

AHCS

Information Management – Retention and Disposal of Data Policy

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Background

UK GDPR and the Data Protection Act 2018 specify that personal data shall be kept for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods where it processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Legal Basis for Processing

The Academy for Healthcare Science's lawful basis for processing personal data is set out in our [Privacy Notice](#)

Policy

Personal data must be periodically reviewed in accordance with AHCS' retention schedules and if it is no longer needed it should be deleted or anonymised as appropriate. Anonymised data is not subject to UK GDPR or the Data Protection Act 2018.

Any challenges to the retention of personal data must be considered in accordance with [UK GDPR Article 17 \(Right to erasure\)](#), or the equivalent sections in the [DPA 2018](#) if the processing is for law enforcement purposes. The right to erasure does not apply where AHCS are legally obliged to process personal data or where the processing is necessary for performing our functions.

Where AHCS would be required to erase personal data, but the personal data must be maintained as evidence for legal purposes or for reasons of important public interest, AHCS will (instead of erasing the personal data) restrict its processing.

Information held for longer than is necessary carries additional risk and cost. Records and information should only be retained when there is a business need to do so in accordance with UK GDPR and the DPA 2018.

Retention Periods

The standard retention period for AHCS records types are specified in Appendix B -

AHCS Data Retention Schedule

Records will be regularly reviewed after 3 years inactivity to establish whether any personal data can be destroyed. This excludes incomplete registration records which are reviewed every 12 months to reflect the shorter retention periods for these records.

Personal Data must only be retained beyond the standard retention period if retention can be justified for statutory, regulatory (including in the Public Interest), legal or security reasons. The disposal periods for records retained for extended duration must be included within retention schedules.

APPENDIX A - APPENDIX A AHCS DATA RETENTION SCHEDULE

This document sets out the retention period for records relating to registration and applications for registration.

Record Type	Retention Period	Reason for Retention Period	Action required
Registration including Equivalence & Gateway application routes			
Electronic Registration and equivalence. This includes annual renewal records, CPD audit, portfolios, interview records.	7 years following expiry of registration	Regulatory Function/Auditing purposes & workforce planning	Delete
Electronic application for Registration. Unsuccessful outcome.	7 years following date of rejection	Regulatory Function/Auditing purposes & workforce planning	Delete
Incomplete applications	Following 6 months of inactivity (non equivalence) 12 months (equivalence)	Partial unprocessed data	Delete
Application Assessor recruitment records including CV's	7 years from date of leaving the role.	Regulatory Function/Auditing purposes	Delete
Complaints			
Complaints about AHCS and/or its processes	10 years following close of case	Regulatory Function	Delete
Complaints about equivalence	10 years following close of case	Regulatory Function	Delete
Whistleblowing Complaints (internal)	10 years following close of case	HR Function	Delete
Complaints about Registrants (Fitness to Practice)			
Electronic Registration – Registrant subject to Fitness to Practice investigation	Permanent	Regulatory Function	Secure retention
Fitness to Practice case documentation	Permanent	Regulatory Function	Secure retention
HR documentation			
Electronic Contracts	6 years from date of	HR Function	Delete

of Employment (permanent, fixed term and Contracts of Assignment)	leaving/		
Electronic Performance Appraisals/ Objectives/ Action Plans	6 years from date of leaving	HR Function	Delete
Electronic Disciplinary Records	6 years from date of disciplinary	HR Function	Delete
Organisational			
Committee Meeting Agendas, Minutes, Papers, Action Plans	Permanent	Business need and Regulatory Function	Secure retention
Business plans, organisational reports, annual reports and updates	Permanent	Business need and Regulatory Function	Secure retention
Regulatory documentation (e.g. PSA Renewal Applications)	Permanent	Business need and Regulatory Function	Secure retention
Internal and External Policy and Guidance Documents	Permanent	Business need and Regulatory Function	Secure retention
Accreditation information (reports, audits, applications etc)	Permanent	Business need and Regulatory Function	Secure retention
Business contracts and agreements, trademarks and other intellectual property	Permanent	Business need and Regulatory Function	Secure retention
Insurance Policies/Schedules	Permanent	Business Need	Secure retention
Financial Documents	6 years from the end of the last company financial year they relate to	Business Need	Secure retention
Media, i.e. Newsletters, press releases, logos	Permanent	Business need and historic value	Secure retention