

Data Set Name	Data held	Time Consent Obtained	Storage Medium & Location	Accessible By	Retention Start	Retention Period	Action at end of retention period	Method of deletion	Validation of Deletion	Justification
Accident books, accident records/reports	Accident Data for Employees and Visitors.	N/A	MS Azure, People HR	Onebright Management Staff	Date of last entry	3 years (or, if the accident involves a child or young adult, then until that person reaches the age of 21)	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Email from Office Manager	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)(SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances.
Business Continuity Plans	BCP and DR plans are vital to Onebright in the event of a disaster. These plans are stored on the hosted desktop system and also a hard copy is kept by the directors.	N/A	MS Azure, People HR - UK based data centre Printed records	Onebright Management Staff	From date document created	7 years	Review and if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Confirmation from Group Compliance Manager as part of policy management.	Public Records Act 1958
Call Recordings	Standalone call recordings (not linked to accounts). Recorded conversation which may later be needed for clinical negligence purpose.	Notification of call recording provided on all calls	Xarios and EtCloud UK based data centre	Onebright Management Staff	From the date when phone call was recorded	2 years	Review and if no longer needed destroy. Client specific requirement to return copy recording.	Manual deletion of records by the provier.	External: Supplier Certificate of Destruction. (Internal decommissioned systems)Service Desk Ticket approved and checked that no records are remaining by supervisor	NHS Records of Management Code of Practice
Client records (had assessment and or treatment)	This refers to patient records stored in Case Management systems, including: Name; DOB; Gender; Address; Treatment History; Call Recordings linked to account; and other pertinent case information.	At the time of assessment or first treatment session	Morpheus, Caselow, Lumeon, Jotforms, Salesforce, Proclaim, Hubspot, MS Dynamics	Authorised Users Only	Upon case closure	Adult health records - 8 years Children's health records - 25th/26th birthday (16th if treated at age 17) Mental health records - 20 years or 10 years after the patient has died (in Northern Ireland it is 8 years after death and in Scotland 3 years after death)	Review and destroy if no longer needed	Automatic deletion	Audit as part of internal audit programme	NHS Records of Management Code of Practice
Client Management System Backups	Back-up data for forensic readiness and unexpected data loss	N/A	Azure (UK) Lumeon (AWS)	Not actively accessed	From date of backup	Sufficiently archived as per ICO guidelines for Data Privacy. Back-up schedule in place.	Review if no longer needed destroy	The automatic retention period is driven by back-up data, which is informed by this retention schedule.	Audit as part of internal audit programme	ICO Guidelines
Client Therapy Session Recordings	Recording of therapy session	At the time of the recorded session	Azure(UK)	Authorised Users Only	Date of recording	28 days	Destroy	Auto-delete at 28 days	Audit as part of internal audit programme	Business decision
Clinician Data	This refers to our Clinician Network where we store details of cases on the Caselow/ Proclaim systems such as Name, Address, Phone, Email, payment details	N/A	MS Azure - Caselow, Proclaim, Dynamics, Email, Sharepoint, Healthcode, Maptive (UK based data centre)	Authorised Users Only	Upon request to be closed	7 Years	Clinician data would remain visible on the case record.	Manual deletion of records. Paper copies to be placed in confidential waste.	Audit as part of internal audit programme	Defence of legal claims
Complaints	Complainant Data including name, address, email address and telephone number.	Complainant Data including name, address, email address and telephone number.	Respond Complaints Spreadsheet Legacy: Proclaim	Authorised Users Only	From date complaint received	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Audit as part of internal audit programme	NHS Records of Management Code of Practice
Corporate client information	Contact details of corporate clients such as name, work email and address signatures	N/A	Hubspot	Authorised Users Only	Termination or expiry of the relevant corporate contract/service	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Email from Head of Account Management	Legally defined
Email Data	Email data may be all data types transferred electronically. This is provided from Microsoft Office 365 and is managed by 3rd party EtCloud.	N/A	Office 365, MS Azure UK based data centre (Microsoft)	Onebright Internal Users	From date of email received	7 years	Review and if no longer needed destroy	Automated retention period configured in Exchange	Audit as part of internal audit programme	NHS Records of Management Code of Practice
Financial Accounting Data	Accounting information is held on our clients, customers and suppliers. This can include bank account details, amounts owed, finance history and other accounting related data. All data is stored on the hosted desktop system.	Agreed within contract	Sage, Prophix, MS Azure (UK based data centre) & printed copies. Legacy: SAGE 50 and Sage Xero	Onebright Account staff only	Close of financial year	Due to software limitations this data will be retained until the system is no longer used.	N/A	N/A	N/A	Section 221 of the Companies Act 1985 as modified by the Companies Acts 1989 and 2006

Data Set Name	Data held	Time Consent Obtained	Storage Medium & Location	Accessible By	Retention Start	Retention Period	Action at end of retention period	Method of deletion	Validation of Deletion	Justification
HR	Name, address, skills, performance records, NI records, pension records, leave and absence records.	Signing of contract	MS Azure, People HR	Onebright Management Staff	Staff member leaves	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Yearly Audit	NHS Records Management Code of Practice
	Income tax and NI returns, income tax records and correspondence with HMRC	N/A	MS Azure, ADP Hentons	Onebright Management Staff	End of the financial year to which they relate	Due to software limitations this data will be retained until the system is no longer used.	N/A	N/A	N/A	The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended, for example by The Income Tax (Employments) (Amendment No. 6) Regulations 1996 (SI 1996/2631) Extended to 7 years from 3 for practical terms
	Parental leave, sick pay, Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	N/A	MS Azure, ADP, Hentons	Onebright Management Staff	End of the tax year in which the maternity period ends	Due to software limitations this data will be retained until the system is no longer used.	N/A	N/A	N/A	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended Extended to 7 years from 3 for practical terms
	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	N/A	MS Azure, People HR	Onebright Management Staff	From date of redundancy	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Confirmation of deletion from Head of HR	Recommended non-statutory period
	Training Records	N/A	MS Azure, People HR	Onebright Management Staff	Staff member leaves	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Confirmation of deletion from Head of HR	NHS Records Management Code of Practice
	Death benefit nomination	N/A	MS Azure, People HR	Onebright Management Staff	Staff member leaves	Staff member's last day	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Confirmation of deletion from Head of HR	Business decision
Insight survey data	Welbeing survey for customers (large customers) - named until reported back to corporate	At the time of the survey	Cogniss Snowflake	Authorised Users Only	From date survey returned	Cogniss 35 days Snowflake 2 years	Snowflake Data is anonymised	E-mail to Cogniss Cogniss then execute full anonymisation in the app	Cogniss provide written confirmation via e-mail	Business decision
Incidents (Serious)	Details regarding the incident, risk or safeguarding	N/A	Sharepoint (Spreadsheet) MI Referrer Pack	Onebright Management and Staff	From incident reported date	20 years	Review if no longer needed destroy	Manual Deletion	Email from Head of Assessment and Specialist Clinical Services	NHS Records Management Code of Practice
Incidents (Not Serious)	Details regarding the incident, risk or safeguarding	N/A	Sharepoint (Spreadsheet) MI Referrer Pack	Onebright Management and Staff	From incident reported date	10 years	Review if no longer needed destroy	Manual Deletion	Email from Head of Assessment and Specialist Clinical Services	NHS Records Management Code of Practice
Office 365 Barracuda Backups	All and any class of data i.e. Client, Employee, Network Clinician etc.	N/A	Office 365 environment i.e. Sharepoint, Teams and Emails.	Authorised Users Only	From date of backup	Due to software limitations this data will be retained until the system is no longer used.	N/A	N/A	N/A	Business decision
Onebright Group Company Document	Miscellaneous documents, procedures, policies and work instructions held by Onebright.	N/A	MS Azure, Sharepoint - UK based data centre	Onebright Internal Users	From date document created	Delete previous version one new version in place	Review and if no longer needed destroy	Manual Deletion	N/A	Public Records Act 1958
Payment Details	Name, Address, Phone, Email, payment details	N/A	Sage Pay or Key IVR	Authorised Users Only	See individual providers	SagePay 3 months (from date of collection) <u>Key IVR TBD</u>	Review if no longer needed destroy	Automatic deletion when expired	6 monthly audit	Business decision
Potential Candidates (Talent bank and non-interviewed candidates)	Email address of prospective employees	When added to Oleo	Oleo	Authorised Users Only	From date added	2 years	Review if no longer needed destroy/ or consent	Auto-deletion rules in Oleo	6 monthly audits by the Strategic Supply Team	Business decision
QA Scorecards	Employee quality assurance checks of calls and file	N/A	Sharepoint	Authorised Users Only	From date added	1 year	Review if no longer needed destroy/ or consent	Manual Deletion	Annual confirmation of deletion from the Head of Operations	Business decision
Recruitment Data (successful candidate)	Application and interview notes	N/A	People HR, MS Azure, Sharepoint - UK based data centre	Onebright Management Staff	From date of job offer	7 years	Review if no longer needed destroy	Manual deletion of records. Paper copies to be placed in confidential waste.	Confirmation of deletion from Head of HR	Employment Practices Code (Information Commissioner's Office, 2011), Equality Act 2010, s 124

Data Set Name	Data held	Time Consent Obtained	Storage Medium & Location	Accessible By	Retention Start	Retention Period	Action at end of retention period	Method of deletion	Validation of Deletion	Justification
Right to be forgotten request (RTBF) confirmations	Confirmation email where we have completed a RTBF	N/A	MS Azure, Sharepoint - UK based data centre	Onebright Management Staff	From date of request	6 years	Review if no longer needed destroy	Manual deletion	Audit as part of internal audit programme	Business decision
Subject Access Requests (SAR), response, and subsequent correspondence	Subject Access Requests (SAR), response, and subsequent correspondence	N/A	Respond, MS Azure, Sharepoint - UK based data centre	Onebright Management Staff	From date SAR received	3 years 6 years if there has been an appeal	Review if no longer needed destroy	Manual deletion	Audit as part of internal audit programme	NHS Records of Management Code of Practice
Website forms database (brochure request, ADHD request etc)	Enquiries via HubSpot Gravity Forms	Completion of the website form.	Hubspot Gravity Forms	Authorised Users Only	From form received	30 days	Review if no longer needed destroy	Automatic deletion	Confirmation of electronic setting Audit (6 monthly)	Business decision