

Policy/Procedure Name:	Data Collection, Storage & Retention Policy
Last Updated:	July 2022
Associated Policies & Procedures:	Data Protection Policy Children, Young People & Parent Carers Privacy Notice Staff & Volunteer Privacy Notice Acceptable Use of IT Policy Social Media Policy

Introduction

Extratime is required to collect, store and retain information for a number of purposes concerning children, young people, parent carers, staff, contractors and any other individual who comes into contact with the charity. Extratime is committed to creating, keeping and managing records which document its activities efficiently and systematically, to a standard appropriate to meet its purposes and the requirements of information legislation.

Policy Aim

The aim of this policy is to provide a framework for managing information to enable Extratime to:

- Deliver quality services by having timely access to meaningful and appropriate information
- Make informed decisions
- Be open and transparent
- Protect vital records
- Comply with the law
- Work with partners
- Protect our reputation and provide accountability over time

Maintaining appropriate and effective records management practices will help Extratime to deliver our services effectively and meet our statutory duties. By adopting this policy Extratime aims to ensure that our records, in whatever form they take, can be easily and efficiently located, accessed and retrieved, are better protected and securely stored, are disposed of safely and at the right time and that risk is reduced through compliance with relevant legislation.

Scope

This policy applies to Extratime records held in all formats, whether paper, electronic or audio-visual, including e-mails produced or received in the conduct of business and records held in business systems (i.e. Office 365, QuickBooks, Rota Cloud, Parent Carer Portal, Child & Young Person Database).

This policy applies to all Extratime staff and volunteers, and Trustees if they hold any records on behalf of Extratime.

Roles and Responsibilities

All staff and volunteers who receive, create, maintain or delete records are responsible for ensuring that they do so in accordance with this policy and Extratime's *Data Protection Policy* and *Acceptable Use of IT Policy*. It is important that everyone recognises information as an asset and understands their responsibilities as set out in this policy.

Relevant Legislation

Legislation relating to this policy is detailed in **Appendix 1**.

Records Management

Records must be managed through their lifecycle: from creation, through storage and use, to disposal.

Creation and maintenance

All staff and volunteers will:

- Create, keep and manage records in line with Extratime's principal activities.
- Maintain records Extratime requires for business, regulatory, legal and accountability purposes. The requirements for different classes of records are documented in the Records Retention Schedule (**Appendix 1**).
- Create records with meaningful titles so that they can be retrieved quickly and efficiently.
- Make sure records are authentic, reliable, have integrity and remain usable. This includes making appropriate arrangements for ensuring the continuity and availability of information when staff and volunteers leave, or during major organisational or technological change.

Extratime's Management Team will:

- Ensure that appropriate storage arrangements are available for records in paper/hard copy.
- Ensure that appropriate back-up arrangements are in place for electronic records (including restoration of back-ups and disaster recovery if electronic records are damaged).
- Ensure that business systems are appropriately supported, maintained and protected by adequate security measures.

Access to Records

- Records shall only be accessed by staff and volunteers for a legitimate purpose.
- Individuals can ask to access the records we hold about them under the UK GDPR. Refer to relevant *Privacy Notices* for more information.
- For more details, refer to Extratime's *Data Protection Policy*.

Storage

Extratime must ensure that appropriate measures are taken against the accidental loss of, or damage to, personal data. The DPA and GDPR requires us to put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Electronic and physical record systems and files will be designed to comply with the principles set out in the DPA and GDPR.

Physical/paper records shall be kept in such a condition as to ensure continuing accessibility, intelligibility and usability throughout their whole life-cycle (including, for those selected for long-term or permanent retention, the period when they are kept in storage).

Electronic records should only be retained in the Extratime SharePoint Folders accessible via Office 365 and approved business systems. Records relating to Extratime should not be retained on laptops, smartphones or other devices where they are not accessible to other staff, or available to the back-up system.

If working remotely on a computer, laptop, smartphone or other device not belonging to Extratime, all records can and should be accessed and stored via Office 365 portal. Any files downloaded onto a laptop, smartphone or other device should be deleted and shredded when the staff member finishes work for the day. Staff failing to delete files will be in breach of Extratime's *Acceptable Use of IT Policy*, which may lead to disciplinary action.

Email correspondence also constitutes an element of electronic records, and therefore this guidance covers the disposal and retention of stored emails. Good practice dictates that all emails should be deleted after a maximum of three years, but if individual emails constitute formal records relating to any of the categories listed in **Appendix 1** the disposal and retention schedule should apply.

Retention & Disposal

Under the DPA and GDPR, personal data processed by Extratime should not be retained for longer than is necessary for its lawful and legitimate purpose.

Data reaching its retention period should be reviewed on a regular basis and then signed off for destruction by the Data Protection Lead, who will ensure that the destruction request is in line with the period required by the relevant class of data. This stipulation shall, however, be subject to the specific requirements of the CEO, auditors and other bodies who may require data to be held to facilitate the closing or audit of Extratime accounts or the inspection of services.

The Extratime Records Retention Schedule is available at **Appendix 1**. This should be routinely reviewed to comply with all relevant UK statutory provisions currently in force and must be modified as appropriate.

Storage and destruction of records can be undertaken by third parties contracted for those purposes. Paper documents containing personal data will be securely disposed of. Processes must be in place to ensure that all backups and copies are included in the destruction of records.

Document Version & Review:

Date Written/ Reviewed	Version Number	Written/ Reviewed By	Summary of Changes	Date Approved
June 2022	1	Rebecca Jenkins/ Sam Price	Rewrite and update of previous Retention of Policy & Documents Policy. Version Number reset to 1 as new document.	July 22
Date of next review: June 2023				

Appendix 1: Records Retention Schedule

Record Type	Retention Period	Source of Requirement or Guidance
Children & Young People's Records		
Attendance registers	25 years	
General records, including EHCPs, support plans, medication records and accident records pertaining to children/young people, parental permission forms for medication and activities, complaints records, and data for local authority funded children/young people.	Until the child reaches 25 years of age or 6 years after they leave Extratime, whichever is later	EYFS (given legal force by Childcare Act 2006), Data Protection Act 2018 and UK GDPR, Limitation Act 1980
Other records which may contain personal information of children or families, such as photographs or videos, website content, social media posts, texts and emails.	Retain records of photographic/ video/ audio-visual permissions given by parents for 21 years and six months.	Data Protection Act 2018 and UK GDPR
Records of any reportable death, injury, disease, dangerous occurrence, accident/ incident records and risk assessments specific to a child	Until the child reaches 25 years of age or 6 years after they leave Extratime, whichever is later	RIDDOR 2013, Limitation Act 1980
Safeguarding		
Record of Safeguarding Concern and associated documents	Until the child reaches 25 years of age or 6 years after they leave Extratime, whichever is later	Working Together to Safeguard Children, 2018
Allegation of a child protection nature against a member of staff or volunteer	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is the longer. Note: allegations that are found to be malicious should be removed from personnel files.	Working Together to Safeguard Children, 2018
Governance		
Governing & Constitutional documents, e.g. Certificate of Incorporation, Memorandum and Articles of Association, Charity Commission schemes/orders	Permanent	Charities Act 2011, Companies Act 2006
Minutes of Board Meetings, AGMs, Special Committee Meetings	Permanent	Companies Act 2006
Documents relating to Trustee appointments	Permanent	Charities Act 2011, Companies Act 2006
Statutory Registers, e.g. register of directors and voting members,	Permanent	Charities Act 2011, Companies Act

Record Type	Retention Period	Source of Requirement or Guidance
charges, secretaries, directors' residential addresses		2006
Printed copies of resolutions submitted to Companies House	10 years	Companies Act 2006
Annual returns	Permanently	Recommended practice
Subject access request information	1 year following completion of the request	Data Protection Act 2018
Policy and strategy documents, e.g. business plans, policies, procedures	Until revised plus 7 years	Recommended practice
Financial		
Accounting records, e.g. payments, invoices, petty cash, bank instructions/records/reconciliations,	6 years from the end of the financial year	Charities Act 2011, Companies Act 2006
Annual report and accounts, including interim versions	Permanently	Charities Act 2011, Companies Act 2006
Budgets, forecasts and internal financial reports	5 years	Recommended practice
Documents supporting entries in accounts for donations and grants	6 years from the end of the financial year	Charities Act 2011, Companies Act 2006
Contracts with commissioners, suppliers, agents and others	6 years after expiry or termination of contract	Limitations Act
Fixed Assets register	Permanently	Charities Act 2011, Companies Act 2006
Rental and hire purchase agreements	6 years after expiry	Recommended practice
Leases	12 years after lease and liabilities under the lease have terminated	Recommended practice
Public liability policies	Permanently	Recommended practice
Employers liability insurance policies	40 years	Employers' Liability (Compulsory Insurance) Regulations 1969
Other insurance policies	Until claims under the policy are barred or 3 years after policy lapses, whichever is longer	Recommended practice
Health and Safety		
Health and Safety policy documents	Permanently	Health and Safety Act 1974
Staff and volunteer accident books/accident records and reports	3 years after last entry or end of investigation if later	RIDDOR 1995, Limitation Act 1980

Record Type	Retention Period	Source of Requirement or Guidance
Records of any staff and volunteer related reportable deaths, injuries, diseases or dangerous occurrences	3 years from the date of the last entry	RIDDOR 1995, Limitation Act 1980
Accident/medical records as specified by the Control of Substances Hazardous to Health regulations (COSHH) 1999	40 years from the date of the last entry	The Control of Substances Hazardous to Health Regulations 1999 & 2002
Assessment of risks under health and safety regulations	Until revised plus 3 years	Recommended practice
Fire Log books	Current year plus 3 years	Regulatory Reform (Fire Safety) Order
First Aid training	6 years after working with Extratime	Health & Safety (First Aid) Regulations 1981
Staff and Volunteer Records		
Job application and interview records for unsuccessful candidates	1 year	Chartered Institute of Personnel and Development
Personnel files and training records (must contain all information for the staff/volunteer, including application form, work history, references, supervision and appraisals, qualifications, disciplinary records, working time records and training records)	6 years after working with Extratime	Limitation Act 1980, Chartered Institute of Personnel and Development
DBS information	Name, DOB, Reference Number, Date of issue, details of whom obtained it and anything recorded on the certificate: 6 years after employment ceases. Once a recruitment (or other relevant) decision has been made, we do not keep more detailed Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.	Disclosure and Barring Service Guidance, Data Protection Act 2018, Childcare Act 2006
Working time records including overtime, holiday, jury service and special leave	2 years from the date on which they were made	Working Time Regulations 1998
Payroll and wage/salary records, incl. overtime and expenses	6 years from the end of the tax year to which they relate	Taxes Management Act 1970
Income tax and National Insurance returns, income tax records and correspondence with HMRC	At least three years after the end of the tax year to which they relate	Income Tax (Employments) Regulations 1993

Record Type	Retention Period	Source of Requirement or Guidance
National Minimum Wage records	3 years	National Minimum Wage Act 1998
Pension scheme and member records	6 years	The Pensions Regulator
Parental Leave records	18 years from the birth of the child	Chartered Institute of Personnel and Development
Statutory maternity, adoption and paternity pay records	3 years plus current year	Statutory Maternity Pay Regulations 1986
Tax return, P60 and P45 information	6 years	Data Protection Act
Operational		
Minutes of staff meetings	Date of meeting plus 3 years then review	Recommended practice
Records of parents' meetings	Date of meeting + 6 years	Recommended practice
Reports created by management, data and cohort analysis	3 years	Recommended practice
Correspondence created by management	3 years	Recommended practice
Visitor and Signing in Sheets	Current year plus 6 years	Recommended practice
Records relating to complaints made/investigated	Until the child reaches 25 years of age or 6 years after they leave Extratime, whichever is later unless: <ul style="list-style-type: none"> • If negligence involved: current year + 15 years. • If child protection or safeguarding issues are involved: current year + 40 years. 	Recommended practice