

## Information Retention and Disposal

### Schedule

|                                     |                     |
|-------------------------------------|---------------------|
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## **Introduction**

COPNI recognises the importance of having and maintaining an efficient and effective records management system. Crucial to the success of this system is the development and implementation of a retention and disposal schedule.

## **Purpose of the Retention and Disposal Schedule**

The retention and disposal schedule identifies the disposal arrangements for all records created by COPNI. The objective of the retention and disposal schedule is to:

- support the development of control over the data held and records created;
- dispose of records promptly and securely when they cease to be of any continuing administrative/legal value;
- identify records worth preserving permanently; and
- identify records which should be transferred to the Public Record Office of Northern Ireland (PRONI) because of their long-term historical/research value.

The schedule complies with the requirements in the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R. & O.1925 No 167). Commitment to the operation and compliance of the disposal schedule is stated in the Records Management Policy.

## **What is covered by this retention and disposal schedule?**

This schedule identifies the retention and disposal arrangements for all records created by COPNI. A record is recorded information, in any form, created or received by COPNI or individual members of staff to support and show evidence of COPNI's activities.

## **Categories of Retention / Disposal**

The four categories of disposal which relate to records are:

- Destroy – the records are disposed of securely;
- Permanent Preservation by COPNI;
- Permanent Preservation by PRONI; and
- Determined on Review: these are records requiring appraisal. They are appraised by COPNI staff at specified periods to determine if there is a continuing business need for retention and by PRONI staff to determine if they are required for historical or research purposes.

## **Operation of the Retention and Disposal Schedule**

### **Retention Schedule**

The record retention schedule (Appendix 1) documents the minimum length of time that COPNI records should be retained to comply with legal, regulatory and operational requirements.

The Schedule identifies the relevant functions of COPNI and the categories of records held. The Schedule describes:

- The record type;
- Examples or descriptions of what makes the record;
- The minimum retention period;
- The recommended disposal action;
- The supporting justification.

Where there is a statutory requirement to hold records for a certain period of time, this will be recorded. Other records, including some personnel records do not have a definitive retention period as set down by law. It is up to the employer to decide how long to keep such records depending on the type of record. The below table is based upon sensible conclusions bearing in mind that there is a 6 year time limit within which legal proceedings must be commenced as laid down under the Limitation Act 1980. Thus, where documents may be deemed relevant to a contractual claim, it is recommended that these be retained for at least the corresponding 6 year limitation period.

### **Closing of records**

In order for this retention and disposal schedule to operate effectively, it is important to maintain a streamlined filing system through regular and systematic closure of files. Records should be closed as soon as they have ceased to be of active use. Closing a record means that no additional papers should be added to the file, no documents can be edited and that it should be used only for reference. The record has now entered into its retention period, but can continue to be used for reference purposes.

When a file is due to be closed the appropriate member of staff should consult the retention and disposal schedule and indicate on the file the date on which it can be destroyed, transferred to the Public Record Office of Northern Ireland, or whether it should be subject to the normal review procedures.

## Retention Period

Retention periods are based upon the specific business needs of COPNI in addition to the regulatory environment within which COPNI operates. The retention period required for each type of file is calculated from the point the file is closed.

## Destruction

Destruction of files will take place on a planned basis in line with the retention and disposal schedule recommendations.

All destruction decisions must be agreed to by the Senior Management Team before destruction can take place.

A record of all file destruction will be kept for audit purposes and all files will be destroyed in line with the arrangements for the destruction of confidential waste.

## Review

Where the retention and disposal schedule indicates that the appropriate action in relation to any file is review, this will be carried out systematically, so as to eliminate redundant information and reduce the bulk of records held, while ensuring that no papers likely to be required for business continuity reasons and/or permanent preservation are destroyed. A file may be reviewed a number of times:

- |                      |   |
|----------------------|---|
| <b>On Closure:</b>   | A file should be reviewed immediately on being closed. The long term value may be quite clear at this stage and staff should indicate their decision on the file's retention / disposal when it is being closed, if not already specified in the retention and disposal schedule.                             |
| <b>First Review</b>  | Review five years after the file was closed. Procedures shall be put in place to ensure that these records are reviewed at the appropriate stage.   |
| <b>Second Review</b> | There may be occasions when it proves impossible to reach a decision on a file at first review. Such files may be put away for examination at a later stage, no more than 20 years after the file was opened. If this is the case systems shall be put in place to ensure that the second review takes place. |

## **PRONI Permanent Preservation / Copy Sent To PRONI**

Where the action is PRONI Permanent Preservation, the records need not undergo the normal review procedures. Appropriate arrangements will be put in place to ensure timely transfer to PRONI.

## **Roles and Responsibilities**

The Chief Executive has overall responsibility for ensuring that COPNI complies with the requirements of legislation affecting the management of records, and with any supporting regulations and codes.

### **The Data Protection Officer is responsible for:**

- Ensuring that the Records Management Policy is implemented effectively;
- The provision of record management guidance to COPNI staff;
- Producing procedures documenting all necessary record management arrangements;
- Regularly reviewing and where necessary amending record management policies and procedure statements;
- Making recommendations to Senior Management in relation to changes or improvements; and
- Liaising with the Public Record Office to ensure that COPNI complies with NIRMS (Northern Ireland Records Management Standard).

### **Line Managers are responsible for:**

- Ensuring that the agreed COPNI records management policy and procedures are fully observed and implemented within their area of responsibility and by all individual members of staff;
- Ensuring that all staff within their area of responsibility receive the appropriate training.

### **All staff are responsible for:**

- Documenting their actions and decisions, and for maintaining the records in accordance with COPNI's agreed policies and practices.

## APPENDIX 1 Retention and Disposal Schedule

| Record Type  | Start of retention Period      | Retention Period                       | Final Action           |
|--|--------------------------------|--|------------------------|
| <b>Premises</b>  |                                |  |                        |
| Accident and injuries records                            | Last action                    | 6 years                                | Destroy                |
| Fire Risk Assessments                                    | Last action                    | 6 years                                | Destroy                |
| <b>Finance</b>   |                                |  |                        |
| Fixed Asset Register                                     | End of financial year          | 6 years + current financial year (cfy) | Destroy                |
| Petty Cash Records                                       | End of financial year          | 6 years + cfy                          | Destroy                |
| Banking records  | End of financial year          | 6 years + cfy                          | Destroy                |
| Journals   | End of financial year          | 6 years + cfy                          | Destroy                |
| Invoices and Payment runs                                | End of financial year          | 6 years + cfy                          | Destroy                |
| Expenses claims  | End of financial year          | 6 years + cfy                          | Destroy                |
| Salary Processing Information                            | End of financial year          | 6 years + cfy                          | Destroy                |
| Credit Card Transactions                                 | End of financial year          | 6 years + cfy                          | Destroy                |
| Monthly Management Accounts                              | End of financial year          | 6 years + cfy                          | Destroy                |
| Annual Report and Accounts                               | Signed by C&AG                 | Permanent preservation                 | Permanent preservation |
| Annual Report and Accounts working papers                | End of financial year          | 6 years + cfy                          | Destroy                |
| Internal Audit – terms of reference, strategies, reports | End of financial year          | 6 years + cfy                          | Destroy                |
| Finance Policies and procedures                          | When superceded                | When superceded                        | Destroy                |
| Procurement contract documentation                       | Award of contract              | Until end of contract                  | Determine on review    |
| <b>Human Resource Management</b>                         |                                |  |                        |
| Staff performance, appraisal and development             | End of employment              | 7 years                                | Destroy                |
| Staff training plans and requests                        | End of employment              | 7 years                                | Destroy                |
| Monitoring information and returns                       | End of recruitment competition | 3 years                                | Destroy                |
| Staff Flexi Sheets                                       | End of employment              | 7 years                                | Destroy                |
| Annual Leave Records                                     | End of employment              | 7 years                                | Destroy                |
| Disciplinary records                                     | End of employment              | 7 years                                | Destroy                |
| Grievance records  | End of employment              | 7 years                                | Destroy                |
| Health referrals   | End of employment              | 7 years                                | Destroy                |
| Letters of appointment                                   | End of employment              | 7 years                                | Destroy                |
| Resignation letters                                      | End of employment              | 7 years                                | Destroy                |
| Return to work interviews                                | End of employment              | 7 years                                | Destroy                |
| Special leave applications                               | End of employment              | 7 years                                | Destroy                |
| Statutory maternity documents                            | End of employment              | 7 years                                | Destroy                |
| Sickness documents                                       | End of employment              | 7 years                                | Destroy                |

|  |                             |                        |                            |
|--|-----------------------------|------------------------|----------------------------|
| Security passes                                | End of employment           | 0                      | Destroy                    |
| Recruitment documentation                      | End of competition          | 3 years                | Destroy                    |
| <b>Governance</b>                              |                             |                        |                            |
| Freedom of Information files                   | Response deadline           | 3 years                | Determine on review        |
| Subject Access Requests                        | Last action                 | 3 years                | Determine on review        |
| SMT Minutes                                    | End of financial year       | 6 years + cfy          | Determine on review        |
| Management Team Minutes                        | End of financial year       | 2 years                | Destroy                    |
| Team meeting minutes                           | End of financial year       | 2 years                | Destroy                    |
| ARAC Meeting Minutes                           | On approval                 | Permanent preservation | Permanent preservation     |
| Accountability Meeting minutes                 | On completion of meeting    | 3 years                | Destroy                    |
| ARAC Meeting Papers                            | End of financial year       | Permanent preservation | Permanent preservation     |
| ARAC Annual Performance Assessments            | End of term                 | 6 years + cfy          | Destroy                    |
| Correspondence to and from the Commissioner    | End of financial year       | 6 years + cfy          | Offer to PRONI and Destroy |
| Correspondence to and from the Chief Executive | End of financial year       | 6 years + cfy          | Offer to PRONI and Destroy |
| Register of Interests                          | End of financial year       | 6 years + cfy          | Destroy                    |
| ARAC Annual performance assessments            | End of final term of office | 6 years                | Destroy                    |
| Corporate Plans                                | End of plan period          | Permanent preservation | Permanent preservation     |
| Business Plans                                 | End of financial year       | Permanent preservation | Permanent preservation     |
| Departmental returns                           | End of financial year       | 6 years + cfy          | Destroy                    |
| <b>Administration</b>                          |                             |                        |                            |
| Letters received and sent                      | End of financial year       | 6 years + cfy          | Determine on review        |
| Taxi Log                                       | End of financial year       | 6 years + cfy          | Destroy                    |
| TV Licence log                                 | End of financial year       | 6 years + cfy          | Destroy                    |
| Outward post log                               | End of financial year       | 2 years                | Destroy                    |
| <b>Communications and Engagements</b>          |                             |                        |                            |
| Accepted meetings and engagements              | End of financial year       | 6 years                | Determine on review        |
| Declined meetings and engagements              | Date invitation received    | 9 months               | Destroy                    |
| Photos from engagement events                  | End of financial year       | 6 years                | Determine on review        |
| Events   | End of event                | 6 years                | Determine on review        |



|  |                                 |   |                        |
|--|---------------------------------|---|------------------------|
| Publications   | When published                  | Permanent Preservation                          | Permanent Preservation |
| Stakeholder engagement                               | Date of event                   | 6 years   | Determine on review    |
| Recording or broadcasts of meetings or engagements   | Date of recording               | Permanent preservation                          | Permanent preservation |
| Mailing Lists  | When superceded                 | When superceded                                 | Destroy                |
| Legal and Policy Advice                              |                                 |   |                        |
| Legal casework files including QI's                  | Closure of file                 | 6 years   | Determine on review    |
| Investigation files, interview transcripts and notes | Completion of the investigation | No less than 3 years and no longer than 6 years | Determine on review    |
| Enquiry Log and associated notes of calls            | End of financial year           | 6 years   | Determine on review    |
| Consultation responses                               | Response date                   | Permanent preservation                          | Permanent preservation |
| Project final reports                                | Date of report                  | Permanent preservation                          | Permanent preservation |
| Project working files                                | Date of report                  | 3 years   | Determine on review    |
| Statistical data                                     | End of financial year           | Linked to PFG term at date of closure           | Determine on review    |

