



# Data Retention Policy

Date: 23 May 2018

Owner: MedCo Registration Solutions

Author: Data Services Officer

## Purpose

The purpose of this document is to outline MedCo's retention periods for retaining the data it processes. MedCo will only retain your personal data for as long as necessary to fulfil the purposes that it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In order for MedCo to comply with the legislation, it will routinely archive or destroy any personal data that is no longer required. Once the retention periods have been reached the data will be located and will be disposed of securely.

## Categories of data

MedCo holds limited personal data, as defined by the General Data Protection Regulation (GDPR) and Data Protection Act 2017, but it does not process special categories of personal data.

Claimant data is not processed by MedCo and data entered from the medical report into the MedCo system for Management Information ('MI') reporting is anonymised and therefore does not fall within the remit of data protection legislation.

## Responsibility

MedCo is the Data Controller and responsible for the data processed. The MedCo Head of Operations will have responsibility for overseeing compliance with this policy and ensuring that MedCo maintains adequate controls in place to assist the business in meeting its data protection obligations.

If you have any queries regarding this policy please email: [enquiries@medco.org.uk](mailto:enquiries@medco.org.uk)

## Destruction

All data contained in the MedCo system, servers and folders (including both electronic and paper formats) will be destroyed in accordance with this policy, at the end of the relevant retention period.

Confidential paper records will be destroyed by shredding and non-confidential paper records will be sent for recycling. Electronic records will be permanently deleted in consultation with the IT team to render them non-recoverable.

An annual review will be conducted in June each year to ensure that data that falls outside of the retention periods is destroyed and no longer retained.

## Your rights

Under Data Protection Legislation you have numerous rights in relation to your personal data, including but not limited to, the right to request erasure of your personal data, object to processing of your personal data and request restriction of processing your personal data.

You should refer to MedCo's Privacy Policy for more details about your rights or email: [enquiries@medco.org.uk](mailto:enquiries@medco.org.uk)

## Retention periods

To determine the appropriate retention period for personal data, MedCo considered the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which MedCo processes your personal data and whether MedCo can achieve those purposes through other means, and the applicable legal requirements.

The table below outlines the retention periods for personal data processed by MedCo:

Data Type	Description of personal data	Record type	Retention Period
Registrations, Identity, Contact & Financial Inc. Accreditation info.	Names, postal addresses, gender, email addresses, telephone numbers, qualifications, gender, professional identifier and financial data.	Electronic	<b>6 years</b> from the date the registration is withdrawn.
MI Reporting, Usage, Profile & Technical	Name, professional identifier, email address, IP address, cookies, contact information.	Electronic	<b>6 years</b> from the date the report was produced - Remove all personal data. Anonymised reports will be retained for trend analysis.  <b>10 years</b> – Anonymised report deleted.
Board and Committee Packs Inc. meeting minutes, decisions, Audit reports, Committee Issue logs and rationales	Names, professional identifiers, address details.	Electronic and Paper	<b>6 years after the meeting/decision is taken</b> – Delete the document.
Audio Recorded Minutes / Meetings	Names, professional identifiers, address details.	Audio, Electronic and Paper	<b>6 years from the date of the recording or immediately if a Party withdraws their consent</b> - Delete the audio file and all transcripts.
Data Subject Access Request (DSARs) and disclosure of Information requests ( i.e. Section 29/35)	Personal data e.g. Forename, Surname, gender, telephone number, email address and postal address, professional identifier.	Electronic and Paper	<b>1 year after the request is responded to</b> - Delete the request, response & related correspondence.
Helpdesk enquiries, User emails and call logs	Names, email addresses, professional identifiers.	Electronic	<b>2 years after the enquiry is responded to</b> - Delete the emails and call notes.
Audit files including reports	Names, professional identifiers, clinic/business address.	Electronic and Paper	<b>3 years after the report date/audit date</b> –Files archived.  <b>6 years after the report date/audit date</b> - Delete the report/correspondence.
Marketing and communications data	Names, email addresses, professional identifiers.	Electronic	<b>1 year</b> from the date the registration is withdrawn.

MedCo requires third parties it shares your personal data with, to comply with MedCo's Data Retention Policy.

For more information about how MedCo processes your personal data, please refer to the MedCo Privacy Policy which can be found at [www.medco.org.uk](http://www.medco.org.uk).

# Changes to the retention policy

This version was last updated on 23 May 2018.

MedCo will keep this policy under review and will update it from time to time to reflect developments in data protection legislation and amendments to ICO guidance.

Any changes MedCo makes to this policy will be published in an updated version on its website. Please check back frequently to see any updates or changes to the Retention Policy.