

Retention and Disposal Policy – Accessible Version

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Key messages

This policy outlines the ICO's approach to retention and disposal of information. This policy covers:

- Retention periods
- ROT and weeding
- Reviewing information
- Destruction of information
- Permanent preservation
- Legal holds

Does this policy relate to me?

This policy relates to all ICO staff.

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1. Introduction

- 1.1. A general overview of our approach to records management is outlined in our [Information Management Policy](#). The aim of the Retention and Disposal Policy is to outline the ICO's approach to managing the retention and secure disposal of our information in line with our business requirements and legal obligations.
- 1.2. There are various pieces of legislation which outline retention requirements. These include, but are not limited to:
- Freedom of Information Act 2000 – including the Code of Practice Section 46 (FOIA)
 - The UK General Data Protection Regulations (the UK GDPR)
 - Data Protection Act 2018 (DPA 18)
 - Public Records Act 1958
 - Limitation Act 1980
 - Inquiries Act 2005
- 1.3. The requirements outlined in this policy have been developed to provide a consistent approach to the retention and disposal of corporate information. This policy applies to all physical and digital information, regardless of storage location.

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2. Roles and Responsibilities

- 2.1. All ICO staff are responsible for managing the information they create and receive as part of their normal daily business activities

and should familiarise themselves with the [Retention and Disposal Schedule](#).

2.2. Specific records management responsibilities are also allocated to individual staff members and various committees and boards across our corporate structure, as detailed in our [Information Risk Management Network](#) (IRMN). The following roles have additional responsibilities around retention and disposal:

- 2.2.1 **Information Asset Owners (IAOs).** IAOs ensure that all assets under their control are following retention schedule rules. They have ownership of the assets and are therefore responsible for ensuring adherence to the Retention and Disposal Schedule. IAOs are responsible for authorising the destruction of information when required.
- 2.2.2 **Information Asset Managers (IAMs).** IAMs assist the IAOs in their role and are operationally responsible for the upkeep of information assets, including adherence to the Retention and Disposal Schedule.
- 2.2.3. **Local Information Management Officers (LIMOs).** LIMOs monitor compliance with the retention schedule, whilst encouraging and working with staff to ensure ongoing conformity. Alongside this, the LIMO reports to the IAM and IAO on compliance with the schedule within their team. They also need to implement any changes required to the schedule in accordance with ICO procedure and work to improve compliance with the schedule where needed.
- 2.2.4. **Local Asset Administrator (LAAs).** LAAs work with staff directly to ensure the retention schedule is adhered to, undertaking some work disposing of information and recording disposal where needed. The LIMO is likely to

delegate instructions to the LAA to assist in improving compliance with the schedule.

- 2.3. More information about the responsibilities of individuals in the IRMN can be found in our [Roles and Responsibilities guidance](#).

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3. Retention Periods

- 3.1. Our retention periods are driven by legislation, business need, or both. If there is no legally defined retention period for corporate information it is the responsibility of the relevant IAO(s) to determine an appropriate retention period. The Information Management team must agree the proposed retention period to ensure:

- Retention triggers are clear and consistent
- Retention periods are not excessively long and are consistent with the rest of the schedule
- The correct retention source has been identified
- IAO approval has been obtained for any new entries with an action of 'destroy'.

- 3.2. We assign clearly defined retention periods to our information to ensure it is kept for the appropriate length of time. Each retention period has three elements:

- Trigger – the action which begins the retention period (e.g., 'End of Financial Year' or 'End of Employment')
- Retention period – the length of time the information will be kept
- Action – either 'review' or 'destroy'.

- If the action is 'review' the information must be reviewed to ensure it is no longer required before destruction. Outcomes of a review may be – dispose, mark for permanent preservation, or temporary extension to review again at a future date.
- If the action is 'destroy', this means the information can be destroyed without being reviewed in line with ICO procedure. IAO approval is not needed prior to destruction if the action is 'destroy.'

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4. Retention and Disposal Schedule

- 4.1. Our Retention and Disposal Schedule sets out our retention periods. Information **must** be kept for the length of time defined in the schedule unless there is a legal requirement to destroy it sooner.
- 4.2. The schedule is arranged by function, rather than by directorate. By following a functional approach we can ensure that the schedule will not need to change in the event of organisational restructures and that information held by multiple directorates is only captured on the schedule once.
- 4.3. Any proposed additions or changes to retention periods must be sent through to the Information Management and Compliance team. Significant changes may need to be signed off by the relevant IAO(s).
- 4.4. The Schedule is reviewed on an annual basis by the Information Management and Compliance team with input from the IRMN. Any queries about the schedule should be raised with the Information Management and Compliance team.

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5. Weeding

- 5.1. Not all information we create has long-term value. Our Retention and Disposal Schedule does not include redundant, obsolete or trivial (ROT) information. Such information should be identified by directorates regularly weeding their information and then destroyed. Approval or sign-off to delete ROT information is not required.
- 5.2. 'Weeding' does not apply to corporate records included in the Schedule, which should only be destroyed when they have reached the end of their retention period.
- 5.3. Information should be weeded for two reasons:
- To ensure that we are not wasting money or space (either digital or physical) by storing ROT information.
 - To make the process of reviewing and appraising records easier. Sifting through low-value records makes this process more time-consuming.
- 5.4. Below are common examples of information which are usually of limited value once they are no longer in use and can be weeded through housekeeping. This should not be seen as an exhaustive list.

Drafts - Draft documents lose value and can become obsolete once a final version has been published. However, on some occasions where significant changes or deviations have taken place, a draft may be retained to show how the final decision was made.

Trivial emails - Outlook has an automated retention policy that retains emails for 12 months. It is important that emails containing information of value are saved to EDRM to provide a record of decisions made or action

taken. Where the content of emails contains information with no long term value, these can be left in personal inboxes for disposal after 12 months.

Duplicates – We should not retain any duplications. Duplications can lead to multiple versions of information which can cause confusion.

Research Material – Whether developing policy or preparing to give advice, research material may be created or collected such as notes or copies of guidance from external organisations.

Limited Long Term Operational Value – Some information may be of importance for only a short period of time and then become redundant. This information should be weeded as soon as it is no longer required.

- 5.5. Weeding should be done on a regular basis to ensure that clutter does not build up over time. It is up to each team to decide a reasonable schedule for housekeeping, based on their resources and the amount of information they generate. IAOs should encourage weeding on a regular basis.
- 5.6. Weeding should cover all information the directorate stores, paper or digital, regardless of the system it is held on. This includes personal drives and desktops.

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6. Reviewing Information

- 6.1. When information has reached the end of its retention period it may need to be reviewed to ensure that it is no longer required. Information that has an action of 'destroy' on the Schedule can be disposed of securely without a review and without IAO approval. Where possible, automated retention rules should be built into corporate systems.

6.2. Where a review is required, the IAO assisted by the IAM and LIMOs should consider the relevant information and decide whether it can be destroyed. If a high volume of information is being reviewed at once then this should be conducted at a macro level, i.e., not document by document. If information is marked for permanent preservation or subject to a legal hold it may be necessary to review every document.

6.3. Information should only be retained beyond its retention period in limited circumstances. When conducting a review, the following factors should be taken into account:

- Is the information required to fulfil statutory or regulatory requirements?
- Is the information relevant to ongoing litigation or subject to a legal hold?
- Is the information the subject of an information request or related to information recently disclosed in a response?
- Is retention required to evidence events in the case of a dispute?
- Does the information fall under the selection criteria for permanent preservation and transfer to The National Archives (TNA)? See [section 14 of this policy](#) for more detail on permanent preservation.
- Is the information required for a Public Inquiry?
- Is there another demonstrable business need for retaining the information?

6.4. If the information is deemed to still be required, an extension of two years is given, the information needs to be reviewed again at the end of the extension. The only exception to this is where the information has been marked for permanent preservation (see [section 8](#)).

- 6.5. The retention period must not be extended indefinitely. You should contact the Information Management and Compliance team if you still intend to keep the information after applying the two-year extension period.

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7. Destruction

- 7.1. When records are no longer required by the organisation and do not have archival value they should be securely destroyed.
- 7.2. If the action on the retention schedule is 'review', destruction of records should not proceed without approval from the relevant IAO. A record containing what has been destroyed, when it was destroyed and the individual who authorised the destruction should be created and retained by the relevant directorate. A template Record of Destruction can be found [here](#) (please note that this link is only accessible to ICO staff).
- 7.3. If the action on the retention schedule is 'destroy', a Record of Destruction does not need to be created.
- 7.4. Records should be destroyed securely and the method chosen should reflect the sensitivity of the contents. For example, if records containing special category data or protectively marked papers have been shredded, the shredded paper should be handled securely and not dumped. Records awaiting destruction must be stored securely.
- 7.5. Paper records should be placed into the confidential waste bins and documents stored on electronic systems should be deleted, including back-ups. Deletions should be carried out by someone with appropriate access to the system from which they are being deleted. Digital documents should be deleted and not overwritten.

- 7.6. When information is destroyed, all copies of the information should be destroyed at the same time (both digital and physical). Information cannot be considered to have been completely destroyed unless all copies have been destroyed as well.

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8. Permanent Preservation

- 8.1. Documents should be selected for permanent preservation if they meet the criteria specified in [section 14 of the Retention Schedule in Annex B](#).
- 8.2. Documents which have been marked for permanent preservation must not be destroyed. Any information which is selected for preservation should be clearly marked to ensure it is not destroyed accidentally.

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9. Legal Holds

- 9.1. As a public authority the ICO is responsible for ensuring that any information under a legal hold is identified. A legal hold is the process of preserving all forms of information relevant to legal proceedings. If a legal hold is in place there is a freeze on the destruction of any relevant material held by the organisation.
- 9.2. A legal hold might be required if information relates to a Public Inquiry or if it pertains to any litigation that the ICO is involved with, such as an FOI Complaint which is subject to appeal. If you are unsure whether information in your possession falls under a

legal hold, contact the Information Management and Compliance team for advice.

- 9.3. When information falls under a legal hold it should be clearly marked as such so it is not accidentally included in any scheduled destruction.
- 9.4. Under the Inquiry Rules 2006, those responsible for public records have a duty to make arrangements for the selection of all information they hold which contains, or may contain, content as identified in relation to an investigation. [Appendix A](#) shows the Public Inquiries that are currently open in the UK, or due to be opened soon.
- 9.5. Following the closure of the Inquiry, the information should be reviewed to determine how long it needs to be retained.

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Feedback on this document

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Version history

Version	Changes made	Date	Made by
3.1	First Draft	20/01/18	Stuart Ashton
4.0	Final Version	24/05/18	Stuart Ashton
4.1	Final Version, updated with minor amendments	14/08/18	Lesley Owen-Edwards
4.2	Update to Retention Schedule – Assurance and Customer Contact (Breach Reports)	05/11/2019	Steven Johnston
4.3	Added general annual leave information to HR section	19/11/2019	Ben Cudbertson
4.4	Split 'Live Chat Transcriptions' into 'GCI/Touchpoint' and 'Goss' transcriptions. Changes retention of GCI/Touchpoint transcriptions from 2 years to 90 days.	27/11/2019	Ben Cudbertson
4.5	Update to live chat transcript retention period. Amended from 90 to 100 days.	06/01/2020	Steven Johnston
4.6	Removal of 'text messages' entry in schedule	03/02/2020	Steven Johnston

Version	Changes made	Date	Made by
5.0	Annual review and schedule updates.	07/04/2020	Steven Johnston
5.1	Addition to HR (Security Clearance Correspondence, Declaration of outside interests)	21/05/2020	Jennifer Matthews
5.2	Addition of Data Protection Fee Information – Paper records. Changed the trigger for Data Protection Fee Information – Electronic Records from 'lapsed payment' to 'lapsed registration.'	16/06/2020	Ben Cudbertson
5.3	Addition of Webinar and live event recordings	24/06/2020	Steven Johnston
5.4	Added Case Study to Comms section	13/10/2020	Ben Cudbertson
5.5	Changed Maternity, Paternity, Adoption and Sick Leave retention period from 3 years to 4 years and changed trigger from 'end of financial year after return' to 'end of financial year'.	20/10/2020	Ben Cudbertson

Version	Changes made	Date	Made by
5.6	Added digital direct debit scans	13/01/2021	Ben Cudbertson
5.7	Added car sharing information	19/02/2021	Ben Cudbertson
5.8	Changed Internal Guidance and LTT to date withdrawn from Creation.	02/03/2021	Tiffany Higgins
5.9	Added - Digital Mailroom instruction DP Fees scans	04/03/2021	Jen Matthews
5.10	Schedule under review - Updated: Legal Basis, Roles and Responsibility, IMS contact, Weeding	11/03/2021	Jen Matthews
6.0	Changes (including 2-year extension) confirmed	06/04/2021	Jen Matthews
6.1	Directorate name change throughout to Digital, IT and Business Services. Amendments to include this directorates IAO at 2.1, 2.2, 2.3, 2.4, 2.5, 2.9, 8.1, 8.16, 10.2, 10.3, 10.4. Name change from GCI to Nasstar at 1.8. Addition of 10.12. Retention period for 3.9 changed.	04/06/2021	Steven Johnston

Version	Changes made	Date	Made by
6.2	Addition to HR section (MHFA Application Details and details of MHFA attendance to training)	09/08/2021	Tiffany Higgins
6.3	Addition of 2.10 and 2.11.	23/08/2021	Steven Johnston
6.4	Addition of 3.15, 3.16 and 6.21.	25/08/2021	Steven Johnston
6.5	Addition of 2.12 and 2.13.	08/09/2021	Tiffany Higgins
6.6	Removal of 1.9	22/09/2021	Tiffany Higgins
7.0	Major update of Retention and Disposal Policy following review. Amended retention periods for HPI inquiries (8.5-8.7)	28/09/2021	Ben Cudbertson
7.1	Change to retention period for communications with journalists (2.7) – increased from 12 months to 3 years	04/10/2021	Ben Cudbertson
7.2	Updated job titles for IAOs	11/10/2021	Ben Cudbertson
7.3	Addition of 6.22.	01/12/2021	Steven Johnston
7.4	Addition of 2.14.	02/12/2021	Ben Cudbertson
7.5	Change of IAO at 3.7.	03/12/2021	Steven Johnston

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7.6	Addition of 11.13 – Staff photographs	10/01/2022	Simon Lochery
7.7	Addition of 1.9 Chatbot transcripts	13/01/2022	Steven Johnston
7.8	Addition of 6.23 – audio recordings	14/02/2022	Simon Lochery
7.9	Addition of 2.15 – Staff pulse surveys	26/04/2022	Steven Johnston
7.10	Updated section 4.2 – clarified that template is only accessible to ICO staff	15/05/2022	Ben Cudbertson
7.11	Added section 8.25	10/06/2022	Ben Cudbertson
7.12	Amendment to trigger and additional IAO in section 8.8.	19/07/2022	Simon Lochery
7.13	FOI and Transparency directorate added to 10.4.	02/09/2022	Steven Johnston
8.0	Appendix B updated following annual review of retention schedule by LIMOs. Divided regulatory section into 3. Updated TNA section following changes to selection criteria. No changes made to policy content. Updated	08/09/2022	Ben Cudbertson

Version	Changes made	Date	Made by
	Covid Inquiry entry for Appendix A.		
8.1	Added contracts and offer letters to 6.12. Added 6.24-6.26.	23/09/2022	Ben Cudbertson
8.2	Minor changes to sections 6 and 8 of the policy and section 14 of the retention schedule, to clarify reference to permanent preservation and the criteria.	30/09/2022	Simon Lochery
8.3	Added sections 8.16-8.18	24/10/2022	Ben Cudbertson
8.4	Added entry for 'breach report – no further action' to section 8.8 of Retention Schedule	31/10/2022	Simon Lochery
8.5	Retention schedule: Cases relating to Section 159 moved from 14.3 to 8.4. External consultation responses at 12.6 – action changed to review. External consultation responses at 14.6 – added word 'significant' for clarity.	11/11/2022	Simon Lochery

Version	Changes made	Date	Made by
8.6	Updated Regulatory – Assurance entries following review	08/12/2022	Ben Cudbertson
8.7	Retention schedule: Entry for 'Training materials moved from HR section to Organisation wide section. Added sections 10.5 and 10.6	21/12/2022	Simon Lochery
8.8	Added in section 8.21 – NIS Register	05/01/2023	Ben Cudbertson
8.9	Retention schedule: Entries 8.2 and 8.3 amended to include EIR, INSPIRE and RPSI complaints.	25/01/2023	Simon Lochery
8.10	Retention schedule: Entry added for 'Team administration' at section 13.4	07/02/2023	Simon Lochery
9.0	Annual review. Removed mention of DCMS as our sponsor department following recent government restructure. Section 3.1. updated in	17/02/2023	Ben Cudbertson

Version	Changes made	Date	Made by
	Retention Policy to clarify Information Management team's involvement in determining retention periods. Updates to sections 3.2, 6.1, and 7.1 in the Retention Policy clarifying when IAO approval is needed before destruction of information. Removed IICSA from Annex A following closure of Inquiry.		
9.1	Updated retention period for 12.9 'Consultations: SME feedback.'	22/02/2023	Ben Cudbertson
9.2	Retention schedule: Added new entry at 9.10 and updated the entry now at 9.9. Updated IAO column for 11.1. Added new entry at 8.22 and updated entry 8.17.	06/03/2023	Simon Lochery
9.3	Added entry for 3.20 'Website Analytics Data'.	20/03/2023	Ben Cudbertson

Version	Changes made	Date	Made by
9.4	Retention period for 6.9 successful recruitment candidate information changed from 6 months to 2 years from date employment ceases.	14/04/2023	Steven Johnston
9.5	Added 12.10 'Consultations: FOI and EIR Upstream Feedback Group'	20/04/2023	Ben Cudbertson
9.6	Added 6.26 'Reasonable Adjustments Information'	25/04/2023	Ben Cudbertson
9.7	Retention schedule amended: Addition of Director of International to IAO sections and removal of specific entries for adequacy assessments in section 10.	23/06/2023	Simon Lochery
9.8	Added 2.15, Slido event data	11/08/2023	Ben Cudbertson
9.9	Added 8.23 to Annex B – retention schedule.	07/08/2023	Steven Johnston
9.10	Descriptions for 12.2 and 12.3 of Annex B changed as a result of requests for clarification.	09/08/2023	Steven Johnston

Version	Changes made	Date	Made by
9.11	Section 7 of policy updated to clarify when a record of destruction needs creating.	17/08/2023	Simon Lochery
9.12	Retention period in 9.3 changed from 2 years to 3 years	16/09/2023	Ben Cudbertson
9.13	Change to 12.5, privacy changed to protection. Annex B part 14 actions changed from prepare for transfer to consider for transfer. CLI retention period at 1.9 of Annex B changed from 100 days to 90 days.	20/10/2023	Steven Johnston
9.14	Added 9.12 to Annexe B – retention schedule	02/11/2023	Simon Lochery
9.15	Annex B – retention schedule: Amended retention period for 1.6 Instant messages. Added 3.21. Added 8.24. Amended retention period and retention source for 13.6 Procedures and	20/12/2023	Simon Lochery

Version	Changes made	Date	Made by
	13.8 Corporate Polices.		
10.0	Annual review completed. No changes.	21/02/2024	Simon Lochery
10.1	Change of retention period from 12 months to 6 years for 10.24, 10.27 and 10.29 in Annex B.	16/05/2024	Steven Johnston
10.2	Annex B – retention schedule: Entry added at 9.13 for cookie compliance tool. Director of Economic Analysis added as IAO in entry 11.1.	10/06/2024	Simon Lochery
10.3	Annex B – retention schedule: Reference to 'Slido Event Data' removed from 2.15 and new entry for 'Sido data' added at 13.14	29/07/2024	Simon Lochery
10.4	Annex B – retention schedule: Entry added at 3.22 for user design documentation	02/09/2024	Simon Lochery
10.5	Annex B – retention schedule: Entry added at	25/09/2024	Caroline Browne

Version	Changes made	Date	Made by
	11.2 for resources for staff.		
10.6	Annex B – retention schedule: Entry added at 3.23 for scan data for office roll call report	06/11/2024	Simon Lochery
11.0	Annual review (not including annexes). Amendments made to 5.1; explanation of weeding, 5.4; emails and research materials and 7.4; minor simplification of paragraph.	05/02/2025	Steven Johnston
11.1	Annex B – retention schedule: Entry at 12.6: Consultations. Amended description and retention period changed to 3 years.	18/02/2025	Simon Lochery
11.2	Annex B – retention schedule: Minor amendment to 3.11. Entry added at 1.11 for Microsoft Teams recordings and transcripts.	07/03/2025	Simon Lochery

Version	Changes made	Date	Made by
	Entry added at 13.15 for Microsoft Copilot user interactions.		
11.3	Annex B – retention schedule: Amendment to retention period for 1.6 Instant Messages	14/03/2025	Simon Lochery
11.4	Annex B – retention schedule: Addition at 3.24 for Enterprise Architecture documentation	07/05/2025	Simon Lochery
11.5	Annex B – retention schedule: Minor amendment to trigger for 12.9 Consultations: SME feedback	16/06/2025	Simon Lochery
11.6	Annex B – retention schedule: 3.4 amended from <i>"Information detailing what has been sent to the National Archives (not transferred)"</i> to <i>"Administration of ICO records considered for transfer to the National</i>	04/09/2025	Steven Johnston

Version	Changes made	Date	Made by
	<i>Archives</i> ". Director of Risk and Governance added as a responsible IAO.		

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Annexes

Annex A – Ongoing Inquiries

Public Inquiry	Information to be retained
Scottish Child Abuse Inquiry	Any material including reports, reviews, briefings, minutes, notes and correspondence relating to the care of children in public or private care.
Undercover Policing Inquiry	Any material relating to undercover police operations conducted by English and Welsh police forces in England and Wales since 1968 in particular the collusion of the police in the blacklisting of trade union members.
Upcoming Covid-19 Inquiry	All information relating to Covid to be preserved until further guidance issued

Annex B – Retention Schedule

Note: For a complete list of our permanent preservation criteria see [section 14](#) of this schedule.

1. Communications Activities

IAO: These are generic documents which sit within all departments for filling similar roles. Therefore, there isn't a specific Information Asset Owner for this set of information, each owner's departments will have their own versions of these documents for which they will be the owner.

		Retention Trigger	Retain For	Action	Retention Source
1.1	Staff Mailboxes and Outlook	Creation	12 months	Destroy	Business Need
1.2	Physical Correspondence	Once Scanned	See Digital Mailroom Retention and Disposal Schedule	Destroy	Business Need
1.3	Internal Email Mailboxes	Creation	12 months	Destroy	Business Need
1.4	Customer Email Boxes	Creation	12 months	Destroy	Business Need

		Retention Trigger	Retain For	Action	Retention Source
1.5	External Email Mailboxes	Creation	12 months	Destroy	Business Need
1.6	Instant Messages	Creation	7 days	Destroy	Business Need
1.7	Nasstar and Touchpoint Live Chat Transcriptions	Creation	100 days	Destroy	Business Need
1.8	Chatbot transcripts	Creation	12 Months	Destroy	Business Need
1.9	Calling Line Identification	Creation	90 Days	Destroy	Business Need
1.10	Your Data Matters Pledge	Creation	Email Address: 1 month Name and Organisation: 12 months	Destroy	Business Need
1.11	Microsoft Teams recordings and transcripts	Creation	21 days	Destroy	Business Need

2. Corporate Communications and Marketing

		Retention Trigger	Retain For	Action	Retention Source	IAO
2.1	Market Research Reports, Press Releases, Campaigns and Projects, Informer, and Image Banks	Last Action	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance, Director of Digital, IT and Business Services
2.2	Staff Events and Briefings, Public Engagement and Political Monitoring	Last Action	3 years	Review	Business Need	Director of Corporate Planning, Risk and Governance, Director of Digital, IT and Business Services
2.3	Conference Delegate Lists	Last Action	400 days	Destroy	Business Need	Director of Corporate

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Planning, Risk and Governance, Director of Digital, IT and Business Services
2.4	Webinar and Live Event Registration	Webinar Completed	12 months	Destroy	Business Need	Director of Corporate Planning, Risk and Governance, Director of Digital, IT and Business Services
2.5	Webinar and Live Event Recordings	Event completed	12 months	Destroy	Business Need	Director of Corporate Planning, Risk and Governance, Director of Digital,

		Retention Trigger	Retain For	Action	Retention Source	IAO
						IT and Business Services
2.6	Journalist Information	Request of the Journalist to remove their information	Instant once requested	Destroy	Business Need	Director of Corporate Planning, Risk and Governance
2.7	Communications with Journalists	Creation	3 years	Destroy	Business Need	Director of Communications
2.8	Case Study	Publication date	3 years	Review	Business Need	Director of Communications, Director of Digital, IT and Business Services
2.9	E-newsletter contact profile	Last Action (ICO stops sending its e-newsletter)	6 months	Destroy	Business Need	Director of Communications.

		Retention Trigger	Retain For	Action	Retention Source	IAO
2.10	E-newsletter analytics	Last Action	2 years	Destroy	Business Need	Director of Communications.
2.11	Records of emails to main contacts of DP Fees Register	Creation	18 months	Destroy	Business Need	Director of Digital, IT and Customer Services
2.12	Email the Register – suppression list	Completion of emailing main contacts of DP Fees Register	12 months	Destroy	Business Need	Director of Digital, IT and Customer Services
2.13	Customer Experience Survey contact information	Survey Closure	30 days	Destroy	Business Need	Director of Public Advice and Data Protection Complaints
2.14	Staff Pulse Surveys	Survey Closure	12 months	Destroy	Business Need	Executive Director of Strategic Change and Transformation.

3. Corporate Functions

		Retention Trigger	Retain For	Action	Retention Source	IAO
3.1	Health and Safety Inspections, Property Management and Asset Records	Last Action	6 years	Review	The National Archives Retention Scheduling: Departmental Accounts, Health and Safety at Work Act 1974 and supporting Regulations, Limitation Act 1980	Director of Finance
3.2	Documents relating to IT systems integral to their running and long-term use	End of System Life	12 months	Review	Business Need	Director of Digital, IT and Business Services
3.3	Information Management and Compliance Records	Last Action	3 years	Review	Business Need	Director of Digital, IT and Business Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
3.4	Administration of ICO records considered for transfer to the National Archives	Last Action	6 years	Review	The National Archives Information Management Guidance	Director of Digital, IT and Business Services Director of Risk and Governance
3.5	IT Infrastructure	Last Action	3 years	Review	Business Need	Director of Digital, IT and Business Services
3.6	Information Security	Last Action	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance, Director of Digital, IT and Business Services
3.7	Information Requests (Including MP request not dealt with directly by the Commissioner)	Case Closed	2 years	Destroy	Business Need	Director of Corporate Planning, Risk and Governance

		Retention Trigger	Retain For	Action	Retention Source	IAO
3.8	Projects and Corporate Programmes	Last Action	3 years	Review	Business Need	Exec Director Strategic Change and Transformation
3.9	Building Reports, Risk Assets, Helpdesk and Security Reports	Last Action	3 years	Review	Limitation Act 1980	Director of Finance
3.10	IT Back ups	Last Action	Up to 12 months	Destroy	Business Need	Director of Digital, IT and Business Services
3.11	System Audit Logs	Last Action	12 months	Destroy	Business Need	Director of Digital, IT and Business Services
3.12	Casework Performance Management Information	Last Action	2 years	Destroy	Business Need	Director of Digital, IT and Business Services
3.13	CCTV	Last Action	1 month	Destroy	ICO CCTV Policy	Director of Finance
3.14	Reception Sign in Book	End of Year	2 years	Destroy	Business Need	Director of Finance

		Retention Trigger	Retain For	Action	Retention Source	IAO
3.15	Google Analytics Reports	Last Action	38 months	Destroy	Business Need	Director of Digital, IT and Business Services, Director of Corporate Planning, Risk and Governance
3.16	IT incident management reports from 3 rd parties	Last Action	3 years	Review	Business Need	Director of Digital, IT and Business Services
3.17	IT helpdesk incident reports, service requests and knowledge base	Last Action	3 years	Review	Business Need	Director of Digital, IT and Business Services
3.18	Mobile device information for visitor Wi-Fi use	Creation	90 days	Destroy	Business Need	Director of Digital, IT and Business Services
3.19	Service Adjustments	Last Contact	2 years	Destroy	Business Need	Director of Public Advice and DP Complaints

		Retention Trigger	Retain For	Action	Retention Source	IAO
3.20	Website Analytics Data	End of Contract	30 days	Destroy	Business Need	Director of Digital, IT and Business Services
3.21	Website user testing volunteer database	Creation	2 years	Review	Business Need	Director of Digital, IT and Business Services
3.22	User design documentation	Last action	3 years	Review	Business Need	Director of Digital and IT
3.23	Scan data for office roll call report	Creation	Up to 7 days	Destroy	Business Need	Director of Finance
3.24	Enterprise Architecture documentation	Superseded	12 months	Review	Business Need	Director of Architecture

4. Corporate Governance

		Retention Trigger	Retain For	Action	Retention Source	IAO
4.1	Memorandum of Understanding	End of Understanding	6 years	Destroy	Business Need	Director of Corporate Planning, Risk and Governance, Director of International
4.2	Internal Committees and Groups minutes	Minutes Agreed	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.3	Commissioner's Delegated Authority, Briefings, Decision Notes and Legal Advice	End of Commissioner's Term	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.4	Corporate Governance Support	Last Action	3 years	Review	Business Need	Director of Corporate Planning, Risk and Governance

		Retention Trigger	Retain For	Action	Retention Source	IAO
4.5	Organisation wide Corporate Plans, Business Continuity, Risk Management and Strategies	Superseded	3 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.6	Elected Members Correspondences to the Commissioner	End of Commissioner's Term	3 years	Review	Business Need	Director of Governance Transition
4.7	Corporate Roles and Responsibilities	Superseded	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.8	ICO Annual Report Drafting Documents	Report Published	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance

		Retention Trigger	Retain For	Action	Retention Source	IAO
4.9	Non-Financial External Audit Documents	End of audit	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.10	Incidents and Investigations into the ICO – no legal matter arising	Investigation Closed	6 years	Review	Business Need	Director of Corporate Planning, Risk and Governance
4.11	Directorate Business Plans, Corporate and Other Scorecards and Related Performance Measures	End of financial year	7 years	Destroy	Business Need	Director of Corporate Planning, Risk and Governance

5. Finance

		Retention Trigger	Retain For	Action	Retention Source	IAO
5.1	Financial Information	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of Finance
5.2	Payroll Capita Reports	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of Finance

6. Human Resources

		Retention Trigger	Retain For	Action	Retention Source	IAO
6.1	Employee Files and Personal Development Records	End of Employment	6 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of People and Workforce Planning
6.2	Disciplinary and Grievance, Examination and Testing, Accident, and Ill Health	Last Action	6 years	Destroy	Limitation Act 1980	Director of People and Workforce Planning
6.3	Job Descriptions and Terms and Conditions	Last Action	6 years	Destroy	Limitation Act 1980	Director of People and Workforce Planning
6.4	Political Declarations	Superseded or End of Employment	6 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of People and Workforce Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
6.5	Industrial Relations	Last Action	6 years	Destroy	Limitation Act 1980	Director of People and Workforce Planning
6.6	Payroll Sheets	End of Financial Year	6 years	Destroy	HM Treasury guidelines, National Audit Office advice, Companies Act 2006	Director of People and Workforce Planning
6.7	General Annual Leave Information	End of Financial Year	3 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of People and Workforce Planning
6.8	Maternity, Paternity, Adoption and Sick Leave	End of Financial Year	4 years	Destroy	Statutory Sick Pay (General) Regulations 1982 Statutory Maternity Pay	Director of People and Workforce Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
					(General) Regulations 1986 Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002	
6.9	Successful Recruitment Candidate Information (including third party referee details provided by the applicant)	End of Employment	2 Years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records and CPID	Director of People and Workforce Planning
6.10	Unsuccessful Recruitment Candidate Information (including third party	Last Action	6 months	Destroy	Limitation Act 1980	Director of People and Workforce Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
	referee details provided by the applicant)					
6.11	Staff Pension, Pay History, Contracts, Offer Letters, and Termination Reasons	From DOB	100 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of People and Workforce Planning
6.12	Health Surveillance	Last Action	40 years	Destroy	Health and Safety at Work Act 1974	Director of People and Workforce Planning
6.13	Third party emergency contact details provided by the staff member	End of Employment	Immediate	Destroy	Business Need	Director of People and Workforce Planning
6.14	Equality and Diversity Published Information	Last Action	6 years	Review	Public Sector Equality Duty	Director of People and Workforce Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
6.15	Marriage Certificate and Documents relating to Civil Registration	From DOB	100 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of People and Workforce Planning
6.16	Medical and Self Certificates – unrelated to industrial injury	End of absence	4 years	Destroy	The National Archives Retention Scheduling: Employee Personnel Records	Director of People and Workforce Planning
6.17	Security Clearance Correspondence	End of Security Clearance	6 years	Destroy	Business Need	Director of People and Workforce Planning
6.18	Secondary Employment and Outside Interests Declaration	Superseded or End of Employment	6 years	Destroy	Business Need	Director of People and Workforce Planning
6.19	Mental Health First Aiders Application Form and	Acceptance to MHFA Scheme	3 years	Destroy	Business Need	Director of People and Workforce Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
	Details of Attendance to MHFA Training					
6.20	TMP profiles	Last Action	1 year	Destroy	Business Need	Director of People and Workforce Planning
6.21	Responses to recruitment process feedback surveys	Last Action	6 months	Destroy	Business Need	Director of People and Workforce Planning
6.22	Audio recordings of staff interviews for National Apprenticeship Week	Created	12 months	Review	Business Need	Director of People and Workforce Planning
6.23	Career Banding assessment documentation	Career Banding Window closes	6 years	Destroy	Business Need	Director of People Services
6.24	Recruitment folders	Last action	6 years	Review	Business Need	Director of People Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
6.25	Bupa log	Last action	5 years	Destroy	Business Need	Director of People Services
6.26	Reasonable Adjustments Information	End of Employment	6 years	Destroy	Limitation Act 1980	Director of People Services

7. Legal

		Retention Trigger	Retain For	Action	Retention Source	IAO
7.1	Legal Advice	Last Action	6 years	Review	Limitation Act 1980	Director of Legal Services (Regulatory Enforcement), Director of Legal Services (Regulatory Advice and Commercial),

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Director of International
7.2	Enforcement Legal Cases	Case Closed	6 years	Review	Business Need	Director of Legal Services (Regulatory Enforcement)
7.3	Contracts	End of Contract	6 years	Review	The National Archives Retention Scheduling: Contractual Records	Director of Legal Services (Regulatory Advice and Commercial)
7.4	Unsuccessful Tenders	Last Action	400 Days	Review	The National Archives Retention Scheduling: Contractual Records	Director of People and Workforce Planning
7.5	Building Contracts and Leases	End of Contract	12 years	Review	Limitation Act 1980	Director of Legal Services (Regulatory Advice and Commercial)

		Retention Trigger	Retain For	Action	Retention Source	IAO
7.6	Non-disclosure agreements	Last Action	2 years	Review	Business Need	Director of Legal Services (Regulatory Advice and Commercial)
7.7	Trademark documents	Last Action	6 years	Review	Business Need	Director of Legal Services (Regulatory Advice and Commercial)
7.8	Case summaries and background documents	Last Action	6 years	Review	Business Need	Director of Legal Services (Regulatory Advice and Commercial)

		Retention Trigger	Retain For	Action	Retention Source	IAO
7.9	Non-Property Licenses	End of license	3 years	Review	Business Need	Director of Legal Services (Regulatory Advice and Commercial)

8. Regulatory – Registration and Casework

		Retention Trigger	Retain For	Action	Retention Source	IAO
8.1	Appeals Information Tribunal	Case Closed	6 years	Review	Limitation Act 1980	Director of Legal Services (Regulatory Enforcement)
8.2	Data Protection and FOI Complaints (including EIR, INSPIRE and RPSI complaints)	Case Closed	2 years	Destroy	Business Need	Director of Public Advice and DP Complaints, Director of FOI and Transparency
8.3	Data Protection and FOI Complaints (including EIR,	Case Closed	6 months	Destroy	Business Need	Director of Public Advice and DP Complaints,

		Retention Trigger	Retain For	Action	Retention Source	IAO
	INSPIRE and RPSI complaints) Physical items (items which cannot be scanned or returned)					Director of FOI and Transparency
8.4	Cases relating to Section 159 of the Consumer Credit Act	Case Closed	6 years	Destroy	Limitation Act	Director of Public Advice and DP Complaints
8.5	Data Protection Fee Information – Electronic Records	Lapsed registration	2 years	Destroy	Business Need	Director of Digital, IT and Business Services
8.6	Data Protection Fee Information – Paper Records	Date of payment	2 years	Destroy	Business Need	Director of Digital, IT and Business Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
8.7	Data Protection Fee Information – Digital Mailroom Scan (copy of paper records)	Date Processed in digital mailroom	9 months	Destroy	Business Need	Director of Digital, IT and Business Services
8.8	Digital Scans of Direct Debit Mandates	Date of payment	6 years	Review	Business Need	Director of Finance
8.9	Breach Report – no further action	Case Closed	2 years	Destroy	Business Need	Director of Digital, IT and Business Services
8.10	Breach Report - informal action taken - advice provided	Case closed	2 years	Destroy	Business Need	Director of Digital, IT and Business Services
8.11	Breach Report – where action was taken	Case Closed	6 Years	Review	Limitation Act 1980	Director of Digital, IT and Business Services
8.12	Payments and Penalties Referrals	Penalty Notice issued	6 years	Destroy	Business Need	Director of Digital, IT and Customer Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
8.13	Gone Aways	Date processed	2 months	Destroy	Business Need	Director of Digital, IT and Customer Services
8.14	Welsh Language Complaints	Last action	2 years	Review	Business Need	Director of Regulatory Strategy
8.15	Welsh Language Compliance	Last action	6 years	Review	Business Need	Director of Regulatory Strategy
8.16	Registrations issued with Penalty Notice	Date of issue	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services
8.17	NIS correspondence	Last action	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services
8.18	Non-Registration Correspondence	Last action	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services
8.19	Mailing Campaign Database and Trackers	Last action	6 years	Destroy	Business Need	Director of Digital, IT and Customer Services
8.20	DP Fees – Auditor's Checks	End of audit	2 years	Destroy	Business Need	Director of Digital, IT and Customer Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
8.21	NIS Register	Last action	6 years	Review	Business Need	Director of Digital, IT and Customer Services
8.22	NIS and eIDAS casework	Case Closed	6 years	Review	Business Need	Director of Digital, IT and Customer Services
8.23	Website Subject Access Request Service	Last Action	14 days	Destroy	Business Need	Director of Public Advice & DP Complaints
8.24	Website Privacy Notice Generator Service	Creation	Until midnight on day created	Destroy	Business Need	Director of Digital, IT and Customer Services

9. Regulatory – Investigations

		Retention Trigger	Retain For	Action	Retention Source	IAO
9.1	All Criminal Enforcement Cases	Case Closed	6 years	Review	Limitation Act 1980	Director of Investigations, Director of High Priority

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Investigations and Intelligence
9.2	Civil Enforcement case where action was taken	Case Closed	6 years	Review	Limitation Act 1980	Director of Investigations, Director of High Priority Investigations and Intelligence
9.3	Civil Enforcement Case where no action taken	Case Closed	3 years	Destroy	Business Need	Director of Investigations, Director of High Priority Investigations and Intelligence
9.4	HPI inquiry where regulatory action was taken	Inquiry Closed	6 years	Review	Limitation Act 1980	Director of High Priority Investigations and Intelligence

		Retention Trigger	Retain For	Action	Retention Source	IAO
9.5	HPI inquiry where no regulatory action was taken	Inquiry Closed	6 years	Review	Business Need	Director of High Priority Investigations and Intelligence
9.6	HPI scoping activity that is not progressed to an inquiry	Scoping activity ceased	2 years	Destroy	Business Need	Director of High Priority Investigations and Intelligence
9.7	Gathered Intelligence	Date intelligence logged	6 years	Review	Business Need	Director of Investigations, Director of High Priority Investigations and Intelligence
9.8	Communications Data	Document created	5 Years	Review	Home Office: Communications Data Code of Practice	Director of Investigations, Director of High Priority Investigations and Intelligence
9.9	Financial Investigation and Recovery Cases (not including Scotland)	Case Closed	6 years	Review	Limitation Act 1980	Director of Investigations

		Retention Trigger	Retain For	Action	Retention Source	IAO
9.10	Financial Investigation and Recovery Cases (including Scotland)	Case Closed	5 years	Review	Prescription and Limitation (Scotland) Act 1973	Director of Investigations
9.11	NICC Management	Creation	5 years	Review	Business Need	Director of Investigations
9.12	PECR concerns processed in the website reporting tools (including nuisance calls and messages, SPAM, and cookies)	Date concern received	6 years	Destroy	Business Need	Director of Investigations, Director of Strategy and Planning
9.13	Cookie compliance tool data	Creation	6 years	Review	Business Need	Director of Investigations, Director of PACE

10. Regulatory – Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.1	Audit, Advisory, and Engagement Reports under DPA98	Completion of engagement	6 years	Review	Limitation Act 1980	Director of Regulatory Assurance
10.2	Audits and supporting documents and evidence under DPA18	Completion of engagement	6 years	Review	Limitation Act 1980	Director of Regulatory Assurance
10.3	HPI audit reports and supporting documents where regulatory action was taken	Inquiry Closed	6 years	Review	Limitation Act 1980	Director of Regulatory Assurance
10.4	HPI audit reports and supporting documents where no regulatory action was taken	Inquiry Closed	6 years	Review	Business Need	Director of Regulatory Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.5	Audit research	Last action	6 years	Review	Business Need	Director of Regulatory Assurance
10.6	Assurance departmental project documentation	Last action	6 years	Review	Business Need	Director of Regulatory Assurance
10.7	Assurance owned documentation for interorganisational work	Last action	6 years	Destroy	Limitation Act 1980	Director of Regulatory Assurance
10.8	IPA audits and supporting audit documents	Case Closed	6 years	Review	Business Need	Director of Regulatory Assurance
10.9	IPA related documents and correspondence	Document created	6 years	Review	Business Need	Director of Regulatory Assurance
10.10	NIS related documentation	Document created	6 years	Review	Business Need	Director of Regulatory Assurance, Director of Digital, IT and Business Services

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.11	Legacy ICO DRIPA audits and supporting documentation	Last action	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.12	Trust Service Providers - Applications for qualified status	Failure or abandonment of the application	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.13	Qualified Trust Service Providers	Completion of Qualified Trust Service Provider status termination	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.14	eIDAS security incidents	Closure of the incident	6 years	Review	Business Need	Director of Regulatory Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.15	EU BCRs authorised under DPA98 - terminated	Termination of the BCR	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.16	EU BCRs authorised under DPA98 and GDPR - transferred to a new EU Supervisory Authority	Transfer of the BCR	6 years	Review	Business Need	Director of Regulatory Assurance
10.17	Applications for EU BCRs under GDPR that remain relevant for applications for UK BCR approval	Brexit grace period end	3 years	Destroy	Business Need	Director of Regulatory Assurance
10.18	EU BCRs under GDPR being processed for UK BCRs approval under transitional regulations	Last action	3 years	Review	Business Need	Director of Regulatory Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.19	Applications for UK BCRs	Failure or abandonment of the application	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.20	Approved UK BCRs	Termination or superseding of the UK BCR	6 years	Destroy	Limitation Act 1980	Director of Regulatory Assurance
10.21	DPA 2018 notifications, under Section 75 and 77	Date received	6 years	Review	Business Need	Director of Regulatory Assurance
10.22	UK GDPR and EU GDPR Article 49 notifications	Date received	6 years	Review	Business Need	Director of Regulatory Assurance
10.23	Administrative Arrangements relating to Public Authority notifications	ICO approval granted	6 years	Review	Business Need	Director of Regulatory Assurance
10.24	Certification schemes – under development	Last action	6 years	Destroy	Business Need	Director of Regulatory Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.25	Certification schemes – approved	Certification scheme discontinued	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.26	Certification bodies – engagement	Date the certification bodies stops using the certification scheme	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.27	Codes of conduct documentation – under development	Last action	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.28	Codes of conduct - Approved	Code of conduct superseded or retired	6 years	Destroy	Business Need	Director of Regulatory Assurance

		Retention Trigger	Retain For	Action	Retention Source	IAO
10.29	Monitoring bodies – under development	Last action	6 years	Destroy	Business Need	Director of Regulatory Assurance
10.30	Monitoring bodies – Approved	Date of the end of an organisation being a monitoring body	6 years	Destroy	Business Need	Director of Regulatory Assurance

11. Regulatory – Internal Activities

		Retention Trigger	Retain For	Action	Retention Source	IAO
11.1	Information created in relation to new policies, guidelines, and research. This information has been created internally to guide	Last Action	6 years	Review	Business Need	Director of Regulatory Strategy, Director of Regulatory Futures, Director of Legislative Reform, Director of

		Retention Trigger	Retain For	Action	Retention Source	IAO
	decision making. This relates to any final drafts and significant supporting information					Technology and Innovation Service, Director of High Priority Investigations and Intelligence and Director of Regulatory Assurance, Director of Regulatory Design, Director of FOI and Transparency, Director of International, Director of Economic Analysis
11.2	Resources for staff to help them with their role, such as completing research for policies or guidelines eg journals, online	Creation	4 years	Destroy	Business Need	Director of Strategy and Planning

		Retention Trigger	Retain For	Action	Retention Source	IAO
	subscriptions and internally produced resources					

12. Stakeholder Engagement

		Retention Trigger	Retain For	Action	Retention Source	IAO
12.1	First Line Advice Services	Case Closed	2 years	Destroy	Business Need	Director of Digital, IT and Business Services, Director of Regulatory Strategy, Director of Public Advice and DP Complaints
12.2	Significant engagement with stakeholders: This will typically include our advice and engagement	Last Action	6 years	Review	Business Need	Director of Regulatory Strategy, Director of Regulatory Futures, Director of Legislative

		Retention Trigger	Retain For	Action	Retention Source	IAO
	with larger organisations, government departments and our international work where its impact can be widespread.					Reform, Director of Technology and Innovation Service, Director of International Regulatory Co-operation, Director of Investigations, Director of High Priority Investigations and Intelligence, Director of Regulatory Assurance, Director of Public Advice and DP Complaints, Director of FOI and Transparency, Director of Digital, IT and Business Services,

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Director of Governance Transition, Director of Regulatory Design
12.3	Less significant engagement with stakeholders: This will typically include our advice and engagement with smaller organisations where its impact is unlikely to be widespread.	Last Action	3 years	Review	Business Need	Director of Regulatory Strategy, Director of Regulatory Futures, Director of Legislative Reform, Director of Technology and Innovation Service, Director of Investigations, Director of High Priority Investigations and Intelligence, Director of Regulatory Assurance, Director of Public Advice

		Retention Trigger	Retain For	Action	Retention Source	IAO
						and DP Complaints, Director of FOI and Transparency, Director of Digital, IT and Business Services, Director of Regulatory Design
12.4	Guidance for External Use	Superseded	6 years	Review	Business Need	Director of Regulatory Strategy, Director of Regulatory Futures, Director of Legislative Reform, Director of Technology and Innovation Service, Director of Regulatory Assurance, Director of Digital, IT and Business

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Services, Director of FOI and Transparency, Director of Regulatory Design, Director of International
12.5	Data Protection Impact Assessments	Last Communication	6 years	Review	Business Need	Director of Technology and Innovation Service
12.6	Consultations: <i>The ICO gathers information through an open consultation</i>	Policy Published/ Product Finalised	3 years	Review	Business Need	Director of Regulatory Strategy, Director of Regulatory Futures, Director of Legislative Reform, Director of Technology and Innovation Service, Director of Regulatory

		Retention Trigger	Retain For	Action	Retention Source	IAO
						Assurance, Director of Regulatory Design
12.7	Sandbox – key documents	Last Action	7 years	Review	Business Need	Director of Technology and Innovation
12.8	Sandbox – supporting documents	Last Action	1 year	Review	Business Need	Director of Technology and Innovation
12.9	Consultations: SME feedback	Last Action	2 years	Destroy	Business Need	Director of Digital, IT and Business Services
12.10	Consultations: FOI and EIR Upstream Feedback Group	Last response	2 years	Destroy	Business Need	Director of FOI and Transparency

13. Organisation Wide

IAO: These are generic documents which sit within all departments fulfilling similar roles. Therefore, there isn't a specific Information Asset Owner for this set of information, each owner's departments will have their own versions of these documents for which they will be the owner.

		Retention Trigger	Retain For	Action	Retention Source
13.1	Significant Draft Versions: The draft versions of policies, advice, and guidelines for significant areas of work	Last Action	3 years	Review	Business Need
13.2	Internal Audits	Creation	3 years	Destroy	Business Need
13.3	Internal Guidance and Lines to Take	Date Withdrawn	6 years	Destroy	Business Need
13.4	Team administration	Creation	3 years	Review	Business Need
13.5	Templates	Superseded	3 years	Review	Business Need
13.6	Procedures	Superseded	6 years	Review	Limitation Act 1980
13.7	Internal Team Meeting Minutes	Last Action	3 years	Review	Business Need
13.8	Corporate Policies	Superseded	6 years	Review	Limitation Act 1980
13.9	Department Logs and Registers	Last Action	12 months	Review	Business Need
13.10	Training Material	Superseded	6 years	Destroy	Limitation Act 1980
13.11	Management Information	End of Financial Year	6 years	Review	Business Need

13.12	Car Sharing Information	Last Modified	12 months	Destroy	Business Need
13.13	Staff photographs	End of employment	Up to 12 months	Review	Business Need
13.14	Slido data	End of meeting or event	Up to 12 months	Review	Business Need
13.15	Microsoft Copilot user interactions, including prompts and responses	Creation	7 days	Destroy	Business Need

14. Transfer to The National Archives (For permanent preservation)

Note: You should consider your information against the following criteria to decide whether it needs to be permanently preserved. You should consider all of the criteria in this section as this isn't structured by team or directorate.

Where any of the criteria are met, the retention and disposal rules in parts 1 to 13 of this Retention Schedule are superseded and the information should be marked up accordingly and permanently preserved.

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
14.1	Constitution and Governance	• Correspondence with our sponsor department regarding the governance of the ICO • Management agreement with our sponsor department • Records showing changes to the high level structure and governance of the ICO • Scheme of delegation and delegated authorities	Last action	20 years	Consider for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Planning, Risk and Governance

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
14.2	Enquiries, advice and complaint handling	• Cases attracting significant media attention • Cases relating to a public figure that generated significant contemporary interest or controversy • Cases that led to a change in the interpretation of the law • Cases with outcomes that set a precedent (pathfinder cases) • An issue that affected a large number of	Case closed	20 years	Consider for Transfer	The National Archives Collection Policy, Public Records Act 1958	All IAOs responsible for casework

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		individuals and had a significant impact on them (damage or distress) • Upper Tribunal Appeals • Cases which proceeded to High Court, Court of Appeal, Supreme Court, European Court of Justice or International Court • Cases that resulted in the significant fine being issued • Cases which resulted in Judicial Reviews					

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		High profile complaints about the ICO handled externally					
14.3	Investigations and regulatory action	- Investigations resulting in regulatory action relating to breaches of section 55 DPA 98, Section 170 of the DPA 18 and Section 77 of the FOIA. - High Profile Investigations - Documents relating to significant civil claims including correspondence and court documents	Case closed	20 years	Consider for Transfer	The National Archives Collection Policy, Public Records Act 1958	All IAOs responsible for investigations and regulatory action

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		• Legal advice relating to significant investigations and enforcement action taken by the ICO • High profile engagement and audits					
14.4	Management decisions	• Management Board meeting agenda, minutes and accompanying papers • Executive Team meeting agenda, minutes and accompanying papers	Last action	20 years	Consider for Transfer	The National Archives Collection Policy, Public Records Act 1958	Director of Corporate Planning, Risk and Governance

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		• Senior Leadership Team meeting agenda, minutes and accompanying papers • Meeting agenda, minutes and accompanying documents from other high-level committees and panels such as the Regulatory Panel, the Nomination Committee and the Audit and Risk Committee • Records of decisions that affect the way the ICO conducts its core					

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		functions that have a discernible impact on policy or events, or where there is likely to be public interest (for example, decisions that set a precedent or had an impact on wider political developments) • Office Wide Strategic Plans • Commissioner correspondence, decisions, briefings, presentations, and engagements with					

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		significant stakeholders and on issues of national significance • Senior posts holders e.g., Deputy Commissioner or Deputy Chief Executive; correspondence, decisions, briefings, presentations, and engagements with significant stakeholders and on issues of national significance					

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		Records of programmes or project boards facing significant issues of innovation, cost, method of financing, risk or impact					
14.5	Public communications and published guidance and resources	- ICO Twitter account - ICO YouTube account - ICO Website	N/A – automatically captured by TNA	N/A	N/A	The National Archives Collection Policy, Public Records Act 1958	Director of Communications
14.6	Stakeholder Engagement, Policy research	Interactions with key stakeholders in relation to interpreting Data Protection and	Last action	20 years	Consider for Transfer	The National Archives Collection Policy, Public	All IAOs responsible for stakeholder

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
	and guidance development	Freedom of Information Act, Code of Practice relating to acts, legislative development, and significant internal advice • Advice or guidance given to the government relating to the UK's adequacy status following the exit from the EU • Legal Advice to the Commissioner (where it is directly related to				Records Act 1958	engagement, policy and guidance

		Selection Criteria	Retention Trigger	Retain For	Action	Retention Source	IAO
		information rights policy) • Advice given to Central Government departments on the development of government policy and legislation • External responses to significant ICO consultations					