



IRIS SOFTWARE GROUP

**RECORD RETENTION
&
DISPOSAL SCHEDULE
(CONTROLLER VERSION)**

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Retention times should be read as full financial years after closure or last entry unless otherwise stated

Introduction

This working document is designed to support each Function's local, documented standard operating procedures (SOPs). This schedule aims to set out the legislation, guidance and policy about record retention; it cannot provide for every eventuality but should be used as a reference point to support records management practice within the IRIS Group.

These retention guidelines will help Functions to produce their local records management procedures. Local records management procedures should be in line with the principles of data minimisation and Article 5(1)(e) of the General Data Protection Regulation (GDPR). This requires personal data to be kept for no longer than necessary for the purpose they relate to.

Records owners should establish processes to ensure that records are either (1) automatically deleted/disposed of at the end of the retention period or that they are reviewed to establish whether they should be kept for a further period of time, bearing in mind the purpose and value of their retention and the risks inherent in keeping information for longer than necessary.

The schedule can be updated at any time by the relevant Data Protection Single Point of Contact by informing the Group Data Protection Officer. Each Function should keep the entries that relate to their records up to date. The aim is that this schedule will be a dynamic document. A customer-facing version of the schedule has been created to support privacy statements.

Remember that management of records (including disposal at the end of its life) must be in line with the IRIS Information Management Policy (see the Group ISMS) and the Group Data Protection Policy. These are accessible via the Group Data Protection Intranet page.

This retention schedule does *not* apply to data held or processed on behalf of customers

This schedule does not apply to data that IRIS processes (including hosting) on behalf of customers as part of our core business function. In relation to that data, IRIS must, at the choice of the customer, delete or return all personal data to the customer after the end of the service provision and delete existing copies unless IRIS is under a specific legal obligation to retain it for a further specified time.

Product/Service managers should ensure that any service/product information packs make the following clear:

- Whether IRIS is under a legal obligation to retain data after the end of the service provision. If so, make clear which legislation applies, what data are affected and when customers can expect IRIS to permanently delete the data.
- If there is a "grace period" that results in customer data being held for a short time after the contract has expired, explain how long this grace period is.

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The retention periods are set out in columns as follows:

1. Record

Describes the kinds of files and documents

2. Legislation and Other Requirements

Information about the actual law or the area of law that is appropriate for such records. There is not always a law setting out a retention period; in such instances it is guidance, departmental policy or usage that dictates the retention period.

3. Trigger

This is when the retention period starts. Where there is no clear indication as to when this time should be counted from it should be assumed that the retention time is from the financial year following closure of the file or record.

4. Retention Period

All retention periods quoted as legislative requirements are minimum periods for retention only. However, this does not mean records may be kept indefinitely. Any variation from the retention period given in this schedule must be supported by a legitimate business case and discussed with the Group Data Protection Officer.

5. Disposal Policy

Disposal Policy describes what should be done at the end of the retention period; destroy or review it to see if it should be held for longer. Departmental procedures for the disposal of electronic and hard copy records must meet the requirements set out in the IRIS Information Management Policy (see the Group ISMS) – specifically that each department maintains a disposal schedule. The IRIS ISMS is accessible via the Group Data Protection Intranet Page.

6. Information Asset Owner – The role responsible for setting corporate procedures for the record type in question.

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CORPORATE RECORDS					
RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Corporate complaints and escalations, including complaints regulated by the FCA	Legitimate business need (includes FCA Handbook requirements)	End of financial year in which case closed	6 years	Review for secure disposal	Customer Success Director
General individual complaints	Limitation Act 1980	End of financial year in which case closed	3 years	Review for secure disposal	Functional CEO
Board Minutes/Executive Committee Minutes	Companies Act 2006	End of financial year	10 years (Any written notes of the meeting should be retained until the minutes are approved and then should be destroyed)	Destroy	Group CEO
Compliance records					
Records of disposal/deletion (corporate)	Business need based on Limitation Act 1980.	End of financial year in which case closed	6 years	Destroy	Head of Group IT
Records of disposal/deletion (product)	Business need based on Limitation Act 1980.	End of financial year in which case closed	6 years	Destroy	Product manager

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CORPORATE RECORDS					
RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Subject Access Request Procedure (superseded versions)	Legitimate business requirements	Once superseded	1 year	Destroy	Chief Information Officer/ Group Data Protection Officer
Information security incidents, subsequent investigations and related reports	Legitimate business requirements	End of financial year in which file closed	6 years	Review before secure disposal	Chief Information Officer/ Group Data Protection Officer
Information Commissioner investigations	Legitimate business requirements	End of financial year in which file closed	6 years	Review before secure disposal	Chief Information Officer/ Group Data Protection Officer
Data Protection Officer reports to Exco, CIO and Information Security & Governance Forum	Legitimate business requirements	End of financial year in which file closed	6 years	Review before secure disposal	Chief Information Officer/ Group Data Protection Officer
Data protection compliance audit reports	Legitimate business requirements	End of financial year in which file closed	3 years	Destroy	Chief Information Officer/ Group Data Protection Officer
Compliance advice (internal) given by Group Data Protection Officer	Legitimate business requirements	End of financial year to which the advice relates	6 years	Destroy	Chief Information Officer/ Group Data Protection Officer

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CORPORATE RECORDS					
RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Personal data disclosure requests (police enquiries and third parties)	Legitimate business requirements	End of financial year in which file closed	3 years	Destroy	Chief Information Officer/ Group Data Protection Officer
Information Security and Governance Forum Records	Legitimate business requirements	End of financial year	3 years	Destroy	Chief Information Officer/ Group Data Protection Officer
Functional Information Security and Governance Records	Legitimate business requirements	End of financial year	3 years	Destroy	Functional CEOs

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Audited Accounts: Statement of accounts produced each year and circulated to the public, other LA's, staff, members etc	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Financial System Reconciliations	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Review/ Destroy	Chief Financial Officer
Budget files & statements	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Review/ Destroy	Chief Financial Officer
Capital monitoring files	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Review Destroy	Chief Financial Officer
Budget monitoring files	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Review Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Used receipt books	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Review Destroy	Chief Financial Officer
Debtor invoices	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Credit notes	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Daily Takings records (i.e. till rolls)	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Destroy	Chief Financial Officer
Sales Book/sales records	N/A	End of financial year	3 years	Destroy	Chief Financial Officer
Year End Ledger	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Journal Transfers	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6years	Destroy	Chief Financial Officer
Cash Books	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Receipt Books		End of financial year	2 years	Destroy	Chief Financial Officer
Petty Cash vouchers	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Cheque books and counterfoils	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Cheque Lists		End of financial year	2 years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Returned Cheques		End of financial year	2 years This timescale is guidance: it can be useful to prove an intention to pay.	Destroy	Chief Financial Officer
Unpresented cheque list	Limitation Act 1980, Audit, Tax, VAT	End of financial year	2 years	Destroy	Chief Financial Officer
Payment Card Records* (Sensitive payment card information must not be retained at all after authorisation – this includes any payment strip information and the CVV/CVV2 code)	Customs & Excise VAT requirements	End of financial year	3 year or 6 years (depending on VAT. If the transaction's VAT information is <u>not</u> shown on other prime records, the slip must be kept for 6 years.)	Destroy	Chief Financial Officer
Bank Reconciliations	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Bank Statements	Legitimate business purpose	End of financial year	6 years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Bank paying in books	Legitimate business purpose	End of financial year	6 years	Destroy	Chief Financial Officer
Purchase orders and order books	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Stock inventories/stock sheets/stock control books	Limitation Act 1980, Audit, Tax, VAT	End of financial year	3 years	Destroy	Chief Financial Officer
Inventories	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Creditor Invoices received	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer
Finance correspondence where it provides evidence of income/expenditure	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Payroll Timesheets Overtime Sheets N.I. Records PAYE Deduction Records Deductions made under CITDS Claim Forms Over time claims P11 & P35 returns Inline revenue documentation	Limitation Act 1980, Audit, Tax, VAT	End of financial year	6 years	Review/ Destroy	Chief People Officer
Tax & PAYE	Limitation Act 1980, Audit, Tax, VAT	End of financial year	7 years	Review for secure disposal	Tax: Chief Financial Officer PAYE: Chief Financial Officer
VAT – Options to tax	VAT	End of financial year	20 years	Destroy	Chief Financial Officer
Subsistence and Mileage Claims	Audit, Tax, VAT	End of financial year	6 years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Debtors underling records	Legitimate business purposes	End of financial year	2 years after end of the financial year in which they are paid or are written off. At least 6 years in respect of any unpaid account which has not yet been written off.	Destroy	Chief Financial Officer
Creditor underling records	Legitimate business purposes	End of financial year	2 years after end of the financial year in which they are paid or a credit has been received.	Destroy	Chief Financial Officer
Insurance Records – Claims – Fire and Motor Vehicles	Legitimate business purposes	End of financial year	4 years	Destroy	Chief Financial Officer
Insurance Records – Claims – Public/Employers Liability	Limitations Act 1980	End of financial year	6 Years	Destroy	Chief Financial Officer
Insurance Register		End of financial year	10 Years	Destroy	Chief Financial Officer

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FINANCIAL RECORDS AND DOCUMENTATION

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Insurance Policy Records + Pensions Personal Records		End of financial year	Employers Liability Certificates need to be kept indefinitely.	Destroy	Chief Financial Officer

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Anti-money laundering and associated records

Record	Legislation & Other Requirements	Trigger	Retention Period	Disposal Policy	Information Asset Owner
<p>AML Regulations apply to money service businesses which</p> <ul style="list-style-type: none"> act as a currency exchange office (a bureau de change) transmit money or any representation of money by any means (money remittance) cash cheques payable to customers (third party cheque cashing) <p>AML checks are required in advance of new business relationships or occasional transactions (i.e. transactions carried out with an ongoing business relationship with a value of 15,000 euros or more)</p>					
Copies of the evidence obtained to satisfy customer due diligence obligations and details of customer transactions	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended by The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (the “ AML Regulations ”)	End of business relationship	5 years*.	Destroy	Chief Financial Officer
Details of occasional transactions subject to AML checks	AML Regulations	Date of transaction	5 years*	Destroy	Chief Financial Officer

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Anti-money laundering and associated records

Record	Legislation & Other Requirements	Trigger	Retention Period	Disposal Policy	Information Asset Owner
Details of actions taken in respect of internal and external suspicion reports		Date of transaction	5 years*	Review/Destroy	Chief Financial Officer
Details of information considered by the nominated officer in respect of an internal report, where the nominated officer does not make a suspicious activity report		Date of transaction	5 years*	Review/Destroy	Chief Financial Officer
Copies of the evidence obtained if you are relied on by another person to carry out customer due diligence		date that the third party's relationship with the customer ends	5 years*	Review/Destroy	Chief Financial Officer

***IMPORTANT:** if a client is investigated by an AML authority such as the FCA, OPBAS, police fraud squad, etc the records must be retained for 10 years. If a case goes to one or more appeals, then AML data must be retained until the final judgement is reached – which could be longer than 10 years.

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GENERAL FILES AND COMMUNICATIONS

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
General Correspondence & Management Operational Files	Legitimate business purposes	End of financial year in which case closed	Defined locally	Destroy	Various – Functional CEO and SMTs
Departmental/Section Meetings etc.	Legitimate business purposes	End of financial year	3 years	Review for destruction. May be kept for a longer period if no personal data/commercially sensitive information	Various – Functional CEO and SMTs
Project Meetings etc.	Legitimate business purposes	End of financial year	3 Years from closure of project	Review for destruction May be kept for a longer period if no personal data/commercially sensitive information	Various – Functional CEO and SMTs
Physical correspondence	Legitimate business purposes	Once scanned	6 months	Shred	Various – Functional CEO and SMTs

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HR, EMPLOYEE, RECRUITMENT AND APPRAISAL RECORDS

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Personal files of employees, including: Application Forms Reference Reports Discretionary Awards Employment record Termination		Cessation of employment	7 years	Destroy	Chief People Officer
Mortgage references		Cessation of employment	7 years	Destroy	Chief People Officer
Staff training records – General and targeted (departmental) training		Cessation of employment	7 years	Destroy	Chief People Officer
Occupational Health and Safety Training Register		Completion of training	50 Years	Destroy	Chief People Officer
Staff Training Materials		Date on which course superseded	1 year	Destroy	Chief People Officer/ Various managers
Disciplinary and grievance records where proved Oral Warning Written Warning Final Warning		Closure of investigation	6 months 1 year 18 months	These warnings should be removed from the file and destroyed after the relevant time has spent.	Chief People Officer

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HR, EMPLOYEE, RECRUITMENT AND APPRAISAL RECORDS

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Disciplinary and grievance records where unfounded		Closure of investigation	6 months		Chief People Officer
Medical records relevant to employment	COSHH Regulations 1994		40 years	Destroy	Chief People Officer
Pre-employment vetting	CRB guidelines	Date of result			Chief People Officer
Recruitment documentation (unsuccessful applicants)		End of financial year	1 Year	Destroy	Chief People Officer
Staff appraisal		Cessation of employment	7 years	Destroy	Chief People Officer
Equal Opportunities Monitoring Sheets		End of financial year	1 year	Destroy	Chief People Officer
Job descriptions		Revision	1 year	Destroy	Chief People Officer
Person specifications		Revision	1 year	Destroy	Chief People Officer
Staff Contracts		Cessation of employment	6 years	Destroy	Chief People Officer
Inventory Records		End of financial year	6 years	Destroy	Chief People Officer
Equal Employment Opportunities - Investigation and reporting on specific cases		Completion of action	5 Years	Destroy	Chief People Officer

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HR, EMPLOYEE, RECRUITMENT AND APPRAISAL RECORDS

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Staff Leave – Monitoring, including Annual Leave Sick Leave Jury service Study Leave Special & Personal Leave Attendance Books Flexitime sheets Leave applications Clock on/off cards		Completion of action	2 Years	Destroy 2 years after action completed	Chief People Officer
Daily industrial Relations management			2 years after administrative use is concluded	Destroy	Chief People Officer

HEALTH AND SAFETY (EMPLOYEES)

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Safety Inspection Audits	Health & Safety Act 1974	Last action	5 years	Review	Chief People Officer

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HEALTH AND SAFETY (EMPLOYEES)

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
RIDDOR Forms	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1985	Date created	3 years	Transfer to individual's personal file and marked 'not for destruction'	Chief People Officer
Staff Records of Accidents	Health & Safety regulations	Date created	3 years	Transfer to individual's personal file and marked "not for destruction"	Chief People Officer
H & S risk assessments	Health & Safety regulations	Date created	7 years		Chief People Officer
H & S Safety inspection reports	Health & Safety regulations	Last action	5 years		Chief People Officer
Monitoring Records related to Control of Substances hazardous to Health	COSHH regulations	End of financial year	40		Chief People Officer

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LEGAL AND CONTRACTS					
RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Signed Contracts	Limitation Act 1980	Expiry of contract	6 years	Destroy Could contain confidential information	Chief Financial Officer/ General Legal Counsel
Pre-contract advice and contract negotiations	Legitimate business purposes	End of financial year in which completed	2 years	Destroy	Chief Financial Officer/ General Legal Counsel

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MARKETING AND SALES

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Customer Consultations	Legitimate business requirements	End of financial year			Chief Marketing Officer
Bought in (e)mailing lists (Record of original file as supplied record)	Legitimate business requirements	TBC	TBC	Permanently delete/shred	Chief Marketing Officer
Records of due diligence on mailing list suppliers	Legitimate business requirements	End of contract	Two years	Permanently delete/Shred	Chief Marketing Officer
Due diligence enquiries received from customers/prospective customers	Legitimate business purpose	End of contract	1 year	Review for disposal	Chief Sales Officer
Prospect personal data acquired through web forms, webinar sign-ups, trials, demos, request a call back and other forms completed on the IRIS website	Legitimate business requirements	From last engagement	2 years	Review	Chief Marketing Officer

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MARKETING AND SALES

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Non-customer/prospect personal data held for marketing and sales purposes that have engaged	Legitimate business requirements	From last engagement	2 years	Permanently delete/shred	Chief Marketing Officer
Non-customer customer/prospect personal data held for marketing and sales purposes that have not engaged This information is collected through event bookings, white papers, newsletter subscriptions and so on	Legitimate business requirements	First contact	2 years	Purge/Permanently delete/shred	Chief Marketing Officer
Suppression file data	Legitimate business requirements	Rolling/ongoing	Permanent (unless specific request received from individual to remove from list)	Permanent disposal/deletion	Chief Marketing Officer
General product enquiries (record of correspondence)	Legitimate business requirements	End of financial year	2 years	Review for permanent disposal/deletion	Chief Marketing Officer

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TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Documents relating to IT system, integral to their running and long-term use	Legitimate business purposes	End of system life	3 years	Review	Group IT Director
IT Infrastructure	Legitimate business purposes	Last action	3 years	Review	Group IT Director
IT Back-ups for disaster recovery	Legitimate Business requirements	Last action	3 months	Destroy/overwrite	Group IT Director
System audit logs	Legitimate business purposes	Last action	12 months	Destroy/overwrite	Group IT Director
Customer support/JIRA correspondence	Limitations Act 1980 part II	End of financial year	3 years	Review for permanent disposal May be kept for a longer period if cleansed of personal data/commercially sensitive information	Group IT Director
Call recordings (general)	Legitimate business requirements	End of call	3 months	Permanent over wipe	Chief Information Officer
Call recordings (specific - relating to complaints or open matters)	Limitations Act 1980	Last action	File with matter they relate to and subject to the same retention	As for matter they relate to/permanent deletion	Chief Information Officer or relevant Executive Member responsible for function that the

TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
			requirements as the matter they relate to		recording is required to support.
Calling line identification	Legitimate business purposes	Creation	90 days	Permanent disposal	Group IT Director
Physical correspondence	Legitimate business purposes	Once scanned	6 months	Shred	Group IT Director
Contents of current employee mailboxes and outlook* (emails required for future reference should be filed in OneDrive/SharePoint or a dedicated structure system and subject to the retention period to for the subject matter outlined in this schedule)	Legitimate business purposes	Creation	8 years	Permanent disposal	Group IT Director
Leaver's mailboxes and outlook accounts (emails required for future reference should be filed in OneDrive/SharePoint or a dedicated structure system and subject to the retention period to for the subject matter outlined in this schedule)	Legitimate business purposes	Employee's final day of employment	30 days	Permanent deletion	Group IT Director
Contents of Internal email mailboxes* (emails required for future reference should be filed in OneDrive/SharePoint or a dedicated structure system and subject to	Legitimate business purposes	Creation	6 months	Permanent disposal	Group IT Director

TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
the retention period to for the subject matter outlined in this schedule)					
Contents of External email mailboxes* (emails required for future reference should be filed in OneDrive/SharePoint or a dedicated structure system and subject to the retention period to for the subject matter outlined in this schedule)	Legitimate business purposes	Creation	3 months	Permanent disposal	Group IT Director
Instant messages	Legitimate business purposes	Creation	7 days	Permanent disposal	Group IT Director
Live chat transcriptions	Legitimate business purposes	Creation	2 years	Permanent disposal	Group IT Director
IT Project Documentation					
Business Case	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director (Chief Product Officer in relation to products)
Business requirements Document (non-product)	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Business requirements for product development	Legitimate business purposes	File closure	6 years	Review for permanent disposal May be held for a longer period if	Chief Product Officer

TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
				cleansed of personal and commercially sensitive data	
Change requests (non-product)	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Change requests (product management)	Legitimate business purposes	File closure/end of contract	2 years	Review for permanent disposal May be held for a longer period if cleansed of personal and commercially sensitive data	Chief Product Officer
Consultation Documents	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Product Demo	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Product Description	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Project Initiation Document	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director

TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Project review	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Project Scope Document	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Project Sign off Document	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Group IT Director
Group Risk Log	Legitimate business purposes	File closure/end of contract	2 years	Destroy	Chief Financial Officer
Product support, engineering and professional services					
Support call correspondence and tickets	Limitations Act 1980	File closure/end of contract	3 years	Permanent deletion	Head of Customer Support and Professional Services
Support screenshots and recordings	Legitimate business purposes	Confirmation of call resolution	6 months	Permanent deletion	Head of Customer Support and Professional Services in relation to Support and Professional Services Chief Information Officer in relation to Development

TECHNICAL, IT AND PRODUCT TECHNICAL SUPPORT

RECORD	LEGISLATION & OTHER REQUIREMENTS	TRIGGER	RETENTION PERIOD	DISPOSAL POLICY	INFORMATION ASSET OWNER
Scrambled data sets	Legitimate business purposes	Confirmation of call resolution	6 months	Permanent deletion	Head of Customer Support and Professional Services in relation to Support and Professional Services Chief Information Officer in relation to Development
Live dataset imports	Legitimate business purposes	Confirmation of call resolution	Do not retain	Permanent deletion	Head of Customer Support and Professional Services in relation to Support and Professional Services Chief Information Officer in relation to Development