

Reference: 2026-064

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

Please provide copies of the Serious Fraud Office's current records management documentation, including:

- 1. The current Records Management Policy, Records Management Framework, or equivalent document governing the creation, maintenance, retention, archiving, and disposal of records.**
- 2. Any records retention and disposal schedule(s), retention policy, or records retention schedule identifying the retention periods applicable to:**
 - criminal investigation and case files;**
 - intelligence, assessment, and evaluation records;**
 - correspondence (including email correspondence);**
 - corporate and administrative records;**
 - policy, governance, and operational records; and**
 - any other principal classes of records maintained by the SFO.**
- 3. Any business classification scheme, file plan, records taxonomy, or similar documentation used to classify or organise records.**
- 4. Any guidance, procedures, or manuals explaining how records are created, registered, classified, indexed, stored, archived, transferred, reviewed for disposal, or destroyed, including any guidance relating to electronic records and email management.**
- 5. Any policy or guidance describing the management of records held within the SFO's electronic document and records management systems or case management systems, excluding any information whose disclosure would prejudice the security or integrity of those systems.**

Response

Question 1 & 2

Please see Annex A for some of the information requested. The SFO also holds additional information within the scope of your request. However, this is exempt from disclosure under section 31(1) of the FOIA.

Section 31(1)(a), (b), and (c) provides that:

Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders,*
- (c) the administration of justice:*

How the exemption is engaged

As a law enforcement agency, the SFO holds sensitive operational information that would be of significant interest to those it investigates and to others who seek to avoid scrutiny. Retention periods indicate how long the SFO holds case files, intelligence material, and correspondence before review, archiving, or disposal. Knowledge of these timeframes could allow individuals under investigation to anticipate when material relating to them is likely to be reviewed, archived, or destroyed, and to time their own conduct, disclosures, or legal challenges accordingly.

We consider that disclosure would be likely to prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, and the administration of justice, as set out at section 31(1)(a), (b) and (c).

Public interest test

Sections 31(a), (b), and (c) are qualified exemptions and require consideration of whether, in all the circumstances of the case, the public interest in exempting this data outweighs the public interest in disclosing it. More information about exemptions in general and the public interest test is available on the ICO's website at www.ico.org.uk.

It is recognised that there is a general public interest in publicising information about the SFO, so that the public knows that serious fraud, bribery, and corruption are being investigated and prosecuted effectively, and so that the public can be reassured about the general conduct of our organisation and how public money is spent.

However, having considered the public interest in releasing this information, we consider that the stronger interest lies in maintaining these exemptions of the FOIA. Primarily, the risk that this information could pose to the SFO's investigative functions against which it is essential to safeguard given the highly sensitive nature of the information held as a law enforcement agency. Releasing specific details of record management and retention policies risk compromising the SFO's investigative capacity at pre-investigation, investigation, prosecution stages and beyond.

Having considered the opposing arguments, I believe that the stronger public interest lies in exempting the information from release.

Question 3

The SFO adheres to the government-wide classification schemes for organising and managing information: Government Security Classifications Policy - GOV.UK. We do not hold a bespoke business classification scheme, file plan, records taxonomy, or similar standalone document of the type described in your request.

Question 4

We hold a Retention, Review and Disposal (RRD) schedule, which is addressed in our response to questions 1 and 2 above and is exempt from disclosure under section 31(1)(a), (b) and (c) of the FOIA for the reasons set out there.

Beyond this, the SFO does not currently hold separate guidance, procedures, or manuals explaining how records are created, registered, classified, indexed, stored, archived, transferred, reviewed for disposal, or destroyed, including guidance relating to electronic records and email management. This information is therefore not held.

Question 5

The SFO does not hold separate policy or guidance documentation beyond standard operating procedures and user manuals for our electronic document and records management systems and case management systems.

The standard operating procedures and user manuals that we do hold contain technical specifics and operational direction relating to these systems. We are withholding this information under section 31(1) of the FOIA.

Annex A – Retention Schedules

The retention periods below are the minimum periods for which records should be kept and should not be regarded as a time for automatic disposal.

As a guiding principle, the SFO has three standard minimum retention periods that it applies to its records. Exceptions to these standard periods will exist where records are needed for more specific periods in line with business requirements or legal obligations. Our default minimum retention periods are:

- Short term – 3 years
- Medium term – 7 years
- Long term – 12 years

Regardless of the minimum retention period and any subsequent reviews, the SFO must not destroy files that are subject to a legal hold or ongoing legal proceedings or requests, such as:

- a preservation order under section 17 of the Criminal Appeal Act 1995, unless the order has been lifted by the Criminal Cases Review Commission (CCRC);
- a request from a Public Inquiry Chairperson for documents under section 21 of the Inquiries Act 2005;
- a request for access to information under the Freedom of Information Act 2000, Environmental Information Regulations 2004, UK GDPR or Data Protection Act 2018, or any other access regime;
- civil litigation involving the SFO, or judicial review;
- Any other legal requirement to preserve or produce information.

The minimum retention periods for SFO records are as follows:

Case material

Record category	Retention trigger	Retain for
Discontinued cases at either investigation or trial stage	Pre-trial from Director sign off on discontinuation. Mid-trial from court decision to discontinue case	7 years
Cases finalised in Crown Court	From case closure, including the conclusion of any appeal made	7 years; or length of sentence if longer
Cases concluded in Deferred Prosecution Agreement (DPA)	From the conclusion of the DPA period	7 years
Civil cases (including judicial reviews)	From completion of proceedings, including the conclusion of any appeal made	7 years

Cases passed from SFO to other law enforcement authorities	From date case passed, subject to representations from partner agency	7 years
Cases in which a confiscation order was made under the Proceeds of Crime Act 2002 (POCA)	From case closure, including the conclusion of any appeal	7 years
Civil Recovery Cases	From date of recovery order, including the conclusion of any appeal	7 years
Account freezing, cash seizures, and listed asset investigations <i>(This also includes account forfeiture cases and cryptoasset forfeiture)</i>	From date of forfeiture order, including the conclusion of any appeal	3 years

Corporate material

Record category	Retention trigger	Retain for
Governance		
Agendas, minutes and papers from SFO's top level decision making forums	From date of meeting	7 years
Records of internal and external audits	From date report finalised	7 years
Project and programme documentation and reporting	From project closure or last action	3 years
Organisational performance management and reporting	From last action	7 years
Business planning, corporate strategy, governance policies and risk management	From publication / when superseded	3 years
Private Office secretariat, briefing and administration records	From last action	3 years
Director's notebooks (hardcopy)	When superseded	7 years

Director of Operations notebooks (hardcopy)	When superseded	7 years
Chief Operating Officer's notebooks (hardcopy)		
Director of Legal Services notebooks (hardcopy)		
Head of Private Office notebooks (hardcopy)	From last action	7 years
Chief of Staff notebooks (hardcopy)	From last action	7 years
Finance		
Financial records including: • Invoices (and payment of) • Cost schedules • Expenses • Accounts receivable • VAT returns • Spending control • Budget control • Management accounts • Reconciliations (transactional listings) • Payroll posting	From end of the Financial Year	7 years
Human Resources		
Payroll records including: • Salary • Allowances • Overtime & Travel Time • Bonuses • Changes in working hours • Termination of employment • Strike action, career breaks	From date of birth	Until Age 100

Change of Legal Status (Marriage, Divorce, Death)		
Loans (Season Tickets, Bikes, Rental, etc.) Expenses	From end of the Financial Year	3 Years 7 Years
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical Evidence, shared parental, paternity and adoption pay records	From date of birth	Until Age 100
Special Paid Leave Statutory sick pay records	Date of occurrence	3 years 7 years
Collective agreements with Trade Unions	From agreement end date	7 years
Pension records	From date of birth	Until Age 100
Employment contracts, on-boarding, and leavers forms	From date of leaving	7 years
Disciplinary, conduct and grievance records	From date of last action	7 years (longer where it impacts a case)
Recruitment application forms and interview notes (for unsuccessful candidates)	Date of completion of campaign	2 years
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Date of birth	Until Age 100
Commercial and Facilities Management		
Commercial files including: contracts, tenders, procurement and evaluation documentation, and related correspondence	From the end of the contract	7 years
SFO Counsel panel engagement files including applications, evaluations and related correspondence	From last action	7 years

Accommodation files including floor plans, refurbishments and repairs and correspondence with lease holder	From last action	7 years
Health & Safety files including accident reporting, DSE equipment, risk assessments, fire and first aid files	From last action	7 years
Environmental reporting data	From end of financial year	10 years
Car hire, stationary, post, and other facilities management files	From last action	3 years
Strategy and Policy		
Parliamentary Questions, FOI Requests, Subject Access and other statutory Individual's Rights requests	From date of response	3 years
Complaint files	From last action	7 years
External communications, including media handling, press releases, social media and associated case related information	From last action	3 years
Internal communications, including intranet articles, media summaries and other staff messaging	From last action	3 years
General correspondence	From date of response	3 years
Internal policies (including Operational Handbook policies) and associated instructions, advice and briefings	From being superseded	7 years
Cross-Whitehall and other external stakeholder engagement	From last action	7 years
Memoranda of Understanding (MoU)	From end of MoU	7 years
Overseas Justice Assessments (OSJA)	From last action	7 years
Information Technology		
IT Incident and request tickets	From creation of ticket	3 years

International Transfer Forms	From receipt of form	3 years
Data Protection Impact Assessments	From completion of the assessment	7 years
MS Teams Chat records	From date created	30 days
Files held in Egress Workspace	From date content is last modified	90 days
User account data (inc. email, personal file areas and profile data)	From date staff leave employment, unless under a preservation hold for ongoing legal purposes	3 years