

POLICE FEDERATION OF ENGLAND AND WALES

DATA RETENTION AND DISPOSAL POLICY

Effective Date	November 2020
Review Date	March 2022
Version	2
Author	Lucy Gale
Document Owner	Data Protection Officer
Approved By	National Secretary

Document Review Control Information

Version	Date	Reviewer – Job Title	Amendment(s)
1	11/2020	Lucy Gale - DPA	New Policy
2	01/03/2022	Lucy Gale - DPA Linda Bradshaw – Risk Manager	<ul style="list-style-type: none"> • Doc reformatted • Version Control Template added • Updates to Retention Schedule

NB - This is a controlled document and the electronic version posted on the intranet is the controlled copy. Any printed copies of this document are not controlled. As a controlled document, this document should not be saved to local or network drives but should always be accessed from the intranet

Contents

1. Introduction	4
2. General Principle	4
3. General Schedule	4
4. Destruction of Data	5
5. Review	5
Appendix A - Data Retention Schedule	6
Appendix B - HR Retention Schedule	8
Appendix C - Claims Retention Schedule	9

1. Introduction

- 1.1 The purpose of this policy is to ensure the Police Federation of England and Wales (PFEW) retains its official records in accordance with all applicable laws and regulations and to ensure that official records no longer required by PFEW are discarded at the correct time.
- 1.2 PFEW seeks to avoid duplication in data storage whenever possible, though there may be instances in which for programmatic or business reasons it is necessary for data to be held in more than one place. This policy applies to all data in PFEW's possession, including duplicate copies of data.
- 1.3 This policy:
 - Applies to all PFEW employees, self-employed contractors, Federation officials and representatives, suppliers or other data processors who are storing or processing data on the behalf of PFEW.
- 1.4 For more information about PFEW's commitment to Data Protection and individual role responsibilities, please refer to the Data Protection Policy.

2. General Principle

- 2.1 In the event of any category of documents not specifically defined in this policy, and unless otherwise mandated by applicable law, the required retention period for documents will be 6 years from the date of creation of the document.

3. General Schedule

- 3.1 PFEW's Data Protection Officer (DPO) defines the time period for which documents and electronic records should be retained.
- 3.2 PFEW will review information regularly to ensure that it is:
 - Necessary - the information must hold some value for PFEW to carry out its functions
 - Proportionate - in order to justify the retention of the information, it must be proportionate to retain the information against the impact on an individual's Human Rights - specifically in Human Rights Act Article 6, Right to a Fair Trial and Article 8, Right to Respect for Private and Family Life Adequate - in order to justify the retention of information, it must be as complete as possible
 - Relevant - information must be fit for the purpose for which it is held
 - Accurate and up to date - all record details must be accurate, records must be updated with any new information

- Of historical value - it may also be necessary to retain information of particular legal or historical significance.

3.3 Factors which may impact on the retention of information are:

- Age of information - as time progresses information can become increasingly inaccurate
- Reliability of information - may be questioned/unreliable where the information is unproven the Reliability of the source of information - sources of information may prove to be unreliable or false allegations may be made
- Social change - changes in social acceptability of actions by individuals
- Legal requirement - there may be a legal requirement to retain information for a specified period of time.

3.4 Any reason for prolonging the retention of data should be made to both the Data Protection Advisor (DPA) and the Head of IT who will jointly consider the request and make an informed decision on a case-by-case basis. All requests will be recorded and stored on the Data Retention Exemption Log.

3.5 The legal basis under which any data is processed can be found in the relevant PFEW Privacy Notice.

4. Destruction of Data

4.2 Employees should review all data on a regular basis, whether electronic or paper, to decide whether to retain, destroy or delete once the purpose for which it was created is no longer relevant.

4.3 Data should always be disposed of according to the Data Retention Schedule (Appendix A).

4.4 The method of data disposal varies and is dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly special category data) must be disposed of as confidential waste and is subject to automated secure electronic deletion.

4.5 Appropriate controls are in place to prevent the permanent loss of essential information as a result of malicious or unintentional destruction – these controls are described in PFEW Information Security Policy.

4.6 In all cases, disposal is subject to any disclosure requirements which may exist in the context of litigation.

5. Review

5.2 This policy will be reviewed every 3 years, or sooner should the Data Protection Officer or Data Protection Advisor deem it to be relevant or required.

Appendix A - Data Retention Schedule

Data Type	Retention Period	Disposal Method
Member Records	Until death plus 12 months (or date of birth plus 100 years)	Deletion/Shredding
Claims	Duration of claim plus six years and seven days after resolution or last meaningful change	Deletion/Shredding
Financial records (payroll, supplier contracts, etc.)	Legally required duration	Deletion/Shredding
Financial records (audits, financial statements, etc)	Legal requirement for auditability	Deletion/Shredding
Financial records (Fed House)	Legally required duration	Deletion/Shredding
Customer data (Fed House)	12 months from last contact	Deletion/Shredding
Security (e.g., building entry and exit data, CCTV images)	6 weeks	Deletion
Press Contacts	3 years from last contact	Deletion after yearly review of list/Shredding physical records
Suppliers Database	3 years from last contact	Deletion after yearly review of list
Fed Reps including Elected Officers, operational data (e.g., e-mail inbox)	6 years following stepping down from the role	Deletion
Fed Reps including Elected Officers, record of duty (e.g., name and role)	See Member Records	Deletion
Employee Records, excluding e-mail inbox	Duration of employment plus six years	Deletion/Shredding
Employee Vetting data (summary of response)	Duration of employment plus six years	Deletion/Shredding
Employee Vetting data (full response)	12 months from receipt	Deletion/Shredding
Employee e-mail inboxes and individual network and one drive data	Duration of employment or role plus 6 years	Deletion
Shared Mailboxes (generic accounts)	Every three-year election cycle plus three months *OR* Reviewed annually to ensure relevance	Deletion
Next of Kin (Staff)	Duration of employment	Deletion
Next of Kin (Member)	See Member Records	Deletion
Phone Records	Tied to retention schedule of telecommunications provider	Deletion
Technology support tickets	Anonymise at top level in accordance with Employee Record retention schedule	Anonymisation
Asset History Metadata	Lifetime of asset	Secure physical disposal

		of asset
Asset History Use Data (e.g., Mobile Device Management)	90 day moving window	Deletion
Board policies	6 years (covers 2 triennials)	Deletion/Shredding
Board meeting minutes	6 years (covers 2 triennials)	Deletion/Shredding
Office and team meeting minutes	3 years	Deletion/Shredding
Audio/video/transcript recordings of meetings	60 days	Deletion
Accident books Accident reports and correspondence	As per legal requirement (3 years)	Deletion/Shredding
Training and development records	Legally required duration	Deletion/Shredding
Contracts: Signed	5 years	Deletion/Shredding OR anonymised and retained for historical value
Contract amendments	5 years	Deletion/Shredding OR anonymised and retained for historical value
Successful tender documents	5 years	Deletion/Shredding OR anonymised and retained for historical value
Unsuccessful tenders' documents	1 year	Deletion/Shredding
Tender – user requirements, specification, evaluation criteria, invitation	5 years	Deletion/Shredding OR anonymised and retained for historical value
Contractors' reports	5 years	Deletion/Shredding OR anonymised and retained for historical value
Operation and monitoring, e.g., complaints	5 years	Deletion/Shredding OR anonymised and retained for historical value

Appendix B - HR Retention Schedule

Data Type	Retention Period	Disposal Method
Unsuccessful applicants (CV's, interview notes, etc.)	1 year following interview process	Deletion/Shredding
Recruitment documents (CVs, interview notes, test results, evidence of skills and qualifications, references)	Duration of employment plus six years	Deletion/Shredding
Proof of right to work in UK	Duration of employment plus six years	Deletion/Shredding
Details of any disabilities and reasonable adjustment records	Duration of employment plus six years	Deletion/Shredding
Employment offer letters	Duration of employment plus six years	Deletion/Shredding
Contracts/Terms and Conditions of employment	Duration of employment plus six years	Deletion/Shredding
Variation of contracts documents	Duration of employment plus six years	Deletion/Shredding
Training agreements and records	Duration of employment plus six years	Deletion/Shredding
Exit interviews and leaver documentation	Six years post-employment	Deletion/Shredding
P46/new starter checklist	Duration of employment plus six years	Deletion/Shredding
Pay and benefit entitlements documentation	Duration of employment plus six years	Deletion/Shredding
Bank details and NI numbers	Duration of employment plus six years	Deletion/Shredding
Disciplinary and grievance records	Duration of employment plus six years	Deletion/Shredding
Absence and leave record details	Duration of employment plus six years	Deletion/Shredding
Medical or Health certificates	Duration of employment plus six years	Deletion/Shredding
Probation records	Duration of employment plus six years	Deletion/Shredding
Appraisal documentation	Duration of employment plus six years	Deletion/Shredding
Performance reviews and plans	Duration of employment plus six years	Deletion/Shredding

Appendix C - Claims Retention Schedule

Data Type	Retention Period	Disposal Method
Appeals	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
CICA (Criminal Injuries Compensation Authority)	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Civil – Legal Advice	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Conduct & Performance	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Criminal	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Employment Tribunal	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
General (claim refusal, etc)	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Health & Safety Advice	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Inquests	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Judicial Reviews	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Major incident/Media interest	Duration of claim plus 15 years after resolution or last meaningful change	Deletion/Shredding
Medical Advice	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Personal Injury	Duration of claim plus six years after resolution or last meaningful change	Deletion/Shredding
Personal Injury - Negligence	Duration of claim plus 15 years after resolution or last meaningful change	Deletion/Shredding
Personal Injury – Minor	Date of birth up to the age of 21	Deletion/shredding
Personal Injury – Asbestos related	Duration of claim plus 30 years after resolution or last meaningful change	Deletion/Shredding