

Catch22 group policy

Data Protection – Data & Records Management Policy

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Queries to:	<i>Data Protection Officer</i>
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4Policies level (all staff or managers only)	<i>All staff</i>

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	29/09/2022	Beverley Clark	Policy reviewed.
1.1	04/02/2024	Ben Wright	Annual Review – No changes made
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1. Summary

In order to operate efficiently, Catch22 has to collect and use information about the people with whom it works, as well as its current, prospective and past employees, volunteers and donors. This personal data must be collected, handled and dealt with lawfully and in accordance with the UK Data Protection Legislation incorporating Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UKGDPR).

Knowing when to delete or retain data is important for several reasons. In some instances, records will need to be retained for specified periods of time for statutory and regulatory reasons that are prescribed to us. There may also be specific organisational/business need to retain certain documents for periods of time. Equally, Principle 5 of the UKGDPR requires that personal data be kept for no longer than is necessary for the purpose(s) for which the personal data are processed. It is therefore imperative that the organisation retains data for no longer than is necessary in order to be deemed compliant with data protection legislation. This policy and the accompanying data retention schedule highlight good practice with regard to data retention and define retention periods for varying records that the organisation holds.

2. What is the policy about?

This policy promotes good retention behaviours to all staff that handle personal data whilst working for Catch22. It provides staff and volunteers with information that will allow them to make suitable decisions with regard to data retention in conjunction with the Data Retention Schedule. Both this policy and Data Retention Schedule strive to strike a balance between the need to store information and the legal obligations to destroy the data safely when it is no longer required. Data can be held in paper or electronic form and this policy applies to both.

3. Who is the policy for?

This policy applies to staff, volunteers, trustees and all other parties who collect and/or process data on behalf of Catch22. This includes all contractors, consultants, partners or other servants or agents of Catch22.

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The policy applies to information in all its forms, be it manual records or data stored electronically. It applies throughout the lifecycle of the data from it being received or created, through storage and utilisation to disposal/deletion.

4. Policy requirements

There are no defined retention periods set out in data protection legislation, instead principle 5 of the UKGDPR states that 'Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. In short, records will only be held for a period that is required by statutory, contractual, or business need.

In relation to operational data, Managers must ensure that they refer to their contracts or seek guidance from the commissioner of their service if clarity is required, to establish who should be storing the data and for how long.

Archiving must always be done in compliance with the relevant contract (which will normally specify what records are to be returned to the commissioner), and which records should be retained for what period by Catch22. Where the contract is mute on this point, the commissioner should be contacted with a view to agreeing a return, to them, of any relevant records. Any records not covered by a contractual agreement or agreed for return to the commissioner must be retained in line with the relevant legal requirement (where relevant). If this is not the case, then the data must be retained in line with the retention periods set out in the Catch22 Data Retention schedule (DRS).

As a non-statutory organisation, it is unwise for us to commit to retaining data that does not belong to us, upon conclusion of a contract, as we are unable to guarantee our existence for the duration of the retention period. Preferably, data should be transferred to the commissioner/local authority upon the conclusion of the contract. This ensures that data that is legally required to be held for a period of time is not lost if the organisation ceases to exist. There have been notable examples of non-statutory agencies that have closed and with that closure the data they held was subsequently lost despite needing to be held for legal reasons. Managers must therefore ensure arrangements are put in place to transfer data back to the commissioner. If Catch22 are required to hold data after the closure of the service, this will need to be negotiated and should ideally be held for no longer than 7 years,

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unless there is a legal obligation to retain the information for longer which must be specified at the earliest opportunity.

In instances where a document/record is not included in the DRS, please contact the Data Protection Officer (DPO@catch-22.org.uk) for further guidance.

Record keeping – non-statutorily defined periods

There are instances where Catch22 retains certain records, for varying periods of time, depending on the role of the individual in question, in order to satisfy a legitimate business need. These records may include, but not be limited to, the following: -

- Emails which record key decisions
- Documents (electronic and paper)
- Elements of HR records

These retention periods are detailed below:

- All staff up to Director level – max 6 years after they have left the organisation
- Director(s) – max 10 years after they have left the organisation
- COG – max 15 years after they have left the organisation

Catch22 has a responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. Catch22 ensures that records **for which it is responsible** are accurate, maintained and disposed of appropriately. All Catch22 staff and volunteers who create, receive, and use Catch22 data hold data retention and records management responsibility. All members of staff are responsible for ensuring that they comply with good data retention principles in their daily working practices, which include:

- The creation and maintenance of accurate and relevant records, where applicable to their role
- Ensuring records are appropriately maintained and remain accurate, up to date and relevant to the purpose that they were initially collected
- Ensuring that data is held securely in line with the Integrity and Confidentiality principle of the UK Data Protection Legislation. This includes ensuring that only people that have a legitimate reason to access the data are able to view the records.
- Abiding by the Data Retention Schedule in respect to the retention/deletion of records

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- Ensuring personal data and sensitive personal data are handled appropriately and in accordance with legal requirements
- Avoiding duplication of records
- Contacting the Data Protection Officer if the document/data in question is not included in the Data Retention Schedule
- Ensuring the safe deletion/disposal of records
- Ensuring that data that is stored is compliant with all seven of the GDPR principles

5. The Independent Inquiry into Child Sexual Abuse (IICSA)

On Thursday 12 March 2015 the Home Secretary established a statutory inquiry under the 2005 Inquiries Act with the aim of conducting an overarching national review of the extent to which institutions in England and Wales have discharged their duty of care to protect children against sexual abuse.

The Inquiry is independent of government. As of August 2016, it is now led by Prof. Alexis Jay OBE who is supported by a Panel, Victims and Survivors Consultative Panel, and other expert advisers. The Inquiry will cover England and Wales. A wide range of public institutions will be investigated including local authorities, the police, the armed forces, schools, hospitals, children's homes, churches, and charities.

On 2nd July 2015 Justice Goddard (the former Chair of the inquiry) wrote to the Chief Executives Local Authorities in England and Wales, requesting that the organisation: 'Retain any and all documents; correspondence; notes; emails and all other information – however held – which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care. For the purposes of this appendix, the word "children" relates to any person under the age of 18.' The Goddard Inquiry has now concluded, and the records can now all back in line with the Data Retention Schedule.

As mentioned above, it is important that Catch22 services return data to their commissioners prior to closure. Copies may be archived for a prescribed time in case of any enquiry but ideally no longer than seven years. As a non-statutory agency, we cannot guarantee that we can hold onto the data for the time needed. To ensure that data continues to be retained

for the specified legal period, it is essential for Catch22 to return the data upon contract completion/termination.

For any advice on clarification on whether records covered by the IICSA can be destroyed, consult the Data Protection Officer DPO@catch-22.org.uk

6. Archiving

The Record of Processing Activity (Article 30 UKGDPR) requires that all records (electronic or paper) containing personal data are mapped out with retention periods defined for the type of record held.

a. Paper documents

All Catch22 archived paper documents are stored at one central storage unit, which is administered by the Facilities team. Archiving falls under Corporate Procurement and no one else can enter into contracts for the provision of archive storage on behalf of Catch22.

It is important that all staff follow the correct procedure when archiving documents to ensure consistency across the organisation. Once items have been identified as ready to archive, they must be boxed in line with procedure. Once boxed, Facilities must be contacted to arrange for their collection. Archiving must not be retained and stored locally whether on site or off.

Archiving must always be done in compliance with the relevant contract (which will normally specify what records are to be returned to the commissioner), and which records should be retained for what period by Catch22. Where the contract is silent on this point, the commissioner should be contacted with a view to agreeing a return, to them, of any relevant records. Prior to archiving, reference must be made to this policy.

Procedure for archiving:

- Remove all paperwork from lever arch and box files.
- Section paperwork for ease of reference, try to keep the same type of item in the box rather than mixing
- Bind bundles with string.

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- Place paperwork into box with a list of contents (this must detail a start and end date).
- Retain a copy for your records to be able to locate any items at a later date.
- The box then needs to be numbered, starting at 1 (e.g., HR1, Payroll1).
- Further boxes will then be numbered upwards.
- Create a spreadsheet starting with number 1 and then note the contents for your own reference (this is how we will know what box is to be retrieved in the future if needed).
- Mark the end of the box with the Service name, a brief description of the contents e.g., HR records A-C and a Destroy Date (in accordance with the retention guidelines in the policy).
- Contact facilities to arrange collection

Guidance notes are available from Facilities or the DPO for full information on retrieval, collection, charges and what to do when a service closes.

b. Electronic records (digital)

Records held electronically are subject to the same legal requirements as paper records.

Managers must ensure that all records that are held on electronic (digital) systems are managed and treated with the same rigor as paper files with regard to retention, disposal and/or deletion

The following principles should apply to all electronic records: -

- Files and folders should be clearly named
- File/folder permissions and access rights must be established to ensure that they can only be accessed by the people with the right to do so
- Records relating to individuals must be clearly named.
- Consideration must be given to what happens to the records when the service is no longer being delivered to the individual or the contract ends.

As with paper records, service user data should be returned to the commissioner if relevant.

- If records are held on third party systems supplied by the commissioner, then the records will fall under the contract/agreement in place for their processing

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- If records are held on third party systems bought by/licensed to Catch22 then managers must ensure there is a clear plan for when the system will no longer be used for that contract or service. If the records are downloaded to another system, a deletion date must be recorded for the data held and ownership of that responsibility needs to be documented.
- Records held on the Catch22 Cloud/SharePoint must be held in a structured form. Any files relating to individuals or holding bulk information e.g., payroll files, staff lists, report data must only be held for a period suitable for their purpose.

7. Image Retention

Catch22 will from time-to-time capture and store images of individuals such as staff or service users. This could be in photo form or in images that are recorded as part of CCTV operations.

Images are considered personal data under UK Data Protection Legislation and therefore must be treated in the same manner as the other forms of data that we process. A key aspect of processing images lawfully and in accordance with the UK Data Protection Legislation is to ensure that individuals have consented to the use of their image and have been informed of how their data will be used. Their consent must be freely given, specific, informed and unambiguous in order to be deemed lawful. The request for consent must also be provided in a manner which is intelligible and in an easily accessible form, using clear and plain language (especially when addressing children). Their consent must be dated and stored in order to provide evidence of their consent and to serve as a reminder for when the images should be deleted or renewed. See the template Consent form in the Photography & Film Policy, this will need to be edited to suit the individual circumstance that you are requesting consent for.

Images must be destroyed in a secure manner **two years** after they were collected. If you wish to continue to use an image after this time period, you must regather consent from the individual. The same will apply to images and footage that is uploaded onto organisational social media accounts. However, we cannot be held responsible for any onward sharing that occurs once this data has been uploaded.

8. Deletion/Disposal of records

Once a document has reached/surpassed its retention limit or business need it will need to be deleted or disposed of in a secure way in line with of the legislation but that have time limits on how long they should be retained for e.g. contracts, leases, grant agreements etc.

Prior to the documents deletion it is necessary to check the Data Retention Schedule to ensure that there are no further reasons why the data should need to be retained. Once it has been established that there is no other reason in which to keep the records, they may be fully deleted/disposed of in the following ways:

- **Paper records and other physical records** – must be destroyed by shredding the documents in a crosscut shredder with a DIN number of 3 or above. Alternatively, arrangements can be made for this to be carried out by an authorised external organisation that deals with the disposal of confidential waste and can provide certificate of destruction once this has taken place.
- **Electronic records** - must be permanently deleted as well as any copies that are stored elsewhere
- **Disposal of IT storage equipment** - (See the IT Disposal policy)

9. Related Policies

- Code of Conduct policy
- Data protection – Overarching policy
- Data Protection – Data incident policy
- Data Protection – Observing data subject rights
- Data Protection – Privacy impact assessment policy
- Data Protection – Recording processing activity policy
- Data Protection – Subject access policy
- IT Acceptable Use policy
- Confidentiality policy
- Home Working policy
- IT Secure Use policy
- Telemarketing policy
- Off site and Residential policy

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- Social Media policy
- Photography & Film Policy
- Volunteer policy
- Whistle-blowing policy
- IT disposal policy

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Data Retention Schedule
(Corporate Records)

Human Resources records-

Class	Series	Records	Description	Retention Period	Rationale
Administering Employees Discipline	Employee files	Administration of formal disciplinary process		Destroy – 6 years after case closed	Limitation Act 1980
Grievance	Employee files	Administration of formal employee grievance process including tribunal case defence		Destroy – 6 years after case closed	Limitation Act 1980
Employment conditions	Employee files		Documentation relating to individuals general or specific conditions of employment	Destroy 2 years after employee ceases employment	Limitation Act 1980
Personnel Administration	Employee files		Bank, Pension, Emergency Contact	Destroy – minimum retention 6 years after the	Limitation Act 1980

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			& Qualifications; Employment Contracts (signed); Educational Qualifications; Adverts, JD's and Person Specs; Change of Hours; Travel & Subsistence Documents	employee has left	
Individual training records	Employee files		Documentation relating to an individuals training record and any work experience undertaken within the authority	Destroy – 6 years from termination of employment	Limitation Act 1980
Individual training records	Employee files	Proof of completion	Documentation relating to proof of training course completed	Keep for a reasonable time based on business needs. 6 years minimum legal requirement.	ICO employment practices data protection code part 1

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Induction			Documentation relating to the process and undertaking of induction for new employees or councillors	Destroy – 2 years after closure	Limitation Act 1980
Leave	Employee files		Documentation relating to requested employee leave: Annual, study, carers, special, compassionate, unpaid leave etc.	Destroy – 2 years after action completed	Based on Retention Guidelines for Local Authority 2003
Maternity/Paternity	Employee files		Records documenting entitlements to, and calculations of, Statutory Maternity pay	Destroy – 3 years from end of current tax year	Regulation 26, Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960)

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Reporting			Reports related to working hours and terms and conditions	Destroy when superseded	Common practice
Termination			Documentation relating to the leaving process: resignation, termination other than pension	Destroy – 6 years form termination of employment	Limitation Act 1980
Equalities and diversity			Investigation and reporting on specific cases	Destroy – 5 years after action completed	Limitation Act 1980
Monitoring employees – Performance appraisal		Probationary reports and performance plans	Documentation relating to the performance appraisal of an employee, including performance related pay if applicable	Termination plus keep until business need, 6 years minimum	Employment Practices Data Protection Code Part 1: Recruitment & Selection
Occupational health – Absence reporting			Aggregated management information on	Destroy – 3 years after action completed	Management of Health and Safety at Work Regulations 1999 Noise at Work

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			absences, for instance, working days lost to various sickness categories		Regulations 1989
Occupational health		Staff health records	Documentation relating to occupational health and safety	Destroy – 75 years after DOB	Limitation period for personal injury claims (there may be circumstances where it is not practical to separate these from other Occupational Health Records)
Personal risk assessments	Employee files		Including restrictions i.e. cannot lift or desk work only	Destroy – 3 years after the completion of the assessment	Health & Safety at Work Act 1974; Management of Health & Safety at Work Regulations 1999
Sickness monitoring	Employee files		Documentation relating to sickness absence, including medical certificates	Destroy – 3 years from termination of employment	Common practice
Major injuries			Documentation relating to major injuries	Destroy – 40 years after termination of employment	Health and Safety at Work Act 1974; Reporting of injuries, Diseases and Dangerous Occurrences

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					Regulations 1995 reg. 7; Limitation Act 1980
Job descriptions			The job description and person specifications for current posts	Destroy – 2 years after superseded	Limitation Act 1980
Recruitment			Process relating to the recruitment of an employee	Destroy – 6 years from termination of employment	Employment Practices Data Protection Code Part 1: Recruitment & Selection
Recruitment	Position	Unsuccessful candidate	Documents relating to unsuccessful candidates	Destroy – 6 months after recruitment finalised	Employment Practices Data Protection Code Part 1: Recruitment & Selection
Interview notes	Position	Unsuccessful candidate	Interview notes	Destroy – within 6 months	Limitation Act 1980
Detailed vetting information where conditional offers are not confirmed (including References, Occupational Health Advice and DBS disclosures)	Position	Unsuccessful candidate		Destroy – within 6 months	

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These may be extended on receipt of any Employment Tribunal Complaint until 3 years following determination of any complaint					
DBS disclosures – Note of disclosure number & whether or not clear:	Position		Documentation relating to individuals general or specific conditions of employment	Destroy 2 years after employee ceases employment	
Recruitment information	Position	Employed staff	Other recruitment information e.g. copies of qualification certificated, proof of ID	Destroy – 6 years after termination of employment	Limitation Act 1980
Application form	Position	Employed staff	Application form	Kept for duration of employment	Limitation Act 1980
Application form	Position	Unsuccessful candidates	Application form	6 months to a year. (Because of the time limits	CIPD recommendation

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				in the various discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications should be at least 6 months. A year may be more advisable as the time limits for bringing claims can be extended. Successful job applicants documents will be transferred to the personnel file in any event.	
Supervision notes	Position	Employed staff	Supervision notes	Destroy – within 5 years	CIPD recommendation
Recruitment	Position		Selection for a position	Destroy – 1 year after recruitment finalised	CIPD recommendation

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Recruitment process			Documentation relating to the recruitment process	Destroy when superseded	CIPD recommendation
Secondment	Secondment files		Documentation relating to the process of secondments to or from Catch22	Destroy – 6 years from termination of employment	CIPD recommendation
Training – Reporting			Performance management relating to training and development, including feedback statistics		CIPD recommendation
Training courses	Training course files	Course Administration	Training documentation	Destroy – 2 years after completion	CIPD recommendation

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			relating to specific courses and sessions		
Training courses	Training course files	Courses concerning children	Training courses concerning children	Destroy – 35 years after course completed, or last entry	CIPD recommendation
Workforce planning – Workforce development planning		Financial rewards	Documentation relating to workforce management	Destroy – 7 years after action completed	CIPD recommendation
Workplace development planning		Strategy	Documentation relating to workforce management and salaries.	Destroy – 3 years after action completed	CIPD recommendation

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Finance records-

Class	Series	Records	Description	Retention period	Rationale
Financial Transaction Management – Expenditure		Identification of the receipt, expenditure	Activities involved in the payment of goods and services by the organisation. Include expenses claims and honorariums.	Destroy 6 years after the conclusion of the transaction	Limitation Act 1980, VAT Act 1994, Taxes Management Act 1970, Audit Commission Act 1998. May be reduced by agreement with HMRC
Expenditure		Travel expenses	Travel expenses	Destroy 6 years after the conclusion of the transaction	Limitation Act 1980, VAT Act 1994, Taxes Management Act 1970, Audit Commission Act 1998.
Payroll and Pensions - Pay		Payment of employees	Activities involved in the administration of remuneration to staff of the authority.	Destroy – 7 years after the conclusion of the transaction	Taxes Management Act 1970 Audit Commission Act 1998

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Pay		Payment of employees	wage/salary records (also overtime, bonuses, expenses)	Destroy – after 6 years	Taxes Management Act 1970
Pensions			Activities involved in the administration of pension schemes for current and former employees.	Destroy – after 6 years	Taxes Management Act 1970

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Information Governance-

Class	Series	Records	Description	Retention period	Rationale
Freedom of Information request (FOI)			• Correspondence with requester regarding their request • Internal & external reviews • Internal memorandums • Information disclosed • Unused relevant documentation	Destroy – 3 years after case closure	National Archive guidance
Data Protection	Subject Access request (SAR)		• Correspondence with requester regarding their request • Internal & external reviews	Destroy – 3 years after last documented action unless specific circumstances advise otherwise.	Common practice

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			• Internal memorandums • Information disclosed • Unused relevant documentation		
Data Protection	Section 29 cases		Correspondence with CSA, HM Revenue & Customs, Police and Local authorities	Destroy – 6 years after the request was received	Common practice
Data Protection	Data Controller Notification documentation		Notification forms and certificates of notification	Destroy - once expired	Common practice

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Health & Safety-

Class	Series	Records	Description	Retention period	Rationale
Training			Documentation relating to Health & Safety training	(See Human Resources)	
Monitoring – Accidents and incident reporting		Accident books - adult	Registers of accidents and incidents	Destroy – 3 years from closure	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances (see below).
Accidents and incident reporting		Accident books – children	Registers of accidents and incidents	Destroy - 25 years from closure	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995

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Asbestos inspections			Monitor the condition of known asbestos products within buildings	Destroy - 50 years from last action or age 75 years from date of birth (greater)	Control of Asbestos at Work Regulations 1987
Hazardous substances		COSSH inspections	Control and monitor the use of hazardous substances at work.	Permanent – offer to archivist	Control of Substances Hazardous to Health Regulations 2002
Health and safety inspections			Activities relating to internal or external inspections examining the organisation health and safety provision	Termination plus 5 years	The Control of Substances Hazardous to Health Regulations 2002
Risk Management – Risk assessments			Activities relating to risk assessments carried out by the organisation. Includes workplace assessments	Destroy - 3 years after last assessment	Management of Health and Safety at Work Regulations 1992

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(Operational records)

Children & Families services records-

N.B Upon termination of contract return records to commissioner. See the Policy Requirements section for more detail.

Class	Series	Records	Description	Retention period	Rationale
Childcare provision – Care provision			Provision of childcare including: Development and welfare monitoring and education progress monitoring	Retain records for 25 years from date of birth	Limitation Act 1980
Child protection			Child protection including: Investigation of allegations, protection planning, monitoring and review, court order application, statutory visits administration and location of missing children and families	Retain for 75 years from service users date of birth	Children's Act 1989
Psychological and behavioural support			Provision of support to children with psychological and behavioural difficulties	Retain 25 years from service users date of birth	Limitation Act 1980

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Substance Misuser Rehabilitation support			Provision of Substance Misuser Rehabilitation support	25 years unless child is or becomes looked after (DOB + 75 years) or adopted (Date of adoption order + 100 years)	Limitation Act 1980 Children's Act 1989
Vulnerable childcare & Family support – Case management			Overarching management of vulnerable children and family cases including; referrals, needs assessments, care and support planning, recording of key summary information and administration of 'case'.	Retention records 25 years from DOB unless child is or becomes looked after (DOB + 75 years) or adopted (Date of adoption order + 100 years)	Limitation Act 1980
Accommodation provision			Provision of accommodation including: Supported accommodation and lodgings excluding residential care, fostering and adoption.	Retention records 25 years from DOB unless child is or becomes looked after (DOB + 75 years) or adopted (Date of adoption order + 100 years)	Limitation Act 1980

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Adult Care Services Provision-

N.B Upon termination of contract return records to commissioner. See the Policy Requirements section for more detail.

Class	Series	Records	Description	Retention period	Rationale
Case Management – Care and Support planning			Planning of care and support provision to meet assessed needs	Retain records 6 years from date closed	Limitation Act 1980
Case administration			Administration of adult care cases. Excluding needs assessment, care and support planning and key information recording	Retain records 6 years from date closed	Limitation Act 1980
Basic information recording			Recording of basic case information	Retain records 6 years from date closed	Limitation Act 1980
Outcome summary recording			Recording of summary outcomes	Retain records 6 years from date closed	Limitation Act 1980
Service summary recording			Recording of services provision summary	Retain records 6 years from date closed	Limitation Act 1980

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Needs assessment			Assessment of care needs and priorities	Retain records for 6 years from date closed	Limitation Act 1980
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School records-

Class	Series	Records	Description	Retention Period	Rationale
Child Protection- Child Protection files				Destroy – DOB + 25 years	Education Act 2002, s175 related guidance “Safeguarding Children in Education”, September 2004
Allegation made toward a member of staff relating to child protection			Allegations of a child protection nature against a member of staff, including where the allegation is unfounded	Until the persons normal retirement age, or 10 years from the date of the allegation whichever is the longer	Employment Practices Code: Supplementary guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance “ Dealing with allegations of abuse against teachers and other staff” November 2005
Minutes (Inspection Copies)				Date of meeting + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Annual parents meeting papers				Date of report + 6 years	Information records Management Society

					(Records Management Toolkit for Schools)
Instruments of Government					Information records Management Society (Records Management Toolkit for Schools)
Trusts & Endowments				Retain in school whilst operationally required	Information records Management Society (Records Management Toolkit for Schools)
Action Plans				Date of action plan + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Policy Documents				Retain in school whilst the policy is operational	Information records Management Society (Records Management Toolkit for Schools)
Complaints files				Date of resolution of complaint + 6 years	Information records Management Society (Records Management Toolkit for Schools)

Annual reports required by the Department for Education				Date of report + 10 years	Education (Governors Annual Report) (England) (Amendment) Regulations 2002. SI 2002 No 1171
Proposals for schools to become, or be established as Specialist Status School				Current year + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Management – Log books				Date of last entry in the book + 6 years	Information records Management Society (Records Management Toolkit for Schools)
Minutes of the Senior Management Team and other internal administrative bodies				Date of meeting + 5 years	Information records Management Society (Records Management Toolkit for Schools)
Report made by the head teachers or management team				Date of report + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Records created by head teachers, deputy				Closure of file + 6 years	Information records Management Society

head teachers, heads of year and other members of staff with administrative responsibilities					(Records Management Toolkit for Schools)
Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities				Date of correspondence + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Professional development plans				Closure + 6 years	Information records Management Society (Records Management Toolkit for Schools)
School development plans				Closure + 6 years	Information records Management Society (Records Management

					Toolkit for Schools)
Admissions – if the admission is successful				Admission + 1 year	Information records Management Society (Records Management Toolkit for Schools)
Admissions – if the appeal is unsuccessful				Resolution of case + 1 year	Information records Management Society (Records Management Toolkit for Schools)
Proofs of address supplied by parents as part of the admissions process				Current year + 1 year	Information records Management Society (Records Management Toolkit for Schools)
Pupils – Admission Registers				Retain in the school for 6 years from the date of the last entry then consider transfers to Archives	Information records Management Society (Records Management Toolkit for Schools)
Attendance Registers				Date of register + 3 years	Information records Management Society (Records Management

					Toolkit for Schools)
Pupil files Retained in Schools				Look into retention rates for AP schools	Information records Management Society (Records Management Toolkit for Schools)
Pupil files				Look into retention rates for AP schools	Information records Management Society (Records Management Toolkit for Schools)
Special Educational Needs files, reviews and Individual Education Plans				Date of birth of pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves	Information records Management Society (Records Management Toolkit for Schools)

				in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum, retention period.	
Correspondence relating to Unauthorised Absence and Issues				Date of absence + 2 years	Information records Management Society (Records Management Toolkit for Schools)
Examination results – Public				Year of examination + 6 years	Information records Management Society (Records Management Toolkit for Schools)
Internal examination results				Current year + 5 years	Information records Management Society (Records Management Toolkit for Schools)

Any other records created in the course of contact with the pupils				Current year + 3 years	Information records Management Society (Records Management Toolkit for Schools)
Parental permission slips for school trips – where there has been no major incident				Conclusion of the trip	Information records Management Society (Records Management Toolkit for Schools)
Parental permission slips for school trips – where there has been a major incident				DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules have been followed for all pupils	Information records Management Society (Records Management Toolkit for Schools)
Curriculum returns				Current year + 3 years	Information records Management Society (Records Management Toolkit for Schools)

Children's Homes -

N.B Due to the length of required retention, in the near future the relevant authorities should be approached with a view to retention in the National Archives.

Class	Series	Records	Description	Retention period	Rationale
Children's case records*			All information in line with Schedule 3 Regulation 28(1) of the Children's Homes (England) Regulations 2015 to be included in the Case Records of Children Accommodated in Children's Homes	Retain records for 75 years from date of birth. If the child dies before attaining the age of 18, for 15 years from the date of the child's death.	The Children's Homes (England) Regulations 2015
All other records**			All other records as identified in Schedule 4 Regulation 29(1) of the Children's Homes (England) Regulations 2015	Retain records for at least 15 years from the last date of entry.	The Children's Homes (England) Regulations 2015

***Children's case records:**

Schedule 3 Regulation 28(1)

Information to be Included in the Case Records of Children Accommodated in Children's Homes

1. The child's name and any name by which the child has previously been known, other than a name used by the child prior to adoption.
2. The child's date of birth and sex.
3. The child's religious persuasion, if any.
4. A description of the child's racial origin, cultural and linguistic background.
5. The child's address immediately prior to entering the home.
6. The name, address and telephone number of the child's placing authority.
7. The statutory provision (if any) under which they are provided with accommodation.
8. The name, address, telephone number and the religious persuasion, if any, of the child's parents.
9. The name, address and telephone number of any social worker for the time being assigned to the child by the placing authority.
10. The date and circumstances of all absences of the child from the home, including whether the absence was authorised and any information relating to the child's whereabouts during the period of absence.
11. The date of, and reason for, any visit to the child whilst in the home.
12. A copy of any Education, Health or Care Plan in relation to the child;
13. The date and circumstances of any measures of control, restraint or discipline used on the child.
14. Any special dietary or health needs of the child.
15. The name, address and telephone number of any school or college attended by the child, and of any employer of the child.

16. Every school report received in respect of the child while accommodated in the home.
17. Arrangements for, including any restrictions on, contact between the child, their parents, and any other person.
18. A copy of any plan for the care of the child prepared by their placing authority, and of the Placement Plan;
19. The date and result of any review of the placing authority's plan for the care of the child, or of their placement plan.
20. The name and address of the general practitioner with whom the child is registered, and of the child's registered dental practitioner.
21. Details of any accident or serious illness involving the child while accommodated in the home.
22. Details of any immunisation, allergy, or medical examination of the child and of any medical or dental need or treatment of the child.
23. Details of any health examination or developmental test conducted with respect to the child at or in connection with his school.
24. Details of any medicines kept for the child in the home, including any medicines, which the child is permitted to administer to themselves, and details of the administration of any medicine to the child.
25. The dates on which any money or valuables are deposited by or on behalf of a child for safekeeping, and the dates on which any money is withdrawn, and any valuables are returned.
26. The address, and type of establishment or accommodation, to which the child goes when they cease to be accommodated in the home.

****All Other Records:**

Schedule 4 Regulation 29(1)

Other Records with Respect to Children's Homes

1. A record in the form of a register showing in respect of each child accommodated in a children's home:
 - a. The date of their admission to the home.
 - b. The date on which they ceased to be accommodated there.

- c. Their address prior to being accommodated in the home.
 - d. Their address on leaving the home.
 - e. Their placing authority.
 - f. The statutory provision (if any) under which they are accommodated.
- 2. A record showing in respect of each person working at the home -
 - a. Their full name.
 - b. Their sex.
 - c. Their date of birth.
 - d. Their home address.
 - e. Their qualifications relevant to, and experience of, work involving children.
 - f. Whether they work at the home full-time or part-time (whether paid or not), and if part-time, the average number of hours worked per week; and
 - g. Whether they reside at the home.
- 3. A record of any persons who reside or work at any time at the children's home, who are not mentioned in the records kept in accordance with paragraphs 1 or 2.
- 4. A record of all accidents occurring in the children's home, or to children whilst accommodated by the home.
- 5. A record of the receipt, disposal and administration of any medicine to any child.
- 6. A record of every fire drill or fire alarm test conducted, with details of any deficiency in either the procedure or the equipment concerned, together with details of the steps taken to remedy that deficiency.
- 7. A record of all money deposited by a child for safekeeping, together with the date on which that money was withdrawn, or the date of its return.
- 8. A record of all valuables deposited by a child and the date of their return.
- 9. Records of all accounts kept in the children's home.
- 10. A record of menus served.
- 11. A copy of the staff duty roster of persons working at the children's home, and a record of the actual rosters worked.
- 12. A daily log of events occurring in the home.

13. A record of all visitors to the home and to children accommodated in the home, including the names of visitors and the reasons for the visit.

Storage of records etc.

The registered person must ensure that the following items, which may be kept in electronic form, are kept in an accessible manner—

- (a) the statement of purpose.
- (b) the children's guide.
- (c) placement plans for children who are not looked after (see regulation 18).
- (d) the policy for safeguarding children (see regulation 34).
- (e) the policy for preventing bullying (see regulation 34).
- (f) the missing child policy (see regulation 34).
- (g) the behaviour management policy (see regulation 35).
- (h) records of the use of measures of control, discipline or restraint (see regulation 35).
- (i) children's case records (see regulation 36).
- (j) other records (see regulation 37).
- (k) the procedure for considering complaints (see regulation 39).
- (l) records of complaints (see regulation 39).
- (m) the independent person's reports (see regulation 44).
- (n) quality of care reviews (see regulation 45).
- (o) annual reviews of the appropriateness and suitability of the location of the home's premises (see regulation 46).

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Data and Records Management Policy
EIA completed by:	Beverley Clark
Date of assessment:	29/09/2022
Assessment approved by:	

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes

This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	

Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.