



Data Retention & Destruction Policy

North East Local Enterprise Partnership

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1. Introduction

This Policy sets out the North of Tyne Combined Authority's approach and procedural arrangements for managing its data, making specific reference to the retention and disposal of its data (in whatever form – whether paper or electronic) and provides a standardised approach across NTCA and each of its operations.

Equally, the Combined Authority is required to comply with statutory obligations, for example:

- **compliance** with applicable Data Protection laws and the individual rights to access to information;
- the **expectations of stakeholders** that records are not retained for longer than is necessary;
- allow people to have **appropriate access** to the data we hold about them;
- responsibility to obtain the **consent** of people we collect information about; and
- respond to requests from individuals for **personal data to be erased** (also known as 'the right to be forgotten') or corrected.

These statutory obligations are underpinned by our commitment to the highest standards throughout our information governance principles (this is the collection, storage, security, use, appropriate release and destruction in relation to data). Our three principles noted below, support this commitment:

Responsible: A clear commitment to acting lawfully and properly at every stage.

Empowered: By knowing what data we hold and why we hold it and by ensuring that our employees understand their responsibilities and are empowered to take action to meet our data responsibilities, and to ensure we are best able to meet our commitments.

Clear: We are clear about what data we collect and why we collect and use it, and we are able to provide this information to both our employees and the public to support our commitment. We are also clear with our suppliers and stakeholders about these matters.

2. Purpose

The purpose of this policy is to:

- i. Ensure proper management of our data in line with the current legislative frameworks.
- ii. Demonstrate public accountability through the proper retention of data and by demonstrating that disposal decisions are taken with proper authority and in accordance with due process.
- iii. Identify the relevant information asset owner (by job title) for each type of organisational data.
- iv. Assist in identifying data that may require preserving permanently.
- v. Assist in identifying data that does not need to be captured.
- vi. Prevent the premature destruction of data that may need to be retained for a specific period to satisfy legal, financial and any other requirements.
- vii. Provide consistency for the destruction of those data which are not required to be retained permanently.
- viii. Ensure proper access to information whilst protecting personal rights as required by law.

3. Aim

This policy provides a clear set of procedures which will ensure employees and other users of the Combined Authority's information systems understand, manage and implement the retention and destruction of data consistently and that all actions taken are fully documented. The accompanying Retention and Destruction Schedule at **Appendix 1** explains the life cycle of the data held by NTCA.

An indication of data that does not need to be captured is set out at **Appendix 2**.

4. Scope

The Schedule identifies the retention and disposal arrangements for all types of data created, received or maintained by individual employees and external service providers¹ where they are processing data on NTCA's behalf.

It is intended to provide a consistent approach which meets legal standards and ensures that key documents can be retrieved when needed.

Retention periods apply to all formats on which they are created and the devices on which they are stored. Data in electronic format must be maintained in the same way as hard copy or paper documents containing that data and in accordance with the Retention Schedule. Examples include, but are not limited to:

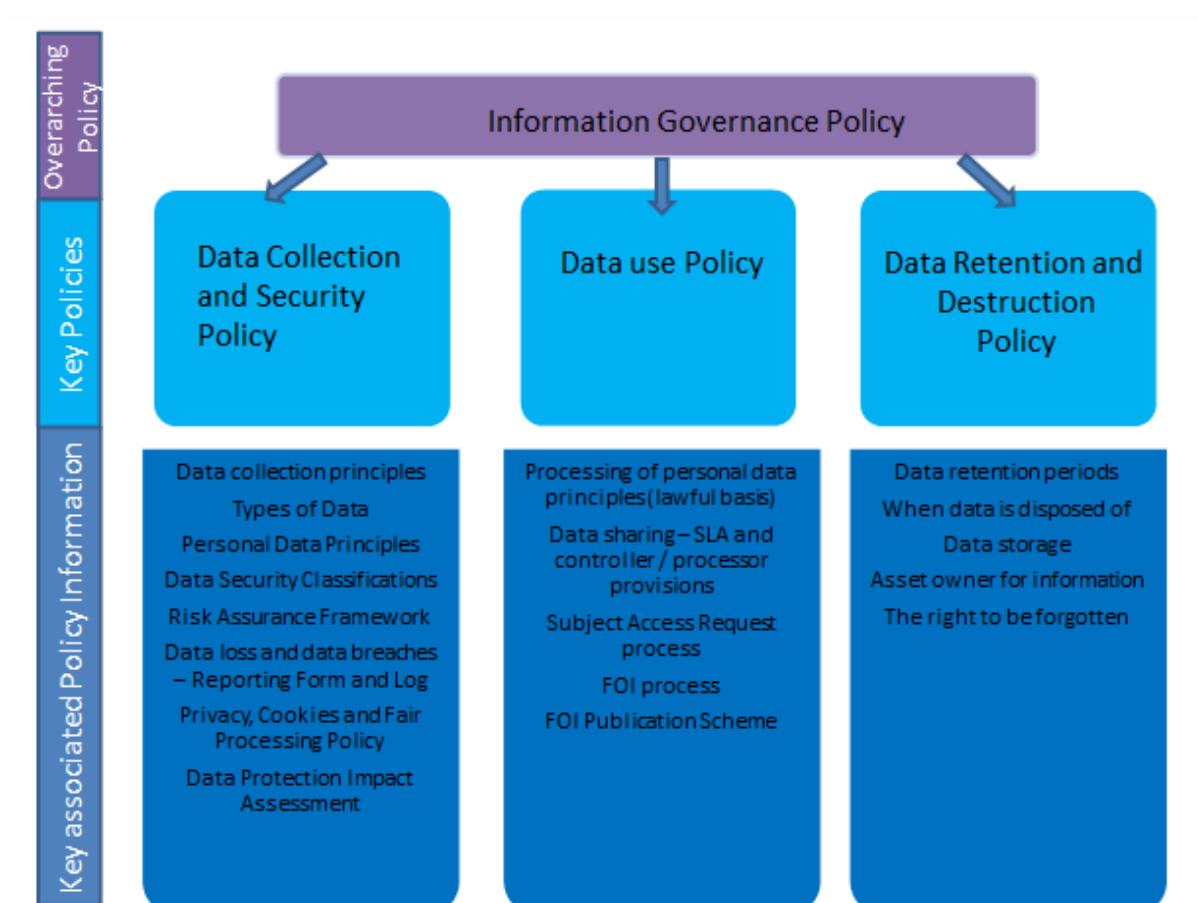
- Paper-based data;
- Emails, databases, Word documents, PowerPoint presentations, spreadsheets, scanned documents and webpages;
- Financial information including invoices, statements and reports;
- Legal documents such as contracts and deeds;
- Data about recruitment activities including applications, CVs, references, DBS checks;
- Various types of project applications and grants, including forms, plans, drawings;
- Photographs, scanned images;
- Lap-tops, mobile phones, USBs, CD-ROMs etc.

¹ Where information is shared with other bodies (ie Partners and Contractors working with NTCA or constituent authorities on behalf of NTCA), we will obtain assurances that they have adequate procedures for records to ensure that the information is managed in accordance with the relevant legislation and regulatory guidance.

5. Information Governance Policy Framework

As described in the Information Governance Policy the Framework as shown below has been developed to cover all aspects of Information Governance.

The Retention and Destruction Policy forms part of this framework of standards, policies, procedures and guidance developed to support effective information governance.



6. Operation of the Policy and Retention and Disposal Schedule

In order for the retention and disposal schedule to operate effectively, it is important for all employees to ensure that:

- All data is collected properly and lawfully, following our Data Collection and Security Policy.
- Data is given a security classification and appropriately stored and secured in accordance with our Data Collection and Security Policy.
- Data stored in electronic documents is given a short but meaningful name in order that the nature of the data is clear and can be found and identified easily.
- Data is only retained for as long as is necessary (in accordance with this policy) and is disposed of correctly.

7. Categories for Retention/Disposal

The Schedule attached to this policy provides a clear framework to help determine whether a particular set of data should be retained, disposed or destroyed.

Decisions relating to the retention and disposal of data should be taken in accordance with this policy. Appendix 1 sets out the length of time that data should be retained and the processes for disposing of data at the end of the retention period.

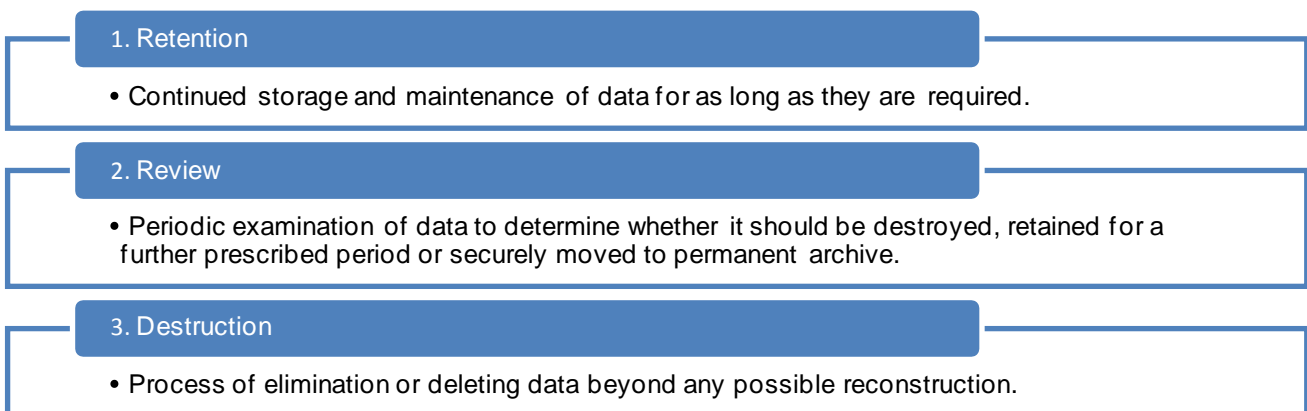
The retention periods are based upon specific business need in addition to the regulatory environment within which NTCA operates. The retention period required for each type of file is calculated from the point the file is closed.

The primary factors that inform decisions on retention are:

- Business need;
- Legislative and regulatory requirements;
- National Archives requirements or guidelines.

The Information Asset Owner is responsible for identifying and ensuring the disposal of obsolete data as determined in the Retention and Destruction Schedule outlined in Appendix 1.

Records on disposal will fall into three main categories:



All employees are responsible for ensuring that data is disposed of in the following ways:

- *Unclassified data* - i.e. records that are clearly in the 'public domain' can be placed in a normal rubbish/recycle bin or permanently deleted from IT systems;
- *Official Sensitive and Official Confidential data (as described in the Data Use and Collection Policy (Data Classifications section))* - information destroyed in line with the organisation's agreed arrangements for disposal of confidential files (for example using an approved contracted document disposal company or shredded immediately on-site) – see **Appendix 3**;
- *Electronic records* are permanently deleted from the system (to include hard-drives and remotely wiping data from mobile phones).

All copies including drafts or back-up copies should be destroyed at the same time and in the same way.

All employees must also return work laptops, mobile phones and other mobile devices prior to leaving employment in order that they can be de-activated and all data removed.

8. Personal Data

The Combined Authority applies Data Protection laws in regards to personal data. Our Privacy, Cookies and Fair Processing Policy details the rights of individuals, which links to our fair processing notices. It is important to remember that data protection laws state that an individual can request:

- corrections to their personal information if it is inaccurate or incomplete; and
- to have personal data which an organisation holds on them deleted (also known as 'right to be forgotten')

In accordance with our policy we will delete an individual's personal data if:

- the personal data is no longer necessary for the purpose it was originally collected or processed;
- the individual subsequently withdraws their initial consent allowing use of their personal data;
- there is no overriding legitimate interest to continue processing their personal data;
- personal data is being processed for the purposes of direct marketing and the individual objects to this;
- the personal data has been processed unlawfully;
- it is necessary in order to comply with a legal obligation

This is any data which relates directly to an individual and can be linked directly to them. For example, this includes: name, phone number, email address, photographs, genetic and economic data.

NTCA is required to respond to all requests to be forgotten within one month of receipt. Requests can be made to any employee either verbally or in writing. Please view our Privacy, Cookies and Fair Processing Policy for further information.

All employees are responsible for forwarding any request to be forgotten (including those to have personal data amended or corrected) onto the Senior Information Risk Officer and Data Protection Officer as a matter of urgency and to ensure we comply within the required timescales (one month).

The **Senior Information Risk Officer** and Data Protection Officer will then be responsible for:

- **considering the request** and making the decision as to whether the right to be forgotten is applicable and/or take action to correct inaccurate or incomplete personal information;
- the **formal response** to the individual concerned; and
- **informing other organisations** about the deletion/correction of personal information where appropriate.

9. Roles and Responsibilities

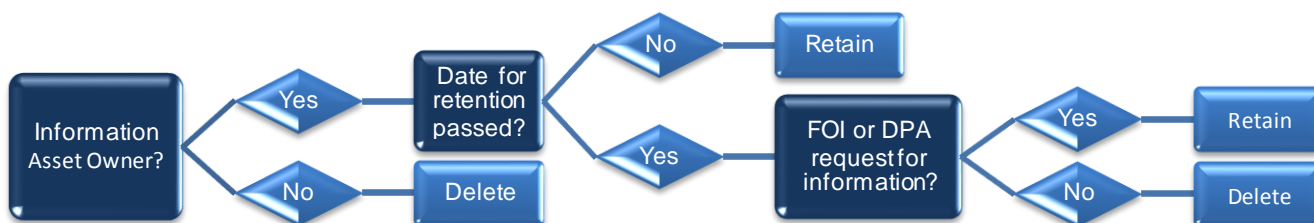
All employees have responsibility for ensuring data is retained and/or destroyed in line with this policy and for ensuring that the highest standards and good practice are maintained when carrying out these activities.

Further information about the different roles of employees is set out in the Information Governance Policy, the purpose of which is to ensure everyone understand their responsibilities and who to refer to if an employee is unsure about any matter and requires clarification.

Each type of data has one Information Asset Owner who is responsible for classification and security. No information system will be put into production before the Information Asset Owner is determined. In case of dispute of ownership, the Senior Information Risk Officer decides.

One of the key advantages is that no other employee is required to hold the data other than the Information Asset Owner. Therefore, **if you are not the Information Asset Owner you are free to delete any copy of the data because you can be confident that the organisation still holds it.**

Decision Tree



Information Asset Owners are supported by the Senior Information Risk Officer working in conjunction with the Data Protection Officer.

Every employee, however, continues to have a responsibility to hold data securely and take care to ensure data is held appropriately and securely.

10. Audit and Review

There is no need to document the disposal of records which have been listed on the retention schedule.

If the Freedom of Information Officer or Senior Information Risk Officer instructs you to retain data because of FOI, Subject Access Requests or legal challenge, they will keep a record of this for audit purposes.

There will be occasions where particular data is held and subject to systematic and regular review; this will ensure data likely to be required for the purposes of business continuity and/or permanent preservation is not destroyed. In addition, data held will be subject to periodic review to ensure the data is accurate and up-to-date. The Senior Information Risk Officer will carry out these periodic reviews and monitoring of data to ensure everyone continues to maintain the highest standards of compliance in relation to this policy.

11. Reporting Breaches

Further information relating to data incidents (breaches) and reporting is set out in the Data Collection and Security policy.

A data incident includes the accidental or unlawful destruction or loss of available personal data.

When a security incident takes place employees must report this immediately to the SIRO and DPO in order that it can be quickly established whether a personal data breach has occurred. This will ensure steps are taken promptly to address it; that the Commission is informed where appropriate; and a formal record of the data breach is kept to include the remedial action taken to ensure similar incidents are prevented.

12. Monitoring

Responsibility for monitoring the retention and destruction policy rests with the Senior Information Risk Officer. The policy will be reviewed annually and shared with SMT for approval

APPENDIX 1 – Retention and Destruction Schedule

- The following explains the life cycle of classes of data collected, stored and used by NTCA.
- If you cannot identify the relevant class of data or are unsure which is correct please contact the Data Protection Officer **before** taking any action.

Business Support and Management

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

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
NTCA Constitution	Updated annually	Retained permanently	Monitoring Officer
NTCA Order (for information only)	Duration of Order until changed by Statute	Retained permanently	Not owned by NTCA
North East LEP Host Authority and Accountable Body Agreement	Duration of Agreement and 6 years after superseded/terminated	Dispose	Monitoring Officer
Strategic Economic Plan	Duration of plan until superseded (or 12 years)	Dispose	Head of Paid Service
Service Level Agreements (including any contract variations, notices /correspondence, performance and notes of meetings)	Termination of contract/ financial year in which contract terminated plus 6 years (unless a Deed and then plus 12 Years)	Dispose	Monitoring Officer
Officer decision records	12 years from the end of the financial year in which the decision is made	Dispose	Monitoring Officer
Delegated decisions	12 years from the end of the financial year in which the decision is	Dispose	Monitoring Officer

	made		
Formal consultations and responses	12 years from the end of the financial year in which the consultation is completed or responses finalised	Destroy	Head of Paid Service
Electronic (Digital) signatures	Whilst employed	Destroy on leaving employment.	Relevant signatory

Legal and Monitoring Officer

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Legal advice received from external solicitors/counsel	6 years	Retained in-house for reference purposes. Destruction to be determined on Review.	Monitoring Officer
Litigation papers (court documents, instructions to counsel)	6 years	Retained in-house for reference purposes. Destruction to be determined on Review.	Monitoring Officer
Legal team internal working papers/research briefing notes and advice provided	6 years	Retained in-house for reference purposes. Destruction to be determined on Review.	Monitoring Officer (see also SLAs)
External legal correspondence	6 years	Retained in-house for reference purposes. Destruction to be determined on Review.	Monitoring Officer
Sealing book/contract register	Permanent	Originals to be kept permanently.	Monitoring Officer
Insurance policies	Indefinite	Recorded destruction. Destroyed under confidential conditions.	Chief Finance Officer
Insurance claims	Indefinite	Recorded destruction. Destroyed under confidential conditions.	Chief Finance Officer
Certificate of employers liability insurance	Indefinite	Recorded destruction. Destroyed under confidential conditions.	Chief Finance Officer
GDPR consents, register of	Active document	Remove all contact records where consent is withdrawn and destroy under confidential conditions.	Monitoring Officer

Policy, Strategy and Public Affairs

To include correspondence (and associated documentation) and agreements entered into with third party organisations.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Board and Committee Meetings (Minutes and papers)	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Partnership and Agency Meetings (where NTCA owns the record)	2 years from the end of the project or partnership	Destroy	Relevant Service Director
External Committee Meetings (where NTCA does not own the record but holds as participant)	3 years	Destroy after last action completed	Relevant NTCA representative
Parliamentary questions	25 years	Destroy	Monitoring Officer
MP Briefings	25 years	Destroy	Head of Paid Service
Leadership Briefings	25 years	Destroy	Head of Paid Service
Internal Briefings	7 years	Destroy	Head of Paid Service
Members/Officers Contact information (Committees)	Active document	Remove all contact records where no longer a member and destroy under confidential conditions.	Monitoring Officer
Memorandums of Understanding with public bodies	6 years after memorandum created	Destroy	Monitoring Officer
Annual Governance Statement	7 years from the end of the financial year after the one to which it relates	Destroy	Chief Finance Officer
Annual Report and Accounts	Life of organisation	Destroy	Chief Finance Officer
Annual Consolidated report to Leadership Board	25 years	Destroy	Head of Paid Service
Statutory Returns	25 years	Destroy	Head of Paid Service
Enquiries and Complaints	6 years	Destroy	Head of Paid Service
Marketing (to inc materials and mailing lists)	Active database	Remove all contact records where no longer a member and destroy under confidential conditions.	Head of Paid Service
Mailing Lists (record of request to be unsubscribed)	1 year from date of entry (to allow time for audit and challenge)	Destroy under confidential conditions.	Head of Paid Service

Democratic Services

All aspects of administration and governance of the Combined Authorities key committees and boards including Register of Interests, delegation of authority and correspondence with elected members.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Committee Terms of Reference	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Committee agendas	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Committee papers	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Committee minutes and decisions	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Rules of procedure and budgetary management	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Conflicts/Declarations of Interest Register	Life of organisation	Transfer to a place of deposit after administrative use is concluded	Monitoring Officer
Gifts and Hospitality Register	6 years after entry	Destroy under confidential conditions	Monitoring Officer
General formal correspondence to NTCA	6 years	Destroy under confidential conditions	Head of Paid Service

Human Resources

The management of NTCA employees and administration of employee related activities such as recruitment, disciplinary and grievances to include records of recruitment exercises, job descriptions, terms and conditions of employment.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Organisation charts	Whilst relevant	Destroy	Head of Paid Service
Policies and procedures related to the recruitment and employment of staff	Superseded plus 10 years	Destroy	Head of Paid Service
Pay and Grading Framework and relating documents	Whilst relevant	Destroy	Head of Paid Service
Authorisation to recruit	3 years	Destroy 3 years after recruitment finalised	Head of Paid Service
Job Descriptions	6 years	Destroy 6 years after superseded	Monitoring Officer
Recruitment (unsuccessful candidates), documents relating to unsuccessful candidates: Applications forms Interview notes Outcome of tests/exercises References Verification documentation (eg ID/right to work and qualifications)	7 months after recruitment finalised	Destroy under confidential conditions	Monitoring Officer
Speculative applications (eg Curriculum Vitae)	Do not retain – direct to recruitment website	Do not retain and destroy under confidential conditions	
Selection documentation (eg shortlisting grid)	7 months after recruitment finalised	Destroy under confidential conditions	Monitoring Officer
Secondments – documentation relating to process of secondments (internal/external)	6 years after termination (in respect of employees) or 6 years after end of secondment (for those external)	Destroy under confidential conditions	Monitoring Officer
Performance management framework	When superseded	Destroy	Head of Paid Service
Disciplinary/grievance/capability investigation report	Retain records for 6 years from termination of employment	Destroy under confidential conditions	Head of Paid Service
Processing of disciplinary investigations where outcome is no formal action	Retain until investigation concluded	Destroy under confidential conditions	Head of Paid Service

Processing of grievance investigations where outcome is no formal action	Retain until process concluded (including any appeal)	Destroy under confidential conditions	Head of Paid Service
Processing of disciplinary and grievance investigations where outcome is case to answer	<ul style="list-style-type: none"> • <i>Oral warning</i> retain for 6 months • <i>Written warning</i> retain for 12 months • <i>Final warning</i> retain for 18 months 	Destroy under confidential conditions	Head of Paid Service
	Note: any disciplinary warnings involving children to be kept on personnel file permanently		
Termination of Employment	Until employee age 75 (if retired in-service) or 7 years after termination (whichever is the latest)	Retention required by LG Pension Scheme. Then destroy under confidential conditions	Head of Paid Service
Tribunal case files	Close of case plus 6 years	Destroy under confidential conditions	Head of Paid Service
Employee and Industrial Relations (inc Trade Union liaison and joint projects groups)	6 months	Destroy 6 months after completion of last action	Head of Paid Service
Equal Opportunities questionnaire	Do not retain	Records anonymised statistics only.	
Training and Development	Created plus 5 years	Destroy under confidential conditions	Head of Paid Service

Employee Records

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
<p>Records relating to Recruitment (where applicant is successfully employed by organisation):</p> <ul style="list-style-type: none"> • Written particulars of employment, including contract of employment • Job history – consolidated record of whole career • Record of previous service dates • References • Qualifications • Health declaration • Health referrals, including medical reports from doctors and consultants • Papers relating to any injuries whilst carrying out role • Unpaid leave periods • Pension estimate and awards • Resignation, termination and/or retirement letters • Added years • Additional Voluntary Contributions 	<p>Until employee age 75 (if retire in-service) or 6 years after leaving employment (whichever is the latest)</p>	<p>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.</p>	<p>Head of Paid Service</p>
<p>Disclosure and Barring Service checks (DBS)</p>	<p>6 months after recruitment (or other decision is reached to allow for any disputes to be resolved/decision made).</p>	<p>Destroy under confidential conditions</p>	<p>Head of Paid Service</p>
<p>Disclosure and Barring Service record (to include date of check, who checked it, subject name, type, unique cert. no., decision and expiry date)</p>	<p>Retained separate to employee file</p>	<p>Destroy under confidential conditions 6 years from the end of employment</p>	<p>Head of Paid Service</p>
<p>Current address details</p>	<p>6 years after employment has ended</p>	<p>Destroy under confidential conditions</p>	<p>Head of Paid Service</p>
<p>Bank details – current</p>	<p>6 years after employment has ended</p>	<p>Destroy under confidential conditions</p>	<p>NTCA Principal Accountant</p>
<p>Death Benefit Nomination and revocation forms</p>	<p>Until employee age 75 (if retire in-service) or 6</p>	<p>Destroy under confidential conditions</p>	<p>Head of Paid Service</p>

	years after leaving employment (whichever is the latest)		
Variation of hours – calculation of formulae for individual	Destroy after use	Destroy after use	Head of Paid Service
Promotion, temporary promotion and/or substitution documentation	Destroy after summary noted	Destroy after summary noted	Head of Paid Service
Previous service support papers	Destroy after records noted as appropriate	Destroy after records noted as appropriate	Head of Paid Service
Annual/assessment reports for last 5 years of service or summary of performance marks	Until employee age 75 (if retire in-service) or 6 years after leaving employment (whichever is the latest)	Destroy under confidential conditions	Head of Paid Service
Complete sick absence record showing dates and causes of sick leave	Until employee age 75 (if retire in-service) or 6 years after leaving employment (whichever is the latest)	Destroy under confidential conditions	Head of Paid Service
Papers related to disciplinary action which has resulted in any changes to terms and conditions of service, salary, performance pay or allowances	Until employee age 75 (if retire in-service) or 6 years after leaving employment (whichever is the latest)	Destroy under confidential conditions	Head of Paid Service
Training history	Retain whilst employed	Destroy under confidential conditions	Head of Paid Service
Travel and subsistence – claims and authorisation	6 years	Destroy under confidential conditions	Head of Paid Service
Annual Leave and flexible working records	2 years after the end of the performance period	Dispose	Head of Paid Service
Job applications – internal	1 year	Destroy under confidential conditions	Head of Paid Service
Recruitment, appointment or promotion selection papers	1 year	Destroy under confidential conditions	Head of Paid Service
Building Society or Bank References	6 months	Destroy under confidential conditions	Chief Finance Officer
Medical/Self Certs/Sickness Absence Records – unrelated to industrial injury	4 years	Destroy under confidential conditions	Head of Paid Service

Statutory maternity/paternity/adoption pay documentation	6 years from the last financial year to which they relate	Destroy under confidential conditions	Head of Paid Service
Other maternity/paternity/adoption documentation	2 years from the last financial year to which they relate	Destroy under confidential conditions	Head of Paid Service
Overpayment documentation	6 years after repayment or write-off	Destroy under confidential conditions	Head of Paid Service
Authorisation for deputising, substitution allowance and or overtime/travel time claims	6 years from the last financial year to which they relate	Destroy under confidential conditions	Head of Paid Service
Advance for: Season tickets Car parking Bicycles	6 years after repayment	Destroy under confidential conditions	Head of Paid Service

Financial and Estates Management

Control and management of NTCA's financial resources including accounting records, processing of fee income, purchase orders, expenses, payroll, invoices and estates and property management/development.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Financial statements prepared for annual reports	Life of organisation	Destroy under confidential conditions	Chief Finance Officer
Financial statements prepared for management	1 year	Destroy under confidential conditions	Chief Finance Officer
Financial authorities or delegations	6 years after authority or delegation is superseded	Destroy under confidential conditions	Chief Finance Officer
Expenditure and revenue returns	Life of organisation	Destroy under confidential conditions	Chief Finance Officer
Policy and strategy records	Second review	Destroy under confidential conditions	Chief Finance Officer
External Audit investigations reports	Year created plus 7 years	Destroy under confidential conditions	Chief Finance Officer

Audit investigations (internal)	Year created plus 7years	Recorded destruction. Destroy under confidential conditions	Head of Internal Audit
Asset registers	6 years after item/asset is disposed of	Destroy under confidential conditions	Chief Finance Officer
Land registers	12 years after disposal	Destroy under confidential conditions	Chief Finance Officer
Property Acquisition and disposal	Disposal of property plus 12 years	Recorded destruction. Destroy under confidential conditions	Chief Finance Officer
Leasing and occupancy	Expiry or disposal of property	Permanent preservation.	Chief Finance Officer
Property and Land claims management	Retain while current	Permanent preservation.	Chief Finance Officer
Personal Payroll history: Processing of non-statutory deductions from salaries – deduction authorities, tax code notices Payments to include salary advances, bank transfer reports Notifications to include employment related tax liabilities	Until employee age 75, or 6 years after leaving (whichever is sooner)	Destroy under confidential conditions. Recorded destruction	Head of Payroll
Payroll administration: Income tax and NI returns, income tax records and correspondence with HMRC	Retain for 6 years from last financial year to which they related	Destroy under confidential conditions.	Head of Payroll
Loans	Retain for 12 years after date of final payment	Dispose	Chief Finance Officer
Invoices	Year created plus 6 years	Recorded destruction. Destroy under confidential conditions	Chief Finance Officer
Credit notes	Year created plus 6 years	Recorded destruction. Destroy under confidential conditions	Chief Finance Officer
Records relating to serious matters of: <ul style="list-style-type: none"> • theft • fraud • misappropriated • irrecoverable debts and overpayments • write-offs • recovery of debt • wavering of debt (where external action has been taken)	Retain for 12 years after action finalised or other action complete	Recorded destruction. Destroy under confidential conditions after action/investigation is completed and retention period has expired.	Chief Finance Officer
Records relating to serious matters of:	Retain for 6 years after audit or other action	Destroy under confidential conditions after	Head of Audit and Chief Finance Officer

<ul style="list-style-type: none"> • theft • fraud • misappropriated • irrecoverable debts and overpayments • write-offs • recovery of debt • wavering of debt (where internal action has been taken)	complete	action/investigation is completed and retention period has expired.	
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Bank Accounts

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner	
Cheque book/butts for all accounts	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Cancelled cheques	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Dishonoured cheques	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Paid/presented cheques	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Stoppage of cheque payment notices	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Record of cheques opened books	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Cheque register	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Record of cheques drawn for payment	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Register of cheques lodged for collection	6 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Reconciliation files/sheets	2 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Daily list of paid cheques	2 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant

Bank statements, periodic reconciliations	7 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Bank certificates of balance	2 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Company credit card transactions – payments, statements and receipts	7 years	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Electronic banking and electronic funds transfer – cash transactions; payment instructions; deposits, withdrawals	Disposal action in line with paper records	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant
Electronic banking and electronic funds transfers – audit trails	Retain for the same period as the base transaction record	Recorded destruction. Destroy under confidential conditions	Principal NTCA	Accountant

Salaries and Related Records

Function Description	Retention Period	Retention Action Description (where applicable)	Information Asset Owner
Employee pay histories (NB last 3 year records must be kept for leavers for the calculation of pension entitlement)	6 years	Destroy under confidential conditions	Head of Payroll
Salary rates register	When superseded	Dispose and replace with up-to-date version	Head of Payroll
Salary ledger cards/records	6 years		
Copies of salaries/wages payroll sheets	2 years	Destroy under confidential conditions	Head of Payroll

Contract Records and Procurement

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

Function Description	Retention Period	Retention Action Description (where applicable)	Information Owner	Asset
Policy on contracts and procurement	12 years following policy update	Dispose	Monitoring Officer	
Approved supplier lists	6 years	Dispose	Monitoring Officer	
Initial proposal – end user requirement	6 years	Dispose	Monitoring Officer	
Expression of interest	6 years from date of submission	Dispose	Monitoring Officer	
Draft contract specification	Destroy when specification has been agreed	Destroy under confidential conditions	Monitoring Officer	
Agreed contract specification	Completion of contract plus 6 years	Dispose	Monitoring Officer	
Evaluation criteria	6 years from end of contract	Dispose	Monitoring Officer	
Invitation to Tender	6 years from end of contract	Dispose	Monitoring Officer	
Pre Contract Advice	Completion of contract plus 6 years	Destroy under confidential conditions	Monitoring Officer	
Initial Proposal Expression of Interest	6 years	Confidential disposal 3 years from date of award of contract	Monitoring Officer	
Unsuccessful tender documents	6 years	Recorded destruction. Destroy under confidential conditions 3 years from date of award of contract	Monitoring Officer	
Successful tender documentation – executed as Deeds	Completion of contract plus 12 years	Recorded destruction. Destroy under confidential conditions	Monitoring Officer	
Background information supplied	6 years from date of contract completion	Confidential disposal 6 years from date of award of contract	Monitoring Officer	
Evaluation of Tender – report and notes of proceedings	6 years	Confidential disposal 6 years from date of award of contract	Monitoring Officer	
Commissioning letter (Award Letter)	6 years from end of	Confidential disposal 6 years	Monitoring Officer	

	contract	from end of contract	
Signed contract (Under Seal/Deed)	12 years from end of contract	Destruction 12 years from expiration of agreement	Monitoring Officer
Signed contract (standard)	6 years from end of contract	Destruction 6 years after date of expiration of contract	Monitoring Officer
Reports from contractors	6 years	Dispose 6 years from date of expiration of contract	Monitoring Officer
Records of complaints	6 years following date of resolution	Dispose 6 years from date of resolution	Monitoring Officer
Disputes over payment	6 years following date of resolution	Dispose 6 years from date of resolution	Monitoring Officer
Litigation (managing, undertaking or defending for or against)	7 years after last action	Major litigation - destruction to be determined on Review.	Monitoring Officer
Final accounts	6 years	Dispose 6 years from date of expiration of contract	Chief Finance Officer
Changes to requirements	6 year or 12 years (Under Deed)	Recorded destruction. Destroy under confidential conditions 6/12 years from end of contract	Monitoring Officer
Forms of variation	6 year or 12 years (Under Deed)	Recorded destruction. Destroy under confidential conditions 6 (or 12) years from new expiry date of contract	Monitoring Officer
Extensions to contract	6 year or 12 years (Under Deed)	Dispose 6 (or 12) years from new expiry date of contracts	Monitoring Officer

Internal Audit

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Audit reports (including interim), where these have included the examination of long term contracts	6 years	Destroy under confidential conditions	Chief Finance Officer
Report papers used in the course of a fraud investigation	6 years after legal proceedings have been completed	Destroy under confidential conditions	Chief Finance Officer
Other audit reports (including interim)	6 years	Destroy under confidential conditions	Chief Finance Officer

Terms of reference	6 years	Dispose	Chief Finance Officer
Programmes/plans/strategies	One year after last date of the plan	Dispose	Chief Finance Officer
Correspondence	6 years	Destroy under confidential conditions	Chief Finance Officer
Minutes of meetings and related papers including those of the Governance Committee	3 years	Destroy under confidential conditions	Chief Finance Officer
Working papers	3 years	Confidential destruction	Chief Finance Officer
Internal audit guides	When superseded	Dispose	Chief Finance Officer
Manuals and guides relating to departmental procedures (rules of procedure)	When superseded	Dispose	Chief Finance Officer
Annual reports to Accounting Officers	6 years	Destroy under confidential conditions	Chief Finance Officer
Internal Audit Plan	6 years	Dispose	Chief Finance Officer

Health and Safety

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Reporting of Injuries, Notifiable Diseases and Dangerous Occurrences (RIDOR)	6 years	Recorded destruction under confidential conditions	Head of Paid Service
Records of investigations of accidents, injuries, notifiable diseases and dangerous occurrences	6 years	Recorded destruction under confidential conditions	Head of Paid Service
Conduct and results of risk assessments in relation to buildings, plant, equipment, machinery and processes	12 years	Recorded destruction under confidential conditions	Head of Paid Service
Records of conduct and results of Inspections of land, building, facilities and operations and action taken to address issues raised	Completion of inspection plus 6 years	Recorded destruction	Head of Paid Service
Records documenting conduct and results of internal audits and action taken to address issues raised.	Completion of audit plus 6 years	Review for permanency	Head of Paid Service
Enforcement Certification and prosecution	Originals kept permanently		Head of Paid Service
Registration, Certification and Licensing Notifications	Created or modified	Recorded destruction under	Head of Paid Service

plus 12 years

confidential conditions

Project Records

To include all paperwork relating to European Funding applications, Growth Hub Grant Funding and other grants etc.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Call for proposals seeking grant bids	6 years from date of call	Destroy under confidential conditions 6 years from date of call	Chief finance Officer
<p>European Regional Development Funds</p> <p>All original documentation relating to:</p> <ul style="list-style-type: none"> • Development, pre-application, application forms and approval letters • Funding Agreement • Claim forms (inc working papers) • State Aid approved scheme (where appropriate) • Audit reports • Project closure report • Match Funding Certificates • Beneficiary records • Procurement records • Financial records • All correspondence • Marketing materials and press releases bearing EU logo • All other documentation integral for audit purposes 	A minimum of 10 years from 31 December following the submission of the accounts in which the final expenditure of the completed project is included	Destruction date unique to each project – therefore review in line with the details of the Funding Agreement and ESF “ <i>Guidance on Document Retention, including Data Exchange for ESF Projects</i> ”	Chief Finance Officer
<p>European Social Fund</p> <p>All original documentation relating to:</p> <ul style="list-style-type: none"> • Development, pre-application, application forms and approval letters • Funding Agreement • Claim forms (inc working papers) • State Aid approved scheme (where appropriate) 	A minimum of 53 months after the project has finished, the Annual Control Report is submitted and in line with ESF Project Guidance	Destruction date unique to each project – therefore review in line with the details of the Funding Agreement and ESF “ <i>Guidance on Document Retention, including Data Exchange for ESF Projects</i> ”	Chief Finance Officer

<ul style="list-style-type: none"> • Audit reports • Project closure report • Match Funding Certificates • Beneficiary records • Procurement records • Financial records • All correspondence • Marketing materials and press releases bearing EU logo • All other documentation integral for audit purposes 			
All other grant funding documentation including EU Horizon 2020 Project Funding	5 years after completion of the project and payment of all funding	Destroy	
LGF/Growth Hub Grant Funding All original documentation including Drawdown Schedules	A minimum of 10 years from the date of the award where State funds to the Recipient are made or at least 6 years following final payment by BEIS	 Destruction date unique to each project – therefore review in line with the details of the Funding Agreement	Chief Finance Officer
Regional Growth Fund/NEIF All original documentation relating to: <ul style="list-style-type: none"> • The Scheme • Beneficiary Awards and records • Other payments made to Beneficiaries • Claim forms • All other documentation integral for audit purposes 	A minimum of 10 years from the date of the award where State funds to the Recipient are made or at least 6 years following final payment by BEIS	 Destruction date unique to each project – therefore review in line with the details of the Funding Agreement	Chief Finance Officer
Enterprise Zones	25 years from the start of the Enterprise Zone	Destruction under confidential conditions, 25 years starting from the Enterprise Zone	Chief Finance Officer
Approved project proposals	Completion of project monitoring period plus 12 years	Destruction under confidential conditions	Chief Finance Officer
Rejected or deferred project proposals	6 years after completion of project or financial	Destroy under confidential conditions	Chief Finance Officer

	completion, whichever is the latest				
Feasibility Studies	10 years after completion of project or financial completion, whichever is the latest	Destroy conditions	under	confidential	Chief Finance Officer
Plans and specifications	6 years after completion of project or financial completion, whichever is the latest	Dispose			Chief Finance Officer
Map, plans, drawings and photographs	10 years after completion of project or financial completion, whichever is the latest	Destroy conditions	under	confidential	Chief Finance Officer
Equipment and Supplies Documentation	6 years after completion of project	Dispose			Chief Finance Officer
Project Board Minutes and correspondence	6 years after date of last paper	Destroy conditions	under	confidential	Chief Finance Officer
Project reports, plans and charts	6 years after issue	Dispose			Chief Finance Officer
Product descriptions	6 years after completion of project	Dispose			Chief Finance Officer
Project operating manuals	6 years after completion of project	Dispose			Chief Finance Officer
Miscellaneous project records	6 years after completion of project	Dispose			Programme Manager

Information Governance Compliance

Information supporting the investigation and resolution of complaints made under GDPR, Data Protection laws, FOI, Environmental Information Regulations and Privacy and Electronic Communications Regulations and Subject Access Requests.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Statutory Access Requests	3 years from year record created	Recorded destruction	Monitoring Officer
Case enquiries, appeals and correspondence	6 years	Destroy under confidential conditions	Monitoring Officer
Records relating to *FOI request, including the information subject to the request	3 years after date of request	Destroy under confidential conditions	Monitoring Officer
Register of complaints	10 years	Destroy under confidential conditions	Monitoring Officer
Review of correspondence and papers	10 years	Destroy under confidential conditions	Monitoring Officer
Review reports	6 years	Dispose after 6 years	Monitoring Officer
Records relating to the control of record keeping systems	5 years after system/policy is superseded	Dispose after system/policy is superseded	Monitoring Officer
Information about the number of *FOI requests answered and their outcomes	10 years	Dispose	Monitoring Officer
Privacy, Fair Processing and other Information Governance policies	6 years from date policy superseded	Dispose	Monitoring Officer
Policy records and internal documents on implementation and compliance with the *FOI Act	5 years after policy/procedures have been superseded	Dispose	Monitoring Officer
Record Retention and Destruction policy	When superseded	Dispose 10 years from year policy created	Monitoring Officer

*FOI includes all types of requests made under the legislation/regulations listed above.

Press and Public Relations Records

Meetings, speaking engagements with businesses, government, opinion formers, media to maintain good relations and receive feedback.

Record Description	Retention Timescale	Retention Action Description (where applicable)	Information Asset Owner
Press releases (not bearing EU logos – refer to Project Records above)	3 years	Dispose after 3 years	Head of Paid Service
Operational notes (notices to press about forthcoming events or conferences)	3 months	Dispose after 3 months	Head of Paid Service
Press conference reports/previews	3 years	Dispose after 3 years	Head of Paid Service
Press report digests	7 years	Dispose after 7 years	Head of Paid Service
Correspondence with branches of media	7 years	Dispose after 7 years	Head of Paid Service
Handbooks and guides to media/public relations	Retain until superseded	Destroy previous version when superseded	Head of Paid Service
Reports on media public relations	7 years	Dispose after 7 years	Head of Paid Service
Image library	When no longer required or consent withdrawn	Destroy under confidential conditions	Head of Paid Service
Special event correspondence and papers	7 years	Dispose after 7 years	Head of Paid Service
Special event reports	7 years	Dispose after 7 years	Head of Paid Service
Special event attendance registers	3 years	Dispose after 3 years	Head of Paid Service
Special event calendars	3 years	Dispose after 3 years	Head of Paid Service
Brochures and guides	3 years	Dispose after 3 years	Head of Paid Service

APPENDIX 2 – Data Retention Exemptions

A wide range of data exists (e.g. reference material and convenience copy) which is not covered by the retention and destruction schedule – principally because a primary or better copy of the material will be retained by the Authority – and accordingly do not need to be retained. These include:

- Rough or early drafts where these do not contain evidence of policy/project development or pre-application development;
- Circulated copies of drafts; unaltered drafts;
- Convenience copies or information retained for reference purposes only (it is not retained to provide evidence of transactions, but only for its informational value);
- Reference or published materials from external sources which are not needed for audit purposes, e.g. papers from conferences and seminars, policy briefings, sales catalogues, brochures, “junk-mail”;
- CC’d emails;
- Emails that are not the primary record of decisions or transactions (e.g. the data is recorded in some other way following the email exchange);
- Personal records and emails, e.g. social arrangements, personal copies of performance reviews;
- Stocks of publications that have been superseded;
- Bookings for internal services (e.g. rooms, equipment) where no charges are made;
- Notes taken during meetings where formal notes/minutes have been prepared;
- Meeting requests, acceptances and apologies;
- Corporate notices and circulars (circulated copies, i.e. not the original);
- Covering/transmission documents such as covering letters, fax cover sheets, compliments slips or emails accompanying attachments that do not provide additional information to the main document and where evidence of date and time of receipt or despatch are not required;
- Reservations and confirmations of arrangements with third parties, such as joining instructions for conferences, training, etc. when invoices have been received.

The above list is by no means exhaustive but does provide a guide. These categories of data should be destroyed as soon as reference to the data has ceased.

If you are in any doubt then consult with the Data Champions or the most relevant Information Asset Owner in the first instance.

APPENDIX 3 – Disposal Flowchart

Disposal Arrangements

Flow chart for the destruction of unclassified, official sensitive and official confidential data

