

Retention and Disposal Schedule

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Schedule

	Retention Trigger	Retain For	Action	Retention Source	Information Asset Owner
Regulatory					
Appeals Information Tribunal	Case Closed	6 years	Review	Limitation Act 1980	Director of Legal Services (regulatory enforcement)
All Criminal Enforcement Case	Case Closed	6 years	Review	Limitation Act 1980	Director of Investigations, Director of High Priority Investigations & Intelligence
Civil Enforcement case where action was taken	Case Closed	6 years	Review	Limitation Act 1980	Director of Investigations, Director of High Priority Investigations & Intelligence
Civil Enforcement Case where no action taken	Case Closed	2 years	Destroy	Business Need	Director of Investigations, Director of High Priority Investigations & Intelligence
HPI case where action was taken	Case Closed	6 years	Review	Limitation Act 1980	Director of High Priority Investigations & Intelligence

HPI case where no action taken	Case Closed	2 years	Destroy	Business Need	Director of High Priority Investigations & Intelligence
Gathered Intelligence	Entered onto Intelligence Log	6 years	Review	Business Need	Director of High Priority Investigations & Intelligence
Data Protection and FOI Complaints	Case Closed	2 years	Destroy	Business Need	Director of Public Advice & DP Complaints, Director of FOI Complaints & Compliance
Data Protection and FOI Complaints Physical items (<i>items which cannot be scanned or returned</i>)	Case Closed	6 months	Destroy	Business Need	Director of Public Advice & DP Complaints, Director of FOI Complaints & Compliance
Cases relating to Section 159 of the Consumer Credit Act 1974	Case Closed	6 years	Destroy	Limitation Act 1980	Director of Public Advice & DP Complaints
Audit and Engagement Reports	Case Closed	6 years	Review	Business Need	Director of Regulatory Assurance
Audit and Engagement supporting audit documents	Case Closed	6 years	Destroy	Business Need	Director of Regulatory Assurance
Audit and Engagement supporting project documents	Case Closed	3 Years	Destroy	Business Need	Director of Regulatory Assurance

	IPA audits and supporting audit documents	Case Closed	6 years	Review	Business Need	Director of Regulatory Assurance
	IPA related documents and correspondence	Document created	6 years	Review	Business Need	Director of Regulatory Assurance
	NIS related documentation	Document created	6 years	Review	Business Need	Director of Regulatory Assurance
	Data Protection Fee Information	Lapsed payment	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services
	Breach Report - No action taken	Case Closed	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services
	Breach Report – where action was taken	Case Closed	6 Years	Review	Limitation Act 1980	Director of Digital, IT and Customer Services
	Communications Data	Document created	5 Years	Review	Home Office: Communications Data Code of Practice	Director of Investigations, Director of High Priority Investigations & Intelligence
Internal Regulatory Activities						
	Information created in relation to new policies, guidelines and research. This information has been created internally to guide decision making. This relates to	Last Action	6 years	Review	Business Need	Directors of the Regulatory Strategy Service, Director of Technology and Innovation Service, Director of High

	any final drafts and significant supporting information					Priority Investigations and Intelligence and Director of Regulatory Assurance
Stakeholder Engagement						
	First Line Advice Services	Case Closed	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services, Director of Regulatory Strategy (Parliament & Government Affairs), Director of Public Advice & DP Complaints
	Engagement with significant stakeholders: <i>This will include government departments, large companies and charities as well as international work.</i>	Last Action	6 years	Review	Business Need	Directors of the Regulatory Strategy Service, Director of Technology and Innovation Service, Director of Investigations, Director of High Priority Investigations and Intelligence, Director of Regulatory Assurance, Director of Public Advice & DP Complaints, Director of FOI Complaints & Compliance

Engagement with less significant stakeholders: <i>Advice provided to smaller organisations with the advice only affecting small numbers.</i>	Last Action	3 years	Review	Business Need	Directors of the Regulatory Strategy Service, Director of Technology and Innovation Service, Director of Investigations, Director of High Priority Investigations and Intelligence, Director of Regulatory Assurance, Director of Public Advice & DP Complaints, Director of FOI Complaints & Compliance
Guidance for External Use	Superseded	6 years	Review	Business Need	Directors of the Regulatory Strategy Service, Director of Technology and Innovation Service, Director of Regulatory Assurance
Data Privacy Impact Assessments	Last Communication	6 years	Review	Business Need	Director of Technology and Innovation Service
Finalised Binding Corporate Rules	End of Contract	6 years	Review	GDPR (Article 47(2)(k))	Director of Regulatory Assurance

	BCR Initial Assessment Supporting Documents	National Authorisation	2 years	Review	Business Need	Director of Regulatory Assurance
	BCR Point of Contact and Legal Representation details	After each annual update	12 months	Review	Business Need	Director of Regulatory Assurance
	Consultations: <i>The ICO gathers information externally through an open consultation in relation to a policy they are developing</i>	Policy Published	As soon as policy published	Destroy	Business Need	Directors of the Regulatory Strategy Service, Director of Technology and Innovation Service and Director of Regulatory Assurance
	Sandbox – key documents	Last Action	7 years	Review	Business Need	Director of Regulatory Assurance
	Sandbox – supporting documents	Last Action	1 year	Review	Business Need	Director of Regulatory Assurance
Corporate Governance						
	Memorandum of Understanding	End of Understanding	6 years	Destroy	Business Need	Director of Corporate Affairs and Governance
	Internal Committees and Groups minutes	Minutes Agreed	6 years	Review	Business Need	Director of Corporate Affairs and Governance
	Commissioner's Delegated Authority, Briefings, Decision Notes and Legal Advice	End of Commissioner's Term	6 years	Review	Business Need	Director of Corporate Affairs and Governance

	Corporate Governance Support	Last Action	3 years	Review	Business Need	Director of Corporate Affairs and Governance
	Organisation wide Corporate Plans, Policies, Business Continuity, Risk Management and Strategies	Superseded	3 years	Review	Business Need	Director of Corporate Affairs and Governance
	Elected Members Correspondences to the Commissioner	End of Commissioner's Term	3 years	Review	Business Need	Director of Corporate Affairs and Governance
	Corporate Roles and Responsibilities	Superseded	6 years	Review	Business Need	Director of Corporate Affairs and Governance
Corporate Functions						
	Health and Safety Inspections, Property Management and Asset Records	Last Action	6 years	Review	The National Archives Retention Scheduling: Departmental Accounts, Health and Safety at Work Act 1974 and supporting Regulations, Limitation Act 1980,	Director of Resources
	Documents relating to IT system integral to their running and long term use	End of System Life	12 months	Review	Business Need	Director of Digital, IT and Customer Services
	Records and Information Management	Last Action	3 years	Review	Business Need	Director of Corporate Affairs and Governance

IT Infrastructure	Last Action	3 years	Review	Business Need	Director of Digital, IT and Customer Services
Information Security	Last Action	6 years	Review	Business Need	Director of Corporate Affairs and Governance, Director of Digital, IT and Customer Services
Information Requests (<i>Including MP request not dealt with directly by the Commissioner</i>)	Case Closed	2 years	Destroy	Business Need	Director of Corporate Affairs and Governance
Projects and Corporate Programmes	Last Action	3 years	Review	Business Need	Director of Digital, IT and Customer Services
Building Reports, Risk Assets, Helpdesk and Security Reports	Last Action	3 years	Review	Limitation Act 1980	Director of Resources
IT Back ups	Last Action	6 months	Destroy	Business Need	Director of Digital, IT and Customer Services
System Audit Logs	Last Action	12 months	Destroy	Business Need	Director of Digital, IT and Customer Services
Casework Performance Management Information	Last Action	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services

	CCTV	Last Action	1 month	Destroy	ICO CCTV Policy	Director of Resources
	Reception Sign in Book	End of Year	2 year	Destroy	Business Need	Director of Resources
	Google Analytics Reports	Last Action	38 months	Destroy	Business Need	Director of Digital, IT and Customer Services, Director of Corporate Affairs and Governance
Finance						
	Financial Information	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of Resources
	Payroll Capita Reports	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of Resources
Human Resources						
	Employee Files and Personal Development Records	End of Employment	6 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of Resources
	Disciplinary and Grievance, Examination and Testing, Accident and Ill Health	Last Action	6 years	Destroy	Limitation Act 1980	Director of Resources
	Job Descriptions and Terms & Conditions	Last Action	6 years	Destroy	Limitation Act 1980	Director of Resources
	Training Material	Superseded	6 years	Destroy	Limitation Act 1980	Director of Resources

Political Declarations	Superseded or End of Employment	6 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of Resources
Industrial Relations	Last Action	6 years	Destroy	Limitation Act 1980	Director of Resources
Payroll Sheets	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of Resources
General Annual Leave Information	End of Financial Year	3 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of Resources
Maternity, Paternity, Adoption and Sick Leave	End of Financial Year after return	3 years	Destroy	Statutory Sick Pay (General) Regulations 1982 Statutory Maternity Pay (General) Regulations 1986 Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002	Director of Resources
Successful Recruitment Candidate Information <i>(including third party referee details provided by the applicant)</i>	End of Employment	6 months	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of Resources

	Unsuccessful Recruitment Candidate Information <i>(including third party referee details provided by the applicant)</i>	Last Action	6 months	Destroy	Limitation Act 1980	Director of Resources
	Staff Pension, Pay History, and Termination Reasons	From DOB	100 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of Resources
	Health Surveillance	Last Action	40 years	Destroy	Health and Safety at Work Act 1974	Director of Resources
	Third party emergency contact details provided by the staff member	End of Employment	Immediate	Destroy	Business Need	Director of Resources
	Equality and Diversity Published Information	Last Action	6 years	Review	Public Sector Equality Duty	Director of Resources
	Marriage Certificate and Documents relating to Civil Registration	From DOB	100 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of Resources
	Medical/Self Certificates – unrelated to industrial injury	End of absence	4 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of Resources
Corporate Communications and Marketing						
	Market Research Reports, Press Releases, Campaigns and Projects, Informer and Image Banks	Last Action	6 years	Review	Business Need	Director of Corporate Affairs and Governance
	Staff Events and Briefings, Public Engagement and Political Monitoring	Last Action	3 years	Review	Business Need	Director of Corporate Affairs and Governance

	Conference Delegate Lists	Last Action	400 days	Destroy	Business Need	Director of Corporate Affairs and Governance
	Webinar Registration	Webinar Completed	1 month	Destroy	Business Need	Director of Corporate Affairs and Governance
	Journalist Information	Request of the Journalist to remove their information	Instant once requested	Destroy	Business Need	Director of Corporate Affairs and Governance
	Communications with Journalists	12 months after creation	12 months	Destroy	Business Need	Director of Corporate Affairs and Governance
	Requests for Publications	Creation	4 weeks	Destroy	Business Need	Director of Corporate Affairs and Governance
Legal						
	Legal Advice	Last Action	6 year	Review	Limitation Act 1980	Director of Legal Services (Regulatory Enforcement), Director of Legal Services (Policy and Commercial)
	Enforcement Legal Cases	Case Closed	6 years	Review	Business Need	Director of Legal Services (Regulatory Enforcement)

	Contracts	End of Contract	6 years	Review	The National Archives Retention Scheduling: Contractual Records	Director of Legal Services (Policy and Commercial)
	Unsuccessful Tenders	Last Action	400 Days	Review	The National Archives Retention Scheduling: Contractual Records	Director of Resources
	Building Contracts and Leases	End of Contract	12 years	Review	Limitation Act 1980	Director of Legal Services (Policy and Commercial)
	Non-disclosure agreements	Last Action	2 years	Review	Business Need	Director of Legal Services (Policy and Commercial)
	Trademark documents	Last Action	6 years	Review	Business Need	Director of Legal Services (Policy and Commercial)
	Case summaries and background documents	Last Action	6 years	Review	Business Need	Director of Legal Services (Policy and Commercial)
Communication Activities						
	Staff Mailboxes and Outlook	Creation	12 months	Destroy	Business Need	

	Physical Correspondence	Once Scanned	6 months	Destroy	Business Need	Communications which may not directly fall under a function
	Internal Email Mailboxes	Creation	12 months	Destroy	Business Need	
	Customer Email Boxes	Creation	12 months	Destroy	Business Need	
	External Email Mailboxes	Creation	12 months	Destroy	Business Need	
	Unified Comms Instant Messages	Creation	7 days	Destroy	Business Need	
	Other Instant Messages	Creation	7 days	Destroy	Business Need	
	GCI/Touchpoint Live Chat Transcriptions	Creation	100 days	Destroy	Business Need	
	Goss Live Chat Transcriptions	Creation	2 years	Destroy	Business Need	
	Calling Line Identification	Creation	90 Days	Destroy	Business Need	
	Your Data Matters Pledge	Creation	Email Address: 1 month Name and Organisation: 12 months	Destroy	Business Need	
Organisation Wide						
	Significant Draft Versions: <i>The draft versions of policies, advice and guidelines for significant areas of work</i>	Last Action	3 years	Review	Business Need	These are generic documents which sit within all departments for filling similar roles. Therefore there isn't a specific Information Asset Owner for this
	Less Significant Draft Versions: <i>General drafts of documents created for less significant work</i>	Last Action	12 months	Review	Business Need	

	Internal Audits	Creation	3 years	Destroy	Business Need	set of information, each owner's departments will have their own versions of these documents for which they will be the owner of.
	Internal Guidance and Lines to Take	Creation	6 years	Destroy	Business Need	
	Templates, Procedures, Team Information and Team Meetings	Last Action	3 years	Review	Business Need	
	Annually Renewed Documents	End of Financial Year	3 years	Review	Business Need	
	Department Logs and Registers	Last Action	12 months	Review	Business Need	
	Team Administration	Creation	3 years	Review	Business Need	
	Management Information	End of Financial Year	6 years	Review	Business Need	
	General Content Types (SharePoint)	Last Action	12 months 3 years 6 years	Review	Business Need	
	Mobile device information for visitor Wi-Fi use	Creation	90 day	Destroy	Business Need	
Transfer to The National Archives						
	Information detailing what has been sent to the National Archives (not transferred)	Last Action	6 years	Review	The National Archives Information Management Guidance	Director of Corporate Affairs and Governance

Section 170 DPA and Section 77 FOI	Case Closed		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Publications and Material	Creation		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Management Board Minutes	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Senior Leadership Team Minutes	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Executive Team Minutes	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Upper Tribunal Case and Court of Appeal	Case Closed		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
ICO Constitution	Superseded		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Office Wide Strategic Plans	Superseded		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance

Department of Culture, Media and Sport	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Delegated Authority	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Legal Advice to Commissioner (where it is directly relevant to information rights policy)	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
High Profile Casework (Further guidance provided)	Case Closed		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
PECR Breach Logs	Superseded		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Interactions with key stakeholders in relation to interpreting Data Protection and Freedom of Information Act, Code of Practice relating to acts, legislative development and significant internal advice	Last Action		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance
Civil Monetary Penalty Cases	Case Closed		Prepare for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Affairs and Governance