

Introduction

The DPO Support Service have created this guidance document to help our subscribers define and maintain a retention schedule for the different types of data that they hold within their practices.

As with all guidance created and provided by the DPO Support Service, this is a recommendation only. It is ultimately the practices decision on how they define their retention policy.

Definition

According to [NHS England](#), retention, storage, and disposal schedules are a timetable for the planned review of all records to determine their ultimate fate, which is either:

- Permanent retention for records having long term value for the practice,

or,

- Secure destruction of records which the practice is not obliged to keep for legislative or business reasons.

How to use the Records Retention Schedule

1. Use the 'Record type' column to identify the records you wish to retain, whether physical or digital.
2. Use 'Recommended retention period' column to establish the minimum retention period for the record you wish to retain.
3. Use the 'Action at end of retention period' column to determine what should happen to the record. Following this review, records retained for a further retention period should be reviewed again at the end of the further retention period by an appropriate member of Practice staff. Records that are not needed to be retained further should be destroyed securely.

Staff/Employment Records

Record type	Recommended retention period	Action at end of retention period	Notes
Staff Records			
Occupational health reports	Until the data subject's 75 th birthday or 6 years after the staff member leaves. <i>Whichever is sooner.</i>	Review, and if no longer needed, destroy securely.	
Occupational health reports of staff members under health surveillance.	Until the data subject's 75 th birthday.	Review, and if no longer needed, destroy securely.	
Occupational health reports of staff members under health surveillance where they have been subject to radiation doses.	50 years from the date of the last entry or until the data subject's 75 th birthday. <i>Whichever is longer.</i>	Review, and if no longer needed, destroy securely.	
Staff record	Until the data subject's 75 th Birthday or 6 years after the staff member leaves. <i>Whichever is sooner.</i>	Create a Staff Record Summary then review, and if no longer needed, destroy the main file.	
Staff record summary	Until the data subject's 75 th birthday.	A place of deposit should be offered for continued retention, or, destroy securely.	
Timesheets (original record)	2 years after creation.	Review, and if no longer needed, destroy securely.	
Attendance records	2 years after the year to which they relate.	Review, and if no longer needed, destroy securely.	These are records such as a registry of attendance to work by staff members.
Annual leave records	2 years after the year to which they relate.	Review, and if no longer needed, destroy securely.	
Clinical training records	Until the data subject's 75 th birthday or 6 years after the staff member leaves. <i>Whichever is sooner.</i>	Review, and if no longer needed, destroy securely.	
Statutory/mandatory training records	Keep until 10 years after the training has been completed.	Review, and if no longer needed, destroy securely.	
Other training records	Keep until 6 years after the training has been completed.	Review, and if no longer needed, destroy securely.	

Patient Records			
Patient Medical Record	Retain, maintain and update the patients entire medical record for aslong as the patient is alive and registered with the practice.	If the patient leaves the practice, their record should be transferred in it's entirety to the patients new registered practice. If there is no new registered practice, the patients record should be transferred to NHS Wales Shared Services Partnership after 30 days.	For individuals who have passed away, please see 'Deceased Patient Records'.
Applications for Subject Access Requests under the Data Protection Act 2018 or Requests under the Access to Health Records Act 1990	6 years after the application for information is completed.	Mark the patients record that a SAR/MAR has been processed and destroy the application securely.	
Deceased Patient Records	Transfer to NHS Wales Shared Services Partnership within 14 days of notification of patient's death.		All access requests should be directed to NWSSP following transfer of data.
Corporate Records			
Visitor log books	2 years after the year to which they relate.	Review, and if no longer needed, destroy securely.	
External Contractor Applications	6 years after the end of the contract (approvals) 6 years from the receipt of the application (non-approvals).	Review, and if no longer needed, destroy securely.	These can be any contracts in place with third party providers of products or services. E.g. New software to use in the practice.
Complaints including detailed responses from the practice.	10 years from the date of complaint closure.	Review, and if no longer needed, destroy securely.	
Telephone call recordings.	30 days.	Review, and if no longer needed, destroy securely.	If conversations are relevant to a patients healthcare, either attach the call to the medical record, or, transcribe the call and attach the transcription to the record and delete the call recording.