Records Management Policy

Business Area: Assurance Services

Version: 7.0

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Document Control

Document Version History

Date	Version	Author	Comments
04/07/2023	4.0		Baselined following approval
13/06/2024	4.1 *Draft*		Updates to Appendix 1: Retention Table
01/07/2024	4.2 *Draft*		1.2.2 amended Minor updates throughout the Policy Review period updated too biennially
04/07/2024	4.3 *Draft*		Dual review with Deputy DPO. 1.4 Senior Information Risk Owner and Assurance Services, Information Governance Compliance Team removed from list
12/07/2024	5.0		Baselined following approval by DPO
30/12/2024	5.1 *Draft*		Update to wording in Customer Data retention table
06/01/2025	5.2 *Draft*		Minor updates following dual review with DPO, Deputy DPO and Information Governance Assurance Officers
06/01/2025	6.0		Baselined following approval by DPO
	6.1 *Draft*		Updates to Appendix 1: Retention Table
	6.2 *Draft*		Minor updates following Legal Services review. 1.2.2. Cautious risk statement updated following review by ERC
	6.3 *Draft*		Minor correction following review. Updates to RACI table
05/01/2026	6.4 *Draft*		Updates to Appendix 1: Retention Table Note added for Customer Correspondence.
05/01/2026	7.0		Baselined following approval by DPO

Review and Approval Register

Note: RACI = R- Responsible, A- Accountable, C-Consulted, I-Informed

Name	Position	RACI Role
Gary Womersley	Company Secretary/Head of Assurance Services (Data Protection Officer)	A
	Information Assurance & Governance Senior Manager (including Deputy Data Protection Officer)	R
	Information Assurance Governance Officer – SLC Records Manager Lead Responsible person for this document.	C
	Senior Manager – Legal Services	C
	Enterprise Risk & Compliance	C

*NB: names of staff other than DPO have been removed under section 40(2) of the Freedom of Information Act 2000

Update Schedule

This Records Management Policy (the "Policy") will be reviewed biennially or whenever business requirements, legislation, or regulations change.

Applicability

The requirements in this Policy apply to all permanent, temporary and contract workers employed or engaged by the Student Loans Company Limited ("SLC", "we", "us" and/or "our") or any 3rd party organisations while at work or engaged on SLC business (collectively hereinafter referred to as "employee(s)").

Compliance

- Any employee found to have violated the Policy could be subject to disciplinary action, up to and including termination of employment.

- At its sole discretion, SLC may require the removal from the service provision account of any employee of a 3rd party organisation contractually engaged on SLC business who is found to have violated this, Policy.

Contents

1. Introduction

1.1 Purpose

1.1.1 This Policy sets out our commitment to achieving standards in Records Management in line with best practice. It provides the framework within which employees manage our information. Specific standards, procedures, and guidance ensure that records are managed and controlled effectively, and commensurate with legal, operational and information needs and in line with Stakeholder expectations.

1.1.2 This Policy facilitates SLC to establish and maintain good practices around the handling of records, promoting a culture of awareness and improvement.

1.1.3 Records Management is vital to the delivery of SLC services, supporting delivery in an orderly, efficient, and accountable manner. Effective Records Management enables SLC to have the right information at the right time to make the right decisions. Information including records within SLC are an important corporate asset.

1.1.4 This Policy aims to ensure that records, whatever form they take, are accurate, reliable, ordered, complete, useful, up to date and accessible where needed to:

- carry out SLC business;
- support SLC to achieve its business objectives and priorities and make informed decisions;
- comply with relevant legislation; and
- support corporate memory.

1.2 Risk Appetite Alignment

1.2.1 The requirements outlined within this Policy support mitigation of the following risk categories:

Level 1 Risk Category	Level 2 Risk Categories
Security	• Retention and disposal: risk of SLC data or information being compromised due to it being available or unavailable resulting in a retention or disposal issue.

1.2.2 Compliance with the Policy's requirements ensures that SLC continues to operate within Risk Appetite which is:
- Overall, **Cautious** in relation to the retention and disposal of information and data (unless the nature/scope of the information/change requires an alternative risk-

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based approach), ensuring that SLC's internal policies and procedures align to regulatory and legislative requirements and are complied with in practice.

1.3 Scope

1.3.1 This Policy, together with the associated standards and processes, applies to the management of all documents and records, in all electronic or physical formats, created or received by SLC in the conduct of its business activities.

1.4 Roles and Responsibilities

1.4.1 All employees have a responsibility to ensure that SLC's records are managed in line with best practice and SLC policies and procedures. Different employees have different roles in relation to governing and managing records within SLC's Records Management Framework. These include:

- **Data Protection Officer**
- **Information Risk Owner** (designated Accountable record owner)
- **Information Asset Owner** (designated Responsible record owner)
- **All other employees**
- **Third Parties**

1.5 Statutory and Regulatory Environment

1.5.1 The legal and regulatory framework for Records Management is outlined below and includes:

Legislation regulated by the ICO:
- The Data Protection Act 2018 and the General Data Protection Regulation (GDPR)
- The Freedom of Information Act 2000 (FOIA)
- Privacy and Electronic Communication Regulations 2003
- The Environmental Information Regulations 2004 (EIR)

Other related legislation:
- The Public Records Act 1958

Related guidance and codes of good practice:
- Section 46 Code of Practice (FOIA/EIR) – Part 1: Records Management
- BS ISO15489 – Records Management
- The National Archives Code of Practice on Records Management

2. Definitions and Policy Principles

2.1 What is records management?

2.1.1 Records Management is the systematic control and organisation of all types of records so that SLC have ready access to the information needed to meet strategic work objectives and legal responsibilities. All employees need to be able to find information when they need it and to store and share information so that it is available, where appropriate, for others to use.

2.2 Key Drivers for Records Management

2.2.1 Good Records Management is essential to ensure SLC can comply with its legislative responsibilities and act as a driver for business efficiency. Effective management of records and information means:

- obtaining information legally, fairly, and only as needed, including personal, corporate, and copyright information and making sure it is good quality and fit for purpose;
- organising information so SLC can locate it when it is needed;
- sharing and publishing information using an appropriate medium to support effective collaboration and dissemination;
- managing personal information about individuals responsibly and according to the law;
- keeping good records that account for SLC actions and decisions;
- disposing of information promptly when it is no longer needed;
- responding promptly and courteously to public requests for information (including Freedom of Information ("FOI") requests); and/or
- ensuring that material of historical significance is identified and transferred to the appropriate National Archive as appropriate.

2.2.2 Poor records and information management creates risks for SLC, such as:
- poor decisions based on inaccurate or incomplete information;
- inconsistent or poor levels of service;
- financial or legal loss if information required as evidence is not available or cannot be relied upon;
- non-compliance with statutory or other regulatory requirements;
- failure to handle confidential information with an appropriate level of security and the possibility of unauthorised access or disposal taking place;
- failure to protect information that is vital to the continued functioning of SLC, leading to inadequate business continuity planning;
- unnecessary costs caused by storing records and other information for longer than they are needed;
- employee time wasted searching for records; and/or

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- loss of reputation as a result of all the above, with damaging effects on public and stakeholder trust.

2.3 Definition of a Record

2.3.1 Records can be defined as "*information created, received and maintained as evidence by an organisation or person in pursuance of legal obligations or in the transaction of business*" (ISO 15489). In SLC, a record is defined as:

"*any piece of information (document, email or other artefact) created or received and maintained by the organisation in the course of its business and is kept as evidence of an activity or transaction for the purposes of corporate memory (whether it is relevant for a short or long time or kept permanently by the organisation)*".

2.3.2 Records are an essential resource and contain information which is unique and invaluable. They can be used as an audit trail as they provide evidence/proof of a specific activity.

2.3.3 Records come in electronic (including video and audio materials) and paper format. All types must be managed appropriately in terms of storage, accessibility, and disposal.

3. Record Retention

SLC needs to ensure that it maintains appropriate provisions and controls around the retention of information. Retention must be defined in accordance with legal and/or business requirements. **Appendix 1:** Retention Table contains maximum or minimum retention periods for the main categories of information held.

4. Related Documents

This Policy forms an essential part of SLC's overall policy framework and should be read in accordance with relevant related documents, including:

Document Description
Data Protection Policy
Freedom of Information Policy

Appendix 1 Retention Table

The table below contains maximum or minimum retention periods for the main categories of information held by SLC.

SLC retains some historic data due to limitations of legacy record keeping systems. Such data is held in accordance with SLC's Information Security Policy and data will be deleted where appropriate as part of legacy system decommissioning.

Employee Data (Permanent & Fixed Term)

Activity/Information	Description	Start of Retention	Retention Period
Unsuccessful Recruitment Candidates	Personal Information	Last action on the applicant file	2 Years
	Application Forms & Supporting Documentation	Last action on the applicant file	2 Years
	Recruitment Vetting & Criminal Convictions	Last action on the applicant file	12 Months
	Identification Documents	Last action on the applicant file	3 Months
Successful Recruitment Candidates	Personal Information	Last action on the applicant file	6 Years
	Application Forms & Supporting Documentation	Last action on the applicant file	2 Years
	Recruitment Vetting & Criminal Convictions	End of Employment	6 Years
	Identification Documents (including Identification Documents of Foreign Nationals (ensuing from obligations to retain copies of documents used to perform immigration checks)).	End of Employment	6 Years
Employee Records	Employee Personal Details	End of Employment	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
	3rd Party Emergency Contact Details provided by employee	End of Employment	6 Years
	Bank Account Details	End of Employment	6 Years
	Additional Personal Details (e.g., Religion, Ethnicity, Disabilities, Gender Identity)	End of Employment	6 Years
Employment File	Written Particulars of Employment	End of Employment	6 Years
	Personal Payroll History/Salary records (including record of pay, performance pay, overtime pay, allowances, pay enhancements, other taxable allowances, payment for untaken leave, reduced pay, maternity leave)	The end of the assessment tax/period to which the payments relate	6 Years
	Pensions Records	Date of Birth	100 Years
	Expenses Records	The end of the assessment tax/period to which the payments relate	6 Years
	Appraisals/Assessments	End of Employment	6 Years
	Annual Leave Records	End of Employment	6 Years
	Unpaid Leave Periods (Records of Maternity, Paternity, Adoption or Sick Leave)	Date of Birth	100 Years
	Statutory Maternity Pay Document	The end of the tax year in which the maternity pay period ends	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
	Complete Sickness Absences Record showing dates and causes of sick leave	End of Employment	6 Years
	Medical/Self Certificates	End of Employment	6 Years
	Health Referrals (including medical reports from doctors/consultants)	End of Employment	6 Years
	Health & Safety Records	The end of financial year to which the records relate	6 Years
	Death Benefit Nomination & Revocation Forms	From Leaving Employment	6 Years
	Staff Security Vetting Records	From Leaving Employment	6 Years
	Employee Training Records	From Leaving Employment	6 Years
	Employee Grievance Records	From Leaving Employment	6 Years
	Working Time Records	The end of the financial year to which the records relate	6 Years
	Employee Discipline Records	From Leaving Employment	6 Years
	Job History	From Leaving Employment	6 Years
	Redeployment, Redundancy & TUPE	From Leaving Employment	6 Years
Contingent Workers	Contingent Worker Record (name, address, contact details)	End of Employment	6 Years
Operational Records	HR Operational Records	Last Modified Date	2 Years

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Customer Data

Activity/Information	Description	Start of Retention	Retention Period
Applications (Where applications are lapsed/abandoned, or no funding is provided)	• Applicant Record • Customer Funding & Previous Study Record • Customer Application • Health Information • Eligibility/Entitlement • Customer Account, Engagement & Supporting Information • Customer Information Provided to/from 3rd Parties • Parent/Guardian/Partner/Associated Party Information & Supporting Documentation for Applicants • Voluntary Statistical Data • Payment & Fraud Investigations	Between 12 and 24 months from either the: • Start date of the Academic Year • Start date of the last year of the course! • End date of the entire course!	**6 or 12 months** depending on the type of funding, product, and status of the Application. **No Application or Customer data will be deleted where:** • The Customer is identified as a suspected or confirmed fraud case. • The Customer is on the Financial Sanctions list. • The Customer has any open *Compliant, or a Stage 1 or 2 Complaint which was closed in the last 2 years. • Any complaints that have gone to the Independent Assessor which have been closed in the last 10 years. • The Customer has any open *Appeal, or a Stage 1 or Stage 2 Appeal which was closed in the last 6 years + 6 months. • Any Appeal that have gone to the Independent Assessor which

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Activity/Information	Description	Start of Retention	Retention Period
			have been closed in the last 10 years. • Any financial transaction has been recorded for that Customer which can't be attributed to a specific Application. • SAAS have not completed a reconciliation exercise for Fee Loans for that Academic Year. *The Complaints and Appeals exceptions will also include; Instances of Court proceedings where the Customer may not have come directly to SLC first (e.g. pre-action Protocols and Judicial Reviews), Instances where the Customer has escalated their Complaint/Appeal to an Independent Assessor or on to the relevant Ombudsman. If the Customer has no Applications, they will be deleted where: • Student (only) – The Student registered on SLC 12 (or more) months ago. • Sponsor – the Sponsor was 'unattached' from any

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Activity/Information	Description	Start of Retention	Retention Period
			Applications 24 (or more) months ago. An audit of deleted data is retained for 2 years and is deleted at the end of every quarter

Activity/Information	Description	Retention Period
Customer Record – Repayable Funding	• Core Customer Record • Customer Funding & Previous Study Record • Customer Application Record(s) • Health Information • Eligibility/Entitlement Assessment • Customer Account, Engagement & Supporting Information • Customer Information Provided to/from 3rd Parties • Financial Transactions & Payment Information (Customer Specific) • Loan Sales Records (Customer Specific) • Repayment/Deferment/Write-off Artefacts • Operational Artefacts • Voluntary Statistical Data • Payment & Fraud Investigations • Customer Reporting • Lifetime Elements Retained in Core Record	Certain customer data is currently retained on an indefinite basis within SLC. SLC has other obligations to ensure that customer data is retained in line with a range of regulatory and business requirements. In certain circumstances SLC is required to keep data for a minimum length of time (e.g., financial information) and/or even the lifetime of the customer. For example: • student support legislation obliges SLC to take into account any previous supported study to accurately determine an individual's entitlement to student support for any further study; and • student finance eligibility criteria requires that there are no arrears with any previous student loans. In some circumstances (for example, for specific training or reporting purposes) we may anonymise [or pseudonymise] your personal information so that it can no longer be associated with you, in which case we may use such information without giving you any further notice. When customers take out a student loan, it's likely that they'll be making repayments towards it for several years after they've finished or left their course. This means we'll hold on to the majority of their information until they've repaid their loan in full or it's been cancelled. Our Records Management Policy involves key stages where information we hold on a customer's record can be reduced through data

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Activity/Information	Description	Start of Retention	Retention Period
		minimisation/erasure activity. For example, six years after a customer has finished or left their course, or six years after a customer has fully paid off their loan. After a customer has received some non-repayable funding or has fully paid off their loan, we'll continue to hold a reduced amount of information on the customer, in the form of a 'Lifetime' record, ensuring that we're only holding the necessary amount of data to fulfil our Regulatory obligations under our Public Task and no more. A customer's Lifetime record is held until 70 years after their date of birth, when it will be fully erased from our systems. **SLC retains some historic data due to limitations of legacy record keeping systems. SLC has an ongoing erasure programme in place which addresses specific sets of retention requirements within our systems. This is continually being developed in anticipation of our strategic solution being completed, to be able to minimise/delete all relevant data sets within our systems.** You have a right to request access to personal data that we hold on you by making a Data Subject Access Request ("DSAR"). You have a range of specific rights that you can exercise under UK data protection legislation, find out more in our Data Subject Rights factsheet.	
Customer Record – Non-Repayable Funding (Grants – Disabled Student Allowance/Grants for Dependents)	• Core Customer Record • Customer Funding & Previous Study Record • Customer Application(s) • Health Information • Eligibility/Entitlement Assessment • Customer Account, Engagement & Supporting Information	As above	

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Activity/Information	Description	Start of Retention	Retention Period
	• Customer Information Provided to/from 3rd Parties • Financial Transactions & Payment Information (Customer Specific) • Service Provisions for Customers • Operational Artefacts • Voluntary Statistical Data • Payment & Fraud Investigations		
Correspondence*	• Customer Specific External Correspondence (Apply to Pay Phase of Customer Lifecycle) • Customer Specific External Correspondence (Repay Phase of Customer Lifecycle) • Customer Specific Internal Correspondence (Apply to Pay Phase of Customer Lifecycle) • Customer Specific Internal Correspondence (Repay Phase of Customer Lifecycle)	As above	
Parent/Guardian/Partner/Associated Party/Additional Contacts Information	• Parent/Guardian/Partner (Sponsor) Core Record • Parent/Guardian/Partner (Sponsor) Financial Information • Parent/Guardian/Partner (Sponsor) Dependents • Parent/Guardian/Partner (Sponsor) Declaration • Consent to Share • Power of Attorney • Additional Contacts	As above	

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Activity/Information	Description	Start of Retention	Retention Period
Customer Complaints, Research & Feedback	• Complaints & Feedback Case Files • Operational Artefacts • Customer Research (Customer Specific) • Customer Research (Unattributable/Anonymous) • Operational Artefacts	As above	
Appeals	• Appeals Case Files • Operational Artefacts	As above	
Counter Fraud	• Counter Fraud Case Files	As above	
Customer Record – Mortgage Style Loans	• Core Customer Record • Customer Application(s) • Financial Transactions & Payment Information (Customer Specific) • Deferments • Engagement with MSL Owners • Operational Artefacts • Repayment/Write-Off Records	These records are deleted 6-years after the loan has been fully paid off / written-off.	

*NB Customer Correspondence – Inbound and outbound call recordings are retained for a period of 2 years within SLC's call recording system.

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OFFICIAL

Corporate Management and Governance

Activity/Information	Description	Start of Retention	Retention Period
Statutory Books, Registers and Constitutional Records	• Incorporation documents • Companies House Correspondence • Companies House Filings • Company Books and Registers	Date of most recent document	Permanent (Life of Company)
	Gifts and Hospitality Register	End of Financial Year	10 Years
SLC Board	Board Effectiveness working papers	Date of most recent document	10 Years
	Board Schedule	Date of most recent document	5 Years
	Board Minutes of Meetings (incl. versions for publication)	Date of last action	Permanent
	All other working papers	Date of most recent document	10 Years
Board Member Information	Board Member Details including Letters of appointment, delegations, contact details, letters of indemnity, registers of interests, induction paperwork, files and advice, skills, and assessment.	After end of appointment/employment	6 Years
Operational and Business Administration	• Policies and Procedures • Policy Specifications	When updated/superseded	Superseded Permanent

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Activity/Information	Description	Start of Retention	Retention Period
	Operational Business Information (General administrative records, routine administrative correspondence (not related to customer, contract, or legal matters)	Date of most recent document	2 Years
	Letters of Financial Delegated Authority	End of Financial Year to which the records relate	7 Years
	Annual Performance and Resource Agreement (APRA)	End of Financial Year to which the records relate	7 Years
	All other Corporate Management and Governance Records	Date of most recent document or last action in most cases	6 Years in most cases. Some records, e.g. Framework Documents and External Reports are kept permanently.
Planning and Performance	• Corporate and Business Plans • Annual Report and Accounts • Performance Reports • Management Information	Financial Year End	7 Years
Audit	Audit Reports and Report Papers	From issue date	6 Years
	Interim Audit Reports, Correspondence, and Internal Audit Guides	From issue /correspondence date	3 Years
Projects	**General projects** (incl. project documentation, financial documents, project proposals, feasibility studies, plans and specifications)	Completion of Project / date of last paper	6 Years Major projects determined by their nature can be retained for longer up to 25 years
Legal Affairs	Provision of legal advice not specific to an individual case (etc. Legal advice given to SLC	Date of advice	7 Years

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Activity/Information	Description	Start of Retention	Retention Period
	concerning legislation or proposals for new legislation affecting its conduct and business) Includes legal advice for projects, contracts, policy and in relation to a dispute.		
Procurements and Contracts	Tenders, Contracts and Agreements	End of Contract	6 Years
	Settlement Agreements with ex-employees	Date of Agreement	6 Years
	Non-Disclosure Agreements	Date Non-Disclosure Agreement ceases to have effect (NB – may be indefinite)	6 Years
Litigation	• Employment Tribunal Records • Civil Court Litigation	Date file closed (which will not be earlier than appeal deadline)	6 Years
Intellectual Property	Branding and intellectual property (including trade/service marks)	Date modified	Life of Company
Commercial Property	All documents relating to SLC's property portfolio	Date deed is superseded in full or terminated	6 Years
	Land and Buildings Transaction Tax (LBTT) Returns to Revenue Scotland	Date relevant lease ceases to apply	6 Years
Access to Information (Information about Freedom of Information, Data Subject Access Requests, and the Publication Scheme)	Procedures for handling FOI requests and other documents regarding implementation of FOI; Procedure and Policy, case file records which lead to the development or precedent or best practice	When updated or superseded	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
	Case file records detailing FOI requests and responses, consideration of exemptions, and subject internal reviews and appeals. Each case record is likely to contain personal data as defined in UK data protection legislation. Specifically, each record is likely to contain: • the name, address, and other contact information of the applicant • personal details provided by the applicant when making his/her request. • where a fee has been paid, bank account and other payment details. • all personal data will be handled with care and in accordance with UK data protection legislation. Access to personal data will be strictly controlled.	From date of release	6 Years
	Data Protection "Rights of Data Subject" records – to include Subject Access and Data Portability requests, requests for erasure, rectification, restriction, objection. Includes initial request, response, related correspondence, and other supporting documentation	Completion of Request	6 Years
	Statistical data about number of FOI requests and Data Subject Access requests. Includes the timeliness of responses, outcomes, internal	Current Year	10 Years

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Activity/Information	Description	Start of Retention	Retention Period
	reviews and appeals and management information		
	Details of what access decisions have been taken about SLC records and redacted versions of documents that were released	Current Year	10 Years
	Information subject to a FOI request but scheduled for destruction	Last date of correspondence	6 Months
	Publication Scheme published on the SLC website	When updated/superseded	5 Years
Risk Management	• Audit Risk Committee Risk Report and Dashboard.	Date superseded	5 Years
	• Database containing all of SLCs historic and current Corporate Risks and issues	End Date	6 Years
Business Continuity	• Business Impact Analysis • Business Continuity Plans • Post-exercise / post incident reports • Supplier review	At the start of each year	5 Years
Print and Mail Services	• Memorandum of Understandings • Service Level Agreements • Licence Agreements	At the start of each agreement and refreshed annually	Permanent
Health and Safety	Risk Assessment documents for all sites listing hazards or hazardous events and the actions and controls in place to manage these	Updated annually or if/when a change is required	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
	Health & Safety Committee Meeting Minutes	Quarterly when document created	5 Years
	CCTV capture and door access records	Date of capture/record	Up to 90 days
Partner Services and External Engagement	Includes documentation but not limited to minutes of meetings, agendas, presentations, data capture forms, satisfaction surveys, all communications, performance review reports, analytical data, service agreements and contracts, audit reports, guidance, factsheets, web service/online content.	Creation of document / when updated or superseded	When no longer required / Superseded
Public Relations and Press	Press Cuttings and Press Releases	From publish date	2 Years
	Emails with journalists to inform reporting of media stories	From release date	2 Years then Archived
	Correspondence with the media	From date of correspondence	Permanent
	Information and guides	When updated/superseded	Permanent
Internal Communications	Staff communications	When administrative use ends	3 Years
	Intranet pages	From publish date	When no longer required
Images, Templates and Corporate Identify	Images of various SLC offices, staff, and events	From publish date	When no longer required
	Corporate identity material, logos, and stationery	When updated/superseded	Permanent

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Activity/Information	Description	Start of Retention	Retention Period
Online Content	All Web Content	When updated or superseded	Permanent
	Social media including messaging that goes out through various communication channels, links to websites	From publish date	Permanent
	Campaigns and Materials including web adverts and emails	Conclusion of campaign	3 Years
	Plans for Delivery (including web content and delivery)	When updated or superseded	Permanent
	Guides and Facts Sheets – for all domiciles downloadable from web channels	When updated or superseded	Permanent
	Films – animated explainers, piece to camera of colleagues	From publish date	Permanent
Publications, Presentations and Correspondence	Guides distributed domiciles e.g., Universities	When updated or superseded	Permanent
	Presentations for practitioners to teach students about Student Finance	When updated or superseded	Permanent
	System generated letters and emails sent to customers	When updated or superseded	Permanent
Marketing Analysis	Information identifying customer needs and all other marketing materials for analysis	When updated or superseded	Permanent
Governance and Compliance	Emails and reference documents on various topics	Last modified/processed date	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
SLC Compliance Framework - Security Assurance Management - Data Protection Management - Records Management - Data Governance - Knowledge Management - Security Education Awareness Management)	Security Project Delivery Model populated artefacts and compliance records	Last modified/processed date	Lifetime of the system/
	Compliance Framework populated artefacts and compliance records.	From start of control framework cycle	6 Years
	Artefacts including trackers, logs, registers, documents, handbooks, manuals, process documents, and flow charts	When updated/superseded	6 Years
	All other populated artefacts and compliance records	Last modified/processed date	10 Years
	Data Protection Case Files	Closure/Date of Last Action	6 Years (then reviewed for cases of interest)
	Data Protection mandatory artefacts	When updated/superseded	Permanent
	Records Management mandatory artefacts including Retention Schedules	When updated/superseded	Permanent
	Information Asset Registers	When updated/superseded	6 Years
	Statistics and Management Information including information packs and dashboards	Last modified/processed date	Up to 6 Years
	E-Learning modules, handbooks, training packages, and specific awareness activity campaigns	When updated/superseded	6 Years
Independent Assessor (IA)	Customer Files	Date case assigned to an Independent Assessor	6 Years

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Activity/Information	Description	Start of Retention	Retention Period
	Ombudsman Reports	Date report received from Parliamentary and Health Services Ombudsman	6 Years
	Customer Recordings	Date case assigned to an Independent Assessor	6 Years
	Contact Information	Date Independent Assessor assigned to role	11 Years

Financial Management

Activity/Information	Description	Start of Retention	Retention Period
Accounting Records	• Bank Account Records • Financial Statements and Summaries • Management and Project Account Forecast Reports	End of the financial year to which the records relate.	6 + 1 Year
Transaction Records	Record of cheques drawn for payment	End of the financial year to which the records relate.	6 + 1 Year
	General and subsidiary ledgers	End of the financial year to which the records relate.	6 + 1 Year
	Financial transactions – for potential audit requests and historical reconciliation differences	End of the financial year to which the records relate.	6 + 1 Year
	Operational Records	Last modified or processed date	2 Years
	Sanction Records	When added to Sanctions List	Indefinite – until removed from Sanctions List

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Activity/Information	Description	Start of Retention	Retention Period
	Money Laundering Reporting Officer (MRLO) forms and Investigation log	When referral email to MRLO received	5 Years then review.
	Payroll Records	End of the financial year to which the records relate	6 + 1 Year
Employee Financial Records	Payroll Records	End of the financial year to which the records relate	6 + 1 Year
Assets and Equipment	Asset and Equipment Registers	End of the financial year to which the records relate	6 + 1 Year

Information Communication and Technology

Activity/Information	Description	Start of Retention	Retention Period
Information Security Management	• Incident Register • Case Records • Data Breach Records	• Last Action on File • From Closure of Case • Last Action on File	6 Years
	• Management information • Service level data sheets • Data Security Team operational reports, • Issues, monthly trend, and common trends	• When updated/superseded	3 Years
	Data Security Work Instructions	When updated/superseded	4 Years
	Data Transfer Authorisations	Last modified date	6 Years
	Third Party Reviews	Last modified date	6 Years
	Network and system access logs	Date of access	Up to 3 Years

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Activity/Information	Description	Start of Retention	Retention Period
	Artefacts created and retained for project delivery and in conjunction with business services alongside project lifecycle	Date of issue or completion of project	6 Years
Technology Change and Integration	Disaster Recovery and Backups	Date of last update for each document	6 Years
Infrastructure and Operations	System Backups	From the date of the backup	32 days
	Fileserver Backups	From the date of the backup	12 days
	Notes Server Backups	From the date of the backup	90 days
	Email raw data searches used to fulfil a Data Subject Access Request	From date DSAR fulfilled	6 months
Architecture	• Architectural Design Papers • Architectural Level Papers	When updated or superseded	Indefinitely
Technology Operations	• Compliance Tracker Documents • Performance Initiative Documents • Executive Reports • Service Review Packs • Planning Materials • Policy and Process Documentation • Process Trackers	When updated or superseded	Indefinitely
Technology Operations	• Demand and Capacity Reporting • Technology Group Spot Awards	End of Year	6 Years

Records Management Policy (EXTERNAL) POL-20-150

OFFICIAL

Activity/Information	Description	Start of Retention	Retention Period
Software Delivery	• Software Delivery Documentation • Project Documentation • Test Scripts and Results • Audit Histories • Defect Records	Last modified date of a document or on retiral of system.	6 Years or Lifetime of a system
System User Training and Support	• Learning/Training Packs and documentation • Process Maps	When updated or superseded	2 Years

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