

Records Management and Data Quality Policy

Legal and Governance Services

July 2019



Contents

1.	Policy purpose	2
2.	Regulatory and Compliance.....	2
3.	Related policies and strategies.....	3
4.	Roles and Responsibilities	3
5.	Definitions	5
6.	Policy statement.....	6
7.	Training.....	8
8.	Processes and Procedures	8
9.	Impact Assessment.....	8
10.	Privacy notice	9
11.	Policy review or changes.....	9
	Appendix A.....	10

1. Policy purpose

- 1.1. The Combined Authority requires reliable, accurate and timely information to deliver its functions, make robust, evidence-based decisions and account for its performance. Records are important information based assets that require robust management so that their value can be fully realised and any risks associated with them can be mitigated. Data is used to inform business decisions and therefore must be of good quality. The purpose of this policy is to set out the Combined Authority's approach to ensuring this information is managed effectively.
- 1.2. The policy is part of a set of information governance policies, guidance and toolkits that support the delivery of the Combined Authority's functions and it should be read in conjunction with those documents.

2. Regulatory and Compliance

- 2.1. Data Protection Legislation
 - Data Protection Act 2018 (DPA)
 - Human Rights Act 1998
 - (EU Exit) Regulations 2019 (DPPEC Regulations)
- 2.2. Legislation affecting the management of records¹ :
 - Limitation Act 1980
 - Freedom of Information Act 2000
 - Environmental Information Regulations 2004
 - Local Government Acts
 - Public Records Acts
 - Data Protection Act 2018
 - Public Contracts Regulations 2015
 - HMRC - Compliance Handbook Manual CH15400
 - Taxes Management Act 1970
 - The Income Tax (Employment) Regulations 1993
 - The Statutory Maternity Pay (General) Regulations 1986
 - Statutory Paternity and Statutory Adoption Pay (Administration) Regulations 2002
- 2.3. Non-compliance with this policy could have a significant effect on the efficient operation of the Combined Authority and may result in financial loss, reputational damage and an inability to provide necessary services to our customers. Individuals who suffer financial loss or distress by reason of a breach of the data protection legislation due to poor records management can claim compensation from the Combined Authority.
- 2.4. The Information Commissioner has a range of powers available to enforce compliance with the data protection legislation and in certain circumstances,

¹ This is not an exhaustive list of all Statutes which may have a bearing on the retention of records. See legislation.gov.uk for all UK legislation.

where there has been a serious contravention of the data protection legislation, the Information Commissioner can serve a monetary penalty notice on the Combined Authority, and this can be up to 20 million Euros.

- 2.5. The Combined Authority will audit its records management procedures and where practical and proportionate, Corporate ICT Services will monitor users' access to information, including email accounts for the purpose of detecting breaches of this policy and/or other Combined Authority policies and procedures.
- 2.6. Any user who does not understand the implications of this policy or how it may apply to them should seek advice from their immediate line manager, the Records Management Officer or the Data Protection Officer.

3. Related policies and strategies

- 3.1. Related policies:
 - Data Protection and Confidentiality Policy
 - Freedom of Information /Environmental Regulations and Transparency Policy
 - ICT Security Policy

4. Roles and Responsibilities

All users

- 4.1. It is important that all users who create, maintain or receive records and data understand what is required of them, comply with this policy and complete any training provided by the Combined Authority. It should be noted that in some circumstances, disposal of current/in use records in a criminal offence.

Information Asset Owners

- 4.2. Heads of Service (or Service Managers where no Head of Service is in place) have been designated as Information Asset Owners (IAOs). IAOs operationally own the information contained in their business area and systems, they are accountable for the quality of data and access to records that their area creates, maintains or receives. IAOs are required to understand what records are held, who has access to it and why, and to identify, assess and manage the risks associated with their records in order for business to be transacted within an acceptable level of risk. IAOs are responsible for ensuring that the records managed in accordance with this policy and the record retention schedule and authorising record disposal. IAOs are responsible for implementing the data quality standards within their service areas. IAOs are required to IAOs must ensure that staff have completed the relevant records management and data quality training and disseminate any guidance provided by the Information Governance Team.

Information Asset Administrators

- 4.3. Information Asset Administrators (IAAs) are nominated by their IAOs to assist the IAO in meeting their responsibilities. IAA's promote best practice within their service area, notify the Information Governance Team if any new record groups should be added to the schedule and ensure that disposal registers are maintained within individual service areas.

Records Management Officer

- 4.4. The Combined Authority's Records Management Officer (RMO), within Legal and Governance Services is responsible for providing corporate guidance and advice on records management and promoting compliance with this policy. They will ensure the record retention schedule is updated and maintained in line with new legislative and record requirements. The Records Management Officer will hold a central register of records held in off-site storage and will carry out an annual review to ensure that records held beyond their retention periods are securely destroyed with the approval of IAOs.

Information Governance Officer

- 4.5. The Combined Authority's Information Governance Officer (IGO), within Legal and Governance Services is responsible for providing corporate guidance and advice on information governance, including data protection and related legislation. They will assist in the development and maintenance of appropriate systems to support aspects of and to undertake day to day administration relating to enquiries and requests.

Data Protection Officer

- 4.6. The Combined Authority has designated a Data Protection Officer (DPO) within Legal and Governance Services. The DPO must be involved in a timely manner in all issues relating to the protection of personal data within the Combined Authority. The DPO can be contacted at Rebecca.BrookesDPO@westyorks-ca.gov.uk The DPO will inform and advise the Combined Authority of its obligations under the data protection legislation, monitor compliance with the legislation and the Combined Authority's policies, raise awareness of the data protection legislation and this policy within the organisation, ensure that adequate training provision and auditing arrangement are in place and report information risks to the Senior Information Risk Owner. The DPO will advise the organisation on data protection impact assessments, co-operate with the Information Commissioner's Office and act as the Combined Authority's point of contact for all matters relating to personal data. Senior information Risk Owner. The DPO will report to the Combined Authority's Regulatory and Compliance Board, chaired by the Director of Resources, on matters of compliance with this policy and the relevant legislation.

5. Definitions

Data Quality: the accuracy of data used to judge performance or inform business decisions. This can include information collected from processes or internal systems, performance indicator results or information about key actions and projects.

Data: Actual information, structured or unstructured, numbers or text (often in the form of measurements or statistics) which refer to or describe conditions, ideas or objects, which are used as a basis for reasoning, discussion, or calculation

Record: *‘Information created, received, and maintained as evidence and as an asset by an organization or person, in pursuit of legal obligations or in the transaction of business’².*

Records Management: The field of management responsible for the efficient and systematic control for the creation, receipt, maintenance, use and disposition of records.

Semi-current records: Records that are only occasionally used for administrative or legal purposes. These records are still required to be kept, but are not referred to often.

Retention Schedule: A record that defines an organization's legal and compliance recordkeeping requirements, stating how long records should be kept.

Record Disposal: The process of deciding if records that have reached the end of the retention period should be **reviewed**, **archived**, or **destroyed**.

Review: The process of reviewing records which have reached the end of their retention period but may still have ongoing business use. These records are **reviewed** and then assigned new retention periods.

Destroy: The process of **permanently deleting** a record that has reached the end of its retention period.

Archive: The process of **permanently preserving** a record that has reached the end of its retention period and is no longer required for business use.

Combined Authority Systems: all CA Information, data, applications, systems (whether internally, externally or cloud hosted), services, infrastructure and computer devices which are owned, leased or licenced by the CA and accessible to the Third Party pursuant to the Third Party Access.

² ISO 15489 21:2016

6. Policy statement

- 6.1. **Records Management:** The Combined Authority recognises that robust records management processes are necessary to support the delivery its strategic priorities. The CA's objective is to create authoritative records which are **authentic, reliable, useable, full and accurate**.
- 6.2. **Data Quality:** The Combined Authority recognises that data we create must be of high quality and fit for purpose to allow for evidence based decision-making, planning and performance management. The CA's objective is to create data that is **accurate, valid, reliable, timely, relevant and complete**.
- 6.3. The Combined Authority will aim to comply with the recognised standards of records management.

Legislative compliance

- 6.4. The Combined Authority will retain those records required by law and meet its obligations under the Data Protection Act 2018, Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Legal obligations for record retention will be set out in the Record Retention Schedule (Appendix A).

Information security

- 6.5. All records will have the appropriate level of security to protect them from unauthorized access, change, loss or destruction. Electronic records will be accessible to authorised users in line with the ICT Security Policy. Paper records should be kept to a minimum, with those containing personal data or commercially sensitive information stored securely. Information will be shared when it is lawful to do so and with the approval of Information Asset Owners.

Creation and control of records

- 6.6. Records will be created in a timely manner to enable them to support the Combined Authority's business. All records created by users during the course of Combined Authority business must be maintained within Combined Authority systems.

Access to records

- 6.7. To ensure that records are useable, records should be filed appropriately within Combined Authority Systems to ensure authorised staff are able to access them easily and quickly.

File naming conventions and version control

- 6.8. To ensure the integrity and reliability of records, record creation and content will be standardised where possible and relevant, by the use of templates, version control and naming convention guidelines.

Appropriate email management

- 6.9. Emails will be managed to enable the efficient storage and retrieval of information and support compliance with all relevant legislation. Users must identify emails which are records of business activities and transactions and store them within authorized information systems. Records must not be stored within email inboxes. Email usage will be in line with the Email, Internet & Telecoms Usage Policy

Staff Training

- 6.10. All users will receive appropriate training on the creation, maintenance or disposal of Combined Authority records. The Information Governance Team will develop and disseminate guidance where required

Record Store

- 6.11. Semi-current records may be stored off site at the Combined Authority's record store. Records must be in appropriate boxes and labelled with the relevant disposal action as stated in the Record Retention Schedule, logged with the Records Management Officer on the central off-site storage register and transferred in accordance with the offsite transfer procedures (available on the intranet).

Disposal of records

- 6.12. Records that have reached the end of the retention period stated in the Record Retention Schedule and are no longer required for business, FOI or SAR purposes will be disposed of appropriately.
- 6.13. Where possible retention periods for information held within systems will be automated. Where automated destruction of records is not possible, records will be destroyed by the end of the financial year in which the retention period expires.
- 6.14. If records are destroyed, this must be noted in a disposal register. If a record is destroyed by an external organisation on behalf of the Combined Authority, a record of destruction must be made available to the Combined Authority and provided to the Information Governance Team. Records which are subject to existing FOI and SAR requests must not be destroyed.

Preservation of records

- 6.15. A small percentage of Combined Authority records which have reached the end of their retention period may be worthy of permanent preservation due to their historical value. Such records will be noted in the Record Retention Schedule and will be transferred to the West Yorkshire Archive Service.

Data Quality

- 6.16. The Combined Authority recognises that data we create must be of high quality and fit for purpose to allow for evidence-based decision-making, planning and performance management. The CA's objective is to create data that is **accurate, valid, reliable, timely, relevant** and **complete** the Combined Authority will aim to comply with the recognised standards of data quality. These standards will be considered for any data collection exercise.

Accurate

- 6.17. Data should be sufficiently accurate for its intended purpose and captured only once, although it may have multiple uses. Accuracy is most likely to be ensured if it is captured as close to the activity as possible.

Valid and reliable

- 6.18. To ensure consistency between similar organisations and periods covered, data should be used in compliance with relevant requirements, such as the correct application of any rules of definitions. Data should reflect stable and consistent data collection processes across collection points and over time.

Timely and relevant

- 6.19. Data collectors and/or system custodians should ensure that data is current and each dataset has associated metadata which provides information on its update frequency. It should be relevant for the purposes for which it is used, this will require a periodic review of requirements to reflect changing needs.

Complete

- 6.20. Data should be clearly specified based on the information needs of the Combined Authority and data collection processes matched to those requirements.

7. Training

- 7.1. All staff are required to undertake mandatory training in relation to the data protection legislation as part of their induction to the Combined Authority and as otherwise directed.

8. Processes and Procedures

- 8.1. The following toolkits are in place in support of this policy:

- [Records Management Toolkit](#)
- [Offsite Storage and Archiving Toolkit](#)

9. Impact Assessment

- 9.1. In the creation of this policy, consideration has been given to any possible adverse equality impact for the following groups: disability; gender; gender reassignment; marital status (including civil partnerships); sexual orientation; race; religion or beliefs; age; pregnancy and maternity. The policy is considered to have little or no adverse equality impact.

10. Privacy notice

- 10.1. Personal data processing will take place in accordance with privacy notices issued by the Combined Authority and retained in line with retention schedules at Appendix A.

11. Policy review or changes

- 11.1. The Combined Authority reserves the right to amend the details of this policy as required following consultation with relevant parties. This policy will be monitored and reviewed on an annual basis, to ensure that it meets the needs of the Combined Authority and ensure compliance with relevant legislation.

Appendix A

West Yorkshire Combined Authority

Corporate Retention Schedule

Version 3.0

Last Reviewed: June 2019

Next Review: June 2020

1. GENERAL RETENTION SCHEDULE – RECORDS HELD ACROSS SERVICE AREAS

<u>Ref.</u>	<u>Record Group</u>	<u>Retention period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
1.1	AUDIT (EXTERNAL)				
1.1.1	External audits	Date audit accepted + 6 years			For information on how long internal audit documentation is kept, please see the internal audit retention schedule
1.2	CONTRACTS				
1.2.1	Contracts signed under hand	End of contract + 6 years	Destroy	Limitation Act 1980	
1.2.2	Contracts signed under seal	End of contract + 12 years	Destroy	Limitation Act 1980	
1.3	CONTACT LISTS				
1.3.1	Contact list (businesses/ stakeholders/partners)	Retain until business/ stakeholder/partner withdraws consent. Review annually.	Destroy		
1.3.2	Contact list (general public)	Retain until individual withdraws consent. Review annually.	Destroy		
1.4	CORRESPONDENCE				
1.4.1	All records relating to complaints and feedback about services dealt with as business as usual	Year record created + 3 years	Review		Complex complaints may need to be retained for longer. If complaint resulted in significant change to policy or procedure, retain from year record created + 6 years , if referred to ombudsman retain from date complaint resolved + 10 years . Complaints relating to projects need to be retained with project files.

	All general enquiries dealt with as business as usual	Year record created + 3 years	Destroy		
1.4.2	Correspondence with the public or external organisations which cannot be linked and stored with other records relating to a specific process (specific processes such as enquiry/consultation/complaint/request for information under legislation)	Year record created + 1 year	Destroy		Ensure that the matter of the correspondence has been closed and there is no operational reason to retain the correspondence.
1.4.3	Records of incoming/outgoing post	Year record created + 1 year	Destroy		
1.5	HEALTH AND SAFETY				
1.5.1	All records relating to health and safety incident recording	Date of accident + 4 years		Limitation Act 1980	If individual under 18 at time of accident, date of individuals 21 st birthday+ 4 years
1.6	IMAGES				
1.6.1	Staff photographs	End of employment + 1 year			
1.7	MEETINGS				
1.7.1	Team Meeting/Management Team meeting minutes and papers held by individual teams where no corporate decisions are made	Date of meeting + 1 year	Destroy	LGA Best Practice	
1.7.2	Minutes, decisions and meeting papers of meetings other than Team Meeting/Management Team meetings or formal committees managed by Governance Services where corporate decision are made	Date of meeting/project + 4 years	Review		For information on retention periods for formal committees managed by Governance Services, please see the Legal and Governance retention schedule
1.7.3	Background document contained in reports to committee	Date of meeting + 4 years	Destroy		
1.8	PROCEDURES				
1.8.1	All records relating to developing and establishing procedures	Date procedure is superseded/expires + 3 years	Destroy		
1.8.2	Manuals and guides relating to departmental procedures	Superseded	Destroy		

2. DELIVERY

<u>Ref.</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
2.1	Records relating to projects that did not receive CA approval	Last action on proposed project + 1 year	Destroy		
2.3	Project documentation relating to projects which have received any EU funding	The funding body will set the retention period for the funding.	Destroy		Retention will generally be 5 – 10 years. The EU will inform the CA of how long each projects records should be retained for.
2.4	Project documentation relating to corporate projects and projects which have received government funding (central government / government agency / local authority)	The funding body will set the retention period for the funding.	Destroy		<p>The funding body will set the retention period for the funding. In the absence of any guidance, project documentation should be retained from the end of the funding programme + 6 years.</p> <p>Projects that have had their funding matched by the EU should be retained for as long as stated by the EU.</p>

3. BUSINESS SUPPORT

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
3.1	All records relating to the provision of programmes that provide business support - Central government /government agency/local authority funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the records for end of programme + 6 years . Projects that have had their funding matched by the EU should be retained for as long as stated by the EU.
3.2	All records relating to the provision of programmes that provide business support - EU funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	This will generally be 5 – 10 years . The EU will inform the CA of how long each projects records should be retained for.
3.3	All records relating to the provision of programmes that provide business support – Other funding	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the records for end of programme + 6 years .

4. EMPLOYMENT AND SKILLS

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
4.1	All records relating to the provision of programmes to promote the development of learning and employment – Central government /government agency/local authority funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the data for end of programme + 6 years
4.2	All records relating to the provision of programmes to promote the development of learning and employment – EU funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	All projects under the ESF 2014-2020 Programme must ensure they keep all documents for 10 years after their final ESF claim is paid by the ESF Managing Authority.
4.3	All records relating to the provision of programmes to promote the development of learning and employment - Funding Company e.g. The Careers and Enterprise Company, Learning and Work Institute	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the data for end of programme + 6 years.
4.4	All records relating to the provision of programmes to promote the development of learning and employment – Other funding	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the data for end of programme + 6 years.

5. TRADE AND INVESTMENT

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
5.1	Project documentation relating to Trade and Investment projects - EU funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	This will generally be 5 – 10 years . The EU will inform the CA of how long each projects records should be retained for.
5.2	Project documentation relating to Trade and Investment projects - Central government /government agency/local authority funded/corporate funded	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the records for end of programme + 6 years . Projects that have had their funding matched by the EU should be retained for as long as stated by the EU.
5.3	Project documentation relating to Trade and Investment projects – Other funding	The funding body will set the retention period for the funding.	Destroy	Please see relevant provider guidance or contract	In the event that no retention period for the records is specified, retain the records for end of programme + 6 years .

5.4	Records documenting community and stakeholder consultation and engagement	Year record created + 6 years	Destroy
5.5	Contact lists (businesses/stakeholders/partners)	Retain until businesses/stakeholders/partners withdraws consent. Review annually.	Review
5.6	Company visit reports	Year record created + 3 years	Destroy
5.7	Records documenting events management – no personal data	End of event + 6 years	Destroy
5.8	Records documenting events management - containing personal data	End of event	Destroy
5.9	Evolutionary Property Pilot Data	Retain until businesses/stakeholders/partners withdraws consent. Review annually.	Review

6. COMMUNICATIONS AND MARKETING

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
6.1	All records relating to processes to support consultations	Year records created + 6 years	Destroy		
6.2	Consultation documents completed by members of the public	Retain until end of project	Destroy		These may be destroyed sooner if they are no longer operationally required. Responses which have been anonymised may be retained for longer.
6.3	Records relating to the development, implementation and monitoring of each campaign or marketing plan	Year record created + 3 years	Destroy		
6.4	All records relating to market research activity for individual projects	Duration of the research project	Destroy		
6.5	Records documenting MP engagement	Year record created + 5 years	Destroy		
6.6	Photos and designs the CA image bank and design folder	Year record created + 5 years	Review		Photos and designs which do not feature identifiable people may be retained for as long as operationally required.

7. RESEARCH AND INTELLIGENCE

Reference	Record Group	Retention Period	Action at end of retention	Authority	Notes
7.1	Data sets relating to monitoring transport – Not containing personal data	Day record created + 3 years	Review		Certain projects may have retention dates stated in contracts. In these instances, please retain for the length stated in the contract.
7.2	Data sets relating to monitoring transport– Containing personal data	Day record created + 1 year	Review		<p>Personal data must be destroyed once no longer operationally required. Personal data which is later anonymised can be retained for a longer period of time.</p> <p>Certain projects may have retention dates stated in contracts. In these instances, please retain for the length stated in the contract.</p>

8. TRANSPORT AND ECONOMIC POLICY

Reference	Record Group	Retention Period	Action at end of retention	Authority	Notes
8.1	Records relating to internal/commissioned research– Not containing personal data	This data can be retained until out of date/no longer required	Destroy	LGA best practice	
8.2	Records relating to internal/commissioned research – Containing personal data	Year record created + 1 year	Review		Records may need to be retained for longer depending on the project it relates to. Personal data must be anonymised before retaining for longer than 1 year, or individuals must be informed their data will be retained for longer.
8.3	Project documentation relating to projects which have received any EU funding	The funding body will set the retention period	Destroy	Please see relevant provider guidance or contract	The funding body will set the retention period for the funding. This will generally be 5 – 10 years . The EU will inform the CA of how long each projects records should be retained for.
8.4	Project documentation relating to projects which have received funding from	The funding body will set the retention period	Destroy	Please see relevant provider	In the event that no retention period for the records is

	Central government /government agency/local authority funded		guidance or contract	specified, retain the records for end of programme including evaluation + 6 years.
8.5	All records relating to creation, implementation and monitoring of a strategic plans, policies and their delivery plan	Year policy/plan expires/superseded + 6 years	Review	
8.6	All records relating to advice given on planning applications	Year record created + 9 years	Review	Records which relate to an ongoing planning issue may be retained for longer.
8.7	All records relating to processes to support consultations	Year records created + 6 years	Destroy	
8.8	Consultation documents completed by members of the public	Retain until end of project	Destroy	These may be destroyed sooner if they are no longer operationally required. Responses which have been anonymised may be retained for longer.

9. FINANCE

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
9.1	All records relating to the bank, including statement, banking of monies paid to the CA.	Financial year record created + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400	
9.2	All records relating to the creation, implementation and monitoring of revenue and capital budgets.	Financial year record created + 6 years	Destroy	LGA Guidance	
9.3	All nominal ledger postings / journals	Financial year record created + 6 years	Destroy		
9.4	All records relating to sales requisitions, invoices, remittances and debtors'/customers.	Financial year record created + 6 year	Destroy		
9.5	All records relating to holiday and tours schedule	Financial year record created + 6 year	Destroy		
9.6	All records relating to expenditure including invoices and purchase orders,	Financial year record created + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400	

9.7

All records relating to loans and investments, including those managed by Leeds CC.

End of investment/last payment on the loan + 6 years

Destroy

10. HUMAN RESOURCES

<u>Reference</u>	<u>Data Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
10.1	PERSONAL DATA				
10.1.1	Records relating to an individual employees' induction	End of induction period + 3 years	Destroy	LGA Best Practice	<i>These records will be held securely by individual managers, rather than by HR.</i>
10.1.2	Records relating to the monitoring and management of absence including sickness	Creation of record + 3 years	Destroy	LGA Best Practice	<i>This is inclusive of fit notes</i>
10.1.3	Records relating to the disclosure of financial and non-financial officer interests that could conflict with the Council's interest	Termination of employment + 1 year	Destroy	Local Government Act 1972	
10.1.4	Records relating to the annual appraisal process for employees	Creation of records + 3 years	Destroy	LGA Best Practice	
10.2	RECRUITMENT – UNSUCCESSFUL CANDIDATES				
10.2.1	Application form, assessment of candidate and interview notes	6 months from completion of recruitment exercise	Destroy	CIPD guidance	
10.2.2	Copies of records in relation to pre-employment checks ie proof of eligibility to work in the UK,	Immediately after completion of recruitment exercise	Destroy		

	qualification certificates, passport, work permits, immigration status documents			
10.3	RECRUITMENT – SUCCESSFUL CANDIDATES			
10.3.1	Application form, assessment of candidate and interview notes, provisional job offers, letters of appointment and statement of main terms	Termination of employment + 6 years	Destroy	Limitation Act 1980
10.3.2	Records relating an individuals' right to work in the UK ie. proof of eligibility to work in the UK, passport, work permits, birth certificates, identity card, immigration status documents etc.	Termination of employment + 2 years	Destroy	Home Office Guidance
10.3.3	Evidence of qualifications	Termination of employment + 6 years	Destroy	Limitation Act 1980
	Records relating to the provision of employment reference	Termination of employment + 6 years	Destroy	
10.3.4	All records relating to the selection process for Statutory Officers	Date of appointment + 6 years	Destroy	
10.4	PAY AND REWARD AND BENEFITS			
10.4.1	Records relating to the implementation and management of Equal Pay	Year record created + 6 years	Destroy	LGA Best Practice
10.4.2	Records relating to the development and implementation of terms	Date that T&Cs expire + 6 years	Destroy	Limitation Act 1980

	and conditions of employment				
10.4.3	Records relating to the development and implementation of job descriptions and person specifications	Date JD/person specification superseded + 6 years	Destroy	LGA Best Practice	
10.5	EMPLOYEE DATA RELATING TO FORMAL CASES				
10.5.1	Records relating to the management of employee consultation and feedback in relation to organisational change processes	Date consultation completed + 6 years	Destroy	Limitation Act 1980	
10.5.2	Records relating to disciplinary casework investigations, hearings and appeals – Ending in dismissal	Year records created + 6 years	Destroy	Limitation Act 1980	<i>Casework involving children must not be destroyed. Please consult the IG team for further guidance.</i>
10.5.3	Records relating to casework related to disciplinary investigations, hearings and appeals – Ending in written or final warning	Upon expiry of sanction	Destroy		<i>Casework involving children must not be destroyed. Please consult the IG team for further guidance.</i>
10.5.4	Records relating to casework related to	Termination of employment + 6 years	Destroy	Limitation Act 1980	<i>Casework involving</i>

	disciplinary investigations, hearings and appeals – Ending in employee leaving before close of case				<i>children must not be destroyed. Please consult the IG team for further guidance.</i>
10.5.5	Records relating to casework relating to disciplinary investigations, hearings and appeals – Ending in no case to answer	Casework = Retain until end of investigation Outcome letter = close of case + 1 year	Destroy	LGA Guidance	<i>Casework involving children adults must not be destroyed. Please consult the IG team for further guidance.</i>
10.5.6	Records relating to employment tribunal	Year records created + 6 years	Destroy	Limitation Act 1980	
10.5.7	Records relating to casework related to grievance investigations, meetings and appeals	Date grievance resolved + 6 years	Destroy	Limitation Act 1980	
10.5.8	Records relating to casework in respect of employee capability procedure and process	Action completed + 6 years	Destroy	Limitation Act 1980	
10.5.9	Records relating to casework in respect of Attendance Policy and Procedure – Ending in removal from formal procedure	Retain until end of process + 3 years	Destroy		
10.5.10	Records relating to casework in respect of	Year record created + 3 years	Destroy		

	Attendance Policy and Procedure – Ending in Attendance Hearing (and Appeal) – no dismissal			
10.5.11	Records relating to casework in respect of Attendance Policy and Procedure – Ending in Attendance hearing and Appeal) - dismissal	Year record created + 6 years	Destroy	Limitation Act 1980
10.5.12	Records related to formal Performance and Capability	End of procedure + 3 years	Destroy	Limitation Act 1980
10.5.13	Records relating to individuals who are made redundant	Termination of employment + 6 years	Destroy	Limitation Act 1980
10.5.14	Records relating to the TUPE transfer of staff out of the organisation	Date of transfer + 6 years	Destroy	TUPE Regulations 2006
10.5.15	Personal risk assessments for employees returning to work	Date risk assessment expires + 6 years	Destroy	Limitation Act 1980
10.6	HEALTH RECORDS			
10.6.1	All records relating to employee eye tests	Retain until new eye test completed	Destroy	Limitation Act 1980
10.6.2	Health Referral files	Termination of employment + 6 years	Destroy	Limitation Act 1980

11. ICT

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
11.1	All information relating to user profiles for information systems	Termination of employment + 6 years	Destroy		
11.2	All records relating to the development and post-implementation modification and maintenance of ICT systems	Decommissioning of system + 6 years	Review		<p>Project documents that are still of operational can be retained longer.</p> <p>Certain projects may have retention dates stated in contracts. In these instances, please retain for the length stated in the contract.</p>
11.3	All records relating to systems fault reporting	Year record created + 1 year	Review		Anonymised data relating to systems fault report can be retained longer.
11.4	All records documenting the management of ICT systems development projects	Decommissioning of system + 6 years	Review		Project documents that are still of operational can be retained longer.
11.5	All records relating to the creation and implementation of security measures for information	Date system decommissioned	Destroy		
11.6	All records relating to the maintenance and monitoring of ICT networks	Year record created + 1 year			
11.7	SIM Cards in Real-Time displays	Retain for the length of the contract	Destroy		

11.8	AchieveForms	See note	Destroy	AchieveForms are online forms which are used in various service areas. Individual service areas will determine the retention period for their respective forms.
11.9	Anonymised data sets - Not containing personal data	Year set created + 6 years	Destroy	Anonymised data should be kept for as long as operationally required
11.10	Datasets – Containing personal data	Day set created + 1 year	Destroy	Personal data must be destroyed once no longer operationally required. Personal data which is later anonymised can be retained for a longer period of time.

12. INTERNAL AUDIT

Reference	Record Group	Retention Period	Action at end of retention	Authority	Notes
12.1	All records relating to counter fraud investigations	Date of completion of enforcement action + 6 years	Destroy	Limitation Act 1980	
12.2	All records relating to audits carried out internally.	Date audit accepted + 6 years	Destroy	Local Government Finance Act 1992	

13. LEGAL AND GOVERNANCE

Reference	Record Group	Retention Period	Action at end of retention	Authority	Notes
13.1	LEGAL				
13.1.1	All records relating to the process of managing leased property	Expiry of lease + 13 years	Review		
13.1.2	Property deeds	Permanent	Deeds need to be retained until disposal of property. They should be transferred to the new property owner	LGA best practice	
13.1.3	Deeds Index	Until superseded	Destroy		
13.1.4	Lease/Licence Summaries	End of relevant lease/license + 13 years	Review		
13.1.5	All records relating to surveys of buildings owned by the CA	Disposal of building + 6 years	Destroy	Limitation Act 1980	
13.1.6	All records relating of surveys of building not owned by the CA	Completion of survey + 6 years	Destroy	Limitation Act 1980	
13.1.7	All records relating to CA liability where property or other facilities which are owned and maintained by the CA cause damage or injury to people or property.	Year record created + 6 years	Destroy	Limitation Act 1980	

13.1.8	All records relating to health and safety incidents which could result in personal injury claims.	Date of accident + 4 years.		Limitation Act 1980	If individual under 18 at time of accident, date of individuals 21 st birthday+ 4 years
13.1.9	Personal injury claims	Year claim filed + 4 years	Destroy	Limitation Act 1980	
13.1.10	All records relating the management of consultancy agreements	End of contract + 6 years	Destroy	Limitation Act 1980	
13.1.11	All records documenting the provision of legal advice - cases under litigation	Close of case + 6 years	Destroy	LGA best practice	
13.1.12	All records documenting the provision of legal advice – general advice	Year record created + 1 year	Review		Complex cases may need to be retained for longer
13.1.13	All records relating to SRA Practising Certification	For the duration of employment + 6 years	Destroy	Limitation Act 1980	
13.1.14	All records relating to the approval of decisions under delegated authority	Year record created + 6 years	Destroy		
13.1.15	Employee driver documents for employees that have claimed mileage	Termination of employment + 4 years	Destroy		
13.1.16	All records relating to money granted by WYCA to other bodies	Date last grant payment on grant made + 6 years	Destroy	LGA best practice	
13.1.17	All records related to intellectual property matters	Year record created + 10 years	Review		Trademark registration can vary therefore review the document before destruction.
13.1.18	All records relating to money/funding received by the CA	Year record created + 11 years	Review		

13.1.19	All records relating to money loaned by WYCA to other bodies	Date of last loan payment + 6 years		HMRC - Compliance Handbook Manual CH15400
13.1.20	All records relating to debtors	Year case closed + 6 years	Destroy	Limitation Act 1980
13.1.21	All records relating to the creation and monitoring of goods agreements	Date agreement expires + 6 years	Destroy	Limitation Act 1980
13.1.22	All records relating to supply of services agreements	Date agreement expires + 6 years	Destroy	Limitation Act 1980
13.1.23	Projects, Procurement and Contracts legal training documents	Date training superseded + 3 years	Review	
13.1.24	Legal precedent templates	Until superseded	Destroy	
13.2	GOVERNANCE			
13.2.1	Agendas, reports, briefing notes, minutes and papers of all of the Combined Authority's formal committee meetings and panels and meetings of the LEP Board – master copies	Permanent	Offer to archivist at end of administrative use.	Papers are also uploaded onto Modern Gov. CA to retain electronic copies on their servers.
13.2.2	All records relating to the appointment of members (includes elected and private sector members)	End of membership + 3 years	Destroy	
13.2.3	Members declaration of interests (includes interests of elected and private sector members)	End of membership + 3 years	Destroy	
13.2.4	All records relating to events (such as training, conference	Year record created + 3 years	Destroy	

	and seminars) attended by CA members			
13.2.5	Correspondence with members	End of membership + 3 years	Destroy	
13.2.6	Governance documents (CA)	Date superseded + 6 years	Destroy	<p>Inclusive of:</p> <ul style="list-style-type: none"> -Procedure Standing Orders and Access to Information Annex -Code of Practice for Recording Meetings -Scrutiny Standing Orders -Members' Code of Conduct -Procedure for considering complaints alleging failure to comply with the Members' Code of Conduct -Members' Allowances Scheme -Terms of Reference (committees and panels) -Financial Regulations -Procurement Standing Orders
13.2.7	Governance documents (LEP Board)	Date superseded + 6 years	Destroy	<p>Inclusive of:</p> <ul style="list-style-type: none"> -Constitution -Procedure Rules and Access to Information Annex -Code of Practice for Recording Meetings

-Members' Code of Conduct
 -Conflicts of Interests Policy and Protocol
 -Recruitment Procedure for Private Sector Representatives
 -Remuneration and Expenses Scheme
 -Whistleblowing Policy
 -Procedure for considering complaints alleging a failure to comply with the Members' Code of Conduct
 -Confidential Complaints Procedure
 -Equality and Diversity Policy

13.2.8	All records relating to expenses and allowances paid to members.	Year record created + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400
13.2.9	All records relating to research into matters to be considered by Scrutiny	Year record published + 6 years	Destroy	LGA best practice
13.2.10	All records related to subscriptions	Retain until end of subscription	Destroy	
13.2.11	All records relating the arrangements for Special Interest Groups	Year record created + 6 years	Destroy	

13.2.12	Video recordings of CA meetings	Date of meeting + 4 years	Destroy	LGA best practice	
13.2.13	Written records of officer decisions	Date of decision + 6 years	Destroy	LGA best practice	
13.2.14	Officers delegation schemes	Date delegation ends + 6 years	Destroy		
13.2.15	All records relating to the approval of decisions under delegated authority	Year record created + 6 years	Destroy		
13.2.16	Request for decision reports	Year record created + 6 years	Destroy	LGA best practice	Held by Executive PA
13.3	INFORMATION GOVERNANCE				
13.3.1	All records relating to the logging, tracking and monitoring of information security breaches	Current year + 10 years	Review	LGA best practice	Complex breaches may need to be retained for a longer period
13.3.2	All records relating to the responses to information security breaches	Current year + 3 years	Review	LGA best practice	Complex breaches may need to be retained for a longer period
13.3.3	All records relating to the management of Freedom of Information/EIR Requests	Year records created + 2 years	Review	LGA best practice	Complex requests may need to be retained for a longer period
13.3.4	All records relating to the creation and implementation of policies under General Data Protection Regulations	Date policy superseded + 3 years	Destroy	LGA best practice	
13.3.5	All records relating to the management of subject access requests	Year records created + 2 years	Review	LGA best practice	Complex requests may need to be retained for a longer period
13.3.6	Corporate Retention Schedule	Permanent		LGA best practice	As the retention schedule is continually updated a copy should be retained to show what retention

					periods were at any given time.
13.3.7	All records relating to the development of the Corporate Retention Schedule	Date of publication + 3 years	Destroy	LGA best practice	
13.3.8	All records relating to the development and implementation of an information asset audit	Year record created + 5 years	Destroy	ICO guidance	
13.3.9	All records relating to data protect impact assessments	Year record created + 6 years	Review	ICO guidance	Complex cases may need to be retained for a longer period

14. PROCUREMENT

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
14.1. CONTRACT PROCESS					
14.1.1	Unsuccessful bids	Date contract awarded to successful applicant + 3 years	Destroy	Public Contracts Regulation 2015	
14.1.2	All records relating to successful tenders (preparation, process, evaluation and award)	For the duration of contract + 6 years	Destroy	Public Contracts Regulation 2015, Limitation Act 1980	This includes any records which document justification for decisions taken in all stages of the procurement procedures such as on communications with bidders and potential bidders and internal deliberations; preparation of procurement documents; any dialogue or negotiation; and selection and award of the contract.
14.2. CONTRACT MANAGEMENT					
14.2.1	All records related to contract management	Date contract expires + 6 years	Review	Limitation Act 1980	
14.3 FRAMEWORKS AND ASSOCIATED ORGANISATIONS					

14.3.1	All records related to frameworks utilised by the Combined Authority	Date framework expires + 6 years	Destroy	Limitation Act 1980
14.3.2	All records relating to hosting agreements	Expiry of agreement + 6 years	Destroy	Limitation Act 1980
14.4	STRATEGY DEVELOPMENT			
14.4.1	All records relating to the Strategic Procurement Group	Date of meeting + 4 years	Destroy	
14.4.2	All records relating to the development of a procurement strategy	Year record created + 6 years	Destroy	
14.5	PERFORMANCE MANAGEMENT			
14.5.1	All records relating to procurement performance and management	Year record created + 3 years	Destroy	
14.5.2	All records relating to procurement reporting and transparency	Year record created + 6 years	Destroy	
14.5.3	All records relating to procurement spend data.	Year record created + 6 years	Destroy	
14.6	SOCIAL VALUE			
14.6.1	All records relating to ensuring social value within procurement	Year record created + 6 years	Destroy	
14.7	Stakeholders			
14.7.1	All records relating to stakeholders	Year record created + 6 years	Destroy	
14.8	POLICY, PROCESSES & SYSTEMS			

14.8.1	All records relating to procurement policy, processes and systems	Year record created + 3 years	Destroy
14.9	ASSURANCE		
14.9.1	All records relating to procurement assurances such as RFD records and waiver records	Year record created + 6 years	Destroy

15. TRANSPORT OPERATIONS

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
15.1	PERSONALISED TRANSPORT				
15.1.1	Access Bus Driver Information	Retain until end of employment + 1 year	Destroy		
15.1.2	Access Bus Passenger Information	For as long as someone wishes to remain an Access Bus user	Destroy		
15.1.3	Records documenting checks for contract compliance	End of contract + 6 years	Destroy	Limitation Act 1980	Records relating to contracts under dispute may need to be retained for longer.
15.1.4	Special education needs financial information	Year record created + 6 years	Destroy		
15.1.5	Records of operators on WYCA approved list, copy of operator license, vehicle and insurance details	Retain until expiry of license	Destroy		
15.2	EDUCATION TRANSPORT				
15.2.1	All records documenting school bus applications	In the case of secondary school aged applicants, this information is retained until their 18th birthday and in the case of primary school aged applicants, this information is	Destroy		

		retained until their 11th birthday.			
15.2.2	All records documenting appeals where applications for disabled passes have been refused by the council	End of appeals process + 3 months	Destroy		
15.2.3	All records documenting school bus passenger appeals	End of appeals process + 6 months	Destroy		
15.2.4	All records documenting revenue information	Year record created + 6 years	Destroy		
15.3	FACILITIES AND ASSETS				
15.3.1	All records relating to the provision and monitoring of road safety cameras	Date record created + 6 years	Destroy	Limitation Act 1980	
15.3.2	Asset List – Mybus vehicles	Life of the asset + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400	
15.3.3	Asset Management Data	Life of the asset + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400	
15.3.4	CCTV Images & Data	30 days	Review		<p><i>Recordings subject to police request may be held for a longer period.</i></p> <p><i>Recordings relating to Health & Safety, plus footage of incidents (not criminal) where WYCA may have to defend a future civil</i></p>

					<i>claim to be held as per incident/accident reporting. In this instance, it will be retained from the date of recording + 4 years (If individual under 18 at time of accident, date of individuals 21st birthday+ 4 years).</i>
15.3.5	All records relating to anti-social behaviour	Date of the resolution of enforcement action + 6 years	Destroy	Limitation Act 1980	
15.3.6	All records relating to health and safety incident/accident reporting	Date of accident + 4 years	Destroy	Limitation Act 1980	<i>If individual under 18 at time of accident, date of individuals 21st birthday+ 4 years</i>
15.3.7	All records relating to reporting lost property	Date of report + 1 year	Destroy		
15.3.8	All records relating to banned individuals	Retain for duration of the ban	Review		<i>Records relating to banned individuals who are still causing issues may need to be retained for longer</i>
15.3.9	All records relating to nominals	Date record created + 6 months	Review		<i>Please note that emails are records. Records should be reviewed after 6 months and destroyed if no longer relevant.</i>
15.3.10	All records relating to missing from home or vulnerable individuals	Date record created + 6 months	Review		<i>Please note that emails are records. Records should be</i>

*reviewed after 6
months and destroyed
if no longer relevant.*

15.4 BUS NETWORKS

15.4.1 Lost mileage returns Duration of contract **Destroy**

16. CUSTOMER SERVICES

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
16.1	Ticket and pass applications - senior, blind and disabled, Pink MCard, U-16, young person	366 days after either the expiry of the last registered card or, the date of the last transaction on an account whichever is shorter.	Destroy		Any incomplete customer records will be removed after 3 months
16.2	Corporate bus pass applications	Expiry of card + 3 months	Destroy		
16.3	All records related to the payment of operators for ENCTS travel	End of the financial year to which the records relate + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400	
16.4	All records relating to the provision of timetables and routes for local transport	Year record created + 1 year	Destroy	LGA best practice	
16.5	Customer feedback and complaints	Year records created + 3 years	Review	LGA best practice	Complex complaints may need to be retained for longer. If complaint is referred to ombudsman it needs to be retained from date complaint resolved + 10 years.
16.6	Live chat transcripts	Date of last contact + 1 year	Destroy		

16.7	All records relating to fare information from operators	Year record created + 6 years	Destroy	
16.8	MCard Smart Journey Data	Year record created + 3 years	Destroy	This data is anonymised
16.9	MCard App Customer Data	Retain until individual removes application/withdraws consent.	Destroy	
16.10	Records documenting sales and financial information for ticket machines in bus and train stations	End of the financial year to which the records relate + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400
16.11	Records documenting patronage survey responses	Year record created + 3 years	Destroy	
16.12	Records documenting school bus passenger registrations	In the case of secondary school aged applicants, this is retained until their 18th birthday and in the case of primary school aged applicants, this is retained until their 11th birthday	Destroy	
16.13	Records relating agreements, financial and budget information for subsidised services	End of the financial year to which the records relate + 6 years	Destroy	HMRC - Compliance Handbook Manual CH15400
16.14	Statistics for subsidised services	Year record created + 3 years	Destroy	This data is anonymised

17. CORPORATE PLANNING AND PERFORMANCE

<u>Reference</u>	<u>Record Group</u>	<u>Retention Period</u>	<u>Action at end of retention</u>	<u>Authority</u>	<u>Notes</u>
17.1 CORPORATE PLANNING					
17.1.1	All records relating to creation, implementation and monitoring of a strategic plan	Year record created + 6 years	Destroy	LGA guidance	
17.1.2	All records relating to the development and monitoring of business plans	Year record created + 6 years	Destroy	LGA guidance	
17.1.3	All records relating to the development of business continuity plans	Date plan superseded + 6 years	Destroy	LGA guidance	
17.1.4	All record relating to the development of risk register	Year record created + 6 years	Destroy		
17.1.5	Risk registers (both corporate and directorate)	Last entry in register + 6 years	Destroy	Limitation Act 1980	
17.2 CORPORATE PERFORMANCE					
17.2.1	All records relating to performance management including to Key Performance Indicators	Year record created + 6 years	Destroy		
17.3 TRANSFORMATION PROGRAMME					
17.3.1	Project documentation relating to the transformation programme.	End of programme + 6 years	Destroy		This is inclusive of relevant PAT control records.

Document control

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