

Intercom Trust GDPR Retention Schedule

The following is the schedule of retention, destruction and deletion of records that lays out what is kept and for how long based on the following NHS Records Management Code of Practice 2021.

Records	Details	Disposal Action	Who is responsible	Retention	Where is this evidenced?
Client records	<p>Records or logs of:</p> <ul style="list-style-type: none"> Contact information Demographics Contact with the service(s) Third party contacts (other agencies and or/family) Various health and social care records, occasional criminal conviction information (e.g. if working with probation) <p>Including special category data:</p> <ul style="list-style-type: none"> sexual orientation gender identity transition racial or ethnic origin religious or philosophical beliefs health sex life <p>Very occasionally includes information about criminal / court involvement.</p>	Review and destroy if no longer required	CEO and Deputy Director	<p>IF ADULT: 8 years from last contact (6 years from case auto-closed)</p> <p>IF CHILD: Until 25th or 26th birthdays</p>	Client records master
Other Information Governance records	<p>Telephony systems record</p> <p>Data Protection Impact Assessments (DPIAs)</p> <p>Destruction certificates or record of</p>	Review and destroy if no longer required	CEO and Deputy Director	<p>1 year</p> <p>6 years after completion of use of system</p>	Governance records master

	information held on destroyed physical media			Up to 20 years	
	Electronic metadata destruction stubs			Up to 20 years	
Charity Governance records	Trustee and board meetings	Review and destroy if no longer required	CEO and Deputy Director	Up to 20 years	Governance records master
	Policies – electronic record			Up to 20 years	
	Trustee details			Up to 20 years	
	Complaints (legal or otherwise)			10 years	
Incidents and Accidents books	Record of any reportable injury, over-three day injury, disease or dangerous occurrence: <ul style="list-style-type: none"> • RIDDOR • Accident Books • Serious Incident • Not serious Incident 	Review and destroy if no longer required	CEO and Office Manager	8 years	Governance records master
				10 years	
				20 years	
				10 years	
Estates		Review and destroy if no longer required	CEO and Office Manager	3 years after occupation ceases	Governance records master
Finance	Final audited accounts	Review and destroy if no longer required	CEO and Office Manager	20 years	Governance records master
	Procurements (Funding Contracts)			6 years after end of contract	
	Staff salaries, superannuation, payroll for ETs			10 years	

	Other financial records including all accounts associated documentation and records for the purpose of audit.			6 years from end of the financial year they relate to	
Subject access (SAR) requests	From clients, other service users, staff and trustees	Review and destroy if no longer required	CEO and Deputy Director	3 years after closure of requests	In the relevant record master: <ul style="list-style-type: none"> • Client records master • Staff records master • Governance record master
Staff records	Employed Staff Summary and Occupational health reports and other records, including (but not limited to): evidence of right to work, security checks and recruitment documentation for the successful candidate including job adverts and application forms	Review and destroy if no longer required	CEO and Deputy Director	Until 75 th Birthday	Staff records master
Other Contacts	Students on Placement Volunteer Counsellors Suppliers Directory People who use Intercom's offices to hold meetings etc	Review and destroy if no longer required	CEO and Deputy Director	6 years after leave 6 years after leave 2 years 2 years 2 years	In the relevant record master: <ul style="list-style-type: none"> • Client records master • Staff records master • Governance record master

Client filing and archiving system

	NB. Children and young people's records (under 18) are kept until their 25 th or 26th birthdays so check this first and then file in appropriate section
Last contact in 2018	Destroy in 01/27
Last contact in 2017	Destroy in 01/26
Last contact in 2016	Destroy in 01/25
Last contact in 2015	Destroy in 01/24
Last contact in 2014	Destroy in 01/23
Last contact in 2013	Destroy in 01/22
Last contact in 2012	Destroy in 01/21
Last contact in 2011	Destroy in 01/20
Last contact in 2010	Destroy in 01/19
Closed before 2010	Destroyed in Confidential Shredding

Dates for the destruction of records

The start of the second week of January each year, in each office location.