

# Retention and Disposal Policy

<b>Document name</b>	Retention and Disposal Policy
<b>Version number</b>	1
<b>Status</b>	Published
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<b>Date of sign off</b>	28/10/2024
<b>Review by</b>	28/10/2028

## Key messages

This policy outlines ANP Coaching’s approach to retention and disposal of information. This policy covers:

- Retention periods
- ROT and weeding
- Reviewing information
- Destruction of information
- Permanent preservation
- Legal holds

## Does this policy relate to me?

This policy relates to all ANP Coaching staff and contractor

## 1. Introduction

- 1.1. The aim of the Retention and Disposal Policy is to outline ANP Coaching's approach to managing the retention and secure disposal of our information in line with our business requirements and legal obligations.
- 1.2. There are various pieces of legislation which outline retention requirements. These include, but are not limited to:
  - Freedom of Information Act 2000 – including the Code of Practice Section 46 (FOIA)
  - The UK General Data Protection Regulations (the UK GDPR)
  - Data Protection Act 2018 (DPA 18)
  - Public Records Act 1958
  - Limitation Act 1980
  - Inquiries Act 2005
- 1.3. The requirements outlined in this policy have been developed to provide a consistent approach to the retention and disposal of corporate information. This policy applies to all physical and digital information, regardless of storage location.

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## 2. Roles and Responsibilities

- 2.1. All ANP Coaching staff are responsible for managing the information they create and receive as part of their normal daily business activities and should familiarise themselves with the [Retention and Disposal Schedule](#).
- 2.2. Specific records management responsibilities are also allocated to individual staff members and various committees and boards across our corporate structure. The following roles have additional responsibilities around retention and disposal:
  - 2.2.1 **Information Asset Owners (IAO)**: IAOs ensure that all assets under their control are following retention schedule rules. They have ownership of the assets and are therefore

responsible for ensuring adherence to the Retention and Disposal Schedule. IAOs are responsible for authorising the destruction of information when required.

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### 3. Retention Periods

3.1. Our retention periods are driven by legislation and/or business need. If there is no legally defined retention period for corporate information it is the responsibility of the relevant IAO(s) to determine an appropriate retention period. The Information Management team must agree the proposed retention period to ensure:

- Retention triggers are clear and consistent
- Retention periods are not excessively long and are consistent with the rest of the schedule

- The correct retention source has been identified
  - IAO approval has been obtained for any new entries with an action of 'destroy'.
- 3.2. We assign clearly defined retention periods to our information to ensure it is kept for the appropriate length of time. Each retention period has three elements:
- Trigger – the action which begins the retention period (e.g., 'End of Financial Year' or 'End of Employment')
  - Retention period – the length of time the information will be kept
  - Action – either 'review' or 'destroy'.
    - If the action is 'review' the information must be reviewed to ensure it is no longer required before destruction. Outcomes of a review may be – dispose, mark for permanent preservation, or temporary extension to review again at a future date.
    - If the action is 'destroy', this means the information can be destroyed without being reviewed in line with ANP Coaching procedure. ANP approval is not needed prior to destruction if the action is 'destroy.'

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## 4. Retention and Disposal Schedule

- 4.1. Our Retention and Disposal Schedule sets out our retention periods. Information **must** be kept for the length of time defined in the Schedule unless there is a legal requirement to destroy it sooner.
- 4.2. The Schedule is arranged by function, rather than by department. By following a functional approach, we can ensure that the Schedule will not need to change in the event of organisational restructures and that information held by multiple directorates is only captured on the Schedule once.
- 4.3. Any proposed additions or changes to retention periods must be proposed to ANP and the leadership team during a regular directors meeting.
- 4.4. The Schedule is reviewed on an annual basis by the ANP coaching leadership team.
- 4.5.

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## 5. Weeding

- 5.1. Not all information we create has long-term value. Our Retention and Disposal Schedule does not include redundant, obsolete or trivial (ROT) information. This should be destroyed periodically by each department as part of routine housekeeping. Approval or sign-off to delete ROT information is not required.
- 5.2. 'Weeding' does not apply to corporate records included in the Schedule, which should only be destroyed when they have reached the end of their retention period.
- 5.3. Information should be weeded for two reasons:
  - To ensure that we are not wasting money or space (either digital or physical) by storing ROT information.
  - To make the process of reviewing and appraising records easier. Sifting through low-value records makes this process more time-consuming.
- 5.4. Below are common examples of information which are usually of limited value once they are no longer in use and can be weeded through housekeeping. This should not be seen as an exhaustive list.

**Drafts** - Draft documents lose value and can become obsolete once a final version has been published. However, on some occasions where significant changes or deviation have taken place, a draft may be retained to show how the final decision was made.

**Emails** - Outlook has an automated retention policy that retains emails for 12 months. It is important that information assets are saved to shared spaces, to provide evidence of decisions made or action taken. Once a conversation has reached a significant point, any earlier emails from this chain can be deleted.

**Duplicates** – We should not retain any duplications. Duplications can lead to multiple versions of information which can cause confusion.

**Research Material** – Whether developing policy or preparing to give advice, research material may be created or collected such as notes or

copies of guidance from external organisations. The value of this information decreases once the final version has been created.

**Limited Long Term Operational Value** – Some information may be of importance for only a short period of time and then become redundant. This information should be weeded as soon as it is no longer required.

- 5.5. Weeding should be done on a regular basis to ensure that clutter does not build up over time. It is up to each team to decide a reasonable schedule for housekeeping, based on their resources and the amount of information they generate. IAOs should encourage weeding on a regular basis.
- 5.6. Weeding should cover all information the directorate stores, paper or digital, regardless of the system it is held on. This includes personal drives and desktops.

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## 6. Reviewing Information

- 6.1. When information has reached the end of its retention period it may need to be reviewed to ensure that it is no longer required. Information that has an action of 'destroy' on the Schedule can be disposed of securely without a review and without IAO approval. Where possible, automated retention rules should be built into corporate systems.
- 6.2. Information should only be retained beyond its retention period in limited circumstances. When conducting a review, the following factors should be taken into account:
  - Is the information required to fulfil statutory or regulatory requirements?

- Is the information relevant to ongoing litigation / subject to a legal hold?
  - Is the information the subject of an information request or relate to information recently disclosed in a response?
  - Is retention required to evidence events in the case of a dispute?
  - Is there another demonstrable business need for retaining the information?
- 6.3. If the information is deemed to still be required, an extension of two years is given, the information needs to be reviewed again at the end of the extension. The only exception to this is where the information has been marked for permanent preservation.
- 6.4. The retention period must not be extended indefinitely. You should contact the Information Management & Compliance team if you still intend to keep the information after applying the two-year extension period.

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## 7. Destruction

- 7.1. When records are no longer required by the organisation and do not have archival value they should be securely destroyed.
- 7.2. If the action on the retention schedule is 'review', destruction of records should not proceed without approval from the relevant IAO. A record containing what has been destroyed, when it was destroyed and the individual who authorised the destruction should be created.
- 7.3. If the action on the retention schedule is 'destroy', a Record of Destruction does not need to be created.
- 7.4. Records should be destroyed with the level of security required by the confidentiality of their contents. For example, if records containing special category data or protectively marked papers have

been shredded, the shredded paper should be handled securely and not dumped. Records awaiting destruction must be stored securely.

- 7.5. Paper records should be placed into the confidential waste bins and documents stored on electronic systems should be deleted, including back-ups. Deletions should be carried out by someone with appropriate access to the system from which they are being deleted. Digital documents should be deleted and not overwritten.
- 7.6. When information is destroyed, all copies of the information should be destroyed at the same time (both digital and physical). Information cannot be considered to have been completely destroyed unless all copies have been destroyed as well.

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## 8. Permanent Preservation

- 8.1. Documents which have been marked for permanent preservation must not be destroyed. Any information which is selected for preservation should be clearly marked to ensure it is not destroyed accidentally.

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## Version history

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
1.0	First Draft	28/10/2024	ANP

## Annex A – Retention Schedule

### 1. Communications Activities

		Retention Trigger	Retain For	Action	Retention Source	IAO
1.1	Staff Mailboxes and Outlook	Creation	12 months	Destroy	Business Need	Communications which may not directly fall under a function
1.2	Physical Correspondence	Once Scanned	<b>12 months or as required legally</b>	Destroy	Business Need	
1.3	Internal Email Mailboxes	Creation	12 months	Destroy	Business Need	
1.4	Customer Email Boxes	Creation	12 months	Destroy	Business Need	
1.5	External Email Mailboxes	Creation	12 months	Destroy	Business Need	
1.6	Instant Messages	Creation	Between 7 and 15 days	Destroy	Business Need	
1.7	Live Chat Transcriptions	Creation	100 days	Destroy	Business Need	
1.8	Chatbot transcripts	Creation	12 Months	Destroy	Business Need	
1.9	Calling Line Identification	Creation	90 Days	Destroy	Business Need	

### 2. Corporate Communications and Marketing

		Retention Trigger	Retain For	Action	Retention Source	IAO
2.1	Market Research Reports, Press Releases, Campaigns and	Last Action	6 years	Review	Business Need	

	Projects, Informer, and Image Banks					
2.2	Staff Events and Briefings, Public Engagement and Political Monitoring	Last Action	3 years	Review	Business Need	
2.3	Conference Delegate Lists	Last Action	400 days	Destroy	Business Need	
2.4	Webinar / Live Event Registration	Webinar Completed	12 months	Destroy	Business Need	
2.5	Webinar / Live event recordings	Event completed	12 months	Destroy	Business Need	
2.6	Journalist Information	Request of the Journalist to remove their information	Instant once requested	Destroy	Business Need	
2.7	Communications with Journalists	Creation	3 years	Destroy	Business Need	
2.8	Case Study	Publication date	3 years	Review	Business Need	

2.9	E-newsletter contact profile	Last Action (ANP Coaching stops sending its e-newsletter)	6 months	Destroy	Business Need	
2.10	E-newsletter analytics	Last Action	2 years	Destroy	Business Need	.
2.11	Records of emails to main customer contacts	Creation	18 months	Destroy	Business Need	
2.13	Customer Experience Survey contact information	Survey Closure	30 days	Destroy	Business Need	

### 3. Corporate Functions

		<b>Retention Trigger</b>	<b>Retain For</b>	<b>Action</b>	<b>Retention Source</b>	<b>IAO</b>
3.1	Health and Safety Inspections, Property Management and Asset Records	Last Action	6 years	Review	Secure Storage	
3.2	Documents relating to IT systems integral to their running and long-term use	End of System Life	12 months	Review	Business Need	
3.3	Information Management & Compliance Records	Last Action	3 years	Review	Business Need	

3.4	Information detailing what has been sent to the National Archives (not transferred)	Last Action	6 years	Review	The National Archives Information Management Guidance	
3.5	IT Infrastructure	Last Action	3 years	Review	Business Need	
3.6	Information Security	Last Action	6 years	Review	Business Need	
3.7	Information Requests <i>(Including MP request not dealt with directly by the Commissioner)</i>	Case Closed	2 years	Destroy	Business Need	
3.8	Projects and Corporate Programmes	Last Action	3 years	Review	Business Need	
3.9	Building Reports, Risk Assets, Helpdesk and Security Reports	Last Action	3 years	Review	Limitation Act 1980	
3.10	IT Back ups	Last Action	Up to 12 months	Destroy	Business Need	
3.11	System Audit Logs	Last Action	12 months	Destroy	Business Need	
3.15	Google Analytics Reports	Last Action	38 months	Destroy	Business Need	

3.16	IT incident management reports from 3 <sup>rd</sup> parties	Last Action	3 years	Review	Business Need	
3.17	IT helpdesk incident reports, service requests and knowledge base	Last Action	3 years	Review	Business Need	
3.18	Mobile device information for visitor Wi-Fi use	Creation	90 days	Destroy	Business Need	
3.19	Service Adjustments	Last Contact	2 years	Destroy	Business Need	
3.20	Website Analytics Data	End of Contract	30 days	Destroy	Business Need	
3.21	Website user testing volunteer database	Creation	2 years	Review	Business Need	
3.22	User design documentation	Last action	3 years	Review	Business Need	

#### 4. Corporate Governance

		<b>Retention Trigger</b>	<b>Retain For</b>	<b>Action</b>	<b>Retention Source</b>	<b>IAO</b>
4.1	Memorandum of Understanding	End of Understanding	6 years	Destroy	Business Need	
4.2	Internal Committees and Groups minutes	Minutes Agreed	6 years	Review	Business Need	

4.5	Organisation wide Corporate Plans, Business Continuity, Risk Management and Strategies	Superseded	3 years	Review	Business Need	
4.7	Corporate Roles and Responsibilities	Superseded	6 years	Review	Business Need	

## 5. Finance

		<b>Retention Trigger</b>	<b>Retain For</b>	<b>Action</b>	<b>Retention Source</b>	<b>IAO</b>
5.1	Financial Information	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	
5.2	Payroll Capita Reports	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	

## 6. Human Resources

		<b>Retention Trigger</b>	<b>Retain For</b>	<b>Action</b>	<b>Retention Source</b>	<b>IAO</b>
6.1	Employee Files and Personal Development Records	End of Employment	6 years	Destroy	Business Need	
6.2	Disciplinary and Grievance, Examination and Testing, Accident, and Ill Health	Last Action	6 years	Destroy	Limitation Act 1980	
6.3	Job Descriptions and Terms & Conditions	Last Action	6 years	Destroy	Limitation Act 1980	
6.6	Payroll Sheets	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	
6.7	General Annual Leave Information	End of Financial Year	3 years	Destroy	Business Need	
6.8	Maternity, Paternity, Adoption and Sick Leave	End of Financial Year	4 years	Destroy	Statutory Sick Pay (General)	



					Regulations 1982 Statutory Maternity Pay (General) Regulations 1986 Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002	
6.9	Successful Recruitment Candidate Information (including third party referee details provided by the applicant)	End of Employment	2 Years	Destroy	Business Needs	
6.10	Unsuccessful Recruitment Candidate Information (including third party referee details provided by the applicant)	Last Action	6 months	Destroy	Limitation Act 1980	
6.11	Staff Pension, Pay History, Contracts, Offer Letters, and Termination Reasons	From DOB	100 years	Destroy	Business Need	
6.12	Health Surveillance	Last Action	40 years	Destroy	Health and Safety at Work Act 1974	
6.13	Third party emergency contact details provided by the staff member	End of Employment	Immediate	Destroy	Business Need	
6.14	Equality and Diversity Published Information	Last Action	6 years	Review	Business Need	
6.15	Marriage Certificate and Documents relating to Civil Registration	From DOB	100 years	Destroy	The National Archives Retention Scheduling:	

					Employee Personnel Records	
6.16	Medical/Self Certificates – unrelated to industrial injury	End of absence	4 years	Destroy	Business Need	
6.17	Security Clearance Correspondence	End of Security Clearance	6 years	Destroy	Business Need	
6.18	Secondary Employment and Outside Interests Declaration	Superseded or End of Employment	6 years	Destroy	Business Need	
6.19	Mental Health First Aiders Application Form and Details of Attendance to MHFA Training	Acceptance to MHFA Scheme	3 years	Destroy	Business Need	
6.21	Responses to recruitment process feedback surveys	Last Action	6 months	Destroy	Business Need	
6.23	Career Banding assessment documentation	Career Banding Window closes	6 years	Destroy	Business Need	
6.24	Recruitment folders	Last action	6 years	Review	Business Need	
6.25	Bupa log	Last action	5 years	Destroy	Business Need	
6.26	Reasonable Adjustments Information	End of Employment	6 years	Destroy	Limitation Act 1980	

## 7. Legal

		<b>Retention Trigger</b>	<b>Retain For</b>	<b>Action</b>	<b>Retention Source</b>	<b>IAO</b>
7.1	Legal Advice	Last Action	6 years	Review	Limitation Act 1980	
7.3	Contracts	End of Contract	6 years	Review	Business Need	
7.4	Unsuccessful Tenders	Last Action	400 Days	Review	Business Need	
7.5	Building Contracts and Leases	End of Contract	12 years	Review	Limitation Act 1980	
7.6	Non-disclosure agreements	Last Action	2 years or as specified	Review	Business Need	
7.7	Trademark documents	Last Action	6 years	Review	Business Need	

7.9	Non-Property Licenses	End of license	3 years	Review	Business Need	
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