



# Records Retention and Disposal

## Policy and Guidance

Policy

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Guidance

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| Author/reviewer                          | Data Protection Officer   |

**Summary of changes**

Amendments to Appendix 2: clerks’ notes retention and removal of paper retention periods.

# Policy

## 1 Purpose

1.1 The aims of this Policy and the accompanying Guidance are to:

- ensure that staff understand why the retention periods and disposal practices for VTS information are necessary and important
- clarify those periods and the procedures to be followed

1.2 Breaches of the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA) or the UK General Data Protection Regulation (GDPR), can result in a penalty of up to £17.5million or the imposition of lesser non-financial measures, but would always inevitably damage the VTS's reputation. Compliance with the law and this Policy is therefore very important.

1.3 In addition, the Policy is required to assist the VTS in conforming to Cabinet Office guidelines on data handling security. As such, the Policy forms part of and supports the Information Security System (ISS).

1.4 The use of the Dynamics Appeals Management System and SharePoint (the document management system) elevates the importance of and the need for compliance with this Policy.

## 2 Scope

2.1 The Policy applies to staff at all levels. Compliance will be checked by the relevant Information Asset Owner (IAO) through spot checks. A list of current IAOs is at Appendix 1. The requirement for VTE Members to comply has been communicated to them by the President.

2.2 This Policy should be read in conjunction with relevant sections of the ISS, such as the following documents 'Information Security Policy', 'Email System Control', and 'System Backup'.

## 3 Background

3.1 The Public Records Act 1958 applies to government departments, including the VTS, therefore there is an arrangement with the National Archives to hold all VTS Board minutes. Other material that has been determined suitable for archiving will be held locally.

3.2 Under the FOIA, the VTS is committed to having a retention policy, so that it has a clear, **consistent approach** to responding efficiently to information requests. This is in regard to both the length of time the VTS holds data and also the status of the documents. For example, the VTS should not be put in the position of having to release a draft document that it holds, simply because it was retained beyond its useful life.

3.3 The GDPR requires the VTS (as a data controller) to review systematically what personal data it processes and to delete any that is no longer required. Personal data are defined as relating to:

“an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”

Only in exceptional and justifiable circumstances should data be held indefinitely. Under the Third and Fourth Principles of the GDPR, the amount of data processed must not be excessive for the business requirement and the data must also be accurate.

3.4 Legislation and best practice provide requirements and guidelines relating to the periods for which certain types of documents should be retained<sup>1</sup>, for example contracts, accounting records, employment records and appeal records. The Guidance has been drawn up as a result of various research and consultation with managers.

## 4 Principles

4.1 A retention period normally starts when a process or transaction ends. For example, many financial records need to be kept for six years after the current financial year, and a tribunal decision for six years after the date of the last alteration to it.

4.2 The VTS rules and procedures are proportionate to the size of the organisation and the resources available. The general rule will be that any record is kept for at least the time period specified in any relevant legislation but may be kept beyond that where a known business requirement exists.

4.3 The business requirements include the need for simplicity and ease of disposal. Beyond an archive of governance documents, management information and HR records for pension purposes, potential future requests from external stakeholders are not taken into account in setting retention periods.

4.4 Records are kept enabling access and to provide information, so no purpose is served in retaining paper files.

4.5 As far as possible, the integrity of a folder should be maintained, with all its contents retained or disposed of together; this means that selective weeding is not necessary and should not be carried out according to anyone’s personal views. This should be borne in mind when setting up a new electronic file structure.

4.6 Electronic storage is always the preferred option. SharePoint, our document management system is in use for all appeal areas. This means that all documents received in paper format must be scanned for storing electronically. Retention periods have also been built into the SharePoint system to allow automatic deletion or archiving.

4.7 Wherever possible, retention and disposal will be built into each standard business process.

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<sup>1</sup> Institute of Chartered Secretaries and Administrators’ Guide to Document Retention, ICSA 2004  
Retention Guidelines for Local Authorities, Records Management Society 2003  
<http://www.nationalarchives.gov.uk/information-management> (accessed February 2013)

## **5 Help and feedback**

5.1 Any comments or queries about the Policy and Guidance should be sent to the VTS Data Protection Officer.

## Guidance

### 6 Tribunal records

6.1 Retention periods are set out in Appendix 2. The legal requirements are set out in the Statutory Instrument<sup>2</sup> and are incorporated in Appendix 2. Beyond the statutory requirement, the President's instruction is that records relating to determined cases should be retained for four months after the date of the last amendment. This includes clerks' notes. The President issued an instruction to VTE Members<sup>3</sup>, in 2016, to securely dispose of any notes they have relating to a decision as soon as it has been issued, and since then, he has continued to state the importance of data protection within members' circulars. The four-month rule does not apply to paper versions of documents that have been scanned. See 6.2 below.

6.2 Guidance warns appellants that important original documents should not be sent to us and will not be returned. If documents are nonetheless sent in which would be costly or difficult to replace, (for example passports, certificates of birth/ death/ marriage), they must be returned to the sender by registered post. All other documents must be securely disposed of one month after scanning.

6.3 All appeal decisions on Dynamics AMS meet the statutory requirement, retained no longer than six years from the last alteration of the decision. Currently, there is limited access to older records (up to 1999) on an archive system however this will not be maintained for the foreseeable future.

6.4 Auto-delete rules for appeal documentation (appeal form, evidence bundles etc) will be applied to Dynamics AMS in line with Appendix 2, however the appeal record and timeline will be retained for a limited period for NDR appeals\*. CT appeal records and timeline will be kept indefinitely.

*\* NDR appeal records and timeline will be deleted after the next two rating lists have been completed, e.g. 2017 appeal records to be kept during the 2023 and 2026 list but deleted once the 2029 list is introduced.*

6.5 The circumstances where information will be **excluded** from being auto-deleted are listed below:

- information about an appeal that is relevant to a complaint made within the first four months should be held for a further two years;
- information about an appeal that is known to have been appealed to the High Court or the Upper Tribunal should be held until that case is finally determined (as it may be remitted to the VTE).
- appeal information that has been requested as part of a subject access request (SAR) should be held for a further six years; and
- information relating to a review of a decision should be held until that case is finally determined.

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<sup>2</sup> The Valuation Tribunal for England (Council Tax and Rating Appeals) (Procedure) Regulations SI 2009 No 2269 – Regulation 41

<sup>3</sup> Letter to VTE members 11/11/2016

## 7 Other records

7.1 Appendix 3 is a list of other types of more common legal, financial, employment and governance documents held by the VTS, together with the time periods for which they should be retained.

7.2 Staff and VTE Member details on CIPHR, the Members' Portal and on SAP should be synchronised on an ongoing basis, through communication between departments as changes are notified. The IAOs and relevant departments should also arrange to cleanse these databases at least once every two years~, supported by information received through:

- reminding staff to amend any changed details in their HR Self-Service records
- reminding VTE Members (on a quarterly basis) to review and update their personal details held on the members' portal
- checking current hearing and training venue use for the list on Dynamics AMS/member allocation portal (annually)

7.3 Changes to suppliers' details must be updated on SAP as they are notified.

*~ FSSD have an agreement/policy in place with VTS covering vendor/supplier and customer data, and as part of a regular rhythm of review and cleanse, any vendor/supplier and customer data not used in the last 2 years is reviewed and either left live and selectable within SAP or specifically marked dormant in system terms.*

## 8 Disposal

8.1 A timetable for disposal is shown at Appendix 5 and it is the responsibility of IAOs to ensure these duties are allocated to staff. Compliance will be monitored through discussion with individual staff and spot checks.

8.2 Approval must be obtained from the relevant IAO before records not included in this Policy are disposed of or destroyed. There is an electronic form for this purpose on the intranet (Forms Index/Corporate) which is shown as Appendix 4.

8.3 When records are disposed of or destroyed, this must be logged on the form by the person who carries it out. They then pass the form to the relevant IAO for certification. IAO signatures should be scanned signatures (providing that Finance already holds a copy of the signature).

### Paper records

8.4 In the event that paper records are received in the post, these must be disposed of **one month after scanning** to comply with this Policy. The IAOs should ensure that these duties are allocated to specific staff.

8.5 The 'confidential shredding and recycling bins' or shredders must be used for all waste that is either marked 'confidential'/'sensitive'/'restricted' from whatever source or includes personal data. This rule must be applied for tribunal records even though they are in the public domain.

8.6 Confidential waste will be collected by contractors appointed by Head Office to an arranged timetable (currently quarterly). Certificates of secure destruction from the contractors are filed.

8.7 Other non-confidential waste should be binned for recycling collection, where possible.

8.8 Finance, HR and Corporate files for archiving off site should be brought to the attention of the relevant IAO who will arrange indexing as required, boxing up and collection by Iron Mountain.

### **Electronic records**

8.9 The VTS still holds records over six years old, which may be accessed from an archive. Guidance from the Information Commissioner's Office (ICO, 2014) notes the practical reality that it may not be possible for data in backups or archives to be deleted immediately on termination of a contract. Provided appropriate safeguards are in place, such as the data being put immediately beyond use, it may be acceptable that the data is not deleted immediately if the retention period is appropriate and the data is subsequently deleted as soon as possible. The ICO will be satisfied that information has been 'put beyond use', if not actually deleted, provided that the data controller holding it:

- is not able, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way
- does not give any other organisation access to the personal data
- surrounds the personal data with appropriate technical and organisational security
- commits to permanent deletion of the information if, or when, this becomes possible

8.10 For other electronic data, files should be deleted regularly to comply with this Policy. Electronic records should be double-deleted or overwritten. Thereafter, each member of staff should ensure that they regularly delete electronic records that they have received, copied or created, in line with the time limits shown in the Appendices. This is particularly important if staff have saved copies of policies or business processes in personal files, as they soon become out of date. Staff should instead rely on the intranet for the latest versions and not download them.

8.11 Staff must ensure that the electronic 'recycle bin' is emptied weekly.

8.12 The retention times apply not only to files on devices but also to files that have been downloaded onto laptops; these files must also be deleted in line with this Policy.

8.13 Draft documents (such as minutes, decisions, business processes and reports) must be deleted once a final version has been approved.

8.14 Staff are responsible for their own email storage and deletion. This includes PST files. As far as possible, emails that are to be retained or that fall within the other subject categories of information should be moved from mailboxes and saved to the appropriate appeal record on Dynamics so that they are available to other colleagues and to meet FOI requests. The 'Deleted Items' email box should be emptied daily in response to the prompt shown when logging out. Personal and office calendars follow similar retention periods and should not contain sensitive personal data and any personal data must be kept to a minimum.



8.15 Data sent to third parties (for example the payroll provider), must be handled securely; this includes secure and prompt disposal. This requirement will be built into any contract and must be communicated to suppliers, to comply with the UK GDPR.

# Appendix 1

## Information Asset Owners

Data and information in paper and electronic form are treated as information assets for purposes of identifying the risks around their handling and security. The VTS has a number of information assets.

All records come within the Government's security guidelines to "manage and protect". Staff who manage and control these assets are deemed to be information asset owners (IAOs); as such they must ensure that areas of risk are addressed and if need be, highlighted in the relevant risk register. IAOs must also be aware of how information is manipulated over the network for their area of activity and responsibility.

The information assets and their IAOs are:

|   |                        |
|---|------------------------|
| Dynamics AMS                              | IT Analyst             |
| Windows/IT infrastructure                 | IT Analyst             |
| SAP accounting system/integrated software | Finance Director       |
| CIPHR staff and HR records                | Head of HR & Training  |
| Property (Estate)                         | Chief Executive        |
| Records for appeals/operational inboxes   | Planning Manager       |
| VTE Members' database                     | Member Engagement Lead |

As systems develop, obligations fall on each IAO to control information flows and monitor the purposes for which the information is used, internally and externally. This includes determining the appropriate retention periods for records in their area of responsibility, having regard to statutory requirements and best practice.

Each IAO has the added responsibility to report quarterly to the Senior Information Risk Owner (SIRO) and annually through an assurance statement confirming that all responsibilities and obligations on them have been treated in accordance with the VTS security policy framework (the ISS). The SIRO, appointed by the Board on behalf of the Cabinet Office, reports to and supports the Accounting Officer (Chief Executive) on matters of information assurance, handling data risk and monitoring information, in so far as these affect the organisation.

## Appendix 2 – Tribunal records #

| Document  | Period of Retention (electronic)   | Comments   |
|---|--|--|
| Appeal forms  | 4 months after last entry to decision or determination by higher court     |  |
| Incomplete appeal applications, awaiting further information  | 6 months   |  |
| Notices of acknowledgement, hearing, postponement/adjournment   | 4 months after last entry to decision or determination by higher court     |  |
| Hearing correspondence: postponement requests, parties' submissions/statements of case                  | 4 months after last entry to decision or determination by higher court     | Exclude from auto delete/archive to be flagged in Dynamics if related to a SAR, Complaints file, review of a decision or cases being appealed to the High Court or Upper Tribunal. |
| Bespoke – directions, set asides, strikeout   | 6 years  | Special electronic file for the purpose  |
| Draft decisions   | Until final version issued   | Draft versions must be deleted after final version approved  |
| Decision records; review certificates   | 6 years after last amendment - Statutory requirement                       |  |
| Chairman's signed decision or emailed approval of draft decision  | 4 months after last amendment to decision or determination by higher court |  |
| Clerks' notes<br>(N.B. these must not include notes taken during judicial deliberations with the panel) | 4 months after last entry to decision or determination by higher court     | Clerks' notes taken in paper form must be immediately scanned into the appeal record on Dynamics following the hearing.  |
| Members' notes  | n/a. See 6.1 above.  |  |
| FTT / High Court decisions  | IRIS (intranet) library – indefinitely                                     |  |
| Correspondence/emails/notes of phone calls relating to appeals  | 4 months after last entry to decision or determination by higher court     | Exclude from auto delete/archive to be flagged in Dynamics if related to a SAR, Complaints file, review of a decision or cases being appealed to the High Court or Upper Tribunal. |
| Undelivered notices   | Up to 3 months   | Efforts taken to redirect.   |

# Dynamics appeal record and timeline to be retained indefinitely for CT appeals. For NDR appeals, Dynamics appeal record and timeline to be deleted after the next two rating lists have been completed

### Appendix 3 – Other documents

| Document   | Period of Retention  | Comments   |
|--|--|--|
| <b>Statistics (MI, Pis)</b>  | Permanent  |  |
| <b>Emails</b> – inbox and sent items<br><b>Calendars</b>                           | 6 months for individuals’ ; 1 month for ‘office’; 3 months for ‘member’; 1 month for ‘travel’; leave calendar – 1 year | Any longer life suggests they should be stored in a named file |
| <b>Timesheets (sign in sheets)</b>   | 2 weeks  |  |
| <b>Complaints</b> registers and correspondence                                     | 2 years from latest correspondence   | Only retain VTS-related correspondence                         |
| <b>Disposal certificate</b>  | 6 years plus the current financial year  |  |
| <b>FOI and Data Protection</b>   |  |  |
| Request Register; correspondence; disposal certificates                            | 6 years  |  |
| <b>Hospitality and gifts</b> register  | 6 years  |  |
| <b>Organisation/ governance records</b>  |  |  |
| Major agreements of historical significance  | Permanently  | Example: protocols with DLUHC, VTE                             |
| Service level agreements   | 6 years after signing  | Example: with VOA, BAs, MoJ                                    |
| <b>Property</b>  |  |  |
| Deeds of title   | Permanently or until property disposed of  |  |
| Leases and all records in acquisition  | 12 years after termination or resolution of dilapidations etc  |  |
| Negotiations where property is not acquired  | Closure of negotiation + 6 years   |  |
| Planning consents and records of alterations                                       | 10 years   |  |
| Wayleave agreements; licences  | 12 years after expiry or disposal of property  |  |
| Records in disposal – surveys, dilaps etc  | Disposal + 6 years   |  |
| Fitting out records  | Next fit-out + 1 year or disposal of property  |  |
| Maintenance schedules and records, repairs records, inspections, fire certificates | When superseded, or completion + 2 years   |  |
| Health and safety inspection reports   | When superseded or current + 5 years   |  |
| Asbestos inspections, registers, reports   | 40 years   |  |

| Document   | Period of Retention   | Comments  |
|--|---|---|
| Removal of asbestos or other hazardous material  | Removal + 5 years   |   |
| <b>Finance</b>   |   |   |
| Asset registers<br>Depreciation registers  | 6 years after sale or disposal of asset or last asset in register             |   |
| Financial statements for –<br>quarterly, annual reports<br>monthly, periodic<br>ad hoc   | 6 years<br>Until cumulated into quarterly/annual reports<br>1 year            |   |
| Spending reviews   | Permanently   | Exceeds statutory requirement for historical/archive purposes   |
| Grant funding records  | Permanently   | Exceeds statutory requirement for historical/archive purposes   |
| Records of serious matters: theft, fraud, misappropriation, irrecoverable debts and overpayments, write-offs   | 10 years after action/investigation is completed                              |   |
| Purchase order records<br>Courier records<br>Travel warrants   | 6 years<br>2 years<br>2 years   |   |
| Receipt books, post books, reconciliation sheets, revenue cash books, receipt cash books, invoices, debit notes, refunds, register of debts written off, register of refunds | 6 years generally but only 2 years for petty cash and summary cash books      | Value Added Tax Act 1994  |
| Records required for NAO's value-for-money examinations  | 6 years   | Unlikely to be a need to keep beyond first 5-year review, unless for own purposes                     |
| <b>Tax</b>   |   |   |
| Supporting documentation for tax returns and VAT   | 6 years after the end of the financial year in which the records were created | Retain until any tax return enquiry is complete. Value Added Tax Act 1994 s58 and Schedule 11, para 6 |

| Document  | Period of Retention  | Comments   |
|---|--|--|
| PAYE & NI returns   | For PAYE records not required to be sent to the Inland Revenue, 3 years + current year | (Income Tax (PAYE) Regulation 2003, Reg 97); Finance Act 2010. |
| Indemnities, guarantees, loan agreements  | 6 years after expiry   |  |
| <b>Banking Records</b>  |  |  |
| Cheques, bills of exchange and other negotiable instruments, bank statements  | 2 years other than record of cheques drawn (6 years)                                   |  |
| Instructions to banks   | 6 years after ceasing to be effective  |  |
| Subscription records  | 6 years after cessation of membership  | Companies Act 2006   |
| <b>Audit records</b>  |  |  |
| Terms of reference  | 6 years  |  |
| Reports and action plans  | 6 years after completion of action   |  |
| Management letters  | Permanent  |  |
| <b>Vendor details</b>   | Unused archived by FSSD after 18 months; cleansed at 7 yrs                             |  |
| <b>Datasets</b>   | 2 years plus current; older archived   |  |
| <b>Employee Records since VTS formed</b>  |  |  |
| Pension Records   | Until age 100  |  |
| Job history including staff personal records: contract(s), Ts & Cs; previous service dates; pay and pension history, pension estimates, resignation/termination letters | Until age 100  |  |
| Job history: personal records of organisation's important executives  | Permanently  | for historical purposes  |
| Current address details   | 6 years after employment ceases  |  |
| Qualifications, references  | Until age 100  |  |
| Grievance proceedings records   | Informal – 2 years from resolution*<br>Formal – 6 years from resolution                | *or earlier at aggrieved party's request                       |
| Disciplinary, oral/verbal, written, final warnings, appeals   | Time periods specified in Staff Handbook   |  |


| Document   | Period of Retention   | Comments   |
|--|---|--|
| Applications for jobs, interview notes – Recruitment/promotion panel<br>Internal<br>Where the candidate is unsuccessful<br>Where the candidate is successful | 2 years<br>2 years<br>1 year after notifying the unsuccessful candidate<br>Until age 100 (as part of job history record)* | Exceed limits in the Discrimination Acts 1975 and 1986, Race Relations Act 1976 and Limitations Act 1980. Civil Service Appointments Commissioner requirement. * Exceeds statutory requirement as forms part of job history record           |
| Payroll input forms, wages/salary records, overtime/bonus payments<br>Payroll sheets, copies   | 6 years + current year<br>2 years   | Taxes Management Act 1970  |
| Payrolls/wages   | 6 years after employment ceases   |  |
| Bank details – current   | 6 years after employment ceases   |  |
| Loan, advances and overpayment records   | 6 years after repayment or write-off  |  |
| Annual leave records   | 2 years   |  |
| Expenses, T&S records  | 6 years   | Archived off SAP after 18 months; cleansed every 7 years by FSSD   |
| <b>Sickness records</b><br>Reports of home visits or from medical advisers; health declarations; fitness for work  | Until age 100   | Limitation Act 1980  |
| Certificates and self-certificates unrelated to workplace injury; statutory sick pay forms   | Until age 100   | Exceeds statutory requirement as forms part of job history record  |
| Papers relating to injury on duty  | Until age 100   |  |
| Accident books   | 3 years from the date of each entry   | Social Security (Claims and Payments) Regs 1979  |
| Accident reports and correspondence  | 3 years after settlement  | RIDDOR Regulations 1995 S7   |
| Health and safety records – medical reports of those exposed to substances hazardous to health (lead, asbestos, compressed air)<br>For ionising radiation    | 40 years from date of last entry<br><br>50 years from date of last entry or until the person reaches age 75               | Personal injury actions must generally be commenced within 3 years of the injury. Exceeds statutory requirement for industrial injuries not capable of detection within that period (such as to exposure to hazardous substances, radiation) |

| Document   | Period of Retention  | Comments   |
|--|--|--|
| Pregnancy/childbirth certification   | 1 year following return to work after pregnancy  | Time limit for litigation  |
| Parental leave   | 5 years from birth/adoption of child, or 18 years if the child receives disability allowance |  |
| Maternity pay records and calculations   | 3 years after the end of the financial year to which records relate                          | Statutory Maternity Pay (General) Regs 1986  |
| Redundancy details, payment calculations, refunds, notifications                           | 6 years from redundancy  |  |
| Training and development records   | 6 years; employee keeps indefinitely   | Evidence of successful development/competency  |
| Organisational charts  | Permanently  |  |
| <b>Members' records</b>  |  |  |
| Expenses, T&S records  | 6 years after appointment ends   | Archived off SAP after 18 months; cleansed every 7 years by FSSD   |
| Appointment, election, attendance records  | 6 years after appointment ends   |  |
| Declarations   | 6 years after appointment ends   |  |
| <b>Policies and guidance</b>   | For staff and on intranet – until superseded; Corporate records retain permanently           | Draft versions must be deleted when a final version is approved/issued   |
| <b>Business processes</b>  | Until superseded   |  |
| <b>Project management documents</b><br>- approved projects<br>- rejected/deferred projects | 10 years after close of project<br>5 years after close/deferral                              | Includes planning, initiation, business case, feasibility, post-implementation review and evaluation documents |
| <b>Risk registers</b>  | 5 years  |  |
| <b>Minutes and Action points</b>   |  |  |
| Board  | Permanently  | Historical archive   |
| Board Committees   | Permanently  |  |
| Other Committees   | 5 years  |  |
| Office and team meeting minutes  | 2 years  |  |
| Draft minutes  | Only until a final version is approved   | Important that these are deleted   |
| <b>Technical and Research</b>  |  |  |
| Reports  | 10 years after requirements have ended   |  |
| Customer survey Qs, results and analysis   | 10 years   | Headline figures retained permanently  |



| Document                                       | Period of Retention              | Comments   |
|--|----------------------------------|--|
| <b>Contracts</b>                               |                                  |  |
| Signed   | 6 years from end of contract     | Retained by Finance  |
| Contract amendments and contract renewal forms | 6 years from end of contract     |  |
| Operation and monitoring, eg complaints        | 6 years from end of contract     | Retained by the department whose budget was involved in the tender and procurement |
| Contractors' reports                           | 2 years from end of contract     |  |
| Tender – user requirements, specification,     | 6 years from end of contract     |  |
| evaluation criteria, invitation                | 6 years from end of contract     |  |
| Unsuccessful tenders' documents                | 1 year after last correspondence |  |
| Successful tender documents                    | 6 years from award of contract   |  |
| Visitors' books                                | 1 year + current                 |  |
| Interpreters' contact details and contracts    | 3 years + current                |  |

## Appendix 4

|  <b>RECORDS DISPOSAL/DESTRUCTION CERTIFICATE</b>   |                  |              |                     |                |                    |                           |                    |
|---|------------------|--------------|---------------------|----------------|--------------------|---------------------------|--------------------|
| Date of disposal  | Person disposing | Office/ Dept | Description of data | Format of data | Date range of data | In line with RR&D Policy? | Method of disposal |
|   |                  |              |                     |                |                    |                           |                    |
|   |                  |              |                     |                |                    |                           |                    |
|   |                  |              |                     |                |                    |                           |                    |
|   |                  |              |                     |                |                    |                           |                    |
|   |                  |              |                     |                |                    |                           |                    |
| <b>Approvals:</b> Before disposing of any data <b>not included</b> in the Records Retention and Disposal Policy, approval should be sought from the relevant Information Asset Owner (IAO). |                  |              |                     |                |                    |                           |                    |
| <i>I approve the disposal of the data described above</i>   |                  |              |                     |                |                    |                           |                    |
| Printed name and signature of IAO:  |                  |              |                     |                |                    |                           | Date:              |
|   |                  |              |                     |                |                    |                           |                    |
| <b>Certification:</b> After disposing of any data, within one week the relevant IAO must certify that this has been carried out.  |                  |              |                     |                |                    |                           |                    |
| <i>I certify that the data described above has been disposed of, in line with the Records Retention and Disposal Policy</i>   |                  |              |                     |                |                    |                           |                    |
| Printed name and signature of IAO:  |                  |              |                     |                |                    |                           | Date:              |
|   |                  |              |                     |                |                    |                           |                    |
| <b>When completed and signed, please email this form to the Data Protection Officer (for filing and retention for 6 years)</b>  |                  |              |                     |                |                    |                           |                    |

## Appendix 5 - Timetable for disposal

| When         | What   | Who           |
|--------------|--|---------------|
| Continuously | Draft documents when final version approved  | All           |
|              | VTE member records updated   | MEL           |
| Weekly       | Office and Travel inboxes for 5 weeks ago  | Ops           |
|              | Timesheets (signing in sheets)   | HR            |
|              | Personal recycling bins on laptops   | All           |
| Monthly      | Member inbox for 4 months ago  | Ops           |
|              | Operational calendars  |               |
|              | Appeal management reports > 6 weeks (paper + elect)  | Ops           |
|              | Hearing files (paper +virtual) for hearings over 4 months ago, after check against Dynamics for cases that need to be retained for relisting or those under review | Ops           |
|              | SAP reconciliation with Dynamics AMS   | Finance       |
| Quarterly    | Successful applications/interviews to personnel file   | HR            |
|              | Pregnancy/ childbirth certifications > 1 year  | HR            |
| Half-yearly  | Applications where no response to request for further info   | Ops           |
|              | Personal email boxes and calendars   | All           |
|              | Complaints files > 2 years   | All           |
|              | PST files  | All           |
|              | Courier records > 2 years old  | Finance       |
|              | Travel warrants > 2 years old  | Finance       |
|              | Datasets on website > 2 years old to archive   | Finance/ IT   |
|              | Job application records, unsuccessful > 2 years  | HR            |
|              | Promotion/interview records, unsuccessful > 2years   | HR            |
|              | Maternity pay records  | HR            |
|              | Accident records and reports etc > 3 years   | HR            |
| Yearly       | Remind staff to update their HR self-service records   | HR            |
|              | Write to VTE members to check the data we hold about them and update database;   | MEL/ Finance  |
|              | VTE member records > 6 years after appointment ends  | MEL/Finance   |
|              | Estates records  | Corp Services |
|              | FOI/DPA files > 6 years  | BD            |
|              | Finance statements annual > 6 years + current  | Finance       |
|              | Asset Register > 6 years + current   | Finance       |
|              | Depreciation Register > 6 years + current  | Finance       |
|              | Purchase order records > 6 years + current   | Finance       |
|              | Other financial records > 6 years + current  | Finance       |
|              | Parental leave records > 5 years from birth/adoption of child or > 18 if child disabled  | HR            |
|              | Finance and HR records > 6 years after employee leaves: deleted or moved to file to retain to age 100  | Finance/HR    |
|              | Risk registers > 5 years   | Departments   |
|              | Training and development records > 6 years   | Training      |
|              | Contract and tender documents  | HO managers   |
|              | Visitor books > 1 year   | Admin/Recptn  |
|              | Office/team meeting minutes  | Managers      |
| Two-yearly   | HR records for any former employee aged 100  | HR            |
|              | Health and safety records  | HR            |
|              | Ionising radiation records   | HR            |
|              | Project management documentation and reports   | BD            |