



## **Records Retention Policy**

Version	2.0
Review Date	October 2026

### **Policy Statement**

This policy sets out how Play Inclusion Project manages, retains, and disposes of child and staff-related records in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant employment legislation.

The purpose is to ensure that personal data is:

- Kept only as long as necessary,
- Accurate and up to date, and
- Securely disposed of when no longer required.

### **Scope**

This policy applies to all records relating to:

- All current children on Play Inclusion Project's databases
- All past children who have accessed Play Inclusion Project's projects/activities
- Current employees, workers, and contractors;
- Former employees, workers, and contractors; and
- Job applicants (both successful and unsuccessful).

It covers both paper and electronic records held by the charity.

### **Responsibilities**

#### **CEO**

- Is responsible for managing and reviewing child records ensuring appropriate retention and disposal (safeguarding records, accident forms etc)
- Is responsible for managing and reviewing employee records, ensuring appropriate retention and disposal for office-based staff
- As Data Protection Officer oversees compliance with data protection legislation and advises on record retention practices, reviews and updates policies and procedures

### Recruitment & Training Officer

- Is responsible for managing and reviewing employee records, ensuring appropriate retention and disposal for Group Supervisors and Support Workers

### Area Managers

- Are responsible for managing and reviewing child records ensuring appropriate retention and disposal.
- Are responsible for ensuring any staff-related information they hold is handled in line with this policy.

### Records We Keep

We retain the following records for each child who attends our holiday clubs:

- Registration forms (with parent/carer details, care plans, emergency contacts, health information).
- Accident and incident reports.
- Safeguarding reports or concerns raised.
- Consent forms (such as photo consent).
- Attendance records.

### Retention Periods

#### Children/Young People

Record Type	Retention Period
Children's registration forms, attendance, health, consent forms	<b>At least until the child reaches age 21</b>
Accident, incident, or health and safety reports	<b>At least until the child reaches age 21</b> (or 25 if there are related legal issues or ongoing investigations)
Records related to safeguarding or a child protection concern	<b>Indefinitely or until guidance from the Local Authority or Safeguarding Partners</b>

Insurance-related documents	<b>At least 21 years after the child reaches age 18 (until their 39th birthday)</b>

### Staff and Applicants

<b>Record Type</b>	<b>Retention Period</b>	<b>Reason / Legislation</b>
Personnel files and employment contracts	<b>6 years</b> after employment ends	Limitation Act 1980 (contract claims)
Payroll, tax, and NI records	<b>3 years</b> after the end of the tax year they relate to	HMRC requirements
Sickness and absence records	<b>3 years</b> after the end of the tax year they relate to	Statutory Sick Pay (General) Regulations
Accident reports and health & safety records	<b>3 years</b> after the incident, or longer if involving minors	RIDDOR 2013
Working time records (hours, holidays, rest breaks)	<b>2 years</b>	Working Time Regulations 1998
Training and performance records	<b>6 years</b> after employment ends	Best practice
Disciplinary and grievance records	<b>6 years</b> after employment ends	Best practice
Recruitment records (unsuccessful applicants)	<b>6 months to 1 year</b> after recruitment process ends	Equality Act 2010 (defence against discrimination claims)

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Recruitment records (successful applicants)	Transferred to personnel file and retained as above	Best practice
Pension and retirement records	<b>6 years</b> after the scheme ends	Pension legislation
Health records (where required by law)	<b>40 years</b>	Control of Substances Hazardous to Health Regulations (COSHH)

### **Storage and Security**

- All records are kept **secure and confidential** — in locked filing cabinets and on Google Drive.
- Digital files are password-protected with access controls.
- All data is kept in compliance with data protection legislation (UK GDPR and Data Protection Act 2018).

### **Disposal**

- **Records will be safely destroyed or rendered illegible** after their retention period expires.
- Paper files will be shredded in line with the Shred-It All Policy
- Digital files will be permanently deleted.

### **Data Subject Rights**

Under the UK GDPR, families, employees and applicants have the right to:

- Access their personal data,
- Request correction or deletion, and
- Object to processing where applicable.

Requests should be made in writing to HR or the Data Protection Officer.

### **Review**

This policy will be reviewed **at least every two years** or following significant legal or policy updates, and amended if needed.

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