

Title	Record Keeping and Retention Policy
Current Policy Lead	Deputy Chief Executive
Version	2
Approved and Ratified by	Trustee Board July 2021
Date of last review	February 2023
Implementation, monitoring and review	The Chief Executive has overall responsibility for implementing and monitoring this statement. It will be reviewed on a regular basis following its implementation and additionally whenever there are relevant changes in legislation or to Healthwatch Norfolk's working practices
Date for next review	February 2024
To be reviewed by	Deputy Chief Executive
Related/referenced documents	Data Protection Act 2018 Data Protection Policy (GDPR) Confidentiality Policy Data Security Policy Data Transfer Policy GDPR Policy Statement for Staff and Volunteers Subject Access Request Policy Privacy Statement Freedom of Information Act 2000 Health and Social Care Act 2012

1. Policy Statement

Accurate, proportionate records are kept in order to:

- Provide a high-quality service to patients and the public
- To ensure that feedback can be provided
- To ensure good supervision and support to employees and 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 2018. It is Healthwatch Norfolk's responsibility to ensure that its' activities, whether solely or as part of another organisation, are covered by its registration with the Information Commissioner's Office.

2. PROCEDURE

- All paper-based records are held securely in a locked filing cabinet. These include, HR files, signed consent forms and Record of Concerns Forms (ROCA). Where possible such records should be scanned and saved electronically.
- Electronic files are kept securely on password protected devices. which are regularly backed up. Some files themselves may also be password protected. These include the database, payroll information, financial records, all HR records and retention records.
- Members of the public who choose to leave feedback via the Healthwatch Norfolk website are asked for consent that their comments be stored on a secure database and informed that personal information will be kept confidential and will not be shared unless express consent has been given. When asking for consent to pass on personal details Healthwatch Norfolk will always confirm how the information will be used and passed on.
- Members of the public who leave feedback verbally via one of our Community Engagement Officers are asked for their consent for feedback to be shared via our website and stored on our database, as above. Paper copies of their comments are securely destroyed once they have been published on our website.
- When DBS checks are requested, Healthwatch Norfolk will 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
- Healthwatch Norfolk complies with the requirements of company law and records are maintained and retained in accordance with the retention summary below. Healthwatch Norfolk 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.
- Healthwatch Norfolk stores insurance policies and employer's liability insurance certificates and records relating to the ownership or leasehold of premises securely and in line with the retention summary below.
- Confidential hard copy records that are waiting to be destroyed are kept securely and shredded or disposed of using a reputable company.
- Electronic records should be destroyed in line with the retention schedule below by a reputable company and a certificate of destruction provided.

3. RETENTION SCHEDULE

Employment	
<p>Staff and volunteer records, including Trustees, should be retained for six years after the end of employment, but need to only contain sufficient information in order to provide a reference (e.g. training and disciplinary records).</p> <p>Copies of any reference given should be retained for six years after the reference request. Director's files should be retained for six years.</p> <p>Responsibility for the management of employment records lies with the Deputy Chief Executive</p>	
Application form	Duration of employment, destroy when employment ends
References received	Duration of employment, destroy when employment ends
Sickness and maternity records	Six years from end of employment
Annual leave records	Six years from end of employment
Unpaid leave/special leave records	Six years from end of employment
Records relating to an injury or accident at work	12 years
References given/information to enable a reference to be provided	Six years from end of employment
Recruitment and selection material (unsuccessful candidates)	Two years after recruitment is finalised
Disciplinary records	Six years after employment has ended
Statutory maternity pay records, calculations and certificates	Retain while employed and for seven years after employment has ended

Redundancy details, calculation of payments and refunds	Seven years from date of redundancy
---	-------------------------------------

Record of comments and other evidence, e.g. observations, interviews, enter and view notes.	
Comments recorded on internal databases	Permanently
Any paper-based comments recorded on the database	Destroy after entering onto database. Responsibility: staff member entering the comments
Comments and or other evidence that have not been recorded on the database.	Permanently. Responsibility: pass to Deputy Chief Executive for secure storing centrally
Written survey/interview data obtained for projects (Survey website and paper)	Destroy after publication of final report. Responsibility: lead author of the report
Verbal interview or focus group data (Dictaphone or video recordings)	Destroy after publication of final report. Responsibility: lead author of the report
Signed consent forms for data obtained for projects	Destroy after publication of final report. Responsibility: lead author of the report
Enter and view notes and observations	Destroy after publication of final report. Responsibility: Deputy Chief Executive
Volunteer meeting reports	Retain for 1 year Responsibility: Deputy Chief Executive / Administrative assistant (??)
Photographs	Retained and used for five years, but may remain in publication for longer. Responsibility: Head of Communications and Engagement

DBS checks

Responsibility for the management of DBS records lies with the Deputy Chief Executive

Record disclosure reference numbers and date of check and return to the volunteer or staff member.

Record of Concern Forms (ROCA)

All ROCAs and related information should be kept for ten years. If the record relates to children and young people the record must be kept until they are 21 years old before destruction. Responsibility: Deputy Chief Executive

Financial records

Responsibility for the management of financial records lies with the Deputy Chief Executive

Financial records	Six years (public funded companies)
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than three years after the end of the financial year to which they relate
Payroll records (also overtime, bonuses, expenses)	Ten years
Pension contribution records	Six years
Pension scheme investment policies	12 years from any benefit payable under the policy

Corporate records

Responsibility for the management of corporate records lies with the Deputy Chief Executive

Employers Liability Certificate	Forty years
Insurance Policies	Permanently
Certificate of Incorporation	Permanently

Minutes of Board of Trustees	Permanently
Memorandum of Association	Original to be kept permanently
Articles of Association	Original to be kept permanently
Variations to the Governing Documents	Original to be kept permanently
Statutory Registers	Permanently
Membership Records	Retain until membership terminated
Rental or Hire Purchase Agreements	Six years after expiry

Other Records	
Responsibility for the management of all other records lies with the Deputy Chief Executive	
Deeds of title	Permanently
Leases	12 years after lease has expired
Accident books	Three years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).
Health and safety policy documents	Retain until superseded
Assessment of risks under health and safety legislation	Retain until superseded
Deeds of title	Permanently
Leases	12 years after lease has expired