

## Retention and disposal policy

### 1. Purpose

- 1.1 The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that we carry this out consistently and that we fully document any actions taken. Unless otherwise specified the retention and disposal policy refers to both hard and soft copy documents.

### 2. Review

- 2.1 Review is the examination of closed records to determine whether they should be destroyed, retained for a further period or transferred to an archive for permanent preservation.

### 3. How long we should keep our paper records

- 3.1 Records should be kept for as long as they are needed to meet the operational needs of the Authority, together with legal and regulatory requirements. We have assessed our records to:
- Determine their value as a source of information about the Authority, 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, Data Protection Act 1998, the Freedom of Information Act 2000, the Limitation Act 1980, the General Data Protection Regulation 2018, Data Protection Act 2018).
- 3.2 Where records are likely to have a historical value, or are worthy of permanent preservation, we will transfer them to the National Archives after 25 years.

### 4. Disposal schedule

- 4.1 A disposal schedule is a key document in the management of records and information. It is a list of series or collections of records for which predetermined periods of retention have been agreed between the Data Protection Officer (DPO), the Information Asset Owner's (IAO's) and the Senior Information Risk Officer (SIRO).
- 4.2 Records on disposal schedules will fall into three main categories:
1. 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*).

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

3. Review – see 2 above.

4.3 Records can be destroyed in the following ways:

#### **Destruction**

- Non-sensitive information – can be placed in the normal recycling bin
- Confidential information – cross cut shredded and pulped or burnt
- Highly Confidential information – cross cut shredded and pulped or burnt
- Electronic equipment containing information - destroyed using killdisc and for individual folders, they will be permanently deleted from the system.

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

#### **Archival transfer**

4.5 This is the physical transfer of physical records to a permanent custody at the National Archives Office.

### **5. Sharing of information**

5.1 Duplicate records should 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 should be taken that seemingly duplicate records have not been annotated.

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

5.3 Where relevant to do so we will carry out a data privacy impact assessment and update our privacy notices to reflect data sharing.

### **6. An audit trail**

6.1 You do not need to document the disposal of records which have been listed on the records retention schedule. Documents disposed of out with the schedule either by being disposed of earlier or kept for longer than listed will need to be recorded for audit purposes.

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

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## **7. Monitoring**

- 7.1 Responsibility for monitoring the disposal policy rests the IAO responsible for that area (who is identified in the disposal schedule below) . The policy will be reviewed annually or more often if required.

## 8. Disposal schedule – Corporate retention (all teams)

Heading	Description	Retention Period	Comments	IAO
<b>Corporate policies</b>	All internal policies for use by all staff	Until superseded		All Directors (for their Directorate)
<b>Board</b>	Audit committee papers	6 years	Transfer all permanently retained items to TNA	Director of Corporate Services
	Audit committee minutes	Permanently		
	Audit committee terms of reference	Until superseded		
	Board meeting papers	6 years		
	Board meeting minutes	Permanently		
	Board terms of reference	Until superseded		
	Remuneration committee papers	6 years		
	Remuneration committee minutes	Permanently		
	Remuneration committee terms of reference	Until superseded		
	Scrutiny committee papers	6 years		
	Scrutiny committee minutes	Permanently		
	Scrutiny committee terms of reference	Until superseded		
	Private sessions	Permanently		
<b>General correspondence including emails</b>	This relates to both internal and external correspondence (which does not fall into another category in the schedule)	18 months		All Directors (for their Directorate)

## 9. Disposal schedule – Corporate Services: Finance Records

Heading	Description	Retention Period	Comments	IAO
Department of Health	Finance Documents for example Grant in Aid	6 years		Director of Corporate Services
Financial management – bank, petty cash and creditors records	Paid/presented cheques and records of all cheques drawn for payment	6 years	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	All other cheque records – cheque books received, butts, cancelled etc	2 years		
	Bank statements and reconciliations	6 years		
	Electronic banking – transactions, payment files, deposits, withdrawals and audit trail	Same as paper records		
	All petty cash records	6 years		
	Creditors history records, lists and reports	6 years		
	Statements of accounts	2 years		
Financial management – ledger records	General ledger produced for purposes of preparing certified financial statements	6 years	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	Creditor ledger	6 years		
	Other ledgers and related audit trails	6 years		
	Journals – prime record for raising charge	6 years		
	Journals -adjustments	6 years		
	Reconciliations Year End inc TB	6 years		
	Assets and depreciation	6 years on disposal of last		

	registers	asset		
	Records in relation to capital works projects	6 years		
	Annual and quarterly financial statements	6 years		
	Periodic financial statements	destroy when cumulated into quarterly/annual reports		
<b>Financial management – Purchase orders</b>	PO records	6 years	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
<b>Financial management – Income</b>	Debtors records and invoices	6 years	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	Credit notes and refunds	6 years		
	Records relating to unrecoverable revenue (bad debts, overpayments)	6 years minor matters/10 years serious matters		
	Revenue records	6 years		
<b>Financial management – payroll</b>	Employee pay histories	6 years – 3 years for leavers	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	Salary ledger card/records	6 years		
	Salary rates register	when superseded		
	Copy of payroll sheets	6 years		
<b>Financial management – budgeting</b>	Estimations with detailed justification that are submitted to treasury	6 years	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	Calculations and costings for annual estimates	2 years		
	Records relating to bids from Civil Contingencies Fund	6 years		
	Expenditure and revenue returns	1 year after the year to which returns relate		

	FS for annual reports	1 year after publication of the report		
	FS for management	1 year after completion of report		
	Grant funding records	6 years after grant made		
	Treasury Directives and Circulars	Until superseded		
	Fraud and theft	6 years minor matters/10 years serious matters		
<b>Financial management – internal and external audit</b>	External audit investigations	6 years after completion	See TNA generic guidance: <i>Retention Scheduling 3: Accounting Records</i>	Director of Corporate Services
	Audit report that includes long-term contracts	6 years		
	Report papers used in course of fraud investigation	6 years		
	Other audit reports	3 years		
	Terms of reference, correspondence, minute of meetings, working papers	3 years		
	Programmes, plans and strategies	1 year after date of last plan		
	Internal audit guides, manuals, and guides relating to departmental procedures and local auditing standards	when superseded		
	Annual reports to accounting officers	3 years		
	Financial documents (including investment appraisals)	6 years after end of project		

## 10. Disposal schedule – Corporate Services: Human Resource Records

Heading	Description	Retention Period	Comments	IAO
Employee Files and Board Member Files	Paper and hardcopy employee files, all content except that which has a timeframe set out within a statute set out in the rest of this section.	6 years after the employee leaves the organisation.	The Limitations Act 1980 (to reflect that legal proceedings must start within 6 years)	Director of Corporate Services
Income Tax Records and Wages	Income tax and NI returns, income tax records and correspondence with the Inland Revenue	Not less than 3 years after the end of the financial year to which they relate	The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended, for example by The Income Tax (Employments) (Amendment No. 6) Regulations 1996 (SI 1996/2631)	Director of Corporate Services
	Wage/salary records (also overtime, bonuses, expenses)	6 years	Taxes Management Act 1970	
	National minimum wage records	3 years after the end of the pay reference period following the one that the records cover	National Minimum Wage Act 1998	
Pension and Retirement	Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	6 years from the end of the scheme year in which the event took place	The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)	Director of Corporate Services
Policies		Until superseded		Director of Corporate Services
Sickness Records	Statutory Maternity Pay records, calculations,	3 years after the end of the tax year in which the	The Statutory Maternity Pay (General)	Director of Corporate Services



	certificates (Mat B1s) or other medical evidence	maternity period ends	Regulations 1986 (SI 1986/1960) as amended	
	Statutory Sick Pay records, calculations, certificates, self-certificates	3 years after the end of the tax year to which they relate	The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended	
Employee Files – General Exceptions	Records relating to working time	2 years from date on which they were made	The Working Time Regulations 1998 (SI 1998/1833)	Director of Corporate Services
	Accident books, accident records/reports	3 years after the date of the last entry	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended.	

## 11. Disposal schedule – Corporate Services: Corporate Governance

Heading	Description	Retention Period	Comments	IAO
<b>Accommodation</b>	This is information relating to the MOTO and other agreements between the landlord and tenant such as additional services including extra cleaning.	6 years apart from ephemeral documents (room bookings etc) which is 1 year	We work in line with TNA generic guidance: <i>Retention Scheduling 1: Buildings Records</i>	Director of Corporate Services
<b>Annual report</b>	Final reports	Permanently		Director of Corporate Services
	Background documentation and iterations of report	2 years		
<b>Board</b>	Audit committee papers	6 years	Transfer all permanently retained items to TNA	Director of Corporate Services
	Audit committee minutes	Permanently		

	Audit committee terms of reference	Until superseded		
	Board meeting papers	6 years		
	Board meeting minutes	Permanently		
	Board terms of reference	Until superseded		
	Remuneration committee papers	6 years		
	Remuneration committee minutes	Permanently		
	Remuneration committee terms of reference	Until superseded		
	Scrutiny committee papers	6 years		
	Scrutiny committee minutes	Permanently		
	Scrutiny committee terms of reference	Until superseded		
	Private sessions	Permanently		
<b>Corporate and Business Planning</b>	Formal policies/documents	5 years		Director of Corporate Services
	Background to the work	1 year		
<b>Complaints about the Authority or its Board</b>	Policy Statements and guidance. Background papers	Until superseded and 2 years	We work in line with the TNA generic guidance: <i>Retention Scheduling 7: Complaints Records</i>	Director of Corporate Services
	Reports on particular complaints or categories of complaints	3 years		
	Statistical reports	5 years		
	Register of complaints	10 years		
<b>Commercial contracts</b>	Policy	Until superseded	We work in line with TNA generic guidance: <i>Retention Scheduling 5: Contractual Records</i>	Director of Corporate Services
	Initial proposal –end user requirement, list of approved suppliers, statements of interest,	6 years, regularly updated, 1 year from date of last paper, destroy when specification		

	draft specification, agreed specification, evaluation criteria and invitation to tender	agreed, 6 years from end of contract, 6 years from end of contract and 6 years from end of contract		
	Tendering- unsuccessful documents, successful documents, background information, interview panel documentation, commissioning letter, signed contract	1 year after date of last paper, 6 years from award of contract, 1 year after date of last paper, 1 year from end of contract, 1 year from end of contract, 1 year from end of contract and 6 years from end of contract		
	Contract operation and monitoring – report from contractors, schedule of works, bills of quantity, surveys and inspections, records of complaints, disputes over payment, final accounts and minutes and papers of meetings	2 years from end of contract, 2 years from end of contract, 16 years, 2 years from end of contract, 6 years from end of contract, 6 years from end of contract and 6 years from end of contract		
	Amendments to contracts – changes to requirements, forms of variation and extensions to contract	6 years from end of contract		
<b>Department of Health</b>	Quarterly accountability meetings	2 years		Director of Corporate Services
	Parliamentary Questions	2 years		
<b>Forms and Templates</b>		Until superseded		Director of Corporate Services
<b>General correspondence including emails</b>	This relates to both internal and external	18 months		Director of Corporate Services

	correspondence (which does not fall into another category in the schedule)			
<b>Governance</b>	Accounting officer papers	6 years		Director of Corporate Services
	Risk management	6 years		
	Audit	6 years		
	Diversity	6 years		
	Reference documents such as documents provided to support and audit.	6 years		
	Governments	6 years		
<b>Health and safety</b>	Reporting injuries, diseases and dangerous occurrences	3 years	Based on Health and Safety England (HSE) advice	Director of Corporate Services
	Accident book	3 years from last date of entry		
	Risk assessments	40 years		
	Safe operation procedures and safe systems of work	40 years		
	Effectiveness of controls (e.g. monitoring noise levels and light)	40 years		
	Maintenance of controls and other machinery	40 years		
	Training	40 years		
	Safety inspections & checks	40 years		
<b>Information policy and legislation</b>	Policies	until superseded	We work in line with TNA generic guidance: <i>Retention Scheduling 9: Information management records</i>	Director of Corporate Services
	FOI requests: background documents, final versions released	2 years and 10 years		
	SAR Requests	3 years for background documents, 3 years for final documents – unless		

		the requests relate to an only going matter such as a special investigation or PR in which case they will be retained in line with the retention schedule for that area.		
	Disposal schedule, background papers	Permanently, 10 years		
	Documents destroyed list	10 years		
	Training records	5 years		
<b>ICT</b>	All ICT documents	6 years or until superseded.		Director of Corporate Services
<b>ICT helpdesk</b>	Requests submitted through the ICT helpdesk	2 years		Director of Corporate Services
<b>Office administration</b>	Policies and procedures	5 years		Director of Corporate Services
	Internal Meeting Minutes from corporate meetings including DG and the all staff meeting.	5 years		
<b>Records Management</b>	Policies	Until superseded	We work in line with TNA generic guidance: <i>Retention Scheduling 9: Information management records</i>	Director of Corporate Services

## 12. Disposal schedule – Scrutiny and Quality – Appointments

Heading	Description	Retention Period	Comments	IAO
<b>All documentation relating to the appointment process</b>		3 years from the date that advice is provided to the Privy Council		Director of Scrutiny and Quality
	Evidence	3 years from the date that advice is provided to the		Director of Scrutiny and Quality

		Privy Council		
	Correspondence	3 years from the date that advice is provided to the Privy Council		
<b>Letters of advice to Privy Council</b>	Notes of formal meetings/ advice to Privy Council	Permanent	Transfer to TNA	Director of Scrutiny and Quality
<b>Memorandum of Understanding with Privy Council</b>	Current version	Permanent	Transfer to TNA	Director of Scrutiny and Quality
	Previous version	3 years after superseded		
<b>Meetings</b>	Notes of meetings and presentations relating to the formal scrutiny process	3 years		Director of Scrutiny and Quality
<b>S25C</b>	S25C internal operating manual	3 years after superseded		Director of Scrutiny and Quality
	S25C internal operating manual – previous version	3 years after superseded		
	S25C current process guidance for regulators	3 years after superseded		
	S25C current good practice guidance for regulators	3 years after superseded		
	S25C guidance documents – previous versions	3 years after superseded		
<b>Statistical and monitoring data</b>		Permanently in order to monitor trends	Transfer to TNA	Director of Scrutiny and Quality

### 13. Disposal schedule – Scrutiny and Quality

Heading	Description	Retention Period	Comments	IAO
<b>Audit of initial stages of FTP proceedings</b>	Reports	Permanent		Director of Scrutiny and Quality

	Background information	5 years		
	Background to the work	5 years		
<b>Complaints</b>	Policy Statements and guidance. Background papers	Until superseded and 2 years	We work in line with the TNA generic guidance: <i>Retention Scheduling 7: Complaints Records</i>	Director of Scrutiny and Quality
	Enquires	3 years		
	Reports on particular complaints or categories of complaints	3 years		
	Statistical reports	5 years		
	Register of complaints	10 years		
	Quarterly accountability meetings	5 years		
<b>Good Practice</b>	Seminars	5 years	Archived with TNA after 25 years	Director of Scrutiny and Quality
	Fitness to Practise Forum Meeting Papers	Permanently		
<b>Performance Review</b>	Reports	Permanently	Archived with TNA after 25 years	Director of Scrutiny and Quality
	Supporting evidence	5 years after the final publication date		
<b>Regulation</b>		5 years		Directors of S&Q & Standards & Policy
<b>Section 29</b>	Database records	Permanently	Any cases that go to the High Court should be retained permanently and archived with TNA	Director of Scrutiny and Quality
	Hard copy case files	6 months after final conclusion.		
<b>Special Projects and Investigations</b>	Commissioning letters and correspondence with commissioners	5 years	Permanent documents archived with TNA after 25 years	
	Reports	Permanently		

	Supporting evidence	5 years		
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#### 14. Disposal schedule – Standards and Policy – Accredited Registers

Heading	Description	Retention Period	Comments	IAO
<b>Applications for Accreditation</b>	Application forms & supporting materials (final versions)	5 years		Director of Standards and Policy
	Evidence summaries and internal documents about processes (final versions)	5 years		
	Risk assessments (final versions)	5 years		
	Licensing agreements	Until superseded		
	Call for information	3 years		
<b>Corporate and Finance</b>	Audits	6 years		Director of Standards and Policy
	Financial information	6 years		
	Legal advice	5 years		
<b>Panel Meetings</b>	Panel papers (final version)	5 years after the final publication date	Panel decisions should be transferred to TNA	
	Panel decisions	Permanently		
	Appeals by registers	5 years		
<b>References, Templates</b>		Until superseded		Director of Standards and Policy
<b>Standards and policies</b>		5 years after superseded		Director of Standards and Policy
<b>Correspondence, Complaints, Concerns raised</b>		3 years		Director of Standards and Policy



## 15. Disposal schedule – Standards and Policy – Communications, Policy and Research

Heading	Description	Retention Period	Comments	IAO
<b>Communications</b>	Presentations and speeches	Until superseded	We work in line with the TNA generic guidance on press and public relations records	Director of Corporate Services, Standards and Policy and Scrutiny and Quality (depending on project)
	Briefings for ministers	5 years		
	Corporate designs	Until superseded		
	Comms Strategy	Until superseded		
	The Authority	Until superseded		
	Conference and Events	1 year		
	Ministerial meetings	1 year		
	Photos	Until superseded		
	PPI	Until superseded		
	Press and Public Relations	Until superseded		
	Stakeholder management	Until superseded		
	Website	Until superseded		
	Welsh Language scheme	Until superseded		
<b>Policy and Research - Projects</b>	Commissioning letters and correspondence with commissioners	5 years	Final reports - to transfer to National Archives	Director of Standards and Policy
	Project plans	5 years		
	Calls for information including mailing lists and responses for calls to information	5 years		
	Desk research notes	5 years		
	Regulator responses	5 years		
	Draft reports	1 year		
	Final Reports	Permanently		

<b>Policy and Research - Consultations</b>	Original consultation	5 years	Final response - to transfer to National Archives	Director of Standards and Policy
	Final response	Permanently		
	Further correspondence	5 years		
<b>Policy and Research</b>	Briefings	5 years		Director of Standards and Policy
	Presentations	5 years		
	Other correspondence	5 years		
<b>Regulation</b>		5 years		Director of Standards and Policy/Director of Scrutiny and Quality
<b>Style guide</b>		Until superseded		Director of Standards and Policy
<b>Website</b>	Information received via website forms	2 years, unless otherwise stated within the retention schedule.		Director of Standards and Policy
	Email newsletter subscription	As long as you are subscribed to the newsletter		Director of Standards and Policy

## Version Control

Version	Status	Description of Version	Date Completed
1.0	Agreed	Records Disposal Policy	14/11/08
2.0	Agreed	To reflect changes to staff titles	14/10/10
3.0	Agreed	To reflect changes to our position of disposal of human resources data	25/01/11
3.1		Policy was put in a new template	25/04/13
4.0		Reviewed and changed disposal schedule	
5.0	Agreed	Changes to appointments retention schedule and change of name from AVR to Accredited Registers	15/12/2014
5.1	Agreed	Amendment to appointments retention periods	05/05/2015
5.2	Agreed	Amendment to AR retention schedule	10/01/2017
5.3	Agreed	To add a third category of information 'highly confidential'	13 March 2017
5.4		To add ICT helpdesk queries to the retention schedule	22 March 2018
5.5	Agreed	Annual review and updated to reflect GDPR	24 May 2018
5.6		Annual review	20 May 2019
5.7	Agreed	Title change G&O to Corporate Services	April 2020
5.8	Agreed	Annual review and amendment to S&P retention schedule to include website forms, amendment to the AR section on panel decisions; clarification of corporate actions	10 December 2021