

Records and Information Policy, and Retention Schedule.

Version 01

|                         |                                                  |
|-------------------------|--------------------------------------------------|
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| <b>Date:</b>            | January 2025                                     |
| <b>Version:</b>         | Version 01                                       |
| <b>Signed off by:</b>   | ELT 03 February 2025                             |
| <b>Next Review Due:</b> | 03 February 2026 or sooner if legislative change |

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## **1) Introduction**

1.1 Our recorded information is one of the most significant assets we own. Knowing where our information is and how to access it is vital to the efficient management of IPSA's records. The Records and Information Policy, and Retention Schedule (Annex A) helps to ensure we meet our legal obligations, promotes best practice guidelines, and assists in improving consistency across the organisation by ensuring records of a similar nature are managed efficiently and disposed of within a timely and appropriate manner.

As set out below, IPSA's recorded information can be classified as Records or Non-Records. This document sets out IPSA's policy in relation to both forms of recorded information, including roles and responsibilities and a retention schedule.

As part of their overarching responsibility to provide assurance that the Policy is adhered to, the Information Governance Team will develop a separate implementation plan to operationalise the policy which will include evidence of compliance, in the form of a Record Deletion Register. This can be found under the related documents heading.

## **2) Objectives**

2.1 IPSA will use the Records and Information Policy, and Retention Schedule (RIPRS) to help manage its recorded information. This document will assist in:

- a) Helping to identify IPSA's Records and Non-Records (see para 5 & 6).
- b) Providing guidance on how long recorded information should be kept.
- c) Providing a process to follow at the end of a record's lifecycle.

- d) Helping to ensure IPSA meets both its statutory responsibilities and its overall business objectives in relation to records management.

### **3) Principles**

- 3.1 IPSA will manage all records of information efficiently and securely throughout their lifecycle. This applies to information in all formats, including paper and electronic information.
- 3.2 IPSA will manage its records in accordance with legal obligations and in accordance with industry best practice guidelines.
- 3.3 IPSA's recorded information will only be kept for the length of time defined in the retention schedule unless a longer retention period can be justified for statutory, regulatory, security purposes or for its historic value.
- 3.4 All staff members will partake in their responsibility to manage recorded information in accordance with RIPRS.

### **4) Who does this policy apply to?**

- 4.1 This policy applies to all permanent and temporary employees, contractors, consultants and secondees who have access to IPSA's information.

### **5) What constitutes a Record?**

- 5.1 IPSA holds a large amount of recorded information but not all information constitutes a Record. Both Records and Non-records need to be managed efficiently.

5.2 Records are documents in all formats, that have been created or received by IPSA while carrying out its business activities. Typically, they are essential to the fulfilment of legal, business, administrative obligations, or to documenting a decision-making process.

5.3 Below are examples of information in different formats that IPSA staff are likely to use:

- documents (handwritten and typed)
- spreadsheets
- paper-based files
- electronic (computer) files
- databases and the data they contain
- emails
- forms
- receipts and other documentary evidence
- recordings of telephone calls and meetings

## **6) What constitutes a Non-record?**

6.1 Non-records are items that are not essential to the fulfilment of legal, business, administrative or other obligations, or to documenting a decision-making process.

6.2 Below are examples of items which are usually of limited value once they are no longer in use and can be destroyed through housekeeping:

- Duplicate copies of documents retained for distribution or convenience or miscellaneous notices
- Preliminary drafts that do not form significant stages in the preparation of a final document
- Blank forms, personal messages or correspondence, and non-IPSA publications

- Information that may be of need for a short period of time and then quickly becomes redundant.

6.3 The destruction of non-records should be done on a regular basis by individual members of staff and Team Leads.

## **7) Storage and Access**

7.1 Records should be stored securely, so that only members of staff who need to access them are able to do so.

7.2 For access and long-term preservation Records should not be stored on personal drives or desktops.

7.3 Non-records may be stored on personal drives and desktops.

7.4 Both Records and Non-Records that are sent internally or externally need to be done so in accordance with best practice and acceptable use guidelines.

## **8) Ownership of records**

8.1 IPSA owns all information created by staff carrying out work for or on behalf of IPSA.

8.2 Information received by staff relating to IPSA's work is also owned by IPSA.

8.3 In circumstance where IPSA is using a data processor or third party a retention schedule should be stipulated within the contract or data sharing agreement. Auditable evidence of the deletion of files should be retained.

## **9) Roles and Responsibilities**

9.1 The roles and responsibilities of staff members are set out below:

- a) The Data Protection Officer and Senior Information Risk Owner (SIRO), supported by the Information Governance Team, are responsible for ensuring that IPSA's records management procedures (1) comply with best practice guidelines and legislation and (2) that the Retention Schedule is being adhered to by Teams.
- b) The Information Governance Team is responsible for transferring records selected by Team Leads for permanent preservation to The National Archives and other places of deposit, as well as helping to provide guidance in relation to records management.
- c) Information Asset Owners, (see in para 14), are responsible for ensuring that information assets are handled and managed appropriately. In particular, they are responsible for ensuring that policy and the retention schedules are applied in their areas of responsibility, including the identification of records for permanent preservation (see para 17).
- d) Individual Team Leaders are accountable for the management of records within their shared drives and other shared areas. This includes the destruction of Records and Non-records as set out in the retention schedule and the identification of records for permanent preservation.
- e) As part of their day-to-day responsibilities every member of staff is accountable for maintaining effective and efficient record-keeping.

## **10) Retention**

10.1 The retention schedule at Annex A sets out the length of time for which Records should be retained and all members of staff should be aware of the retention periods it sets out.



10.2 In instances where a retention period is not clear, staff should contact the Data Protection Officer to receive further guidance.

## **11) Legislation**

11.1 There are various pieces of legislation which govern retention requirements. The RIPRS is developed to comply with both relevant legislation and statutory regulation.

These include but are not limited to:

- Freedom of Information Act 2000
- Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- Public Records Act 1958
- Inquiries Act 2005
- Limitation Act 1980
- The Environment Information Regulations 2004
- The Parliamentary Standards Act 2009
- The Constitutional Reform and Governance Act 2010

## **12) Legal Holds**

12.1 In exceptional circumstances, legislation may stipulate that a record should not be destroyed. In this instance, IPSA should follow the relevant legislation. For example, it can be a criminal offence to destroy records that are requested for release under the Freedom of Information Act or The Data Protection Act.

12.2 Records that are needed for on-going legal cases should not be destroyed.

12.3 When information falls under a legal hold it should be clearly marked as such by Team Leads or by an appropriately selected member of staff, so the records are not

accidentally included in any scheduled destruction. This should be done as a matter of priority.

### **13) Advanced deletion**

13.1 If there is a legal requirement to destroy information sooner than stipulated within the retention schedule, this should be acknowledged and explained within the Record of Deletion Register (para 18).

13.2 In some cases, IPSA may have signed a data sharing agreement or contract that only provides us with access to material for a defined length of time. The staff member responsible for the area of work (IAOs or Team Leads) should ensure that the records have been deleted when the agreement requires us to do so.

### **14) Information Assets**

14.1 An information asset is a body of information, defined and managed as a single unit so it can be understood, shared, protected and developed efficiently. Information assets have recognisable and manageable value, risk, content and lifecycles.<sup>1</sup>

14.2 All Information Assets are allocated to staff members known as an Information Asset Owners (IAO). An example of the register can be located here: [Asset Register template for departments.xlsx](#)

14.3 Information Asset Owners have been appointed to be responsible for one or more identified information asset. This person will be responsible for ensuring that the

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<sup>1</sup> The National Archives. (2017): <https://cdn.nationalarchives.gov.uk/documents/information-management/information-assets-factsheet.pdf>

Information Asset is accurately stored and maintained on the Information Asset Register. Furthermore, they are responsible for ensuring that policy and the retention schedules are applied in their areas of responsibility.

## **15) Paper Records**

15.1 The majority of IPSA's paper records are stored within offsite storage facilities.

15.2 Individual teams and IAOs should be aware of the records they hold within offsite storage. In line with best practice, paper records should be kept to a minimum.

15.3 In circumstances where teams are unsure of what records they hold in storage they may need to contact the DPO and the offsite storage facility in order to obtain an inventory.

15.4 Paper records should be destroyed with the level of security required by the confidentiality of their contents, e.g. papers containing confidential information should be disposed of via confidential waste bins.

15.5 In circumstances where both paper and digital records are held, they should be destroyed simultaneously.

## **16) Records held on external devices**

16.1 Records should be kept within IPSA's business systems or SharePoint. They should not be kept in personal IPSA email accounts.

16.2 If in exceptional circumstances, information is held on instant messaging apps, personal devices, personal email accounts or non-corporate systems, staff members must transfer the information to corporate systems as soon as possible. They will then delete the information from its original location.

16.3 All users should be aware that any information relating to IPSA is subject to legislation such as the Freedom of Information Act and Data Protection Act.

## **17) Permanent Preservation for IPSA's Legacy Records**

17.1 A legacy record is a record that has a permanent or lasting administrative, legal, fiscal, research or historical value and therefore must be retained and preserved indefinitely.

17.2 Documents which have been marked for permanent preservation should be recorded by Team Leads or Information Asset Owners. They should be clearly marked to ensure they are not destroyed accidentally.

17.3 Records marked for permanent preservation should be moved across to a separate secure folder. Records suitable for permanent preservation will be eventually transferred across to The National Archives. However, they will need to be stored securely until the National Archives is ready to receive the records, this is 20 years after their creation.

17.4 The Information Governance Team will help assist individual teams with this process.

## **18) Record of Deletion Register**

18.1 When a record has come to the end of its lifecycle, i.e., it's no longer required to be kept for IPSA's business needs, the statutory and regulatory requirements have been fulfilled, and is not needed for permanent preservation, then the record can be destroyed.

18.2 IPSA needs to be able to demonstrate that the destruction of records has been done in accordance with its legal and business requirements.

18.3 All records of deletion projects must be logged on the [Record of Deletion register](#). This can be found on the Information Governance SharePoint site. The following fields should be filled in:

- IPSA business area
- Description of records
- Type of record
- Storage location
- Retention period
- Date of deletion
- Signed off by (name)

18.4 If a high volume of information is being reviewed at once then this can be conducted at a macro level, i.e., not document by document. However, this needs to have both the sign off from the Team Lead and the Director of the department.

## **19) Related documents**

19.1 The below are links to supporting documents:

[Implementation plan](#)

[Record of Deletion register](#)



## Annex A – Retention Schedule

### Retention Schedule

Whilst the retention schedule has been developed to help IPSA comply with its regulatory requirements, staff are advised to be mindful of the secondary use of information, particularly with regard to the Compliance Officer and their duty to conduct investigations. If you have any queries, please contact the Information Governance Team for further information.

| Records – Audit, Risk and Assurance   | Description                                                                                   | Trigger point | Retention period                                                                                                            | Retention Source |
|---------------------------------------|-----------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------|------------------|
| Audit - Internal audit reports        | This includes all full reports and interim reports                                            | Creation      | Review after 3 years                                                                                                        | Business need    |
| ARA programmes/plans                  | Future plans of action/programmes                                                             | Last accessed | One year                                                                                                                    | Business need    |
| Audit correspondence                  | Significant emails and correspondence                                                         | Creation      | Review after 3 years. Non-substantive drafts may be deleted after 1 year.                                                   | Business need    |
| Audit supporting documents            | Audit research papers and any supporting documents                                            | Creation      | Review for relevance and retain substantive correspondence for 3 years. Non-substantive drafts may be deleted after 1 year. | Business need    |
| Audit, Risk and Assurance – Contracts | Reports (including interim), where these have included the examination of long-term contracts | Creation      | Review after 3 years (+ current financial year).                                                                            | Business need    |

## Annex A – Retention Schedule

|                                                                                               |                                                                                                                                                                |                                 |                                                                                                                             |                     |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------|
| Audit, Risk and Assurance report papers used in the course of an investigation                | Any papers relevant to legal proceedings.                                                                                                                      | Completion of legal proceedings | Review after 6 years (+ current financial year).                                                                            | Business need       |
| Copy of standards and guidelines                                                              |                                                                                                                                                                | Creation                        | Superseded + one year                                                                                                       | Business need       |
| Terms of reference                                                                            |                                                                                                                                                                | Creation                        | Superseded + one year                                                                                                       | Business need       |
| <b>Risk management</b>                                                                        | Key records documenting the development and establishment of IPSA's risk management policy, and detailed recording of risks and mitigating actions across IPSA | Creation                        | Review after 6 years (+ current financial year).                                                                            | Business need       |
| Identification and evaluation of risks (Pentana)                                              |                                                                                                                                                                | Last accessed                   | 3 years after closure of risk on Pentana                                                                                    | Business need       |
| Working papers documenting development and implementation of IPSA's risk management strategy. |                                                                                                                                                                | Creation                        | Review after 3 years                                                                                                        | Business need       |
| <b>Assurance Reports</b>                                                                      | This includes all full reports and interim reports                                                                                                             | Creation                        | Review after 3 years                                                                                                        | Business need       |
| Legal and Regulatory Advice                                                                   | Advice from our lawyers and other regulatory bodies                                                                                                            | Case closed                     | Review after 6 years (+ current financial year).                                                                            | Limitation Act 1980 |
| Supporting evidence                                                                           | Audit research papers and any supporting documents and correspondence                                                                                          | Creation                        | Review for relevance and retain substantive correspondence for 3 years. Non-substantive drafts may be deleted after 1 year. | Business need       |



## Annex A – Retention Schedule

| Records – Communications                  | Description                                                                                   | Trigger point           | Retention period                                                                                                                     | Retention source |
|-------------------------------------------|-----------------------------------------------------------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------|------------------|
| Instant messages                          | MS Teams' chat                                                                                | Creation                | Delete after 30 days                                                                                                                 | Business need    |
| IPSA individual staff mailboxes (Outlook) | Emails sent and received within and outside the organisation.                                 | End of staff employment | Delete one year after staff member has left employment. Note: This does not capture records held within Engage/SharePoint            | Business need    |
| Meeting minutes                           | Minutes of internal meetings (not Board or ELT) or significant meetings with external bodies. | Creation                | Delete after 3 years. However, if they feed into the formulation of policy or substantial organisation changes, review after 6 years | Business need    |
| Meeting recordings (External)             |                                                                                               | Creation                | Delete after 30 days. If transferred to SharePoint can be kept for a year                                                            | Business need    |
| Phone calls                               | Recorded conversations between IPSA and MPs' and Staff                                        | Creation                | Delete after 1 year                                                                                                                  | Business need    |
| Physical correspondence                   | Postal or Fax Correspondence                                                                  | Creation                | Destroy once scanned                                                                                                                 | Business need    |
| Recordings of internal meeting            | Internal meetings on MS Teams                                                                 | Creation                | Delete after 30 days. If transferred to SharePoint can be kept for a year                                                            | Business need    |
| Shared mailboxes (Outlook)                | Emails sent and received via shared mailboxes.                                                | End of financial year   | Review at 3 years (+ current financial year). Note: Emails for long term storage should be stored within Engage or SharePoint        | Business need    |

## Annex A – Retention Schedule

|                    |                         |          |                                                                                       |               |
|--------------------|-------------------------|----------|---------------------------------------------------------------------------------------|---------------|
| MS Teams' channels | MS Teams' channel chats | Creation | Delete after 6 months unless<br>GE specific channels in which<br>retention is 2 years | Business need |
|--------------------|-------------------------|----------|---------------------------------------------------------------------------------------|---------------|

| <b>Records – Strategic Communications</b> | <b>Description</b>                                                   | <b>Trigger Point</b> | <b>Retention period</b>                                                   | <b>Retention source</b>         |
|-------------------------------------------|----------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------|---------------------------------|
| Communication with journalists            | Communication with journalists (emails, letters, phone call notes)   | Creation             | Delete after 3 years                                                      | Business need                   |
| Communication with MPs                    | Communications including campaigns, events and bulletins sent to MPs | Creation             | Review after 3 years, some records may be kept for long term preservation | Business need/ corporate memory |
| Corporate newsletter                      | IPSA internal newsletter                                             | Creation             | Long term preservation – corporate memory                                 | Corporate memory                |
| Mail Chimp                                | List of contact details for journalist                               | Last actioned        | Delete contact information after 3 years of last use.                     | Business need                   |
| Press & media notices                     | All official notices to external stakeholders and press              | Creation             | Review after 3 years                                                      | Business need                   |

## Annex A – Retention Schedule

| Records – Finance                          | Description                                                                                                                    | Trigger point         | Retention period                                | Retention source    |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------------|---------------------|
| Bank account records                       | Cheques and associated records, bank reconciliations, bank statements                                                          | End of financial year | Review after 6 years (+ current financial year) | Limitation Act 1980 |
| Contingency applications (successful)      |                                                                                                                                | Last actioned         | Review after 6 years (+ current financial year) | Business need       |
| Contingency applications (unsuccessful)    |                                                                                                                                | Last actioned         | Review after 3 years (+ current financial year) | Business need       |
| Contingency supporting documents           | Agendas, minutes                                                                                                               | Creation              | Review after 6 years (+ current financial year) | Business need       |
| Claim reviews                              |                                                                                                                                | End of financial year | Review after 6 years (+ current financial year) | Business need       |
| Debits and refunds                         | Records relating to unrecoverable revenue, debts and overpayments (such as register of debts written off, register of refunds) | End of financial year | Review after 6 years (+ current financial year) | Limitation Act 1980 |
| Expenditure records                        | Cash books/sheets, petty cash records, creditors statements, subsidiary records, vouchers, costing records                     | End of financial year | Review after 6 years (+ current financial year) | Limitation Act 1980 |
| Ledger Records                             | General and subsidiary ledgers, journals                                                                                       | End of financial year | Review after 6 years (+ current financial year) | Limitation Act 1980 |
| Receipts and evidence submitted for claims |                                                                                                                                | Last actioned         | Review after 6 years (+ current financial year) | Limitation Act 1980 |
| Receipts and revenue records               | Year-end balances, reconciliations and variations                                                                              | End of financial year | Review after 6 years (+ current financial year) | Limitation Act 1980 |

## Annex A – Retention Schedule

|  |                                                   |  |  |  |
|--|---------------------------------------------------|--|--|--|
|  | to support ledger balances and published accounts |  |  |  |
|--|---------------------------------------------------|--|--|--|

| Records – Governance            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Trigger point         | Retention period                                                                     | Retention source |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------|------------------|
| Business continuity plans       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | End of financial year | Review at 6 years (+ current financial year)                                         | Business need    |
| Corporate projects and planning | <p>Corporate strategy and strategic plans/ transformation projects/ changes to organisations structure. Records include:</p> <p>Activities and overview</p> <p>Approval proposals</p> <p>Budget records</p> <p>Business case review</p> <p>Correspondence</p> <p>Feasibility studies</p> <p>Formal review report</p> <p>Programme plan</p> <p>Programme timetable</p> <p>Resource Plan</p> <p>Risk assessment reports</p> <p>Risk logs</p> <p>Surveys</p> <p>Project documents relating to the policy or publication space</p> | End of financial year | Review at 6 years (+ current financial year). Possible transfer to National Archives | Business need    |

## Annex A – Retention Schedule

|                                        |                                                                        |                       |                                                                           |                     |
|----------------------------------------|------------------------------------------------------------------------|-----------------------|---------------------------------------------------------------------------|---------------------|
| Data Sharing Agreements                | DSAs, including correspondence and preliminary drafts of significance. | End of the agreement  | After the DSA ends, review at 6 years (+ current financial year)          | Limitation Act 1980 |
| <b>Deletion Register</b>               | Record to show a log of records that have been deleted.                |                       | <b>Permanent preservation</b>                                             | Business need       |
| Information Asset Register             |                                                                        | End of financial year | Review at 6 years (+ current financial year)                              | Business need       |
| Memorandum of Understanding            | MoUs including correspondence and preliminary drafts.                  | End of the agreement  | At the end of the agreement, review at 6 years (+ current financial year) | Limitation Act 1980 |
| Record of gifting                      | List of gifts received by IPSA staff members and the board             | End of financial year | Destroy after 6 years                                                     | Business need       |
| Record of Processing Activities (RoPA) |                                                                        | End of financial year | Review at 6 years (+ current financial year)                              | Business need       |
| Risk management                        | Risk register and local risk management records                        | End of financial year | Review at 6 years (+ current financial year)                              | Business need       |

| <b>Records – Guidance and structural records</b>      | <b>Description</b> | <b>Trigger point</b> | <b>Retention period</b> | <b>Retention Source</b> |
|-------------------------------------------------------|--------------------|----------------------|-------------------------|-------------------------|
| Codes of practice                                     |                    | Creation             | Superseded + 1 year     | Business need           |
| External guidance, e.g., NAO, ICO, House of Commons   |                    | Creation             | Superseded + 1 year     | Business need           |
| External Standards                                    |                    | Creation             | Superseded + 1 year     | Business need           |
| Information relating to the development of procedures |                    | Creation             | Superseded + 1 year     | Business need           |

## Annex A – Retention Schedule

|                                              |                                           |               |                                                                    |               |
|----------------------------------------------|-------------------------------------------|---------------|--------------------------------------------------------------------|---------------|
| Internal corporate policies                  |                                           | Creation      | Review and update annually and retain version history for 6 years. | Business need |
| List of corporate roles and responsibilities |                                           | Created       | When superseded                                                    | Business need |
| Procedures and guidance                      | Manuals, instructions, and other guidance | Last actioned | Superseded + 1 year                                                | Business need |
| Templates                                    |                                           | Creation      | Superseded                                                         | Business need |

| Records – Legal                           | Description                                                                                                        | Trigger point   | Retention period                                                | Retention Source    |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------|---------------------|
| Case summaries and background information | All documentation related to the legal case including all correspondence, papers and any information of importance | Case closed     | Review after 6 years (+ current financial year).                | Limitation Act 1980 |
| Complaints                                | Public complaints                                                                                                  | Case closed     | 1 year unless it becomes a legal issue in which refer to above. | Business need       |
| Confirmation of termination (Contracts)   | Termination of contracts and supporting evidence                                                                   | End of contract | Review after 6 years (+ current financial year).                | Limitation Act 1980 |
| Contracts                                 | Final signed contract and substantial drafts                                                                       | End of contract | Review after 6 years (+ current financial year).                | Limitation Act 1980 |
| Correspondence with contract suppliers    | Emails, complaints, minutes of meetings                                                                            | End of contract | Review after 6 years (+ current financial year).                | Limitation Act 1980 |
| Enforcement legal cases                   |                                                                                                                    | Case closed     | Review after 6 years (+ current financial year).                | Limitation Act 1980 |

## Annex A – Retention Schedule

|                                                    |                                                      |                 |                                                                                                        |                     |
|----------------------------------------------------|------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------|---------------------|
| Internal correspondence and sign off for contracts |                                                      | End of contract | Review after 6 years (+ current financial year).                                                       | Business need       |
| Legal and Regulatory Advice                        | Advice from our lawyers and other regulatory bodies. | Case closed     | Review after 6 years (+ current financial year).                                                       | Limitation Act 1980 |
| Member complaints                                  | Complaints from members, MP staff and House staff    | Case closed     | 3 years unless results to a change in policy in which review after 6 years (+ current financial year). | Business need       |
| Unsuccessful tenders                               |                                                      | Case closed     | 1 year                                                                                                 | Business need       |

| Records – Human Resources                            | Description                                                                                                                                                    | Trigger point         | Retention period                                                                                                                 | Retention Source    |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Absence attendance and leave                         | Annual leave requests, time sheets, working patterns and records of absence                                                                                    | End of financial year | Destroy 6 years after end of leave year to which records relate.                                                                 | Limitation Act 1980 |
| Absence attendance and leave (attendance management) | Details of poor attendance, Details of action taken, Referrals, Appeal, Correspondence and Supporting evidence                                                 | End of financial year | Destroy 6 years after end of year records relate to. If the action results in loss of pay, keep until 100th birthday of employee | Limitation Act 1980 |
| Candidates on reserve list                           |                                                                                                                                                                | Creation              | 6 months                                                                                                                         | Limitation Act 1980 |
| Disciplinary action                                  | Formal warnings including disciplinary letters, Interview notes, Reports, Action taken details, Appeal request, Appeal outcome minutes and Supporting evidence | End of financial year | Destroy 6 years after expiry of warning. If the action results in loss of pay, keep until 100th birthday of employee             | Limitation Act 1980 |

## Annex A – Retention Schedule

|                                                                           |                                                                                                                  |                       |                                                                                           |                                                    |
|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------|
| Disciplinary action<br>(Unsubstantiated)                                  | Alleged offence details,<br>Interview notes, Reports                                                             | End of investigation  | Destroy 6 months after<br>allegations of misconduct<br>are proven to be unfounded.        | Limitation Act 1980                                |
| Employment Tribunal                                                       | Reports                                                                                                          | End of financial year | Destroy 6 years after<br>completion of case                                               | Limitation Act 1980                                |
| Job description and Terms<br>and Conditions                               |                                                                                                                  | End of financial year | Destroy 6 years after<br>employment ceases                                                | Limitation Act 1980                                |
| Maternity/Paternity/Shared<br>Parental leave                              | Correspondence,<br>Maternity/Paternity leave<br>form, DWP maternity<br>certificate                               | End of financial year | Destroy 6 years after end of<br>maternity leave                                           | The Maternity & Parental<br>Leave Regulations 1999 |
| Performance Management                                                    | Managing poor<br>performance,<br>Correspondence, Written<br>warning, Minutes,<br>Performance targets,<br>Reports |                       | Destroy 6 years after<br>warning expires                                                  | Limitation Act 1980,                               |
| Reasonable adjustment<br>information                                      |                                                                                                                  | End of financial year | Destroy 6 years after<br>employment ceases                                                | Business need                                      |
| Recruitment - Unsuccessful<br>Candidates                                  |                                                                                                                  | Creation              | 6 months                                                                                  | Employment Act 2002                                |
| Recruitment of IPSA's Board,<br>Chief Executive and<br>Compliance Officer | Recruitment documentation,<br>selection criteria, other<br>relevant documentations                               | End of financial year | Destroy 6 years after<br>employment ceases.                                               | Business need                                      |
| Recruitment policies                                                      | All policies relating to the<br>recruitment of IPSA staff and<br>contractors                                     | End of financial year | Retain until the policy no<br>longer affects staff who were<br>employed under said policy | Limitation Act 1980                                |
| Security clearance                                                        |                                                                                                                  | End of financial year | End of employment plus 6<br>years                                                         | Limitation Act 1980                                |
| Staff leaver records                                                      | Resignation<br>letters/retirement letters                                                                        | End of financial year | Destroy 6 years after<br>employment ceases                                                | Business need                                      |



## Annex A – Retention Schedule

|                       |                                                                                                             |                       |                                         |                                                                                                                                             |
|-----------------------|-------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Staff management      | Performance management, objectives, one-to-one meetings, appraisals – core record should be saved to Actus. | End of financial year | Destroy 6 years after employment ceases | Business need                                                                                                                               |
| Staff personnel files | Including developmental records, political declarations, staff training logs.                               | End of financial year | Destroy 6 years after employment ceases | Management of Health and Safety at Work Regulations 1999; Statutory Sick Pay (General) Regulations 1982; Limitation Act 1980; business need |

| Records – Facilities                                                                     | Description                   | Trigger point         | Retention period                                 | Retention Source |
|------------------------------------------------------------------------------------------|-------------------------------|-----------------------|--------------------------------------------------|------------------|
| CCTV                                                                                     |                               | N/A                   | Office CCTV is owned by landlord.                |                  |
| Health & Safety procedures & good practice guidance, assessments, inspections and advice |                               | Creation              | Review after 6 years (+ current financial year). | Business need    |
| IPSA Equipment                                                                           | Purchase details of equipment | End of financial year | Review after 6 years (+ current financial year). | Business need    |
| List of First aid responders and Fire Wardens                                            |                               | Creation              | Superseded                                       | Business need    |
| Visitor logs                                                                             |                               | Creation              | Destroy after one year                           | Business need    |

## Annex A – Retention Schedule

| Records – Information requests                                         | Description                                                               | Trigger point | Retention period                                           | Retention Source |
|------------------------------------------------------------------------|---------------------------------------------------------------------------|---------------|------------------------------------------------------------|------------------|
| Data Protection Requests, E.g. DSAR.                                   | All documentation supporting DSAR requests.                               | Last actioned | 3 years unless has appeal has been processed then 6 years. | Business need    |
| FOI Disclosure log on IPSA website                                     |                                                                           | Last actioned | 3 years                                                    | Business need    |
| Information Rights Requests including FOIA, EIR and associated appeals | All documentation supporting FOI requests.                                | Last actioned | 3 years unless it results in a legal case then 6 years.    | Business need    |
| Parliamentary Questions                                                | Answers, draft answers and background briefing to Parliamentary Questions | Last actioned | Response plus 3 years                                      | Business need    |

| Records – I.T                          | Description                                              | Trigger point | Retention period                                 | Retention Source    |
|----------------------------------------|----------------------------------------------------------|---------------|--------------------------------------------------|---------------------|
| Back up systems                        |                                                          | Creation      | Daily backups up to 90 days                      | Business need       |
| I.T Tickets                            |                                                          | Creation      | Review after 3 years                             | Business need       |
| Jot Form Contracts and Employment Tool | Data relating to job descriptions and MP staff contracts | Creation      | Review after 6 years (+ current financial year). | Limitation Act 1980 |

| Records – MP Services - (Information on Engage)* <sup>2</sup> | Description | Trigger point | Retention period | Retention Source |
|---------------------------------------------------------------|-------------|---------------|------------------|------------------|
|---------------------------------------------------------------|-------------|---------------|------------------|------------------|

## Annex A – Retention Schedule

|                                                                   |                                                          |                     |                                                  |               |
|-------------------------------------------------------------------|----------------------------------------------------------|---------------------|--------------------------------------------------|---------------|
| Copies of MPs' contract leases for offices/ accommodation (HOST). |                                                          | Contract end        | Review after 6 years (+ current financial year). | Business need |
| Correspondence with MPs and their office                          | Emails, details of calls and letters, copies of receipts | Last actioned       | Review after 6 years (+ current financial year). | Business need |
| MPs' contact details                                              | Phone number and address.                                | MP leaves office    | Review after 2 years (+ current financial year). | Business need |
| MPs' proxy name and personal contact details                      |                                                          | Proxy leaves office | Review after 2 years (+ current financial year). | Business need |

| Records – Payroll | Description                                                                                                                                      | Trigger point         | Retention period                                                                                         | Retention source        |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------|-------------------------|
| Benefits          | Childcare Vouchers                                                                                                                               | End of financial year | Destroy 6 years after entitlement ceases                                                                 | Business need           |
| Benefits          | Loans                                                                                                                                            | End of Financial year | Destroy 6 years after loan has been repaid                                                               | Limitation Act 1980     |
| Contracts         |                                                                                                                                                  | End of financial year | After employment ceases or after superseded if employee changes roles within same office/or within IPSA. | Limitation Act 1980     |
| Pension records   | Annual return of pay and tax deducted<br>Annual return of pay and tax deducted<br>Maternity/Paternity pay document<br>Bonuses<br>Payroll history | End of financial year | Destroy when individual reaches 100th birthday (or 5 years after last action if later)                   | Pensions administration |

## Annex A – Retention Schedule

|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                         |                                                               |                                                                                                                                |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
|                                      | Details of Estimates and awards<br>Additional voluntary contributions (AVCs)<br>Marriage, death certificates or similar (copies)<br>Death benefit nomination or revocation forms<br>Unpaid leave periods<br>Sick absence records<br>Disciplinary action affecting terms and conditions or salary, records of Appointment letter<br>Probation confirmation<br>Records of payments made/received<br>Resignation, termination and retirement letters to staff |                         |                                                               |                                                                                                                                |
| Pension Schemes                      | Monthly/annual pension payroll reports                                                                                                                                                                                                                                                                                                                                                                                                                     |                         | Destroy 3 years after end of financial year records relate to | National Audit Office/Inland Revenue advice                                                                                    |
| Salary Records/payroll records       | E.g., Wage and Additional hours payments                                                                                                                                                                                                                                                                                                                                                                                                                   | End of financial year   | Review after 6 years (+ current financial year).              | Limitation Act 1980                                                                                                            |
| Staff records – personal information | Personal information of staff members, including full names and date of birth, NI Numbers                                                                                                                                                                                                                                                                                                                                                                  | After employment ceases | Review after 6 years (+ current financial year).              | Limitation Act 1980                                                                                                            |
| Time sheets for contractors          |                                                                                                                                                                                                                                                                                                                                                                                                                                                            | End of financial year   | Review after 6 years (+ current financial year).              | In line with HMRC requirements salary records have to be retained for 3 years after the pay period the records cover. However, |

## Annex A – Retention Schedule

|  |  |  |  |                                                                                                                         |
|--|--|--|--|-------------------------------------------------------------------------------------------------------------------------|
|  |  |  |  | because the limit to commence any civil cases is 6 years, it is recommended these records be kept to cover that period. |
|--|--|--|--|-------------------------------------------------------------------------------------------------------------------------|

| Records – Policy and Advice           | Description                                                                    | Trigger point | Retention period                                                                                                                  | Retention Source |
|---------------------------------------|--------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------|
| Amendment to existing policy          |                                                                                | Creation      | Review after 6 years (+ current financial year).                                                                                  | Business need    |
| Consultation responses                |                                                                                | Creation      | Review after 6 years (+ current financial year).                                                                                  | Business need    |
| Policy correspondence                 | e.g. between the Chair/CEO and stakeholders including Ministers/MPs and others | Creation      | Review after 6 years (+ current financial year).                                                                                  | Business need    |
| Policy draft papers                   | Substantial draft versions of policies                                         | Creation      | Review and retain substantive papers for 6 years (+ current financial year). Non-substantive drafts may be deleted after 3 years. | Business need    |
| Policy formulation and implementation | Policies, advice, and guidelines.<br>Policy reviews and analysis.              | Creation      | Review after 6 years (+ current financial year).<br>Review for permanent retention and potential                                  | Business need    |

## Annex A – Retention Schedule

|                           |  |          |                                                                                                                                     |               |
|---------------------------|--|----------|-------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                           |  |          | transfer to the National Archives.                                                                                                  |               |
| Scheme or Policy Guidance |  | Creation | Review after 6 years (+ current financial year).<br>Review for permanent retention and potential transfer to the National Archives. | Business need |

| Records – Publication                         | Description                                                                                                    | Trigger point – End of financial year | Retention period                                 | Retention source |
|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------|---------------------------------------|--------------------------------------------------|------------------|
| Background data of published MPs' expenses    | Information that supports the publication of MPs' expenses e.g. spreadsheets.                                  | Creation                              | Review after 6 years (+ current financial year). | Business need    |
| Bimonthly data                                | Detailed claim information                                                                                     | Creation                              | Review after 6 years (+ current financial year). | Business need    |
| IPSA websites (IPSA and IPSA online website). |                                                                                                                | Creation                              | Superseded                                       | Business need    |
| Publication of MPs' expenses                  | Information that can be found within 'Annual budgets, costs and claims' webpage.<br>Also, 'other payment data' | Creation                              | Long term preservation                           | Business need    |

## Annex A – Retention Schedule

|                                                     |                                                                 |          |                                                  |               |
|-----------------------------------------------------|-----------------------------------------------------------------|----------|--------------------------------------------------|---------------|
| Records of decisions made in respect of publication | e.g. a decision to withhold/redact something in a specific case | Creation | Review after 6 years (+ current financial year). | Business need |
|-----------------------------------------------------|-----------------------------------------------------------------|----------|--------------------------------------------------|---------------|

| Records – Reports                      | Description                              | Trigger point | Retention period                                                                                | Retention Source |
|----------------------------------------|------------------------------------------|---------------|-------------------------------------------------------------------------------------------------|------------------|
| Annual reports                         |                                          | Last actioned | Review after 6 years (+ current financial year).<br>Potential transfer to the National Archives | Business need    |
| Board and ELT meeting minutes          |                                          | Created       | Review at 6 years (+ current financial year). Possible transfer to National Archives            | Business need    |
| Board Papers                           | Papers submitted to Board meetings.      | Last actioned | Review after 6 years (+ current financial year).<br>Possible transfer to National Archives.     | Business need    |
| Public Consultations including reports | Consultations for changes in policy etc. | Creation      | Review after 6 years (+ current financial year).                                                | Business need    |

## Annex A – Retention Schedule

|                     |                                                                                 |               |                                                  |               |
|---------------------|---------------------------------------------------------------------------------|---------------|--------------------------------------------------|---------------|
|                     |                                                                                 |               | Potential transfer to the National Archives      |               |
| Reports             | Finance, HR, Data Protection, Policy, ARA, etc                                  | Last actioned | Review after 6 years (+ current financial year). | Business need |
| SLT papers          | Submissions to IPSA's SLT on matters that are not for the Board's consideration | Last actioned | Review at 6 years (+ current financial year).    | Business need |
| Supporting evidence | This includes advice, correspondence and internal memos.                        | Last actioned | Review after 6 years (+ current financial year). | Business need |



## Annex A – Retention Schedule

## Amendments tracker

It is important to keep a log of any changes made to the retention schedule – whether this is a change to an existing retention period or the addition of a new document type. Any proposed amendment must be discussed first with the IG team. Once agreed, the amendment must be documented in the table below, at which point the schedule will be given a new version number. This will ensure that when IPSA colleagues access the on-line retention schedule, they will always be viewing the current version.

[illegible]

**Annex A – Retention Schedule**

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