

Data Retention and Schedule Policy

Our data retention and schedule policy outlines our approach to maintaining, destroying and deleting data.

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1. Policy Statement

1.1 We have a legal responsibility to ensure that our use of personal data is lawful, and properly controlled and that an individual's rights are respected. This includes ensuring all our information is stored and retained appropriately.

1.2 The General Optical Council retention schedules are the practical implementation of this policy, and we aim to help staff control their records effectively, preventing information from being either destroyed prematurely or retained unnecessarily. A retention schedule lists the length of time for which categories or series of records should be retained to meet business and operational needs, as well as to comply with legal, audit, and regulatory requirements. It records:

- Categories of records we hold;
- the format in which the master record should ideally be retained;
- the event which triggers the retention period to begin (e.g. the expiry of the contract); and
- A subsequent retention period for each category (e.g., six years, three years).

2. Purpose

2.1 This policy aims to ensure that records are managed consistently across all faculties and services provided by us and that they are retained for as long as necessary to meet operational and business needs and to demonstrate compliance with legal, regulatory and audit requirements. It applies to all records in whatever format they are held (i.e. paper or electronic). The retention schedule to which this policy refers also consider relevant requirements of our policies.

3. Scope

3.1 This policy applies to:

- Employees (whether permanent or temporary) and workers
- members, and
- contractors working with, or on behalf of, the General Optical Council

3.2 Compliance with this policy is mandatory. Non-compliance for employees may be considered a disciplinary matter.

3.3 If you require further advice and guidance, you should contact the Information Governance Team at IG@optical.org.

4. Storage and Preservation

4.1 Documents need to be arranged systematically and labelled helpfully and consistently so that it will be possible to locate them with ease and respond promptly to inquiries. When storing electronic information, a logical structure of folders and subfolders should be used to ensure that documentation can be readily identified for deletion.

4.2 Local storage for paper records should be secure and protect the records from water damage (from flooding, leaks, or sprinklers), fire damage, light damage, and pests.

4.3 Vital records, which could be in paper or electronic format (without which the department could not function) should be prioritised for protection. Departments will need to ensure that any records held electronically remain accessible and do not become trapped in obsolete technology.

4.4 It is advisable that departments review their data periodically and, if necessary, arrange for it to be converted into new file formats.

4.5 There is always a risk of data degrading or becoming corrupt or being lost; therefore, it is good practice for all data to be held centrally and not on local computers, so that it will be adequately backed up and safeguarded from hardware failure.

5. Destruction

5.1 Many documents can be routinely destroyed as part of normal business practice; you can find a list of documents along with how long they should be retained in appendix 1.

6. Destruction Register

6.1 It is essential to keep a record of what is being destroyed when it is being destroyed and why it is being destroyed.

6.2 Recording the disposal of information will ensure that there are transparent, accountable procedures, provide evidence that the retention policy has been implemented, and prevent futile searching for documents that no longer exist.

6.3 Both the Freedom of Information Act 2000 and Data Protection Act 2018 require well-defined procedures since explanations for the destruction of records may have to be given in a response to requests for information.

6.4 You can find a sample of our Data Destruction Register in appendix 2 and a copy of the register will be made available to all Information Asset Owners.

6.5 If there is any doubt concerning the destruction of records, please contact the Information Governance Team at IG@optical.org.

7. References and Further Guidance

7.1 Freedom of Information Act 2000

7.2 Data Protection Act 2018

7.3 Opticians Act 1989

8. Appendix 1 – Retention Schedule

8.1 We are required to hold a Retention Schedule to outline the guide disposal periods for all information held by us. Destruction of information must be completed

appropriately, and with an entry in the GOC destruction log, held by Information Governance and the Information Asset Owner.

8.2 All information must be held securely, in line with our Information Governance policies and the Information Asset Register. Information Asset Owners are responsible for the information held within their areas.

8.3 Disposal periods can be extended as long as there is a reasonable justification for doing so and the consent of the data subject remains valid. Personal/sensitive information must not be kept for any longer than is necessary.

Type	Description	Retention Period	Relevant Legal Provisions
General Information			
Minutes of meetings and agendas	Internal meetings (excluding Council and Committees) Meetings with contractors and suppliers	10 years from the date of the meeting or from the date of passing	Charities Act
Business Continuity Plan		When superseded	Best practice National Archive guidance
Risk Registers		10 years after superseded	Charities Act
Contacts list		Live record updated regularly	The General Data Protection Regulations and the Data Protection Act 2018
Forms and templates		Permanent	Best practice National Archive guidance
Policies, strategies, and operating procedures – including business plans	Corporate and Regulatory Policies held centrally	Permanent	Charities Act
Rules and regulations		Permanent	Best practice National Archive guidance
Draft policy (including early drafts and draft policy for comment)	Initial draft policies	When superseded	Best practice National Archive guidance
Correspondence			
Business related emails	Not exhausted too – personal or trivial emails, internal meeting booking rooms, internal business discussions, email exchanges with external stakeholders.	Business-related emails are transferred to relevant folders and then deleted.	Best practice National Archive guidance

Complaint related emails	Non corporate complaints	5 years	Best practice National Archive guidance
Email accounts and personal folder of employees (director/senior manager)	Email accounts and personal folder of employees (director/senior manager) that have left the organisation.	1 year after the date the employee leaves the organisation. (Deletion to be approved by the manager of IT and completed by IT team/Managed Services Provider).	Best practice National Archive guidance
Email accounts and personal folder of employees (Below Director/Senior Manager)	Email accounts and personal folder of employees (below Director/ Senior Manager) that have left the organisation	6 Months after the date that the employee leaves the organisation (Deletion to be approved by the manager of IT and completed by IT team/Managed Services Provider)	Best practice National Archive guidance
Local procedures		3 years after lapse	The General Data Protection Regulations and the Data Protection Act 2018
Guidance		3 years after lapse	The General Data Protection Regulations and the Data Protection Act 2018
Special delivery dispatch book	For items being sent from the GOC by Special Delivery	3 years	Best practice National Archive guidance
Special delivery receipt logs For items received by the GOC listed by individual and department Visitor book and hearings attendance lists		3 years	Best practice National Archive guidance
Meeting room bookings		1 year	Best practice National Archive guidance
Special delivery receipt logs	For items received by the GOC listed by individual and department	3 years	Best practice National Archive guidance
Communications department			
Press releases and statements	Media statements made by GOC	6 years	Best practice National Archive guidance
Publications, articles and social media content		Permanent	Best practice compared with Regulatory Sector

Press Cuttings	Press cuttings and media reports featuring the GOC, a registrant or of specific interest	2 years If FTP or registration related, the respective retention periods will apply.	Best practice National Archive guidance
External presentations		5 years	Best practice National Archive guidance
External communications	Response to consultations	6 years or unless there is a business need to retain	Best practice National Archive guidance
	Correspondence to MPs	Permanent	
Brochures and guides	GOC promotional brochures and guides	3 years	Best practice National Archive guidance
Operational Notices	Notices to press about forthcoming events or conferences	1 month	Best practice National Archive guidance
Marketing material	Branding logos and advertising information.	7 years 2 years	Best practice compared with Regulatory Sector
GOC events, public engagement and political monitoring	Event management and public information	3 years	
Images and video library		Permanent	Best practice compared with Regulatory Sector
Press conference reports and previews		3 years	Best practice compared with Regulatory Sector
Press correspondence	Correspondence with branches of the media	6 years	Best practice compared with Regulatory Sector
Internal communications	Briefings	6 years	Best practice compared with Regulatory Sector
	Emails	6 years	
	Guidance	6 years	
	Newsletter	Permanent	
	Articles	Permanent	
Compliance			
Information request logs	Logs of information requests and their outcomes.	Permanent	Freedom of Information Act 2000
Information requests and correspondence	A summary must be logged on a spreadsheet	2 years	Freedom of Information Act 2000
Subject access requests background material	Photographic evidence of the requester to confirm identity	1 year	Freedom of Information Act 2000

Information requests where there has been an appeal	Retention begins from the closure of the appeal process	6 years	ICO guidance
Information requests that are referred to an information tribunal	All information kept	Permanent	Freedom of Information Act 2000, the UK General Data Protection Regulations and the Data Protection Act 2018
Data Breaches – security logs, incident forms, correspondence, and any supporting documentation		10 years	ICO guidance
Decisions register	A log of decisions made in regard to information sharing and processing	2 years from the decision	ICO guidance
Information sharing agreements, memorandum of understanding, and NDA	Agreements in place for sharing information	Permanent	ICO guidance
Destruction register log	A log of data that has been destroyed and why	Permanent	ICO guidance and UK GDPR
Physical Asset Registers		Permanent	Charities Act and UK GDPR
Freedom of Information publication scheme		7 years	Freedom of Information Act 2000
Corporate Governance			
Council and committee agendas, papers, and minutes		Permanent	Charities Act
PSA Compliance		10 years	PSA guidance
Council and Committee Terms of Reference and scheme of delegations.		Permanent	Charities Act
Final corporate business plans and annual reports		Permanent	Charities Act
Gifts & Hospitality, Declarations of Interest registers		Permanent	Charities Act
Corporate Legal Advice		Permanent	Best practice National Archive guidance
Register of corporate complaints	Information about the number of complaints answered and their outcomes	6 years 10 years if appealed	Best practice compared with Regulatory Sector

Corporate complaints resolved at level one	Complaints from the prospective, current registrants or members of the public about the GOC, one of its employees, or members.	6 years 10 years if appealed	Best practice compared with Regulatory Sector
Corporate complaint (level 2 or 3)	(As above)	6 years 10 years if appealed	Best practice compared with Regulatory Sector
Acceptable behavior log and correspondence	Log of individuals subject to acceptable behaviour policy and correspondence	6 years from sanction	Best practice compared with Regulatory Sector
Council papers		Permanent	Best practice compared with Regulatory Sector
Committee Papers		Permanent	Best practice compared with Regulatory Sector
Meeting administration		2 Years	Best practice compared with Regulatory Sector
Council Membership	Recruitment, registers of interest, gifts, and hospitality. Members Information.	10 Years	Best practice compared with Regulatory Sector
Internal Audit, Annual Plan, report, assignment reports in house data and working papers.	Risk & internal audit	10 years	Limitations Act 1980
Equality and Diversity Development, performance, and reporting.		6 Years	Best practice compared with Regulatory Sector
Performance and monitoring		6 Years	Best practice compared with Regulatory Sector
Legal			
High court appeal cases		Permanent	Best practice compared with Regulatory Sector
Legal advice and enquiries		6 years	Best practice compared with Regulatory Sector
Illegal practice casework		6 years after the case is closed	Best practice compared with Regulatory Sector
Educational Department			
Raw data gathered from the continuous education and training		Permanent	Opticians Act

(CET) system and CET statistical analysis			
Validations of UK and non-UK institutions		10 years from the decision date	Opticians Act
Educational processes		When superseded (unless there is a business requirement to retain)	Best practice compared with Regulatory Sector
Guidance materials		3 years	Best practice National Archive guidance
General Correspondence		3 years	Best practice compared with Regulatory Sector
Emails relating to our statutory standards		Permanent	Best practice compared with Regulatory Sector
Statutory requirements/adaptation		Permanent	Best practice compared with Regulatory Sector
Evaluation of providers	Annual monitoring Complaints Inspection reports	5 years 3 years Permanent	Opticians Act
Meeting minutes, agendas and papers		10 years unless the rationale changes	Best practice compared with Regulatory Sector
Survey results, feedback, GANT charts, Provider applications		10 years unless the rationale changes	Best practice compared with Regulatory Sector
Education provider quality assurance documents		6 years after programme closure	Best practice compared with Regulatory Sector
Education provider contact details		Destroy when superseded	Best practice compared with Regulatory Sector
Programme approval decision records and correspondence		Permanent	Best practice compared with Regulatory Sector
External SharePoint	Shared with external stakeholders	Removal/access removed upon completion.	Best practice compared with Regulatory Sector
Facilities Department			
Emergency procedures	All evacuation or contingency procedures and policies	When superseded (unless there is a business requirement to retain)	Best practice National Archive guidance

Risk assessments and reports		6 years	Best practice National Archive guidance
Test and Statutory certificates and fire certificates		12 years after expiry or superseded	Best Practice National Archives Guidance and Regulatory Reform (Fire Safety) Order 2005 (RRO)
Records relating to workplace equipment	Display Screen Equipment and working accommodation requests.	100 years from the data subject's Date of Birth	Provision and Use of Work Equipment Regulations 1998
Health and Safety Audit reports	Internal and external inspection reports	12 years from the date of the audit/report	The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
Records and Health and Safety Inductions	H&S employee induction record	6 years after employment has ended	The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
Accident book	Log of reportable injuries, diseases, and dangerous occurrences	3 years from the date of last entry	The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
Accident and incident reports	Where no claim is made Where a claim is made	5 years 6 years	The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
Insurance documents	Insurance contract, policies and any claims or notifications.	Life of the organization for the policies and contract. 7 years for all other documents	Best practice compared with Regulatory Sector
Log of reportable injuries, diseases and dangerous occurrences		3 years	The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995

Log of maintenance and repairs	Non-building related Building related	5 years 16 years	Best practice National Archive guidance
Finance Department			
Financial Statements	Statements prepared for inclusion in quarterly or annual reports	6 years	Charities Act
Budget working papers	Draft papers or material for creating yearly or quarterly budgets	3 years after the budget is published	Charities Act and Commercial
Final budget reports		Permanent	Charities Act and Commercial
Working papers for quarterly or annual reports		2 years after the report is published	Charities Act and Commercial
Invoices and receipts	Invoices (paid, unpaid, register, debts, and ledgers)	10 years	Charities Act and HMRC
Refunds	Records relating to unrecoverable revenue, debts, and overpayments)	Current year plus 6 years	Charities Act and HMRC
VAT	Receipt books	Minimum 6 years	Paragraph 6, Schedule 11, VAT Act 1994 and HMRC Notice 700/21 (October 2013)
Investment portfolios or statements		Permanent	Charities Act and Commercial
Summaries of daily banking and statements		Current year plus 2 years	Charities Act and Commercial
Petty cash records	Records, books, sheets, and receipts	Current year plus 2 years	Charities Act and Commercial
Local auditing standards and internal audit plans		When superseded (unless there is a business requirement to retain)	Charities Act and Commercial
Working papers for audit reports		3 years	Limitations Act 1980
Audit investigations (external)		6 years after action completed	Limitations Act 1980
Audit reports (including internal)	Including where these have included the examination of long-term contracts.	6 years	Limitations Act 1980
Other audit papers, Terms of Reference, correspondence, meeting minutes, and related		3 years	Limitations Act 1980

papers, working papers and interim audit plan			
Theft/fraud (resolved internally)	Relating to serious matters of theft, fraud, misappropriation, irrecoverable debts and overpayments, write offs, recovery of debt, wavering of debt where the matter has been resolved internally.	6 years after audit	Fraud Act 2006
Theft/fraud (resolved externally)	(As above)	10 years after investigation completed	Fraud Act 2006
Report papers used in the course of fraud investigation		6 years after legal proceedings have been completed	Fraud Act 2006
Employee Finance			
Employee, member or worker expenses	Reimbursements for travel, including forms and receipts	Minimum 6 years	Section 12B Taxes Management Act 1970
Employee pay histories		Minimum 6 years	Regulation 97 Income Tax (Pay As You Earn) Regulations 2003 (SI 2003/2682)
Salary/wages payroll sheets		Minimum 6 years	Schedule 18, paragraph 21, Finance Act 1998
Season ticket loan and application advice		Minimum 6 years	Section 12B Taxes Management Act 1970
Employee expenses log		Minimum 6 years	Section 12B Taxes Management Act 1970
Employee and member bank account details		Maximum 6 years after employment ceases	Best practice compared with Regulatory Sector
Employee child benefits and other benefits records		Maximum 6 years after employment ceases	Section 5 Limitations Act 1980 General Data Protection Regulations and the Data Protection Act 2018

List of approved suppliers		Active document – updated regularly	Best practice National Archive guidance
Contract Records – Records relating to contracts worth less than £5,000 should be destroyed 2 years after end of the contract. Records relating to contracts worth more than £5,000 should be kept in accordance with the schedule below.			
Initial Proposals – end-user requirements		6 years	Limitations Act 1980
Statement of Interest		1 year from the date the statement was received.	Limitations Act 1980
Draft Specifications		Once the specification has been agreed	Limitations Act 1980
Agreed specification, evaluation criteria and invitation to tender		6 years from the end of the contract	Limitations Act 1980
Unsuccessful tender documents		2 years	Limitations Act 1980
Successful tender documents		6 years from the end of the contract	Limitations Act 1980
Background Information, Interview Panel – reports and notes of proceedings, Commissioning Letter		1 year from the end the of contract	Limitations Act 1980
Signed Contract		6 years from the end of the contract	Limitations Act 1980
Reports from contractors		2 years from the end of the contract	Limitations Act 1980
Records of disputes over payments and final accounts		6 years from the end of the contract	Limitations Act 1980
Approved supplier lists		6 years	Limitations Act 1980
Changes of requirements, Forms of variation, Extensions to contracts		6 years from the end of the contract	Limitations Act 1980
Fitness to Practice, illegal Practice and Hearings			
Complaint closed without hearing nor warning (no further action)	i.e., not referred by Case Examiners to Fitness to Practise Committee	10 years after closure (determination retained permanently)	Regulatory Powers and Opticians Act
Complaint that results in a warning, undertakings or a sanction imposed by an FTP committee or case	Includes audio data	10 years after sanction elapsed (determination retained permanently)	Regulatory Powers and Opticians Act

examiner, or another committee			
Complaint closed following a Fitness to Practise hearing or Registration Appeal with no outcome (no further action)	Includes audio data	10 years after closure (determination retained permanently)	Regulatory Powers and Opticians Act
Closed complaint undergoing a legal challenge (e.g. judicial review)	Includes audio data	Retention extended to cover the duration of proceedings including time limits for further appeal and or renewal of proceedings (Determination retained permanently)	Regulatory Powers and Opticians Act
Further FTP complaints about a registrant subject to FTP sanction received during the initial retention period		Retention period reset on original complaint and any subsequent FTP complaint(s)	Regulatory Powers and Opticians Act
Appealed FTP or registration appeal decision		10 years from the end of legal proceedings, including any subsequent appeal (determination retained permanently)	Regulatory Powers and Opticians Act
Cases that are referred to a Tribunal - Requests, related correspondence received and the outcome decision.		7 Years	Regulatory Powers and Opticians Act
Erasure from Register	For any reason including, but not limited to, FTP Committee or administrative removal.	Permanent	Regulatory Powers and Opticians Act
Hearing arrangements	Pre-hearing planning and booking arrangements	2 years	Best practice compared with Regulatory Sector
Monitoring and reporting logs and documents	Performance management tools	6 years	Best practice compared with Regulatory Sector
Registration and revalidation			
Appealed FTP or registration appeal decision		10 years from the end of legal proceedings, including any subsequent appeal (determination retained permanently)	Regulatory Powers and Opticians Act

Erasure from Register	For any reason including, but not limited to, FTP Committee or administrative removal.	Permanent	Regulatory Powers and Opticians Act
Human Resources and Member Management			
Employee organisation charts		Permanent	Commercial
Members list	List of members	Active document – updated regularly	Charities Act
Employee, member, and worker recruitment applications (successful)	Internal and external successful job applications	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Employee, member, and worker recruitment application forms and interview notes (unsuccessful)	Internal and external unsuccessful job applications	Six Months to one year. One-year limitation for defamation actions under the limitations act	Equality Act 2010
Employee, member, and worker personnel files	Contracts of employment, CV, qualifications, disciplinaries, references, terms, conditions, etc.	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Employee, member, and worker leavers file		6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Key documents related to major employee issues	Documents related to gross misconduct, fraud etc.	50 years after employment ends to ensure that the individual concerned is not re-employed	CIPD guidance and Section 5 Limitations Act 1980
Pay history (as applicable)	Personal payroll history, including a record of pay, performance pay, overtime pay, allowances, pay enhancements, other taxable allowances, payments for untaken leave, reduced pay, and maternity leave.	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Training records		6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Appraisal reviews and/or assessments (current employees/ members/workers)	Reports or summary of appraisal papers	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Appraisal reviews and/or Assessments (former employees/ members/workers)	Reports or summary of appraisals for the final 5 years of service	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980

Notice of end of employment letter	Resignation, termination, and/or retirement letters	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Health declarations	Letters or notes from GP, as applicable	6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Death benefits nomination and revocation forms		6 years after employment/ appointment ceases	Section 5 Limitations Act 1980
Sickness absence record	Statutory sick pay. Statutory Maternity pay, Statutory paternity pay, Statutory adoption pay.	3 years	(General) Regulations 1982 (General) Regulations 1986 (Administration) Regulations 2002
Pension records		Permanent	CIPD guidance
HR handbook and policies		10 years after being superseded	CIPD guidance
Parental leave records		5 years from birth/adoption of the child or 18 years if the child receives disability allowance	CIPD guidance
Staff working time records	Overtime records, annual holiday and work logs.	2 years	CIPD guidance
Policy and Standards Department			
Parliamentary Questions (PQs)		6 years	Best practice National Archive guidance
MP correspondence		6 years	Best practice National Archive guidance
Internal briefings		5 years	Best practice National Archive guidance
Working group and steering group Terms of Reference		Permanent	Best practice National Archive guidance
Consultations	All consultation documentation	6 years after the date created or unless there is a business need to retain	Best practice National Archive guidance
Research and analysis	Raw Data	Out of date and/or no longer required	Best practice National Archive guidance
	Processed Data, Analysis and Interpretation	6 years after the date created (unless there is a business requirement to retain)	
Stakeholder Contact Information		Active document – updated regularly	Best practice National Archive guidance

Correspondence	General policy and standards related queries and correspondence	7 years	Best practice compared with Regulatory Sector
Policies and guidance		Life of the organisation	Best practice compared with Regulatory Sector
Projects			
Approved project documentation	Approved project proposals, Feasibility Studies, Project Board Minutes, Maps Plans Drawings and Photographs, Plans and Specifications, Project Plans and Charts, Equipment and Supplies Documentation, Project descriptions and Project Operating Manuals	10 years from the completion of the project	Best practice National Archive guidance
Rejected or deferred project documentation	Rejected/Deferred documents (listed above)	5 years after the date the of proposal	Best practice National Archive guidance
Registrations Department			
Registration application file (Leading to registration)	Application evidence including name, contact details, date of birth, copy of passport, copies of relevant qualifications, and criminal declarations.	Date of registration plus 70 years	Regulatory Powers and Opticians Act
Registration application file (not leading to registration)	Application evidence including name, contact details, date of birth, copy of passport, copies of relevant qualifications, and criminal declarations.	Date of application plus 70 years from the date of most recent correspondence	Regulatory Powers and Opticians Act
Registration application file (if erased for any reason)		Permanent	Regulatory Powers and Opticians Act
Consolidated registration record comprising application, readmission, renewal forms and all registration related correspondence including history of payments, including name, date of birth and address.		Permanent	Regulatory Powers and Opticians Act

9. Retention schedule, the UK General Data Protection Regulations (GDPR), and the Data Protection Act 2018 (DPA 2018)

The Freedom of Information Act 2000 is intended to promote a culture of openness and accountability amongst public authorities by providing people with the right of access to records held by the General Optical Council. With the introduction of this legislation, the Lord Chancellor issued a Code of Practice to be followed by public organisations using his powers under Section 46 of the Freedom of Information Act (2000). This guidance sets out his views on desirable practices for the retention, management, and disposal of public authority records. The Code of Practice includes a requirement to develop and apply Records Retention Schedules within the organisation. The Retention Schedule is a requirement of the Freedom of Information Act (2000).

Article 5 (1) of the GDPR and Part 4 Chapter 2 of the DPA 2018 requires that personal data shall be:

- Adequate, relevant, and not limited to what is necessary (not excessive)
- Accurate and where necessary kept up to date.
- Not kept for no longer than is necessary for the purpose for which it is processed.

These three principles require the Council to have procedures in place, covering the review of information held on files. Retention schedules assist with compliance under the UK GDPR and the DPA 2018, which requires us to keep personal data no longer than is necessary for the purpose for which it was collected. The time limits for keeping records are based on statutory requirements, common business practice, and national guidance and best practice (the Retention Guidelines, guidance produced by the Records Management Society of Great Britain). In some parts of the retention schedule the recommended retention period given is six years. This is based on the six-year time limit within which legal proceedings must be commenced as laid down in the Limitation Act 1980. It should also be noted that, under this Act, civil action could be taken for up to 12 years following certain events.

10. Appendix 2 – Data Destruction Register

Please see the below table for an example of the Data Destruction Register.

Please follow these steps when completing the Data Destruction Register:

- Check the data is past its retention period.
- Obtain approval from your manager that you can delete the data.
- Complete the register in as much detail as possible.
- Delete the data.

Document ref (DES24-XX)	Date document was created (if known)	Who is destructing this document? (State name and department)	Number of pages or documents	Format of document	Description of document (please be as specific as possible)	Date document was deleted	Reason for deletion	Notes
DES24-01								