider, or 8 years after the death of the patient or client or service user if sooner</li><li>• Electronic patient records (EPRs) must not be destroyed, or deleted, for the foreseeable future.</li></ul>
Maternity records (including all obstetric and midwifery records, including those of episodes of maternity care that end in stillbirth or where the child later dies)	<ul style="list-style-type: none"><li>• 25 years after the birth of the last child</li><li>• Electronic patient records (EPRs) must not be destroyed, or deleted, for the foreseeable future.</li></ul>
Records relating to those serving in HM Armed Forces	<ul style="list-style-type: none"><li>• Not to be destroyed</li></ul>
Records relating to those serving a prison sentence	<ul style="list-style-type: none"><li>• Not to be destroyed</li></ul>

Personnel files including training records, notes of disciplinary and grievance hearings.	<ul style="list-style-type: none"> <li>• 6 years from the end of employment</li> </ul>
Application forms / interview notes	<ul style="list-style-type: none"> <li>• Maximum of one year from the date of the interviews for those not subsequently employed. If employed, retain in personnel file.</li> </ul>
Allegations against a member of staff or volunteer and DBS certificates	<ul style="list-style-type: none"> <li>• Until the staff member of volunteer is retired or 10 years whichever is the longer. Consider retaining for 75 years.</li> </ul>
Income Tax and NI returns, including correspondence with tax office	<ul style="list-style-type: none"> <li>• At least 6 years after the end of the financial year to which the records relate</li> </ul>
Statutory Maternity Pay records and calculations	<ul style="list-style-type: none"> <li>• As Above</li> <li>• (Statutory Maternity Pay (General) Regulations 1986)</li> </ul>
Statutory Sick Pay records and calculations	<ul style="list-style-type: none"> <li>• As Above</li> <li>• Statutory Sick Pay (General) Regulations 1982</li> </ul>
Wages and salary records	<ul style="list-style-type: none"> <li>• 6 years from the tax year in which generated</li> </ul>
Accident books, and records and reports of accidents	<ul style="list-style-type: none"> <li>• (for Adults) 3 years after the date of the last entry</li> <li>• (for children) three years after the child attains 18 years</li> </ul>
Health records	<ul style="list-style-type: none"> <li>• 6 months from date of leaving employment</li> <li>• (Management of Health and Safety at Work Regulations)</li> </ul>
Health records where reason for termination of employment is connected with health, including stress related illness	<ul style="list-style-type: none"> <li>• 3 years from date of leaving employment</li> <li>• (Limitation period for personal injury) claims)</li> </ul>
Student records, including academic achievements, and conduct	<ul style="list-style-type: none"> <li>• At least 6 years from the date the student leaves in case of litigation for negligence</li> </ul>
Medical Incident Records	<ul style="list-style-type: none"> <li>• Adults (18 years and over at incident). At least 8 years</li> <li>• Children (under 18 years at incident). At least until the age of 26 years.</li> </ul>

Adopted: 19.05.2018  
Reviewed: 23.12.2020

Next Review: 2022