

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 |
| 13 | CH | Reviewed, no changes | July 2022 |

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| 14 | CH, TH & XF | Updated names of evidence verifiers | July 2023 |
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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

The deputy managers have been approved as identification verifiers.

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, or the relevant updated legislation, 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 Deputies 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) |
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| 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 after date of redundancy |
| Documents proving the right to work | Two years after employment ceases |

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| 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.