

ASPE
Association for the Study of Primary Education

Data Retention Policy:
Sensible Information Storage

Policy Version Control

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Data Retention Policy: Sensible Information Storage

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Data Retention Policy: Sensible Information Storage

Introduction

The Association for the Study of Primary Education (ASPE) recognises that its records are a vital asset which need careful management to enable ASPE to conduct its business and comply with its statutory obligations. This policy sets out ASPE's arrangements for the management of its records.

The effective management of records in all formats depends as much on their efficient disposal as well as their long-term preservation. The untimely destruction of records may adversely affect service delivery but so will the unnecessary retention of outdated and potentially inaccurate records. Disposal is necessary not only to reduce administrative burdens but also to ensure that information is not retained for longer than necessary and that accurate records are maintained for appropriate periods to satisfy applicable operational and legal requirements.

This policy is also important in assisting ASPE to comply with its obligations under the Data Protection Act 2018, the General Data Protection Regulation 2016 and the Freedom of Information Act 2000.

Data Protection legislation requires that personal data must be:

- adequate, relevant and limited to what is necessary;
- accurate and where necessary kept up to date;
- not kept for longer than is necessary for its purpose.

The Freedom of Information Act 2000 (FOIA) provides rights of access to information held by public bodies and the link between the FOIA and effective records management will be immediately apparent. The quality of the records which ASPE holds will affect its ability to respond to requests under the FOIA. If records are not created and managed effectively then they will not be found when needed.

Retention Periods

The Retention Schedule which forms part of this policy (the Schedule) sets out the length of time that records should be retained and extends to all records identified in the Schedule, irrespective of the media on which they are created or held including:

- paper;
- digital files (including databases, Word documents, spread sheets, webpages and e-mails);
- photographs and video files.

Retention periods are determined based upon the nature of the information held, not the medium in which it is maintained. For example, information which is held in a digital format should only be retained for the same period as it would be kept if it was in paper form. However, it is not necessary to retain both paper and digital versions of the same record, nor to retain duplicate copies of records. Retention arrangements for digital records should ensure that they will remain complete, unaltered and accessible throughout the retention period.

The value of information tends to decline over time, so the majority of records should only be retained for a limited period of time and eventually be destroyed. A recommended minimum retention period, derived from operational or requirements, is provided for each category of record in the Schedule and applies to all records within that category.

During their retention period, operational needs may require records to be held in different locations and on different media, but they should always be properly managed in accordance with this policy.

A small proportion of records which are considered to be of permanent historical significance will be preserved in ASPE's archives. The Chair, working in consultation with the Executive Committee, is responsible for the selection of records for permanent preservation and the maintenance of the archives of ASPE and its predecessor entities.

Disposal

Records should be reviewed as soon as possible after the expiry of the retention period. It need not be a detailed or time consuming exercise but there must be a considered appraisal of the contents of the record.

A record should not be destroyed without verification that:

- no work is outstanding in respect of that record and it is no longer required by ASPE;
- the record does not relate to any current or pending complaint, investigation, dispute or litigation;
- the record is unaffected by any current or pending request made under the Freedom of Information Act or Data Protection Act.

Variation

Information needs are dynamic and therefore this policy is a 'living' document which ASPE will amend as the need arises.

Any review of retention periods should take account of relevant statutory and legal requirements and consideration of the overall operational value of records, including:

- on-going operational, accountability and audit needs;
- best practice in the applicable professional field;
- the probability of future use;
- the long-term historical or research value of the record;
- the costs of retention or destruction;
- the risks associated with retaining or destroying the record.

Other Records

Many records have no significant operational or evidential value and are not subject to retention under this policy but may be destroyed once they have served their primary purpose. These include:

- requests for forms and brochures;
- compliment slips and similar items which accompany documents;
- superseded distribution or mailing lists;
- drafts of some documents;
- working papers which are the basis of the content of other documents;
- notices of meetings and other events;
- invitations and notices of acceptance or apologies;
- magazines, marketing materials, catalogues, directories, etc.

This is not an exhaustive list but merely indicates the types of record which have no significant operational or evidential value and may be destroyed once their effective use has ended.

The Retention Schedule

Description and Retention Period	
Governance	
Annual Report and Accounts	25 years
Report to Parliament	25 years
Legal advice	25 years
Litigation papers	25 Years
External correspondence	6 Years
External briefing notes etc.	6 Years
Committees' terms of reference	Life of the organisation
Executive Committee and Subcommittee papers	Life of the organisation
Gifts and Hospitality Register	Life of the organisation
General formal correspondence	6 Years
Historic record of Executive Committee and Subcommittee membership	Life of the organisation
Records of decisions regarding Executive Committee and Subcommittee member appointments	Life of the organisation

Description and Retention Period	
Finance	
Bank account records	
Bank statements, periodic reconciliations	6 years
Bank deposit books/slips/stubs	6 years
Bank deposit summary sheets; summaries of daily banking; cheque schedules	6 years
Cheques – cancelled, dishonoured, paid/presented, cheque registers	6 years
Revenue cash books/sheets/records	6 years
Copies of invoices/debit notices rendered on debtors	6 years
Expenditure	
Expenditure sheets	6 years
Cash books/sheets	6 years
Summary cash books	6 years
Copies of invoices/debit notices rendered on debtors	6 years
Source documents/records used for raising invoices/debit notes	6 years
Copies of invoices and copies of source documents	6 years
Receipt books/butts; office copies of receipts	6 years
Receipt books/records for imposts	6 years
Source documents/records used for raising invoices/debit notes	6 years
Copies of invoices and copies of source documents	6 years
Travel and subsistence claims and authorisations	6 years
Statements of accounts outstanding; outstanding orders	6 years
Statements of accounts – rendered/payable	6 years
Creditor's ledgers	6 years
Payroll records	
Employee pay histories	6 years
Salary ledger cards/records	6 years
Personal payroll history	4 years

Description and Retention Period	
Health and Safety	
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	3 years
Accident reports	6 years

Description and Retention Period	
Customer Service Correspondence and/or Complaints	
Policy Statements	When superseded
Case enquiries and correspondence	6 years from last correspondence
Review reports	6 years
Information about the number of FOIA requests answered and their outcomes	10 years
Policy records and internal documents on implementation and compliance with FOIA	5 years after policy or procedures have been superseded
Records relating to FOI requests including the information subject to the request	3 years after date of request
Records relating to DPA requests including the information subject to the request	3 years after date of request
Correspondence	7 years

Description and Retention Period	
Consultation	
Consultation documents	Life of the organisation
Consultation responses	6 years, Anonymised data kept for research purposes



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