

DATA AND DOCUMENT STORAGE , RETENTION AND DISPOSAL

Amendment History

Revision	Author	Description of Change	Date Updated
Original	Karen Walls	New policy (CRB Storage)	August 2006
Original	Carol Hooper	New policy (Document Storage & Disposal, & Data Protection)	August 2008
1	CH and SM	Checked and updated	October 2008
2	CH/ SM/ Alison Foulds	Reviewed, no change. NB vetting and barring to be added when implemented. [not implemented!]	June 2009
3	CH/AF	Reference to storage of records; review again after July training course	May 2010
4	CH	Add reference to Single Central Record	May 2011
5	CH/HS	Checked telephone numbers and contact details	June 2012
6	CH/SF	Amalgamation of policies on data protection, and on document storage retention and disposal	January 2013
7	CH/SF	Add reference to waste transfer notes	March 2013
8	CH/SF	Amended retention periods for document to reflect current best practice	September 2013
9	CH/SF	Replace CRB with DBS; add reference to update service	January 2015
10	CH	Merge DBS Storage and document Storage etc Policies	November 2016
11	CH & SF	Retain all records relating to children for 25 years	February 2018

12	CH & SF	Removed reference to data protection – now a separate policy (Data Protection Policy)	January 2020
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DATA AND DOCUMENT STORAGE, RETENTION AND DISPOSAL POLICY

Introduction

This policy outlines the systematic and planned approach to the management of records at Kineton Playgroup Ltd.

In the context of this Policy, a document is a record that contains information (in any media including electronic) that has been created or gathered as a result of any aspect of the work of Kineton Playgroup Ltd.

The retention periods given are only “minimum recommendations” and discretion should be applied before any documentation is disposed of. However, decisions to keep records beyond the stated periods must be justified and where this involves personal or children’s information, full consideration must be taken of Data Protection.

General principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, Kineton Playgroup complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

Evidence checking

Sally Flynn (deputy manager & office administrator) has been approved as an identification verifier.

Annual update service

All members of staff are required to register their DBS checks with the annual update service. Regular checks are made with the update service for all members of staff.

Storage and access

All personnel records, including DBS disclosure information and the Single Central Record (SCR) are kept securely, whether on site or in a secure off-site storage facility. Disclosure information is kept in a lockable, non-portable, storage container; access is strictly controlled and limited to those who are entitled to see it as part of their duties, namely the manager, the deputy manager (office administrator) and the chair. A summary of relevant parts of the SCR is supplied to Kineton Primary School to be kept securely.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. Kineton Playgroup maintains a record of all those to whom

disclosures or disclosure information has been revealed. It is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Kineton Playgroup do not keep disclosure information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, the DBS will be consulted and full consideration to the data protection and human rights of the individual will be given before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, Kineton Playgroup will ensure that any disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, disclosure information will be kept in a secure way, such as in a secure receptacle or location. Destruction will be carried out by a suitable person or organisation. No photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure will be kept.

Retention of records

However, notwithstanding the above, a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken is kept. A summary of these records is kept securely.

Acting as an Umbrella Body

Before acting as an Umbrella Body (one which countersigns applications and receives disclosure information on behalf of other employers or recruiting organisations), Kineton Playgroup will take all reasonable steps to ensure the handling, use, storage, retention and disposal of disclosure information in full compliance with the DBS Code and in full accordance with this policy. Kineton Playgroup will also ensure that any body or individual, at whose request applications for disclosure are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

Data Protection

Refer to the Data Protection Policy.

Storage

All documents containing personal data will be stored in the office or the staff room. Staff and Board members are required to read and sign the Confidentiality Policy, which should be read in conjunction with this policy, on an annual basis.

Staff personnel files are stored in a locked cupboard, to which only the Manager and Administrator has access.

Parents have access to the files and records of their own children but do not have access to information about any other child.

Records relating to the current year are kept on-site. Information relating to prior years will be kept securely on site for up to 12 months and then in secure off-site archive storage. Information may be retrieved as required for specific and lawful purposes and will be kept in accordance with this policy.

Retention of paper records

Type of record	Retention period (Statutory)
Workplace accidents	Six years after date of last entry. There are specific rules on recording incidents involving hazardous substances.
Payroll	Six years after the end of the tax year they relate to
Statutory maternity, adoption and paternity pay	Six years after the end of the tax year they relate to
Statutory sick pay	Six years after the end of the tax year they relate to
National minimum wage	Six years after the end of the pay reference period following the one that the records cover
Retirement benefits schemes - notifiable events, eg relating to incapacity	Six years from the end of the scheme year in which the event took place
Application forms/interview notes for unsuccessful candidates	Six months
Health and safety consultations	Permanently
Controlled waste transfer notes	Current year and previous 2 years
Parental leave	Five years from birth/adoption, or until child is 18 if disabled
Personnel files and training records	Six years after employment ceases
Redundancy details	Six years from date of redundancy
Documents proving the right to work	Two years after employment ceases

Fees and fee payment records	Current year and previous 6 years
Invoices	Current year and previous 6 years
Accounts	Current year and previous 6 years
Bank statements and records	Current year and previous 6 years
Funding records	Current year and previous 25 years
Day lists	Current year and previous 25 years
Registers	Current year and previous 25 years
SEN records and nappy records	Current year and previous 25 years
Playgroup and KASC contracts	Current year and previous 25 years
Food hygiene records	Current year and previous year
Board minutes	Permanently
Children's records – summary	Current year and previous 25 years
Photographs	Current year and previous year on computer. A selection of photographs permanently in hard copy (eg yearbooks and annual group photographs).
Diaries	Current year and previous 25 years
Letters to parents/ parent information	Current year and previous year
Medical records and accident forms	Current year and previous 25 years
Questionnaires	Current year and previous year
Questionnaire summaries	Current year and previous 2 years
Staff meetings	Current year and previous 25 years
Health and safety	Current year and previous 25 years
Work experience	Current year and previous 25 years

Destruction of records

On a day to day basis, any records that are no longer required which contain personal details will be shredded on-site. Computer based records, records on memory sticks and external hard drives will be permanently deleted at the end of the retention period.

Computer hard drives will be physically destroyed once no longer required. The secure archive storage company may be asked to destroy records on our behalf.