

DATA RETENTION SCHEDULE

USING THE DATA RETENTION SCHEDULE

The Retention Schedule is divided into 6 sections:

1. Human Resources Management.
2. Financial Management.
3. Property & Maintenance Management.
4. Residents Management.
5. Residents' Activities Management.
6. GDPR Data Breach Management

There are sub-headings under each section to help guide you to the retention period you are looking for.

Where statutory provisions are in place, they are listed along with the statutory retention period.

DISCLAIMER

The retention periods specified in this document are only valid moving forward from the date of publication (June 2019). It is possible that, prior to this date, our records may be incomplete as the Company was working to a different set of more informal standards. Therefore, we may have gaps in our historical records and will not be able to supply a full set of data should there be a Freedom of Information (or similar) request. Where a retention period is specified as a period of time, this should be taken to mean that amount of time PLUS the time to the end of the calendar year in which the data retention period expires. The data may be deleted exactly on time but, for practical reasons, we may not be able to do so until the end of the calendar year. Printed data, e.g. documents, will be deleted by shredding. Electronic data will be deleted electronically from all IT systems.

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1 HUMAN RESOURCES MANAGEMENT					
1.1.0 Recruitment - Overseen by HR Manager					
Definition of job applicant: <i>This includes job applicants for permanent work through PJL Healthcare Ltd's safer recruitment process and agency workers seeking temporary work with PJL Healthcare Ltd through an agreement with a recruitment agency</i>					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
1.1.1	All records leading up to the appointment of a new Director.	Yes	N/A	Date of appointment + 6 years	Secure Disposal
1.1.2	Unsuccessful applicants - all records of the application process - e.g. application form, CV, qualification certificates, interview screening (which may include minutes taken during interviews, skills testing, personality profiling, electronic transfer and recording of your voice and/or image through phone or video calls, etc.)	Yes	N/A	Date unsuccessful + 6 months	Secure Disposal
1.1.3	Successful applicants - all records of the application process - e.g. application form, CV, qualification certificates, interview screening (which may include minutes taken during interviews, skills testing, personality profiling, electronic transfer and recording of your voice and/or image through phone or video calls, etc.)	Yes	N/A	Copies kept in personal staff file. See 1.2.1	Secure Disposal
1.1.4	Successful candidates – all records of the vetting process post offer, e.g. reference checks, safeguarding checks, driving licence check, etc.	Yes	N/A	Copies kept in personal staff file. See 1.2.1	Secure Disposal
1.1.5	Pre-employment vetting information – proofs of identity collected as part of processing an enhanced DBS disclosure, etc.	Yes	DBS Update Service Employer Guide June 2014: & July 2015 (DfE Guidance) Sections 73, 74	Copy of DBS certificate kept in personal staff file. See 1.2.1	Secure Disposal

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1.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom, etc.	Yes	An employer’s guide to right to work checks (Home Office May 2015)	Copies kept in personal staff file. See 1.2.1	Secure Disposal
1.1.7	Overt voice and/or image recording through phone or video calls for recruitment purposes. At the start of each call, each attendee’s consent will be requested verbally, with the attendee being informed that recording will take place for monitoring purposes, to ensure transparency and good practice (e.g. to enable a fluid discussion without someone having to focus on writing minutes or taking notes). A copy of the recording can be requested through a subject access request.	Yes	N/A	Securely stored electronically on the Company’s Microsoft Teams and 3CX software for 5 years.	Secure Disposal
1.2.0	Operational Staff Management <i>Definition of staff: This includes anyone employed through PJL Healthcare Ltd’s safer recruitment process, and agency workers engaged in temporary work with PJL Healthcare Ltd. through an agreement with a recruitment agency. Staff employed through PJL Healthcare Ltd’s safer recruitment process overseen by HR Manager and Registered Manager; Agency workers engaged in temporary work through an agreement with a recruitment agency overseen by Registered Managers; all staff training records overseen by the Training Manager.</i>				
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
1.2.1	Staff personal files	Yes	Reg 37, The Children’s Homes (England) Regulations 2015	Termination of Employment + 15 years	Secure Disposal
1.2.2	Annual appraisal / Supervision records	Yes	N/A	Current + 7 years	Secure Disposal
1.2.3	References for future employers / mortgages, etc.	Yes	N/A	Current + 7 years	Secure Disposal
1.2.4	Training records	Yes	N/A	Current + 7 years	Secure Disposal
1.2.5	Overt voice and/or image recording through phone or video calls for operational staff management purposes.	Yes	N/A	Securely stored electronically on the	Secure Disposal

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	At the start of each call, each attendee's consent will be requested verbally, with the attendee being informed that recording will take place for monitoring purposes, to ensure transparency and good practice (e.g. to enable a fluid discussion without someone having to focus on writing minutes or taking notes). A copy of the recording can be requested through a subject access request.			Company's Microsoft Teams and 3CX software for 5 years.	
1.3.0 Management of Disciplinary and Grievance Processes - Overseen by HR Manager					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
1.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Until normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found, they are to be kept on the file and a copy provided to the person concerned	Secure Disposal
1.3.2	Disciplinary Proceedings and Grievance Proceedings	Yes	N/A	See below.	See below.
1.3.2.1	Formal Verbal Warning	Yes	N/A	Six months.	Secure Disposal

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1.3.2.2	First Written Warning	Yes	N/A	Twelve months.	Secure Disposal
1.3.2.3	Final Written Warning	Yes	N/A	Twelve months.	Secure Disposal
1.3.2.4	Case not found	Yes	N/A	Dispose of at the conclusion of the case.	Secure Disposal
1.3.3	Overt voice and/or image recording through phone or video calls for management of disciplinary and grievance processes. At the start of each call, each attendee's consent will be requested verbally, with the attendee being informed that recording will take place for monitoring purposes, to ensure transparency and good practice (e.g. to enable a fluid discussion without someone having to focus on writing minutes or taking notes). A copy of the recording can be requested through a subject access request.	Yes	N/A	Securely stored electronically on the Company's Microsoft Teams and 3CX software for 5 years.	Secure Disposal

2 FINANCIAL MANAGEMENT					
2.1 Payroll and Pensions - Overseen by Accounts Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of admin life of the record
2.1.1	Timesheets	Yes	N/A	Current + 7 years	Secure Disposal
2.1.2	Maternity/Paternity/Adoption Leave pay records, documents e.g. MATB1, etc.	Yes	Statutory Maternity Pay (General) Regs 1986 (SI1986/1960), revised 1999 (SI1999/567).	Termination of Employment + 7 years	Secure Disposal
2.1.3	Records held under Retirement Benefits Schemes (Information Powers) Regs 1995	Yes	N/A	Termination of Employment + 7 years	Secure Disposal

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2.1.4	Income tax and NI records, returns and correspondence with HMRC/Inland Revenue	Yes	N/A	End of the financial year + 3 years.	Secure Disposal
2.1.5	National minimum wage records	Yes	N/A	The pay reference period + 3 years	Secure Disposal
2.1.6	Pension scheme investment policies, record.	Yes	N/A	12 years from the end of any benefit payable under the policy.	Secure Disposal
2.1.7	Redundancy details, calcs of payments, refunds, notification to Secretary of State	Yes	N/A	Six year from date of redundancy.	Secure Disposal
2.1.8	Salary and benefits records, e.g. bonuses, expenses, Statutory Sick Pay	Yes	N/A	Six years after employment ends	Secure Disposal
2.1.9	Working Time records.	Yes	N/A	Two years from date on which they were made.	Secure Disposal
2.2 Risk Management and Insurance – Overseen by the Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
2.2.1	Employer's Liability Insurance	No	N/A	Closure of the Company + 40 years	Secure Disposal

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2.3 Asset Management - Overseen by the Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
2.3.1	Inventories of furniture and equipment	No	N/A	Operational use only.	Secure Disposal
2.3.2	Burglary, theft and vandalism reports	No	N/A	Current year + 6 years	Secure Disposal
2.4 Accounts and Statements including Budget Management - Overseen by the Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
2.4.1	Annual Accounts	No	N/A	Current year + 7 years	Secure Disposal
2.4.2	Loans	No	N/A	Date of last payment + 12 years then REVIEW	Secure Disposal
2.4.3	Records relating to creating and managing budgets incl. the Annual Budget statement and background papers	No	N/A	Life of the budget + 3 years	Secure Disposal
2.4.4	Invoices, receipts, order books and requisitions, delivery notices, credit notes, etc.	No	N/A	Current financial year + 3 years	Secure Disposal
2.4.5	Records relating to the collection and banking of monies, petty cash, etc	No	N/A	Current financial year + 3 years	Secure Disposal
2.4.6	Records relating to the identification and collection of debt, debtor accounts.	No	N/A	Current financial year + 3 years	Secure Disposal
2.5 Contract Management - Overseen by the Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
2.5.1	All records relating to the management of contracts	No	Limitation Act 1980	Last payment on the contract + 12 years	Secure Disposal

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2.6 Company Fund - Overseen by the Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
2.6.1	Cheque books	No	N/A	Current year + 3 years	Secure Disposal
2.6.2	Paying in books	No	N/A	Current year + 3 years	Secure Disposal
2.6.3	Ledger, cashbook	No	N/A	Current year + 6 years	Secure Disposal
2.6.4	Invoices	No	N/A	Current year + 3 years	Secure Disposal
2.6.5	Receipts	No	N/A	Current year + 3 years	Secure Disposal
2.6.6	Bank statements	No	N/A	Current year + 7 years	Secure Disposal
3 PROPERTY MANAGEMENT & MAINTENANCE					
3.1 Property Management & Maintenance- Overseen by Finance Director					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
3.1.1	Title deeds of properties belong to the Company	No	N/A	PERMANENT	Secure Disposal
3.1.2	Leases of property leased by or to the Company	No	N/A	As 3.1.1	Secure Disposal
3.1.3	All records relating to the maintenance of the Company carried out by contractors or Company employees, including maintenance logbooks	No	N/A	Current year + 6 years	Secure Disposal

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4 RESIDENTS' MANAGEMENT					
4.1 Residents Management - Overseen by Service Managers / Safeguarding Lead					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
4.1.1	Children and young people's case records and child protection information held on resident's file.	Yes	Childrens Home Regulations 2015	Information held in locked cabinet and kept from DOB + 75 years. If the child or young person dies before attaining the age of 18 this is reduced to 15 years from DOB.	Secure Disposal
4.1.2	Case records	Yes	Childrens Home Regulations 2015	Information held in locked cabinet and kept from DOB + 75 years. If the child or young person dies before attaining the age of 18 this is reduced to 15 years from DOB.	Secure Disposal
4.2 Health & Safety - Overseen by Service Managers / Safeguarding Lead					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
4.2.1	Health & Safety Policy Statements	No	N/A	Life of policy + 20 years	Secure Disposal
4.2.2	Health & Safety Risk Assessments	No	N/A	Indefinite	Secure Disposal
4.2.3	Records relating to accident/injury at work/injury on site	Yes	N/A	Date of incident + 30 years	Secure Disposal

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4.2.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regs 1979, Reg 25. Social Security Admin Act 1992, Section 8. Limitation Act 1980.	Date of incident + 30 years	Secure Disposal
4.2.4.1	Children's Home Residents	Yes	N/A	Date of incident + 30 years	Secure Disposal
4.2.5	Control of Substances Hazardous to Health (COSHH) including records of tests of control systems/protective equipment/medical records.	No	Control of Substances Hazardous to Health Regs 2002. SI 2002 No 2677 Reg 11; Records kept under the 1994 and 1999 Regs to be kept as if the 2002 Regs had not been made. Reg 18 (2).	Current year + 40 years	Secure Disposal
4.2.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regs 2012 SI 1012 No 632 Reg 19.	Last action + 40 years	Secure Disposal
4.2.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	N/A	Last action + 50 years	Secure Disposal
4.2.8	Fire Precautions logs	No	N/A	Current year + 6 years	Secure Disposal

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5 RESIDENTS' ACTIVITIES MANAGEMENT					
5.1 Visits /trips outside of PJJL homes - Overseen by Service Managers / Safeguarding Lead					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
5.1.1	Records created to obtain approval to run visits/trips outside of PJJL homes.	Yes	No	Date of visit/trip + 7 years	Secure Disposal
5.1.2	Consent and record keeping for Company cars' driving tests	Yes	N/A	Kept in the 'Recruitment key-coded cabinet'.	Secure Disposal
5.2 Special educational needs, Looked after children & Safeguarding - Overseen by Service Managers / Safeguarding Lead					
	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
5.2.1	Records re looked after children, including family details, social worker/advocate information, incident reports, care plans, life goal plans.	Yes	Childrens Home Regulations 2015	DOB of resident child + 75 years	Secure Disposal
5.2.2	Safeguarding records	Yes	N/A	To be held as part of the resident's record.	Secure Disposal
6. GDPR DATA BREACH INFORMATION					
6.0	Basic file description	Data Prot. Issue	Statutory Provisions	Retention Period (Operational)	Action at the end of the admin life of the record
	All records and notes taking during the identification, assessment and investigation of the data breach	Yes	GDPR Regulations	Securely stored for 6 years from the date of the incident.	Secure Disposal