

Records Retention Policy and Schedule

Team responsible for activity:	Information Asset Owners
Activity normally carried out by:	<i>By team</i>

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Introduction

1. IPSA creates and manages a wide range of records to enable us to fulfil our statutory responsibilities and strategic aims.
2. A record is defined as information created, received and maintained as evidence and by an organisation or person, in pursuance of legal obligations or in the transaction of business.
3. We are responsible for storing, managing and archiving these records securely and accessibly, in compliance with legislative requirements on data protection, FOI and public records and with our obligations to account for our activities and expenditure to Parliament and the public.
4. In fulfilment of our statutory responsibilities and in the spirit of transparency we regularly publish data on MPs' business costs, in accordance with our approved publication scheme.
5. For the purposes of the Data Protection Act IPSA is a controller and processor of a range of personal data, as set out in our Information Asset Registers and Register of Processing Activities, which we are required to fulfil in accordance with DPA/ GDPR principles.

Records

6. The records concerned are those listed in our Information Asset Registers. They include electronic and paper operational and payroll records, as well as internal governance, management, financial, human resources and commercial records.
7. Our policy is to retain and manage records for as long as necessary for us to meet our necessary processing responsibilities and obligations. We archive or delete records when they are no longer required, with regular reviews where appropriate.

Retention period

8. The default retention periods for each Information Asset Owner (IAO) area and some specific categories of records are set out in the attached schedules. Where a review period is specified, the records should be reviewed to determine whether they can be destroyed or archived sooner, or need to be retained longer, than the default retention period. The categories of data are in most cases fairly general (there is a more detailed schedule HR to reflect the particular requirements in that area). The retention schedules should

be read in conjunction with IPSA's Information Asset Registers and Register of Processing Activity, which provide detail on individual categories of records within each IAO area.

Conclusion

9. IAOs are responsible for ensuring that this policy and the retention schedules are applied in their areas of responsibility. The policy owner is the IPSA Data Protection Officer.
10. In applying this policy staff should have regard to IPSA's Information Governance Framework and Information Security Policy. Separate guidance will be produced [in 2018] on knowledge management including best practice on naming conventions and file structures.
11. This policy will be reviewed annually.

Appendix 1: IPSA Retention Schedule (non-HR records)

Information Asset owner area of responsibility	Review period	Default retention period	Archive after retention period?	Notes
Board and ARAC papers	n/a	Indefinite	n/a	a.
Register of Board members' interests and other Board members' documentation	n/a	Individual Board members' term of office	No	
CEO's Office papers	Annually	5 years	No	b.
Operations: electronic records	n/a	10 years	No	
Operations: original receipts stored via Iron Mountain from 2010 to 2018 (pre-Business World).	n/a	7 years (10 years until 2020)	No	c.
Publications data: information published on IPSA website	n/a	10 years	Yes, via National Archives copy of IPSA website	
Policy, assurance and regulation	Annually	10 years	Yes, subject to annual review of records scheduled for destruction at end of 10 year retention period.	
FOI	n/a	10 years	Yes, via IPSA website.	
Finance	n/a	6 years plus current year	No	d.
Payroll	n/a	6 years plus current year	No	
Communications: internal documents	Annually	1 year	No	e.
Information Technology: user accounts	Monthly	90 days after employee leaving	No	f.
Information Technology: other	Monthly	1 year maximum	No	
Data protection	Annually	6 years plus current year	No	
Other internal working documents	Annually	1 year	No, subject to annual review.	g.

Notes:

- a) Includes Board, ARAC and Remco minutes; and HR, Communications and other specialist functional advice to Board.
- b) Includes papers relating to meetings and correspondence between IPSA's Chairman and CEO and MPs and other external stakeholders; and papers relating to the IPSA Directors Group and SLT meetings.
- c) For reasons of costs and practicality relating to Iron Mountain storage arrangements, the retention period for paper records held by Iron Mountain is temporarily set at 10 years up to 2020, after which it will become 7 years.
- d) Finance and payroll records stored electronically in the Business World ERP system which contain data about MPs' business costs will be retained for 10 years, in accordance with the retention period for operations records.
- e) Advice to the Board on communications issues is covered under Board and ARAC papers.
- f) Includes user accounts, email, H: drive content and any personal data in server logs.
- g) Includes internal drafts of PQ answers

Appendix 2: IPSA HR Retention Schedule

Record type	Description	Retention period and review and archiving requirements
Recruitment of IPSA's Board, Chief Executive and Compliance Officer	Recruitment documentation, selection criteria, other relevant documentations	Individual Board members' and CO's terms of office.
IPSA staff recruitment	Recruitment paperwork: <ul style="list-style-type: none"> All applicants All shortlisted applicants All unsuccessful interviewed applicants 	<ul style="list-style-type: none"> Destroy after 4 months Destroy after 7 months Destroy after 7 months
Staff records – personal information	Personal information of staff members, including: <ul style="list-style-type: none"> Full names and date of birth National Insurance Numbers Pension statements Reckonable service for pension purposes Proof of right to work documentation 	Destroy 6 years after employment ceases.
Staff records – pay and conditions	<p>Leave:</p> <ul style="list-style-type: none"> Paid leave periods Unpaid leave periods Maternity / Shared Parental / Adoption and Paternity statutory pay documentation Parental leave <p>Personal payroll history, including pay record, performance pay, overtime payments, pay enhancements, taxable allowances</p> <p>Resignation, termination and/or retirement letters</p> <p>Sickness records</p>	Destroy 6 years after employment ceases.
	Advances for season tickets, bicycles, Christmas/holidays etc.	Destroy after 1 year.
HR internal documents		Review 6 monthly for deletion.

