

Records Retention Schedule

Website PDF version | Organisation: Harbour Healthcare | Owner: Data Protection Officer | Effective: Jul-26

Retention periods are based on the NHS Records Management Code of Practice 2021, statutory requirements, and organisational need.

Where systems store multiple data types, retention aligns with the original source record.

Data is securely deleted or anonymised once retention periods expire, unless required for legal, safeguarding, or regulatory purposes.

Backup data is retained for disaster recovery purposes only and is not used as a primary data source.

This retention schedule is linked to the organisation's Record of Processing Activities (ROPA) and Information Asset Register (IAR).

Record Category	Record Type	Retention Period	Action	Legislation / Guidance	Responsible Role	Linked System
Resident Records	Resident Client Files	8 years after death/discharge	Destroy	NHS Records Management Code 2021	MD / DPO	Care System
Resident Records	MAR Records	8 years	Destroy	NHS Code / CQC	Care Manager	Care System
Resident Records	Mental Health Records	20 years	Review then destroy	NHS Code / Mental Health Act	DPO	Care System
Resident Records	Safeguarding Records	Up to 10 years	Destroy	Care Act 2014	DPO	Safeguarding System
Resident Records	DoLS Records	8 years	Destroy	MCA 2005	DPO	Care System
Resident Records	Accident/Incident Reports	8–10 years	Destroy	RIDDOR / H&S	H&S Lead	Incident System
Resident Records	Complaints & Investigations	3–10 years depending on risk	Destroy	CQC / Legal	Home Manager	Complaints Log
Resident Records	Resident Financial Records	6 years	Destroy	HMRC	Finance Director	Finance System
Resident Records	Correspondence (Care)	6 years	Destroy	NHS Code	Home Manager	Email / Care System



Staff Records	Personnel Files	6 years after employment ends	Destroy	Employment Law	HR Director	HR System
Staff Records	Payroll Records	6 years	Destroy	HMRC	Finance Director	Payroll System
Staff Records	Training Records	Employment + 6 years	Destroy	CQC / H&S	HR Director	Training System
Staff Records	DBS Records (status only)	Duration of employment	Destroy	DBS Code	HR Director	HR System
Staff Records	Staff Accident Reports	8 years	Destroy	RIDDOR	HR Director	Incident System
Staff Records	Disciplinary / Grievance	6–10 years	Destroy	ACAS / Legal	HR Director	HR System
Recruitment	Unsuccessful Applicants	6–12 months	Destroy	ICO	HR Director	Recruitment System
Recruitment	Interview Notes	6–12 months	Destroy	Legal defence	HR Director	Recruitment System
Visitors & Security	Visitor Register	30–90 days	Destroy	ICO Guidance	Home Manager	Visitor Log
Visitors & Security	CCTV Footage	30 days unless required	Secure deletion	ICO CCTV Code	IT / Estates / DPO	CCTV System
IT & Systems	Emails & Teams	30 days unless retained	Auto-delete / retain	Operational governance	IT Lead	Microsoft 365
IT & Systems	System Access Logs	6–12 months	Secure deletion	Cyber security	IT Lead	IT Systems
IT & Systems	Audit Logs	Up to 12 months	Secure deletion	ISO 27001 / DSPT	IT Lead	Security Systems
IT & Systems	Backups	Rolling retention	Overwrite	Disaster Recovery	IT Lead	Backup Systems
IT & Systems	Archived Data	Aligned to source record	Secure deletion	Governance	IT / DPO	All Systems
Governance	SAR Records	3 years (6 if complex case)	Destroy	ICO	DPO	SAR Log



Governance	Audit Reports	6–8 years	Destroy	Governance	QA Lead	Governance Folder
Governance	Risk Registers	Active + 6 years	Review	Governance	SIRO	Risk Register
Governance	Data Breach Records	6 years after closure	Destroy	Governance	DPO	Breach Register
Finance	Financial Records / Invoices	6 years	Destroy	HMRC	Finance Director	Finance System
Finance	Contracts	6 years after end	Destroy	Contract Law	Finance Director	Contracts System
Estates	Maintenance Records	10 years	Destroy	Health & Safety	Estates Director	Estates System
Estates	Asbestos Records	40 years	Archive	Legal	Estates Director	Estates File
Estates	Building Plans	Lifetime + 6 years	Archive	Limitation Act	Estates Director	Estates File
Catering	Temperature Logs	2 years	Destroy	HACCP	Head of Hospitality	Catering Logs
Catering	Cleaning Logs	2 years	Destroy	Environmental Health	Head of Hospitality	Catering Logs
Catering	Menu Plans	1 year	Destroy	Operational	Head of Hospitality	Catering Records
Legal	Litigation Files	10 years after closure	Review / archive	Legal	Legal Lead	Legal Files
Legal	Coroner Records	Permanent / long-term	Archive	Legal	DPO	Legal Files
Legal	Fraud Case Files	6 years after closure	Destroy	Governance	Finance Director	Governance Files
Deceased Records	Deceased Care Records	8 years	Destroy	NHS Code / AHRA	DPO	Care System
Deceased Records	AHRA Requests	3–6 years	Destroy	Legal	DPO	DPO Records

Action Definitions (Retention & Disposal Key)	
Action	Definition
Overview	The following actions apply to how records are managed at the end of their retention period:
Destroy	Records are securely and permanently deleted or disposed of in a manner that ensures they cannot be reconstructed or recovered. This includes secure shredding (paper) or certified digital deletion in line with data protection requirements.
Archive	Records are transferred to a secure long-term storage location where access is restricted. These records are retained for legal, historical, or regulatory purposes but are no longer actively used. Archived records remain subject to appropriate security controls.
Review	Records are assessed at the end of the retention period to determine whether they need to be retained for longer due to legal, safeguarding, operational, or investigation purposes. If no further reason for retention exists, the record will be securely destroyed.
Secure Deletion / Overwrite	Primarily used for digital records (e.g. CCTV, system logs, backups), where data is automatically overwritten or deleted using secure system processes.
Auto-Deletion	Electronic records are automatically removed after a defined period (e.g. emails or Teams messages), unless formally retained as part of a business record.
Retain / Transfer to Archive (Place of Deposit)	Records of long-term or permanent value (e.g. board records, legal documents) are retained indefinitely or transferred to an authorised archive location.

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