

# Information Governance

## Records Retention Schedule

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<b>Date of Current Issue:</b>	December 2022
<b>Date of Review:</b>	August 2024
<b>Responsible Officer:</b>	Senior Information Risk Officer (SIRO)
<b>Validated By:</b>	BPAS Information Governance Board (IGB)

Related Policies and Procedures

[Information Governance Policy](#)  
[Information Governance Framework](#)  
[Records Management & Storage Policy](#)

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## 2. Document History

DATE	COMMENT	AUTHOR
2 Feb 2004	First issue	BPAS clinical department
19 Jan 2016	Revised as IG document	Steve Cheung
11 Apr 2017	Instructions for PGD signature sheets on page 7	Steve Cheung
14 Feb 2018	Amendments on Page 11 – External Affairs	Steve Cheung
3 Jul 2018	Amendments from Finance Controller Amendments from Medical Director	Steve Cheung
9 Jul 2018	Amendments from Director of Organisational Development	Steve Cheung
9 Jul 2018	Amendments from Assoc. Director of Marketing	Steve Cheung
10 Jul 2018	Amendments from Director of Business Development	Steve Cheung
23 Jul 2018	Amendments from SIRO	Maxine Taylor
1 Mar 2019	Retention Review	Steve Cheung
11 Oct 2019	Amendment to include ultrasound scan records	Steve Cheung
9 Mar 2020	Reviewed by IG board	Steve Cheung
22 Jun 2020	Update to APPOINTMENT INFORMATION record type (J7)	Steve Cheung
Jan 2021	Updates to include fertility record retention period	Steve Cheung
August 2022	Update management arrangements and to reflect new systems	Jill Craig
December 2022	Update to asset ID7	Steve Cheung

### 3. Introduction

The retention schedule and guidance within this document have been drawn up to assist BPAS managers and workers to fulfil their records management responsibilities. This document will be regularly updated to fully comply with the terms of BPAS' Records Management & Storage Policy.

A retention schedule (also known as a disposal schedule) is an agreed schedule of how long records are to be retained. Guidance is usually based on a mixture of legal requirements and best practice.

### 4. Interpretation of the Schedules

For ease of use, the schedule is split into two parts; Part 1 relates to client information (e.g. medical records) and Part 2 for corporate information (i.e. non-client specific information).

#### 4.1. Asset ID

Where possible, the BPAS Information Asset reference (Asset ID) will be shown against each record type.

#### 4.2. Record Type

Unless stated, the instructions within the schedule apply to records irrespective of the format (e.g. paper, databases, emails, photographs, CD-ROMs) in which they are created or held.

#### 4.3. Responsible Directorate / Department

The BPAS function responsible for administering records, including final disposal.

#### 4.4. Minimum Retention Period

The minimum retention period should be calculated from the beginning of the year after the last date on the record.

It is important that information is not destroyed earlier than the length of time specified in the retention schedule. The schedule always gives the minimum period of time and this should not deviate without explanation and agreement in writing by a member of BPAS' Strategic Leadership Team (SLT).

Consideration should also be given to the fifth principle of the Data Protection Act for any record that contains personal data i.e. that 'Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes'. In practice this means no longer than the minimum retention period set out in the schedule.

#### 4.5. Justification / References

Details of legislation and any other references of relevance to the recommended minimum retention period.

#### 4.6. Final Action

Records for disposal must be destroyed in accordance with **BPAS Records Management & Storage policy**. Where records are due to be destroyed, backup copies including those stored on alternative media (e.g. server, paper, CDs, etc.) should also be destroyed. This is vital to ensure compliance with the requirements of Data Protection legislation. For this reason it is essential that the master file or record, and the master format, are unambiguously identified at all times.

If records are required, or are likely to be required, for litigation purposes, they should not be disposed of, even if their destruction date has arrived. 'Likely to be required' means that there is a strong possibility of specific legal action, rather than that the records are the type used in litigation. Litigation does not need to have started; it is sufficient that there are indicators of litigation.

Records required, or are likely to be required, for litigation purposes will be put on 'litigation hold' with agreement in writing by a member of BPAS' Strategic Leadership Team (SLT).

## 5. Retention Schedule: Part 1 – Client Information

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
J7	Appointment information including cancellations and Did-Not-Attend (DNA) records  Audit History  Attendance Lists  Uploaded information (scanned or otherwise)  Activity information for invoicing	Operations	3 years from date of last appointment or cancellation/Did-Not-Attend booking for client identifiable information – provided all client-relevant information has been transferred to client medical record (paper based)	Abortion Regulations 1991  Good Medical Practice, General Medical Council (2013)  Litigation purposes
	Recordings of client calls requesting care (appointment bookings)	Operations	12 months from the date of call recordings for clients requesting care (appointment bookings) after which they are automatically deleted by the call management system	Good Medical Practice, General Medical Council (2013)
H7	Contraception, sexual health, Family Planning and Genito-Urinary Medicine (GUM)	Operations	8 or 10 years  Basic retention requirement is 8 years unless there is an implant or device inserted, in which case it is 10 years. All must be reviewed prior to destruction taking into account any serious incident retentions. If this is a record of a child, treat as a child record as below.	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016

H7	<p>TOP (termination of pregnancy) Records including aftercare information however collected including call records, live chat &amp; email</p> <p>Client medical records including but not exclusively:</p> <ul style="list-style-type: none"> <li>• Ultrasound scans/ reports</li> <li>• HSA1 certificate</li> <li>• STI testing (including near-patient testing)</li> <li>• Client consent</li> <li>• Referral information e.g. letters, medical information received / sent by BPAS</li> </ul>	Operations	<p>Paper records kept onsite by treatment unit for no longer than 6 months after treatment date. Transported for archive storage afterwards.</p> <p>Case notes can be destroyed after 8 years unless:</p> <ul style="list-style-type: none"> <li>• Required for litigation reasons</li> <li>• Client aged 17 or under at date of treatment – archive until client's 26th birthday</li> <li>• Client died during period of care – 8 years from date of death</li> </ul>	<p>Abortion Act 1968 &amp; The Abortion Regulations 1991</p> <p>Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016</p>
F2	SIRI (Serious Incidents Requiring Investigation) reports	Medical	<p>30 years</p> <p><i>Anonymised data to be stored indefinitely for purposes of research and service improvements.</i></p>	<p>NHS England Serious Incident Framework (2015)</p> <p>NHS/CCG best practice</p>
G2	Non-Clinical Complaints	Nursing	<p>10 Years</p> <p><b>NOTE:</b> Complaints to be kept separate from clinical records</p>	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
G1	Feedback / customer survey	Nursing	<p>2 years</p> <p>Client feedback is externally audited on annual basis for quality purposes.</p>	Business need
H12	Clinical records / documents related to any litigation	Operations	10 years after the file is closed.	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016

H2	Consultation attendance register (electronic & paper-based)	Operations	<p>Paper-based register: Information to be kept for 8 years after last register entry.</p> <p>Electronic register: Retention period of BIS appointment records apply i.e. 3 years from date of last booking for client-identifiable information</p>	Abortion Act 1968 & The Abortion Regulations 1991
F1	Research records containing person-identifiable data collected in the course of research	Medical	12 months after end of research – not exceeding 20 years	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	Fertility records - including 'all consent forms and any specific instructions relating to the use and/or disposal of gametes and embryos'	Medical	30 years from creation	Section 12(1)(d) Human Fertilisation and Embryology Authorisation (HFEA) Act 1990 provides that one of the conditions of every licence granted is that 'proper records shall be maintained in such form as the Authority may specify in directions'. Direction 0012 requires licensed centres to maintain for a period of 30 years certain specific records, including 'all consent forms and any specific instructions relating to the use and/or disposal of gametes and embryos' (paragraph 1(f))

	Research and development (organisation) i.e. all the organisation's records associated with research and development and not individual trial records or information on clients	Medical	30 years after end of research	Medical Research Council
H8	Telemedicine records relating to client care  E.g. video, voice, tele- or video-conference records.	Operations (Units)	To form part of the client's medical record (8 or 10 years)  Basic retention requirement is 8 years unless there is an implant or device inserted, in which case it is 10 years.  All must be reviewed prior to destruction taking into account any serious incident retentions. (If this is a record of a child, treat as a child record as above.)	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	PGD (Patient Group Direction) signature sheets	Operations (Units)	Kept onsite by unit for no longer than 5 years	Human Medicines Act 2012

## 6. Retention Schedule: Part 2 – Corporate Information

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Equipment/instruments maintenance logs, records of service inspections	Operations (Units) / Property services	11 years from the decommissioning of equipment	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	Drug refrigeration and freezer charts	Operations (Units) / Property services	11 years	Best practice
	Drug refrigerator temperature	Operations (Units) / Property services	Retain for 1 year (or for the life of any product stored therein, if longer)	Best practice



ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Operational guidance, policies & procedures	Operations	Life of organisation plus 6 years	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	Clinical guidance, policies & procedures	Clinical	Life of organisation plus 6 years	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	ICT management files (e.g. admin records for HR/Payroll, BIS, Accounts systems)	IT Support	For the lifetime of specific system  (Personal information should be transferred to the relevant file if necessary, if not data should be anonymised where possible.)	Business need and Limitation Act 1980
	Software licences	IT Support	Lifetime of software	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	Web proxy logs (server-based files)	IT Support	12 months	Best practice
	Documentation relating to bespoke computer programmes or software commissioned by BPAS e.g. BIS	IT Support	Lifetime of software	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
	bpas service & promotional literature including client information leaflets	Marketing	6 years after the leaflet has been superseded	Best practice
	Business & Marketing intelligence information. Non Personal	Marketing	7 years	Best practice

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Contract reporting (containing statistics for MDS, statistical data to DH or patient activity)	CID / Business Development	3 years from date of submission	NHS Records Management Code of Practice 2006
	Contractual agreements	Client Information Department (CID) / Business Development	8 years	Business need
D1	Facilities Management Information: <ul style="list-style-type: none"> <li>Buildings – papers relating to occupation of the building (but not health and safety information)</li> <li>Inspection reports (e.g. boilers, lifts)</li> </ul>	Property Services	3 years after occupation ceases  Lifetime of installation. If there is any measurable risk of a liability in respect of installations beyond their operational lives, the records should be retained indefinitely.	Construction Design Management Regulations 1994
D2	Health & Safety records	Property Services	6 years from last action	The National Archives Retention Scheduling: Departmental Accounts, Health and Safety at Work Act 1974 and supporting Regulations.  Limitation Act 1980
	Property security information	Property Services	Lifetime of installation and/or property	Business need
H6	Close circuit TV (CCTV) images and recordings	Operations	31 days  Unless downloaded for an incident forming part of a new file or record. For example footage relating to a health & safety incident would part of that record and that period would apply.	Protections of Freedoms Act 2012.  ICO CCTV code of Practice.  Limitation Act 1980
	Reports (to Board of Trustees, and various governance boards) including minutes of meetings and minutes papers of major committees and sub-committees (master copies)	Executive Leadership Team (ELT)	Must be kept for as long as the charity is registered and for a minimum of two years after the date the registration of the charity is revoked.	Charities Acts

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Legal proceedings including records or documents relating to any form of litigation e.g. complaints, accidents or incidents	Relevant Directorate	10 years after last action	Limitation Act 1980
	Meetings and minutes papers – Other (including reference copies of major committees)	Executive Leadership Team (ELT)	7 years	Business need
	Agendas of board meetings, committees, subcommittees (master copies including associated papers)	Executive Leadership Team (ELT)	7 years	Business need
	Parliamentary and press correspondence (including press releases)	External Affairs	Life of the organisation	Business need
I2	Direct debit forms from donors	External Affairs	12 months after the direct debit ends	Business need
I2	Donor files: <ul style="list-style-type: none"> <li>• Forms</li> <li>• Correspondence</li> </ul>	External Affairs	To be kept in accordance with consent. Consent to be refreshed/reviewed every 2 years	Consent/legitimate interests
	Records of regulatory compliance visit	Operations	12 years	Business need
	Financial audit	Finance	Internal audits: 3 years External audits:7 years	Business need
	Clinical audit – Internal	Clinical	5 years after completion of the audit	Information Governance Alliance - Records Management Code of Practice for Health and Social Care 2016
J5	Contact Centre records (not recorded on BIS or client medical records)	Contact Centre (BIC)	3 years	Business need

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
H11	Copies of receipts for services & products (to self-funding clients)	Operations	6 years after end of financial year to which they relate	Limitation Act 1980
H10	Accident register (Reporting of Injuries, diseases and dangerous occurrences register)	Operations (Units)	3 years	HSE - Reporting injuries, diseases and dangerous occurrences in health and social care guidance for employers
	Annual Financial Report	Finance	3 years	Business need & Charities legislation
	Finance records (i.e. account ledgers)	Finance	7 years	HM Treasury guidelines, National Audit Office advice, Companies Act 2006
	Quotations, tenders and business case for supplier contracts	All responsible directors / managers	3 years	Business need
	Database of parliamentary contacts & correspondence	External Affairs	As required	Business need
	Appraisal and Revalidation of Doctors policy & procedure	Clinical	Electronic copy kept indefinitely	Clinical standards
	CQC documentation & correspondence	Operations	12 years	Clinical standards
H3	DHSE clinic licensing & correspondence	Operations	12 years	Clinical standards
	Charity Commission documentation & correspondence	Finance	7 Years	Charities Acts
	Memorandum & Articles of Association, and Company records	Finance	Previous versions – 7 years Current version – retained for the life of the company	Companies Act 2006

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
E1	Contract tender information	Business Development	3 years	Business need
	Business Performance Information (including corporate and departmental financial information)	Finance	7 years	Business need
E2	Contact details & communication records – commissioners & other stakeholders	Business Development	3 years	Business need
	Service Level Agreements between BPAS and commissioning organisations (e.g. NHS)	Business Development	7 years after end date of SLA	Destroy under confidential conditions
I7	Correspondence evidencing client referrals between BPAS and Abortion Support Network (ASN), and database of Irish clients who have received grants from Abortion Support Network (ASN)	Marketing (External Affairs)	7 years	Business need

## 7. Retention Schedule: Part 3 – Employee Information

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
J2	Employee Files	Human Resources (Organisational Development)	Retain until employee age 100	The National Archives Retention Scheduling: Employee Personnel Records

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
J3	Records of recruitment exercises:  Job descriptions, terms and conditions of employment. (Where candidates are successful a copy of the job description, application and terms and conditions of employment will be placed on the successful candidate's employee file.)	Human Resources (Organisational Development)	Recruitment exercises: Review 6 months from end of recruitment exercise  Application forms: Destroy after 6 months  Applicant names and addresses: review after 3 years  Job descriptions: Review 6 years after superseded  Terms and conditions: Review 6 years after superseded	The National Archives Retention Scheduling: Employee Personnel Records
	Conditions of employment:  Standard contracts and variations of those terms where required, i.e. varied hours and home working.	Human Resources (Organisational Development)	Review 6 years after date superseded	The National Archives Retention Scheduling: Employee Personnel Records
C2	Payroll Administration	Finance (Salaries Dept)	Salary ledger records: Review 6 years from the end of the financial year to which they relate  Payroll sheets: Review 2 years from the end of the financial year to which they relate  Individual employees personal payroll history: Retain until employee aged 100	The National Archives Retention Scheduling: Employee Personnel Records
C2	Pensions Administration	Finance (Salaries Dept)	Retain until employee aged 100	The National Archives Retention Scheduling: Employee Personnel Records
J1	Disciplinary Management of staff conduct	Human Resources (Organisational Development)	Records of formal disciplinary actions in employee file. Retain both paper and electronic for review 6 years after last action	The National Archives Retention Scheduling: Employee Personnel Records

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Grievances Management of staff grievances.	Human Resources (Organisational Development)	Records of formal grievances in employee file. Retain both paper and electronic for review 6 years after last action	The National Archives Retention Scheduling: Employee Personnel Records
J2	Termination of employment  Termination of employment as it relates to BPAS staff e.g. Early retirement and severance, Age retirement, Death in service, Redundancy.	Human Resources (Organisational Development)	Records relating to individual employee files: Retain until employee aged 100	The National Archives Retention Scheduling: Employee Personnel Records
J2	Staff Health and Safety	Human Resources (Organisational Development)	Individual health records: Retain until employee aged 100  Health surveillance records: Review 40 years from date of last entry  Examination, testing, monitoring and control records: Review 5 years after last action  Accident books and ill health reports: Destroy 3 years after closure  Training, guidance and instructions: Review 3 years from date superseded  Risk assessment reports and reviews: Review 5 years from date superseded	The National Archives Retention Scheduling: Employee Personnel Records
	Occupational Health  Procedures, schedule and forms for the management of occupational health services. Occupational health records relating to an individual should be stored on their employee file.	Human Resources (Organisational Development)	Medicals: Retain until employee aged 100  Procedures, events, employee assistance schemes: 7 years from date superseded  Schedules: Destroy 3 years from the end of the financial year to which the records relate.	The National Archives Retention Scheduling: Employee Personnel Records

ASSET ID	RECORD TYPE	RESPONSIBLE DIRECTORATE / DEPARTMENT	MINIMUM RETENTION PERIOD	JUSTIFICATION / REFERENCES
	Trade Union Agreements	Organisational Development	10 years after agreement is not effective	Best practice
H9	Records of Doctors with Practising Privileges (i.e. not BPAS employees)	Operations	6 years after contract ceases	Limitation Act 1980 and Defence of Legal Claims