



## Data Retention Policy

### Policy Statement

This Company Policy and Procedure has been designed to help and encourage all employees to achieve and maintain expected standards of conduct. It applies to all employees and anyone else working for the Company, and its aim is to ensure consistent and fair practice and treatment. This document does not form part of your Contractual Terms and Conditions of employment and the Company may at any time amend it without consultation or prior notice.

### Purpose and Scope

Fennies Day Nurseries (the Company) is committed to managing and handling personal data in line with best practice and data protection principles. As such this Policy details the procedures to use to ensure timely and secure disposal of documents and records that are no longer required for business purposes.

The Company holds a wide variety of personal data, from parents/children, employees, workers, volunteers and contractors, as well as financial data, HR data, marketing data, parent/child data and so on, many of which include personal data. This data is held in various formats including; letters, emails, contracts, forms, software systems in both hard copy and electronic form.

It is essential that this policy is adhered to, as premature destruction of documents could result in an inability to defend claims, business difficulties and failure to comply with data protection legislation, whilst appropriate destruction and disposal will ensure that the storage space is maximised and we are not keeping documents for an unnecessarily long period of time which would breach data protection legislation.

This policy applies to all the information held by the Company and also any personal data that may be held by data processors (service providers) where they are processing information on the Company's behalf.

Everyone is responsible for ensuring that the records that they create/maintain are accurate, maintained and disposed of in accordance with this policy. It is recognised that the documentation created and maintained by the Company will change over time and therefore this policy should be viewed as a living document and it will be reviewed on an annual basis, or as necessary, if sooner. This policy should be read in conjunction with the Data Protection Policy and the Data Protection Breach Reporting Policy.

### Retention

Appendix 1 details the retention periods for specific types of documents and records.

## Destruction/Disposal

Hard copies of confidential documents or personal data should be securely disposed of. Each nursery and the head office have a shredder which must be used for confidential documents. Under no circumstances should any personal or confidential data be disposed of in any other manner, as this would potentially breach data protection legislation.

Disposal of documents which do not contain personal data or confidential information can be disposed of in any bin, or by recycling or by electronic deletion in the case of electronic documents.

### Appendix 1 – Data Retention Periods

Business Function	Examples of documents	Retention Period
HR	Employee data, including all information on personnel files e.g. CVs, sickness information, disciplinary information, training certificates etc. (excluding probation, appraisal and performance data – see below)	7 years post-employment
	Training records	Current year plus 2 years
	Probation/Appraisal/Performance management	Current year plus 5 years
	Data relating to ex-employee claims/threats/SAR	2 years after claim/SAR concluded, or 6 years post-employment whichever is later
	Candidate application forms/CVs and accompanying documentation (of applicants who aren't successful)	6 months post-date of recruitment decision
	Supporting documents for DBS check (not birth certificate or passport as these prove Right to Work entitlement)	6 months post-date of check
Finance	Insurance policy documents/claim history	Current year plus 6 years, or 6 years after case concluded, whichever is the later
	Cheque books	Current year plus 3 years
	Paying in books, ledger, invoices, receipts, bank statements, petty cash books	Current year plus 6 years
	Budget reports/budget documentation	Current year plus 3 years
	Annual Accounts	Current year plus 6 years
Health and Safety	Risk Assessments	Current year plus 3 years
	Health and Safety checks – kitchen checks	6 years
Property	Title deeds	Forever
	Maintenance log book	Life of the equipment - plus five years

Operational	Nappy, meal, sleep, bottle charts	3 Months then shred
	Room Planning	3 Months then shred
	Kitchen daily dietary sheet	3 Months then shred
	Staff meeting minutes	10 Years
	Accident & medication forms (including death) – for children	25 Years
	Accident forms – for staff	7 Years
	Children personal information	5 Years
	SEN information	5 Years
	Health and Safety within the room (checks, temp records)	6 Years
	Interview and application form	6 Months
	Funding children information	6 Years
	Employers liability insurance records	For as long as possible

*Internal use only*

<b>This policy was adopted on</b>	<b>Signed on behalf of the nursery</b>	<b>Date disseminated to staff</b>	<b>Date for review</b>
<i>August 2019</i>			<i>August 2020</i>