

Document 6

Data Retention Policy

Retention and erasure policies

Our Data Retention Policy contains a schedule of retention periods, which are reproduced here, and in the case of sensitive personal data, accord with legislative or regulatory mandated periods. We manually erase data at the end of any such period.

CATEGORY	RETENTION PERIOD
CCTV footage	2 weeks
Complaints	6 years for non-medical related 10 years for treatment-related
Contact details for marketing purposes	4 years from the date of most recent consent
Disability-related reasonable adjustments relevant to job applicants	6 months after unsuccessful decision communicated to applicant
Employee bank details	6 years
Employee criminal record checks	6 months (After this time the original is destroyed. A record is retained for 6 years after the person has ceased to be an employee.)
Employee health and disability-related information	6 years after leaving employment

Employee performance, disciplinary and absence records, references and other employee information	6 years after leaving employment
Incoming telephone call recordings	30 days 6 years or 10 years if used in respect of patient complaint, preferably in transcribed form
Inspection reports	6 years
Job applicants' CVs and passports	6 months after confirmation to the individual that their application was unsuccessful
Monitoring and ensuring customer care levels in accordance with regulatory requirements	7 years
Monitoring and ensuring patient satisfaction with treatment and care. Inspections.	2 years
Patient payment records	2 years
Patient treatment and health information	8 years after treatment ends For minors, if treatment ends before they are 18, until their 26th birthday
Potential patient enquiry information (enquiry made on behalf of someone else)	8 years after treatment ends 6 months from the date of the last communication if treatment doesn't go ahead (assuming potential patient who is 13 or older has consented to the enquirer communicating on their behalf)
Potential patient enquiry information (enquiry made on your own behalf)	8 years after treatment ends 6 months from the date of the last communication if treatment doesn't go

	ahead
Research	Indefinitely in pseudonymised form

Annex 1: Reasoning for Retention Periods

1. Potential patient enquiry information (own behalf)

The 8 year retention period is a regulatory requirement. We have taken 6 months as the retention period for data when treatment does not go ahead, as proportionate and balanced, based on our experience of the likelihood of patients re-contacting us after an initial enquiry and the value of retaining information for a sufficient period in case they do, and the requirement under the UK GDPR not to hold data for any longer than required.

2. Potential patient enquiry information (on behalf of someone else)

Our rationale is identical to that at section 1, above, in respect of the 8 year and 6 month retention periods.

Where an enquiry is made on behalf of another person, we have also to consider how long we can retain data about a potential patient, without confirmation that the data subject is happy for us to discuss matters relating to the health, with a third-party. This is a very sensitive area, and we are conscious that data may have been provided to us without the data subject's knowledge or agreement. Equally, we also know that enquiries of this nature, made on behalf of another person, are common in the context of private medical treatment generally, and sports injury treatment in particular. As such, we expect the potential patient to confirm that they are happy for us to communicate with the third-party, within two weeks of a first appointment being made. Generally, this confirmation will be made as part of the written registration procedure, at a patient's first appointment.

3. Patient treatment and health information

The retention period is a regulatory requirement.

4. Patient payment records

Assuming that there has been no dispute in respect of payment, we consider this

period to be sufficient to ensure that we are able to prepare all filings and other records we are required to prepare for tax and accounting purposes. (This category refers to the retention period for the payment details for a particular patient, rather than accounting records themselves, which are maintained in accordance with law, for 6 years from the six years from the end of the last company financial year they relate to. The two year period will also be extended in the case of non-payment, or dispute.)

5. Monitoring and ensuring customer care levels in accordance with regulatory requirements

Our retention period aligns with best practice.

6. Inspection reports

Our retention period aligns with best practice.

7. Patient complaints

Our retention period aligns with best practice.

8. Monitoring and ensuring patient satisfaction with treatment and care

Our retention period aligns with best practice.

9. Employee performance, disciplinary and absence records, references and other employee information

Our retention period aligns with best practice.

10. Employee criminal record checks

Our retention period aligns with best practice.

11. Employee health and disability-related information

Our retention period aligns with best practice.

12. Employee bank details

Our retention period aligns with best practice.

13. Disability-related reasonable adjustments relevant to job applicants

Our retention period aligns with best practice.

14. Job applicants' CVs and passports

Our retention period aligns with best practice.

15. Contact details for marketing purposes

We request consent for direct marketing, and ask for that consent to be renewed after four years. In arriving at this retention period, we have balanced the likely interest of third parties such as sports organisations, clubs, teams we work with, medical professional, and patients (whose injuries may be ongoing), considering how long they are likely to have an interest in receiving such information, and taking into account that the lists will contain special category data.

16. CCTV footage

CCTV footage is intrusive, and in the case of footage of our offices, can include special category data. We consider that any security event for which we may need the footage will have become apparent after two weeks, and so this is a proportionate retention period.

17. Incoming telephone call recordings

We consider thirty days to be proportionate, given that we record all incoming calls, some of which contain special category data. Where a complaint is made, either about a recorded conversation, or where a recorded conversation is used to evidence a complaint or our response to it, we make a transcript of the recording (which the complainant confirms as accurate), and keep the transcript for a period commensurate with the relevant period for the complaint in question.

18. Research

We are permitted to retain data for this purpose indefinitely, and in order to allow ourselves sufficient flexibility in our research, teaching and statistical analysis, we make use of this as our formal retention period. It is important to note that data for this purpose is pseudonymised, and also often anonymised (at which point it ceases to be personal data for the purposes of the UK GDPR). We may delete data for this purpose on the basis that it is no longer required, on a case-by-case basis.