



Retention Summary – Patient Data

The GDPR requires that personal data should not be held for longer than is necessary for the purpose for which it is being processed. However, it is a fundamental requirement that all of Spire Healthcare’s records are retained for a minimum period of time for legal, operational, research and / or safety reasons. The length of time for retaining records will depend on the type of record. Below you will find a summary of the various types of data we hold about you and how long each will be kept.

Medical Records

As you will see below Spire Healthcare’s retention policy for most medical records is 30 years. This period has been determined with patient safety in mind. There is also the necessity in healthcare to occasionally need to undertake patient recalls where it is generally necessary to have access to the original patient medical record to determine, for instance, what was discussed with the patient, any products implanted or used to treat the patient or identify members of staff involved in the patient’s care. Some non-medical records will also need to be held for this time period as they support the medical records by providing context and further operational information. These are discussed in the next section.

Medical Records			
Type of record	Start of Retention Period	Minimum Retention Period	Comments
Records relating to human fertilisation where the individual has undergone fertility treatment and the Registered Manager is unable to confirm whether or not that patient has given birth to a child as a result of the treatment.	Conclusion of treatment	Retain for 50 years	This is in line with the Human Fertilisation and Embryology Act 1990 (HFEA)
All other medical records	Conclusion of treatment	Retain for 30 years	

Non-Medical Records

The following list explains what other personal data Spire may hold about you and how long that data will be held for.

Type of Record	Start of Retention Period	Minimum Retention Period	Comments
CCTV (many of our hospitals have CCTV installed in communal areas such as car parks, receptions and waiting	Creation	14 days (up to a maximum of 30 days)	Recorded images which are downloaded should only be retained long enough for the incident to be investigated.

Type of Record	Start of Retention Period	Minimum Retention Period	Comments
rooms)			
SAP and STAR records (this is our patient administration software)	Date of last admission	30 years	Retention period of 30 years in line with medical record retention.
Credit Card details where there is no outstanding debt on patient's account	Receipt of credit card details	6 months	For instance when credit card details are taken at registration.
Credit Card details where there is outstanding debt on patient's account	Discharge of debt	6 months	
Debtor records cleared	Close of financial year in which debt is cleared	6 years	
Debtor records not cleared		Retain until cleared	
Invoices to patients regarding their treatment	Close of financial year to which the invoice relates	6 years	
Booking tool for managing patient bookings	Creation	6 years	
Patient enquiries - Email	Receipt	6 years	
Patient surveys	Receipt	6 years	Applies to surveys where patients have consented for their data to be linked back to their patient record.
Prospective patient data for marketing purposes (this data is most commonly collected at events)	Receipt	6 years	
Complaints case file	Closure of incident	30 years	Retention period of 30 years in line with medical record retention.
Fraud case files	Case closure	6 years	
Litigation records	Case closure	30 years	Retention period of 30 years in line with medical record retention.
Subject Access Requests (SAR) and disclosure correspondence	Closure of SAR	3 Years	
Subject access requests where there has been a subsequent appeal	Closure of appeal	6 Years	
Accident forms	Creation	10 years	
Ward Diaries/ registers	Creation	2 years	
Outpatient lists	Creation	2 years	
Telephone call recordings	Creation	1 year	Calls are muted when financial information is taken over the phone. Downloaded calls should only be retained long enough for the purpose of their use to be concluded.