

Title: ICO Retention Schedule
Author: Lesley Bett
Version: 3.0
Date: 30/07/2015



Information Commissioner's Office

Retention Schedule

Document control

Version	Date	Amended by	Comments
0.1	Oct 08	Chris Littler	First draft
0.2	May 10	Chris Littler	Additional retention schedules added
0.3	May 10	John Wilson	Comments on structure and content
0.4	July 2010	Simon Ebbitt	Further additions to reflect changes in classification of EDRMS
0.5	November 2010	Simon Ebbitt	Additional retention periods incorporated
0.6	January 2011	Simon Ebbitt	Review prior to submission to Head of Internal Compliance
0.7	January 2011	Simon Ebbitt	Updated with Lesley Bett comments
0.8	February 2011	Simon Ebbitt	Updated during consultation with business units
0.9	February 2011	Simon Ebbitt	Updated following comments provided by Information Asset Owners
1.0	February 2011	Simon Ebbitt	Approved by Executive Team 28/2/2011
1.1	August 2011	Simon Ebbitt	Approved by IAO for Corporate Affairs/Enforcement and Internal Compliance
1.2	April 2012	Simon Ebbitt	Addition of entries for restricted contacts, reasonable adjustments and single points of contact. Revision of Notification database entry retention due to ICE project requirements. Modified HR retention period for recruitment exercises.
2.0	March 2014	Nicki Hargreaves	Full schedule review
2.1	April 2014	Nicki Hargreaves	PECR SBN folders moved from 5.01 to 5.07, Information Governance changes to 1.11 and 1.09.01 (moved to 1.11)
2.2	March 2015	Nicki Hargreaves	1.10.05 retention period updated
2.3	May 2015	Nicki Hargreaves	2.0 retention period for un-scanned and voluminous information amended, information access team relocated to 2.02.11 and retention period updated with sec 29/59 requests 5.03 and 5.04 updated with investigation data
	July 2015	Nicki Hargreaves	IAO for Facilities (1.07) updated to Head of Organisational Development
3.0	July 2015	Nicki Hargreaves	Updated version published

Summary of Classification Headings

1. Business Support and Management	8
1.01 Business Strategy	8
1.02 Executive and Board Support	10
1.03 Business Continuity	13
1.04 Management Information	13
1.05 Human Resources.....	13
1.06 Financial Management.....	19
1.07 Facilities Management.....	21
1.08 Contracts and Procurement.....	23
1.09 Information and Technology Services.....	24
1.10 Security	24
1.11 Information Governance.....	25
1.12 Legal Services.....	28
1.13 Internal Communications.....	30
1.14 ICO departmental administration.....	33
1.15 Corporate Programmes and Projects	34
1.16 Complaints about ICO (office-wide)	34
1.17 Learning and Development	34
2. Enquiries, Advice and Complaints Handling	39
2.01 Service Adjustment Reviews	40
2.02 Customer Contact – Responding to requests for advice	41
2.03 Decision Notices	42
2.04 Complaints and Concerns	42
2.05 FOI/EIR Appeals.....	43
2.06 Legal Casework Advice.....	43
2.07 Customer Contact – Registrations.....	43
2.08 Publication Schemes Management	44
3. Policy and Guidance Development and Establishment	44
3.01 Policy engagement with stakeholders.....	44
3.02 Codes of practice.....	45
3.03 Guidance.....	45
3.04 Legislative Development.....	45
3.05 Policy Research	46
3.06 International Legislative Developments, Policy and Co-operation	46
3.07 Internal Policy Advice.....	47
3.08 Consultations, Inquiries and Select Committee evidence.....	47
3.09 External consultations initiated by the ICO.....	47
3.10 European and International Working Groups	47
3.11 – 3.22 Legal Services – Policy and Guidance Development	48
4. External Communications	48
4.01 Communications and External Relations	48
4.02 Stakeholder Engagement and External Organisations Liaison	53
4.03 Parliamentary questions	53

5. Regulation and Enforcement.....	54
5.01 Audits, Advisory Visits and Workshops	54
5.02 Remedies and Resolutions	55
5.03 Investigations	55
5.04 Enforcement and Civil Monetary Penalties (CMP)	55
5.05 Prosecutions	56
5.06 Non Registration.....	56
5.07 Intelligence Hub	57

INTRODUCTION

Purpose of the ICO Retention Schedule

The ICO retention schedule is a tool used to ensure the retention of business information for as long as it is needed. It takes account of the context within which the ICO operates, including the legal and regulatory environment, for example compliance with the fifth data protection principle, and the expectations of stakeholders. It is intended primarily as a resource for the Information Governance Team who will assign relevant retention periods across the ICO's Fileplan enabling disposal activity to be carried out in a consistent and controlled manner.

Purpose of the ICO Fileplan

The ICO Fileplan is designed to help organise and manage the ICO's information. Its structure is based on a functional analysis of the ICO's activities and has been built into the ICO's Electronic Document and Record Management system, Meridio. The Fileplan underpins the EDRM system and provides the basis for processing and managing ICO records.

Retention Schedule

A table containing the recommended retention period is given for each relevant level of the Fileplan. The retention period applies to all records in that category by default, and will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods. If individual records or documents require a different retention period to that recommended, Local Records Officers can contact the Information Governance Team to discuss their retention requirements.

Retention periods also apply to all formats of records, i.e. paper and electronic, unless specifically stated otherwise.

The primary actors that inform decisions on retention are:

- Business need - as agreed by the Executive Team.
- Legislative and regulatory requirements – for example compliance with the fifth data protection principle. Where relevant legislation is listed.
- National Archives requirements or guidelines.

Where preservation is indicated, this means that records relating to this activity will be considered for transfer to the National Archives after 20 years.

It is important that the retention schedule is kept up to date, to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for the ICO.

N.B. Not all electronic documents will be declared as formal records within Meridio. Some thought should be taken to ensure that undeclared documents are not retained indefinitely.

Logically, undeclared documents should be ephemeral and deletion possible after a period significantly shorter than that identified as the disposal period for the records.

Understanding this document

The diagram below illustrates the structure used to present retention periods and other useful information in this schedule.

1. Business Support and Management

The internal management of ICO as an organisation, and of its departments.

← Function

1.1 Business Strategy

The formulation of office wide plans, policies and strategies allowing the ICO to operate and deliver services.

← Process

1.1.1 Strategic Planning

The development of strategic plans that enable the ICO to achieve its mission and vision.

← Activity

RETENTION PERIOD	Paper and Electronic	Review 7 years after folder closure
AUTHORITY	Executive Team	
INFORMATION ASSET OWNER	Director or Head of the respective business area	
LOCATION HELD	Meridio and Central Filing System	
PERMANENT PRESERVATION	Yes	
SENSITIVE PERSONAL DATA	No	

← Agreed period of retention

← Who approved the retention

← Business Owner

← Storage location

← Specifies whether the information needs to be considered for permanent preservation at the National Archives

← Specifies whether sensitive personal data is likely to be processed in this area

On-going Development

The Retention Schedule will be maintained by the Information Governance Team who will make amendments and additions whenever legislation, National Archives guidance or the ICO changes. Change control procedures will apply to this document once approved by the Executive Team. Once approved changes will be made when there is agreement between the Head of Good Practice and the relevant Information Asset Owner. These changes will be reported to the Executive Team quarterly.

Please forward any queries to the Information Governance Team.

Glossary

- Appraisal – is the process of assigning value to records and is a means of determining the length of retention for a record.
- Central filing system – is the ICO's main manual filing system used for paper records.
- Document Review - a period of elapsed time after which a document or folder is considered for disposal as dictated by the records management policy.
- Documents - printed or electronic papers such as reports, letters, memos, or e-mail messages. The definition also includes handwritten notes and printed out graphical material. An electronic document is any of these held in machine-readable form or as a scanned image.
- EDRM - Electronic Document and Records Management. Meridio is the software the ICO have chosen as their non-casework document and records management system.
- Fileplan - a classification system used for managing electronic records. The National Archives definition is a structured scheme of categories in which files are grouped – also known as a taxonomy.
- Folder - collection of documents or records on a specific topic that are held together for management and disposal as a single entity.
- Information Asset Owners (IAOs) – are the senior responsible persons for the management of information within a defined area.
- Metadata - information about documents or records that is used to manage and retrieve them. The most common definition is metadata is data about data.
- Records - information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. A record may consist of a collection of documents that together provide a complete 'story' about a particular activity or process.
- Review – the process of considering whether a record which has reached a specified point in time has residual value requiring retention for a further period of time.
- Scanned Document - an electronic image of a paper document.

1. Business Support and Management

The internal management of ICO as an organisation, and of its departments.

1.01 Business Strategy

The formulation of office wide plans, policies and strategies allowing the ICO to operate and deliver services.

1.01.01 Strategic Planning

The development of strategic plans that enable the ICO to achieve its mission and vision.

RETENTION PERIOD	Paper and Electronic	Review 7 years after folder closure
AUTHORITY	Executive Team	
INFORMATION ASSET OWNER	Director or Head of the respective business area	
LOCATION HELD	Meridio and Central Filing System	
PERMANENT PRESERVATION	Yes	
SENSITIVE PERSONAL DATA	No	

1.01.02 Corporate Planning

The development of Corporate Plans setting the broad objectives of the ICO in three year planning cycles.

RETENTION PERIOD:	Paper and Electronic	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER	Head of Corporate Affairs	
LOCATION HELD	Meridio and Central Filing System	
PERMANENT PRESERVATION	Yes	
SENSITIVE PERSONAL DATA	No	

1.01.03 Business Planning

The development of Business Plans that identify priorities office wide on a 12 month cycle.

RETENTION PERIOD:	Paper and Electronic	Review 7 years after folder closure
--------------------------	----------------------	-------------------------------------

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER	Head of Corporate Affairs
LOCATION HELD	Meridio and Central Filing System
PERMANENT PRESERVATION	Yes
SENSITIVE PERSONAL DATA	No

1.01.04 ICO Policies

Developing, reviewing and updating of policies and plans that affect the whole of the ICO. Including finance policies, communication policies, information management policies, human resource management policies but not the interpretation of legislation and regulations that the ICO regulates (see 3 for Policy development activities).

RETENTION PERIOD:	Paper and Electronic	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER	Director or Head of the respective business area	
LOCATION HELD	Meridio and Central Filing System	
PERMANENT PRESERVATION	Yes	
REFERENCES	None	
SENSITIVE PERSONAL DATA	No	

1.01.05 Internal Audit

Reviewing the performance of the ICO through internal audit.

RETENTION PERIOD:	Paper and Electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Internal Audit Records	
SENSITIVE PERSONAL DATA	No	

1.01.06 ICO Constitution

Including the Framework Agreement between the ICO and Ministry of Justice (sponsor body) and liaison with Ministry of Justice regarding changes to the agreement.

RETENTION PERIOD:	Paper and Electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

1.01.07 ICO Risk Management

Corporate risk registers, action plans, and associated administration.

RETENTION PERIOD:	Paper and electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.02 Executive and Board Support

Provision of administrative support for the Commissioner, Directors, Committees and Boards, and liaison with Ministry of Justice (except concerning the Framework Agreement – see 1.1).

1.02.01 Committee and Corporate Governance Support

All aspects of administration and governance of the ICO's key committee's and boards including Management Board, Executive Team, and Audit Committee; Register of interests, Statement on Internal Control, and liaison with non-executive directors.

RETENTION PERIOD:	Paper and Electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

1.02.02 Internal Committees and Groups

Administration of internal committees and groups e.g. Information Rights Board, Audit Committee, and Health & Safety Committee.

RETENTION PERIOD:	Paper and Electronic:	All internal committees and groups except where specified: Review 7 years after folder closure Regional Office Forum: Review 3 years after folder closure Operational Directorate Department Heads weekly meetings: Review 3 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Respective Committee Chair	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.02.03 Ministry of Justice Liaison

Correspondence with officials at the ICO's sponsor department, administration of the Quarterly Liaison Meetings and correspondence with Ministers and their staff. NOTE – this liaison is on the context of the ICO's relationship with the MOJ as a sponsored body, not any other context.

RETENTION PERIOD:	Paper and electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

1.02.04 Private Office Support

Support for members of the Executive Team, and correspondence with elected representatives.

RETENTION PERIOD:	Paper and Electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Relevant business owner	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

1.02.05 Delegated authorities

The delegation of authority, by the Commissioner, for others to exercise his powers.

RETENTION PERIOD:	Paper and Electronic:	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

1.03 Business Continuity

Arrangements for maintaining ICO's capability to deliver services in the event of a business continuity incident.

RETENTION PERIOD:	Paper and Electronic	Destroy 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.04 Management Information

Management information on operational performance at the ICO, such as casework dashboards.

RETENTION PERIOD:	Paper and Electronic:	Review 5 years after end of financial year
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Customer Contact	
LOCATION HELD:	Cognos ReportNet and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.05 Human Resources

The management of ICO staff and administration of staff related activities such as recruitment, disciplinary and grievances. Note, staff development activity is carried out by Learning and Development at 1.17

1.05.01 Recruitment

Records of recruitment exercises, job descriptions, terms and conditions of employment. Where candidates are successful a copy of the job description, application and terms and conditions of employment will be placed on the successful candidate's employee file.

RETENTION PERIOD:	Paper and Electronic:	Recruitment exercises: Review 6 months from end of recruitment exercise
--------------------------	-----------------------	---

	Application forms: Destroy after 6 months Applicant names and addresses: review after 3 years Job descriptions: Review 6 years after superseded Terms and conditions: Review 6 years after superseded
AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Organisational Development
LOCATION HELD:	Human Resources Filing system, Meridio and CIPHR
PERMANENT PRESERVATION:	No
REFERENCES:	Data Protection Act 1998; The National Archives Retention Scheduling: Employee Personnel Records
SENSITIVE PERSONAL DATA	Yes

1.05.02 Employee Files

RETENTION PERIOD:	Paper and Electronic	Retain until employee age 100
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Data Protection Act 1998; The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.05.03 Conditions of employment

Standard contracts and variations of those terms where required, i.e. compressed hours and home working.

Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and Electronic	Review 6 years after date superseded
AUTHORITY:	The National Archives	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.05.04 Payroll Administration

Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and Electronic	Salary ledger records: Review 6 years from the end of the financial year to which they relate Payroll sheets: Review 2 years from the end of the financial year to which they relate Individual employees personal payroll history: Retain until employee aged 100
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Departmental Accounts	
SENSITIVE PERSONAL DATA	Yes	

1.05.05 Pensions Administration

All records relating to pensions administration.
 Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and Electronic	Pension records: Retain until employee aged 100
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.05.06 Disciplinary

Management of staff conduct.

Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and electronic	Records of formal disciplinary actions in employee file. Retain both paper and electronic for review 6 years after last action
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.05.07 Grievances

Management of staff grievances.

Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and electronic:	Records of formal grievances in employee file. Retain both paper and electronic for review 6 years after last action
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	

PERMANENT PRESERVATION:	No
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records; Data Protection Act 1998
SENSITIVE PERSONAL DATA	Yes

1.05.08 Termination of employment

Termination of employment as it relates to ICO staff e.g. Early retirement and severance, Age retirement, Death in service, Redundancy.
 Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and Electronic:	Records relating to individual employee files: Retain until employee aged 100
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records; Data Protection Act 1998	
SENSITIVE PERSONAL DATA	Yes	

1.05.09 Staff Health and Safety

Management of health and safety as it relates to ICO staff.
 Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and electronic	Individual health records: Retain until employee aged 100
		Health surveillance records: Review 40 years from date of last entry
		Examination, testing, monitoring and control records: Review 5 years after last action
		Accident books and ill health reports: Destroy 3 years after closure

		Training, guidance and instructions: Review 3 years from date superseded
		Risk assessment reports and reviews: Review 5 years from date superseded
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Health and Safety at Work Act 1974 and supporting Regulations; The National Archives Retention Guidelines 4: Health and Safety Records (now withdrawn) The National Archives Retention Guidelines: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.05.10 Absence Management

Management of absence as it relates to ICO staff.
 Use 1.05.02 'Employee Files' for individual staff records

RETENTION PERIOD:	Paper and electronic:	Review 7 years from date superseded
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.05.11 Industrial Relations

See also Joint Committee in 1.02

RETENTION PERIOD:	Paper and electronic	Review 7 years after folder closure
AUTHORITY:	Executive Team	

INFORMATION ASSET OWNER:	Head of Organisational Development
LOCATION HELD:	Human Resources Filing System and Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	Yes

1.05.12 Occupational Health

Procedures, schedule and forms for the management of occupational health services. Occupational health records relating to an individual should be stored on their employee file.

RETENTION PERIOD:	Paper and electronic	<p>Medicals: Retain until employee aged 100</p> <p>Procedures, events, employee assistance schemes: 7 years from date superseded</p> <p>Schedules: Destroy 3 years from the end of the financial year to which the records relate.</p>
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Human Resources Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.06 Financial Management

Control and management of the ICO's financial resources including accounting records, processing of fee income, purchase orders, expenses, payroll and invoices.

RETENTION PERIOD:	Paper and Electronic	<p>Bank and cash</p> <p>Bank statements: 6 years from the end of the financial year to which the records relate</p>
--------------------------	----------------------	--

		<p>Bank reconciliations and all other banking records: Current and previous financial year</p> <p>Petty cash records: 6 years from the end of the financial year to which the records relate</p> <p>Fee income DD collection and cheque audit trails: Current and previous financial year</p> <p>Audis and Direct Debit Mandates: Current and previous financial year (or until scanned if earlier)</p> <p>Creditors Supplier statements: Current and previous financial year</p> <p>Invoices and expenses claims: 6 years from the end of the financial year to which the records relate</p> <p>Debtors Income vouchers: 6 years from the end of the financial year to which the records relate</p> <p>Ledger Nominal ledger printout: 6 years from the end of the financial year to which the records relate</p> <p>Journals: Current and previous financial year</p> <p>Year end Working papers: 6 years from the end of the financial year to which the records relate</p>
--	--	---

		Management accounts Monthly management reports: Current and previous financial year
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Finance Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	
SENSITIVE PERSONAL DATA	No	

1.07 Facilities Management

Day to day management of buildings, land, equipment and accommodation services.

1.07.01 Asset Management

Land and buildings, vehicles, office machinery.

RETENTION PERIOD:	Paper and Electronic	Keep asset and depreciation records for 6 years after end of financial year to which they relate. See 1.6 Financial Management.
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Departmental Accounts	
SENSITIVE PERSONAL DATA	No	

1.07.02 Buildings and Land Management

RETENTION PERIOD:		
(i) Records relating to a specific property including	Paper	Destroy 5 years after property is no longer occupied by the ICO

building maintenance and estate planning		
(ii) Records relating to a specific project	Paper and Electronic	Destroy 5 years after completion of project
(iii) Records of health and safety inspections	Paper and electronic	Destroy 7 years from end of the financial year to which they relate
(iv) Closed circuit television recordings	Electronic	Destroy 4 weeks from the date recorded except where required as evidence
(v) Building reports	Paper and electronic	Retain until superseded
(vi) Fire Risk Assessments	Paper and electronic	Retain until superseded
(vii) Securitas Security Reports	Paper	Retain until superseded
(viii) COSHH assessments	Paper	Retain until superseded
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Meridio, the CCTV system and the Facilities Document Control Centre	
PERMANENT PRESERVATION:	No	
REFERENCES:	Health and Safety at Work Act 1974 and supporting Regulations, Limitation Act 1980, ICO CCTV Policy	
SENSITIVE PERSONAL DATA	No	

1.07.03 Buildings Health and Safety

See 1.05.09 for Staff Health and Safety, 1.07.02 for Buildings Health and Safety and 1.02 for the Health and Safety Committee.

1.07.04 Administration – Facilities Management

Documented procedures and risk assessments for facilities management activities and responsibilities.

RETENTION PERIOD:	Electronic and paper	Destroy 3 years from date superseded
--------------------------	----------------------	--------------------------------------

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Organisational Development
LOCATION HELD:	Meridio and the Facilities Document Control Centre
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

Except:

Records relating to notification fee cheques received and Royal Mail Special and Recorded Delivery information (both sent and received)

RETENTION PERIOD:	Electronic and paper	Destroy after 1 year
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION HELD:	Facilities Document Control Centre	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.07.05 Property Law

See 1.12.01 Legal Services – Property Law

1.08 Contracts and Procurement

Procuring goods and services from external sources by means of a contract.

RETENTION PERIOD:	Paper and Electronic	Statements of interest and unsuccessful tender documents: Destroy 2 years after end of procurement exercise
		Keep agreed specifications, evaluation criteria, and invitation to tender for 6 years from end of contract
		Keep records relating to contracts for goods worth less than £5,000 for two years

		Keep records relating to services for 2 years after payment of the last account
		For contracts for goods over £5,000, keep successful tender and other contractual documents for 6 years from end of contract
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Central Filing System and Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES	The National Archives Retention Scheduling: Contractual Records	
SENSITIVE PERSONAL DATA	No	

1.09 Information and Technology Services

Developing and managing IT services and IT projects.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Information Technology	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.10 Security

Managing Security at the ICO.

RETENTION PERIOD:	Paper and Electronic:	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	

SENSITIVE PERSONAL DATA	No
--------------------------------	----

1.10.05 Security Incident Management

Management of all reported security incidents

RETENTION PERIOD:	Paper and Electronic:	Review 2 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.11 Information Governance

Managing ICO's compliance with the requirements of data protection and freedom of information law.

1.11.02 Monitoring

Ensuring compliance with information governance policies, e.g. records management policy, security policy.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.11.03 Awareness

Ensuring that staff are aware of information governance policies and their responsibilities.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
--------------------------	------------	--------------------------------------

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Good Practice
LOCATION HELD:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

1.11.04 Governance

Managing, leading and reporting on information governance activity.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.11.05 Compliance Advice / PIAs

Projects for which the Information Governance team provides compliance advice and undertakes Privacy Impact Assessments.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.11.06 Information Management

The ICO's records management procedures and guidance, including the ICO's data protection register entry and publication scheme.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	

ASSET OWNER:	
LOCATION HELD:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

1.11.07 Memoranda of Understandings

Correspondence and final versions of Memoranda of Understandings entered into by the ICO and third party organisations.

RETENTION PERIOD:	Electronic and paper	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	Yes – at ICO	
SENSITIVE PERSONAL DATA	No	

1.11.08 Information Governance Team Projects

Projects led by the Information Governance Team.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.11.09 Knowledge and Records Management

Knowledge and records management contacts, guidance and reference material. Management of the ICO's EDRMS.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	

INFORMATION ASSET OWNER:	Head of Good Practice
LOCATION HELD:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

1.12 Legal Services

The provision of legal services internally.

1.12.01 Property Law

RETENTION PERIOD:	Electronic and paper	Leases/property and relate records: Destroy 16 years from the end of the lease Building contracts: Destroy 16 years from the end of the contract Advice: Destroy 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.12.02 Intellectual Property, Copyright and Trademarks

RETENTION PERIOD:	Electronic and paper	Intellectual Property licenses: Destroy 7 years after folder closure Misuse of logo: Destroy 4 years after folder closure
--------------------------	----------------------	---

		Trademarks and applications: Destroy 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.12.03 Litigation

RETENTION PERIOD:	Electronic and paper	Destroy 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.12.04 Legal Profession

RETENTION PERIOD:	Electronic and paper	Destroy 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.12.05 Employment Law

RETENTION PERIOD:	Electronic and paper	Destroy 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.12.06 Legal Advice to the Commissioner

RETENTION PERIOD:	Electronic and paper	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Finance	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	Yes	
REFERENCES:	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

1.13 Internal Communications

Provision of internal communications to keep staff well informed, seek, listen and respond to their views and to share best practice within the organisation.

1.13.01 ICO Intranet

Operation of the Intranet service within ICO.

RETENTION PERIOD:	Electronic	Until superseded
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	ICON	
PERMANENT	No	

PRESERVATION:	
SENSITIVE PERSONAL DATA	No

1.13.02 Corporate Calendar

See 1.13.1 ICON.

1.13.03 Staff Events

RETENTION PERIOD:	Electronic	3 years after event
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.13.05 Staff Briefings

RETENTION PERIOD:	Electronic	3 years after briefing issued
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.13.06 Publications and Materials

RETENTION PERIOD:	Paper	Keep 2 copies permanently for ICO reference
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Communications Filing System	
PERMANENT PRESERVATION:	Yes	

SENSITIVE PERSONAL DATA	No
--------------------------------	----

1.13.07 Informer

Staff newsletter produced monthly.

RETENTION PERIOD:	Electronic	Review 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.13.08 Internal Market Research

Staff surveys and research.

RETENTION PERIOD:	Electronic and paper	Draft reports: Destroy 1 year after completion of market research project Presentations: Destroy 5 years after completion of market research project Final Report: Review 7 years after completion of market research project
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION HELD:	Meridio and Communications Filing System	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.13.09 Internal Communications Projects

Significant project documentation and supporting information, not notes.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
--------------------------	------------	--------------------------------------

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Corporate Affairs
LOCATION HELD:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

1.14 ICO departmental administration

Internal management of ICO departments, including, team meetings, team-specific procedures, local staffing and budget management records.

RETENTION PERIOD:	Electronic	<p>Departmental Business Plans: Review 5 years after folder closure</p> <p>Budget management: Review 3 years after folder closure</p> <p>Meetings: Review 3 years after folder closure</p> <p>Management meetings: Review 3 years after folder closure</p> <p>Team Procedures: Review 3 years after folder closure</p> <p>Team Planning and Reporting: Review 3 years after folder closure</p> <p>Team staffing: Review 3 years after folder closure</p>
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of department	
LOCATION HELD:	Meridio	

PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

1.15 Corporate Programmes and Projects

Major projects and cross office initiatives.

RETENTION PERIOD:	Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Relevant project sponsor	
LOCATION HELD:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

1.16 Complaints about ICO (office-wide)

Handling of external complaints about the ICO

1.16.01 Complaints from other Regulators

RETENTION PERIOD:	Electronic	Review 2 years after last action
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Operations	
LOCATION HELD:	CMEH and Meridio	
PERMANENT PRESERVATION:	Yes – certain cases only, in accordance with agreed criteria	
SENSITIVE PERSONAL DATA	Yes	

1.17 Learning and Development

Developing, delivering and monitoring an induction process for new staff, and developing, delivering and monitoring internal and external learning and development activities.

1.17.01 Further Education

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure
--------------------------	----------------------	-------------------------------------

		Personal Data: Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.17.02 Staff L&D records

RETENTION PERIOD:	Paper and Electronic	Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio and CIPHR	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.17.03 Management Development

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure Personal Data: Current employees: duration of
--------------------------	----------------------	--

		employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.04 Training Course Delivery

RETENTION PERIOD:	Paper and Electronic	Review 5 years after course is no longer delivered Personal Data: Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.05 Training Course Evaluation

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure Personal Data: Current employees: duration of employment + review after 6 years
--------------------------	----------------------	--

		Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.06 Personal Development Review

1.17.06.01 – Procedures, Forms & Templates

RETENTION PERIOD:	Electronic	Review 5 years from date superseded Personal Data: Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.06.02 to 1.17.06.06 Staff records

RETENTION PERIOD:	Paper and Electronic	Review 6 years from date of declaration Personal Data: Current employees: duration of employment + review after 6
--------------------------	----------------------	--

		years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
REFERENCES:	The National Archives Retention Scheduling: Employee Personnel Records	
SENSITIVE PERSONAL DATA	Yes	

1.17.07 Talent Management

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure Personal Data: Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.08 Training Projects

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure Personal Data: Current employees: duration of employment + review after 6
--------------------------	----------------------	--

		years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

1.17.09 Procurement

See 1.08 Contracts and Procurement

1.17.10 ISEB

RETENTION PERIOD:	Paper and Electronic	Review 5 years after course is no longer delivered Personal Data: Current employees: duration of employment + review after 6 years Former employees: Review 6 years after employee left ICO
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Organisational Development	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

2. Enquiries, Advice and Complaints Handling

The resolution of complaints and provision of advice.

Casework

Information relating to individual complaints and enquiries by post and email submitted under the Freedom of Information Act, Data Protection Act, Privacy and Electronic Communications Regulations, and Environmental Information Regulations.

RETENTION PERIOD:	Electronic and paper	Destroy 2 years after last correspondence
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Operations	
LOCATION:	CMEH ¹ and central filing system	
PERMANENT PRESERVATION:	Yes – certain cases only, in accordance with agreed criteria	
SENSITIVE PERSONAL DATA	Yes	

Physical evidence and voluminous information which is not scanned into CMEH:

RETENTION PERIOD:	Electronic and paper	Destroy 6 months after last correspondence
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Operations	
LOCATION:	CMEH ² and central filing system	
PERMANENT PRESERVATION:	Yes – certain cases only, in accordance with agreed criteria	
SENSITIVE PERSONAL DATA	Yes	

2.01 Service Adjustment Reviews

Service Adjustment reviews are convened to formally consider adjustments or restrictions to our services. Where a decision is made to adjust or restrict contact a record will be retained.

RETENTION PERIOD:	Paper and Electronic	Destroy 2 years after folder closure
--------------------------	----------------------	--------------------------------------

¹ Casework is stored on CMEH wherever possible. Casework information classified as Confidential or above (using the HMG Protective Marking scheme) cannot be stored electronically.

² Casework is stored on CMEH wherever possible. Casework information classified as Confidential or above (using the HMG Protective Marking scheme) cannot be stored electronically.

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Customer Contact
LOCATION:	Meridio and CMEH
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	Yes

2.02 Customer Contact – Responding to requests for advice

Procedures governing the Advice service

RETENTION PERIOD:	Paper and Electronic	<p>Review 2 years after folder closure then destroy</p> <p>Restricted contact entries – CMEH shell case destroyed 2 years after last contact</p> <p>Single point of contact entries – CMEH shell case destroyed 2 years after last contact</p> <p>Reasonable adjustments – CMEH shell case destroyed 2 years after last contact</p>
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Customer Contact	
LOCATION:	Meridio and CMEH	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

2.02.11 Information Access

The ICO's information request handling procedures.
 Requests handled outside CMEH – Meridio/manual

RETENTION PERIOD:	Electronic	<p>Destroy 5 years after folder closure.</p> <p>Emails received in the Information Governance</p>
--------------------------	------------	---

		Mailbox are retained for 6 months from the date of receipt. Destroy 2 years after last correspondence Section 29 / section 59 (2) (e) DPA requests: Destroy 6 years after last correspondence
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Customer Contact	
LOCATION HELD:	Meridio/Manual Storage	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

2.03 Decision Notices

The administration of the decision notice sign off process.

RETENTION PERIOD:	Paper and Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Performance Improvement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	Yes	

2.04 Complaints and Concerns

Information supporting the investigation and resolution of complaints made under the Data Protection Act, Freedom of information Act, Environmental Information Regulations and Privacy and Electronic Communications Regulations.

RETENTION PERIOD:	Paper and Electronic	Standard letters and templates: Destroy 2 years after folder closure
AUTHORITY:	Executive Team	

INFORMATION ASSET OWNER:	Head of Performance Improvement & Head of Customer Contact
LOCATION:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	Yes

2.05 FOI/EIR Appeals

The handling of appeals against ICO decisions under the Freedom of information Act, and Environmental Information Regulations.

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Freedom of Information	
LOCATION:	Meridio and Central Filing System	
PERMANENT PRESERVATION:	Yes	
REFERENCES	Limitation Act 1980	
SENSITIVE PERSONAL DATA	Yes	

2.06 Legal Casework Advice

Advice provided in relation to specific pieces of casework.

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
REFERENCES	Limitation Act 1980	
SENSITIVE PERSONAL DATA	No	

2.07 Customer Contact – Registrations

Administration of the Registration process.

RETENTION PERIOD:	Paper and Electronic	New registrations, changes, renewals, general enquiries, standard letters and procedures: Destroy 2 years after last correspondence. Lapsed database register entries: Destroy 2 years from the date of entry
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Customer Contact	
LOCATION:	Meridio, ICE and Finance Filing System	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

2.08 Publication Schemes Management

Development of model publication schemes and monitoring of compliance.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

3. Policy and Guidance Development and Establishment

Developing policy directly related to freedom of information, data protection and related legislation, including developing codes of practice responding to consultations and stakeholder liaison.

3.01 Policy engagement with stakeholders

Interaction with key stakeholders on matters relating to the interpretation of data protection and freedom of information law and regulation.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Strategic Liaison	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.02 Codes of practice

Developing Codes of Practice under the Data Protection Act and contributing to the development of Codes of Practice under the Freedom of Information Act.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.03 Guidance

Developing guidance under all of the legislation that the ICO regulates.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.04 Legislative Development

Policy input to the development of new legislation.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.05 Policy Research

Carrying out of research on policy issues either by the ICO or third parties commissioned by the ICO.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.06 International Legislative Developments, Policy and Co-operation

Work with international organisations to develop policy and formulate legislation at international level.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Data Protection	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

3.07 Internal Policy Advice

Providing advice to internal stakeholders on the interpretation of freedom of information, data protection, privacy and electronic communications, and environmental information law and guidance.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

3.08 Consultations, Inquiries and Select Committee evidence

Initiating and responding to consultations, and providing evidence to public inquiries and Parliamentary Select Committees.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

3.09 External consultations initiated by the ICO

See 3.8 above.

3.10 European and International Working Groups

Participating in international groups on the development of privacy and transparency law and regulation.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Director of Data Protection	
LOCATION:	Meridio	

PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

3.11 – 3.22 Legal Services – Policy and Guidance Development

Providing legal advice in relation to policy and guidance development.

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Policy Delivery	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

4. External Communications

Managing the ICO's external profile and activities to promote the ICO and its messages.

4.01 Communications and External Relations

Preparing and providing information to explain and publicise legislation or guidance that has already been produced.

4.01.01 Projects plans and campaigns

The planning and execution of projects to produce and distribute ICO publications in all formats.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure – retain if project is still live Retain 2 copies of any publications for ICO reference permanently.
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio and Communications Filing System	

PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

4.01.02 Image bank

Images used by the ICO in publications and communication materials.

RETENTION PERIOD:	Electronic	ICO staff: Review 2 years from declaration date ICO Events: Review 3 years from declaration date Abstract: Review 5 years from declaration date
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

4.01.03 Events and Conferences

Planning, holding and results of events held by ICO or attended to publicise guidance or advice.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

4.01.04 ICO Website and Online Communications

The development and management of the ICO website, including planning the structure of the website, drafting content and publishing web pages, monitoring, reviewing and updating website content.

RETENTION PERIOD:	Electronic	Website content: Current only Website updates: Destroy 7 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes. The National Archives regularly captures an image of the ICO website for permanent preservation.	
SENSITIVE PERSONAL DATA	No	

4.01.05 Market research

The collection and analysis of information about the ICO's target audiences for external communication.

RETENTION PERIOD:	Electronic and paper	Responses: Destroy 6 months after completion of market research project Tables: Destroy 2 years after completion of market research project Draft reports: Destroy 1 year after completion of market research project Presentations: Destroy 5 years after completion of market research project Final Report: Review 7 years after completion of market research project
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	

LOCATION HELD:	Meridio and Communications Filing System
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

4.01.06 Grayling Archive

Information relating to the ICO's external press office. Note this activity has now been brought in-house, see 4.01.11.

4.01.07 Public engagements

Planning and arranging ICO attendance at external events.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Relevant business owner	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

4.01.08 Political monitoring

Identifying and monitoring trends in political discourse that may impact on transparency and data protection regulation.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes	
SENSITIVE PERSONAL DATA	No	

4.01.09 Green Group

Assessing and managing the ICO's environmental impact.

RETENTION PERIOD:	Paper and Electronic	Destroy 2 years after folder closure
--------------------------	----------------------	--------------------------------------

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Chair of the Green Group
LOCATION:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

4.01.10 Regional office projects plans and campaigns

The planning and execution of communication activity specific to the ICO's Regional Offices.

RETENTION PERIOD:	Paper and Electronic	Destroy 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Corporate Affairs	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

4.01.11 Press office

The management of the media relations activity from 2010 when the press office function was brought in-house.

RETENTION PERIOD:	Paper and Electronic	Press cuttings: Destroy 3 years from date of publication NB – must be stored in hard copy Evaluation: Destroy 7 years after folder closure Draft Press releases: Destroy 1 month from approval Published Press Releases: Review 7 years after publication with a view to permanent preservation by the ICO
--------------------------	----------------------	---

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Corporate Affairs
LOCATION:	Meridio and Communications Filing System
PERMANENT PRESERVATION:	Yes
SENSITIVE PERSONAL DATA	No

4.02 Stakeholder Engagement and External Organisations Liaison

Meetings, speaking engagements, correspondence with businesses, government, parliamentarians and opinion formers, media to maintain good relations and receive feedback. For engagement on policy matters see 3.Policy and guidance development and establishment.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Strategic Liaison	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

4.03 Parliamentary questions

Responding to enquiries of a formal or official nature, such as, responding to parliamentary questions, writing briefings etc.

4.03.01 Parliamentary Questions (PQs)

ICO responses to oral and written PQs received from a government department.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure Note: (i) PQ information will appear in public domain in "Hansard" (ii) Retain duplicate of responses relating to major policy/procedural issues with relevant files
AUTHORITY:	Executive Team	

INFORMATION ASSET OWNER:	Head of Corporate Affairs
LOCATION:	Meridio
PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

5. Regulation and Enforcement

Taking enforcement action, conducting audits of good practice, investigating and prosecuting alleged criminal offences.

5.01 Audits, Advisory Visits and Workshops

Conducting audits, advisory visits and workshops aimed at educating organisations and improving the way that they process personal data. This includes research to develop audit programmes, outcomes reports and self-assessment toolkits.

RETENTION PERIOD:	Electronic	<p>Report and letter of engagement: Review 5 years after folder closure</p> <p>Audit correspondence, policies and working papers: Destroy 1 year after folder closure</p> <p>Research and related correspondence: Destroy 5 years after folder closure</p>
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Good Practice	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes - certain cases only, in accordance with agreed criteria	
SENSITIVE PERSONAL DATA	No	

5.02 Remedies and Resolutions

Informal resolution of compliance issues. Note – this process is now obsolete existing information is held in case files on CMEH.

5.03 Investigations

Investigating criminal offences under the Data Protection Act 1998 and the Freedom of Information Act 2000.

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure Cautions and undertakings – retained for 6 years from date of caution Search Warrants – retained for 6 years from date of application NOTE – forensic evidence should be retained in line with the investigation file Investigation data is held until it is decided whether or not to prosecute. If not the data is returned to the data controller
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes but section 55 DPA and section 77 FOIA only	
SENSITIVE PERSONAL DATA	Yes	

5.04 Enforcement and Civil Monetary Penalties (CMP)

Taking enforcement action and serving CMPs under the Data Protection Act, Privacy and Electronic Communications Regulations, Freedom of Information Act and Environmental Information Regulations.

Individuals complaints are handled in CMEH as casework (see 2 above).

RETENTION PERIOD:	Paper and	Review 6 years after folder closure
--------------------------	-----------	-------------------------------------

	Electronic	Investigation data is held until it is decided whether or not to prosecute. If not the data is returned to the data controller
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	Yes if they fit the casework preservation criteria in Annex A	
SENSITIVE PERSONAL DATA	Yes	

5.05 Prosecutions

The prosecution of offences under the Data Protection Act, Privacy and Electronic Communications Regulations, Freedom of Information Act and Environmental Information Regulations.

RETENTION PERIOD:	Paper and Electronic	Review 6 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

5.06 Non Registration

Investigating organisations not registered with the Information Commissioner under the Data Protection Act and taking action where appropriate.

RETENTION PERIOD:	Electronic	Destroy 2 years after last correspondence
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	

PERMANENT PRESERVATION:	No
SENSITIVE PERSONAL DATA	No

5.07 Intelligence Hub

Intelligence obtained from sources inside and outside the ICO to support the Enforcement and Operations functions.

RETENTION PERIOD:	Paper and Electronic	Review 5 years after folder closure
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	Yes	

5.07.07 PECR SBN

Personal data breaches reported to the ICO by electronic communications service providers under regulation 5A of Privacy and Electronic Communication (EC Directive) Regulations 2003

Logs and breach reports where no further action is taken by the ICO

RETENTION PERIOD:	Electronic	Destroy 2 years after breach report
AUTHORITY:	Executive Team	
INFORMATION ASSET OWNER:	Head of Enforcement	
LOCATION:	Meridio	
PERMANENT PRESERVATION:	No	
SENSITIVE PERSONAL DATA	No	

Logs and breach reports where regulatory action is taken

RETENTION PERIOD:	Electronic	Review 6 years after folder closure
--------------------------	------------	-------------------------------------

Title: ICO Retention Schedule

Author: Lesley Bett

Version: 3.0

Date: 30/07/2015

AUTHORITY:	Executive Team
INFORMATION ASSET OWNER:	Head of Enforcement
LOCATION:	Meridio
PERMANENT PRESERVATION:	Yes
SENSITIVE PERSONAL DATA	No