



Data and records retention and disposal policy

Questions about this document and policy should be directed to dataprotectionofficer@wiltonpark.org.uk

Purpose

The purpose of this Wilton Park policy is to detail the procedures for the retention and disposal of information to ensure that our staff carry this out consistently and that any actions taken are fully documented. Unless otherwise specified, the data retention and disposal policy refers to both paper and electronic documents.

Review

- Review is the examination of records which may need to be permanently preserved and only released if there are no exemptions under the various pieces of legislation.

How long we should keep our records

Records should be kept for as long as they are needed to meet the legal basis referred to in the organisation's Privacy Notice and the operational needs of Wilton Park, together with legal and regulatory requirements. We have assessed our records to:

- determine their value as a source of information about Wilton Park, its operations, relationships and environment
- assess their importance as evidence of business activities and decisions
- establish whether there are any legal or regulatory retention requirements (including: Public Records Act 1958, Freedom of Information Act 2000, Data Protection Act 2018, and UK GDPR).

Where records are likely to have a historical value, or are worthy of permanent preservation, they will be reviewed and either transferred to The National Archives (TNA), deleted or retained (as per the Constitutional Reform and Governance Act 2010).

Sharing of information

Duplicate records will be destroyed. Where information has been regularly shared between business areas, only the original records should be retained in accordance with the guidelines in section 2 above. Care will be taken that seemingly duplicate records have not been annotated.

Where information is shared with other bodies, we will ensure that they have adequate procedures for records to ensure that the information is managed in accordance with the relevant legislation and regulatory guidance.

Audit trail

It is not required to document the disposal of records which have been listed on the records retention schedule. Documents disposed of outside the schedule either by being disposed of earlier or kept for longer than listed will need to be recorded for audit purposes.

This will provide an audit trail for any inspections conducted by the Information Commission Officer and will aid in addressing Freedom of Information requests, where we no longer hold the material.

Monitoring

Responsibility for monitoring the disposal policy rests with the Security Group. The policy will be reviewed annually.

Disposal schedule

Records on disposal schedules will fall into three main categories:

(a) Destroy after an agreed period – where the useful life of a series or collection of records can be easily predetermined (for example, *destroy after 3 years; destroy 2 years after the end of the financial year*).

(b) Automatically select for permanent preservation – where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.

(c) Review – see above.

Records can be destroyed in the following ways:

Either by destruction:

- Non-sensitive information – can be placed in a normal recycling bin.
- Confidential information – fine crosscut shredded and sent for recycling.
- Personal and sensitive information – placed in data shredding bags for collection and certified destruction.
- Electronic equipment containing information - destroyed using kill disc and for individual folders, they will be permanently deleted from the system.

Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.

Or by archival transfer - This is the transfer of physical and digital records to a permanent custody at The National Archives (TNA).

Finance records

Information type	Format	Retention period	Disposal action
Finance records	Paper/ Electronic	6 years	Electronic – deleted Paper – data shredding
Wilton Park staff on casual payroll	Paper/ Electronic		
Employees pay history	Electronic Paper	6 years 3 years for leavers	Electronic – deleted Paper – data shredding
Personal detail records, including timesheets Copy of payroll sheets.	Electronic Paper	6 years	Electronic – deleted Paper – data shredding
Salary rates register	Electronic	6 years	Electronic – deleted
External audit investigations.	Electronic Paper	6 years after completion	Electronic – deleted Paper – data shredding
Audit report that includes long-term contracts.	Electronic Paper	6 years	Electronic – deleted Paper – data shredding

Terms of reference, correspondence, minutes of meetings, working papers.	Electronic Paper	3 years	Electronic – deleted Paper – data shredding
Programmes, plans and strategies.	Electronic Paper	1 year after date of last plan	Electronic – deleted Paper – data shredding
Internal audit guides, manuals, and guides relating to departmental procedures and local auditing standards	Electronic Paper	when superseded	Electronic – deleted Paper – data shredding
Annual reports to accounting officers. Other audit reports.	Electronic Paper	3 years	Electronic – deleted Paper – data shredding
Accounts records	Electronic	6 years of datasets to be kept	Electronic – deleted
Current live dataset	Electronic	all data older than 2 years should be deleted	Electronic – deleted

Human Resource records

Information type	Format / Location	Retention period	Disposal action
Employee records	Paper/ Electronic	85 years from DOB or 5 years after death	Electronic – deleted Paper – data shredding
Income tax and NI returns, income tax records and correspondence with the Inland Revenue.	Electronic Paper	Not less than 3 years after the end of the financial year to which they relate	Electronic – deleted Paper – data shredding
Wage/salary records (also overtime, bonuses, expenses)	Electronic Paper	FCDO guidelines - 85 years from DOB or 5 years after death – for pay, security vetting info, superannuation	Electronic – deleted Paper – data shredding
National minimum wage records	Electronic Paper	3 years after the end of the pay reference period following the one that the records cover	Electronic – deleted Paper – data shredding
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	Electronic Paper	FCDO guidelines – 85 years from DOB or 5 years after death	Electronic – deleted Paper – data shredding
Policies	Electronic Paper	Until superseded	Electronic – deleted Paper – data shredding

Statutory Maternity Pay records, related sickness records, calculations, certificates (Mat B1s) or other medical evidence.	Electronic Paper	3 years after the end of the tax year in which the maternity period ends	Electronic – deleted Paper – data shredding
Statutory Sick Pay records, calculations, certificates, self-certificates.	Electronic Paper	3 years after the end of the tax year to which they relate	Electronic – deleted Paper – data shredding
Employment tribunal files	Electronic Paper	6 years after last action or according to legal advice	Electronic – deleted Paper – confidential
Sifts and interview panels – CVs and notes	Electronic Paper	6 months after appointment	Electronic – deleted Paper – shredded
Recruitment	Paper/ Electronic		
Recruitment records	Electronic Paper	6 months	Electronic – deleted Paper – data shredding
Health and Safety	Paper/ Electronic	6 years	
Risk assessments.	Electronic Paper	40 years	Electronic – deleted Paper – data shredding

Corporate Governance records

Information type	Format / Location	Retention period	Disposal action
Annual report	Paper/ Electronic	Permanently	Reviewed for transfer to TNA for permanent preservation at 20 years
Board and Audit Reports	Paper/ Electronic	Permanently	Reviewed for transfer to TNA for permanent preservation at 20 years
Corporate and business planning	Paper/ Electronic		
Formal policies/documents.	Electronic Paper	5 years	Electronic – deleted Paper – data shredding
Complaints about the Agency	Paper/ Electronic		
Reports on particular complaints	Electronic Paper	3 years	Electronic – deleted Paper – data shredding

Statistical reports	Electronic Paper	5 years	Electronic – deleted Paper – data shredding
Register of complaints	Electronic Paper	10 years	Electronic – deleted Paper – data shredding

General records

Information type	Format / Location	Retention period	Disposal action
Estates	Paper/ Electronic		
Projects and Contracts and contract information	Electronic Paper	10 years	Electronic – review for deletion / Paper – shredded
Information policy and legislation	Paper/ Electronic		
FOI requests:	Electronic	Forward to FCDO for record on central system. Local copy to be kept for 2 years.	Electronic - deleted
Data Protection requests - original request and response. SAR requests.	Electronic	3 years for background documents 3 years for final documents (Kept for as long as there is a business requirement and in line with GDPR)	Electronic - deleted
Documents destroyed list	Electronic Paper	10 years	Destruction method appropriate to classification
Insurance	Paper/ Electronic		
Insurance policies Employers liability claims	Electronic	40 years Permanent	Archived
Information technology	Paper/ Electronic		
IT projects and programme documents	Electronic	Permanent – reviewed for transfer to TNA for permanent preservation at 20 years	Destruction method appropriate to classification
Correspondence including emails	Paper/ Electronic		
General	Electronic	2 years	Electronic - deleted
Content contains policy decisions that are essential for business	Electronic	Can be retained permanently	Move to relevant sharepoint location

Events records

Information type	Format / Location	Retention period	Disposal action
Event Information on KIM			
Participant records	Electronic	Up to 5 years if the record has not been updated	Electronic - deleted
Event information			
Registration / enquiries via website	Electronic	1 month	Electronic - deleted
Event documentation via secure website	Electronic	6 months	Electronic - deleted
Event records (All)	Electronic	Retain to support public service delivery	Electronic - deleted
Dietary / medical / special requirements	Electronic	3 months after event	Electronic - deleted
Event information on Website			
Enquiries via website	Electronic	1 month	Electronic - deleted
Hotel registration			
Guest information	Paper/ Electronic		
	Paper	Deleted after 12 months.	Paper – confidential waste
	Electronic	Min 12 months (To comply with the Immigration (Hotel Records) Order 1972) deleted after 18 months	Electronic - deleted
M&E Data			
MailChimp and SmartSurvey data (email campaign tool)	Electronic	1 Month if not in active use. (individual has the option to unsubscribe at any time)	Electronic - deleted
Accounting files for NAO	Electronic	9 Months from start of audit. Then delete	Electronic - deleted
Other files	Electronic	1 Month unless required longer, review monthly	Electronic - deleted

Document version control

Version	Status	Description of version	Date completed
1		New policy	08.05.18
2	Approved	Review and updated	16.02.21
3	Approved	Review and updated	17.06.21
4	Approved	Review and updated	21.07.2021