

Records retention policy



Document control

Version	Date issued	Changes
V2.1	3 October 2019	Amendments to the Records Retention Schedule requested by ACTS and QMS teams
V2.0	7 August 2019	Baselined for release
V1.11	7 August 2019	Addition of email retention policy
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V1.9	30 May 2019	Minor comments on CPD and SEAF
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V1.3	9 April 2019	Addition of separate entry covering complaints
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V1.1	29 March 2019	Further revisions
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Records retention policy

Introduction

This policy should be read in conjunction with the following documents which can be found at www.icheme.org/policies:

- Data Breach Procedure
- Data Protection Policy
- Data Sharing Policy
- Individual Data Rights Request Procedure
- Information Governance Policy
- Information Security Policy
- Website terms of use and Privacy Policy

Purpose

A Retention Schedule documents the length of time records should be retained in order to comply with legal and regulatory requirements, balanced with the operational requirements of IChemE. The schedule describes:

- the record
- examples or descriptions of what makes the record
- the minimum retention period
- the recommended disposal action
- the supporting justification

This information is presented in the following format:

Category	Description	Minimum retention period
Type of data	Examples or descriptions	The minimum retention period

Retention periods are independent of format and therefore can be applied to any medium whether paper or electronic. Appendix A sets out the schedule for IChemE records.

Retention periods in this document are defined as the minimum, which means that files may be retained for a longer period, should they be required locally, but must not be disposed of prior to the end of the retention period.

Retention periods are formulated based on a number of factors:

- General Data Protection Regulation (GDPR) and the Data Protection Act 2018 regulate how IChemE uses and stores personal information, protects individuals from the misuse of this information and provides individuals the right to access this information. Additionally, this legislation ensures that information is not held for longer than necessary;
- professional, statutory and regulatory bodies courses accredited by professional, statutory or regulatory bodies are required to comply with any specific requirements made by these bodies;
- cost the cost of storage and maintenance of records (both paper and electronic).

Long-term storage of paper records

Further consideration is required of the challenges in storing paper records long term. In addition, further clarity is required on the ambitions for digitising paper records. An update will be issued to this policy once this area has been reviewed. In the meantime questions regarding long-term storage of records should be directed to the Privacy Team in the first instance.

Disposal of records

At the end of a designated retention period, appropriate action should be taken in relation to the record as outlined in the retention schedule. These will be:

1. Dispose - the record can be disposed of using an appropriate method. This may be 'delete' for electronic records, or disposed of in the appropriate waste-bin for non-confidential records. All confidential or restricted records, including those containing personal or financial information, should be disposed of by shredding where possible and through the confidential waste system in all cases.

Appendix B provides a template for recording what, how and when a record is disposed of.

2. Review - documents marked for review at the end of their retention period may be required for a longer period. Therefore, their status should be checked before any action is taken.

Implementation

Implementation should be at a local level within business units. A nominated individual, in conjunction with the Privacy Team should ensure that suitable methods are in place to store records in an appropriate manner (electronic or hard copy), enabling the identification of records as they reach the end of their defined retention period as well as overseeing their disposal.

Inaccuracies

This retention schedule is subject to review and revisions periodically. Notification will be made to all staff when amendments to the Records Retention Schedule have been made. If you notice any inaccuracies within the schedule, any records that are not covered within the schedule or any points of clarification, you should contact the Privacy Team to discuss

Classification

The retention schedule has classified records as follows:

- financial and commercial
- governance
- security
- personal
- IT
- membership, and
- other.

Appendix A - Records retention schedule

Category	Description	Mi	nimum retention period
Financial and commercial	Supplier and contractor information including names, contact details, communications with contractors, details of contracts, tender information, works undertaken, items purchased, invoicing arrangements, VAT numbers and payments made, banking details, information about the selection of contractors/suppliers, including information about the quality and/or value of the work or products.		in the case of transaction records, six years from the end of the financial year in which the work was completed in the case of information about the selection of contractors/suppliers, including information about the quality and/or value of the work or products, retain this whilst they remain a supplier or potential future supplier
Financial and commercial	Records relating to event and merchandise sales and purchases consisting of date of the order, details of the event/merchandise booked, sold or purchased, the amount due, the contact and payment details of the purchaser including credit card number/credit card security number, direct debit or bank transfer (account holder, number and sort code) information and receipts.		six years from end of the financial year in which the transaction occurred
Financial and commercial	Magazine subscription details including but not limited to <i>The Loss Prevention Bulletin</i> and <i>The Chemical Engineer</i> .		six years from end of the financial year in which the transaction occurred
Financial and commercial	Lead generation and associated marketing activity.		for the duration of a valid opt in record
			to remain valid, consent must be re-obtained every five years
Financial and commercial	Records relating to conference, course and event bookings consisting of communications and inquiries, details of the event/conference, the amount due, the contact and payment details of the purchaser.		in the case of enquiries, a period of 36 months after the date of the enquiry, or 36 months after the conference, course or event if later. Assuming a valid opt-in record is held as per lead generation and associated marketing activity papers delivered and information relating to conferences may be retained
		-	indefinitely in the IChemE archive in the case of transaction records, six years from the end of the financial year in which the transaction occurred
Financial and commercial	Title documents, transfers, leases and contracts which include the names of parties, signatories and witnesses.		in the case of contracts, for a period of six years after conclusion of the contract
			in the case of title documents, transfers and leases, for a period of 16 years after IChemE disposes of its interest in the property

Category	Description	Minimum retention period
Financial and commercial	Budget documents, audit and accounting documents, management accounts, investment documents and communications relating to such records, all of which may include names and contact details of individuals responsible for or involved with the budgets/accounts/investments.	six years from the end of the financial year to which the records relate
Financial and commercial	Bank account records, including names of payees and transaction details.	six years from the end of the financial year to which the records relate
Financial and commercial	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	these records will be retained for a period of six years from the date generated for compliance purposes unless there is a compelling justification for the data to be retained for a longer period (eg in connection with legal advice, or in relation to auditing obligations)
Financial and commercial	Records generated as part of the organisation's Quality Management System.	 records will be retained for the following periods: management reviews: two years audit reports: five years process monitoring records: five years risk and opportunity assessments: five years business plans: five years corrective action reports: five years complaint records: two years quality control reports: five years non-conformance reports: five years design review records: five years

Category	Description	Minimum retention period
Governance	Governing body and committee agenda, governance documents, and some legal, financial, buildings and architectural records which are kept in the IChemE archive.	permanently
Governance	Congress Member contact and passport details.	duration of term office
Governance	Nominations Committee records for Board of Trustees – CV and biography.	three years after the nomination process has concluded
Governance	Medals – nominations and winners.	nominations - duration of nomination process
		winners - permanently
Governance	Magazine and journal committee members.	contact details to be held for duration of term of office
		record of committee membership to be held permanently
		record of declining committee membership to be held permanently

Category	Description	Minimum retention period
Security	CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings, and the reason for accessing them.	 recordings - for six months records of who has accessed the recordings - five years
Security	Contact information for emergency contacts, members and staff.	whilst they are a registered member or staff
Security	Emergency medical information about members/ staff held by IChemE security.	for six years after they have ceased to be a member or employee
Security	Informing emergency contacts about any medical emergency.	whilst they are a registered member or staff
Security	Security access records for staff, members and visitors.	six months
Security	Contact details for contractors working on IChemE premises, and information about the contract they are working on.	 for six months after they have completed the work risk assessments should be held for six years or for the length of guarantee if longer
Security	Records of keys and access cards/fobs issued, including the name of the person to whom the key/fob has been issued and the identity number of the fob.	■ for as long as the person holds the key/card/fob.
Security	Room bookings consisting of room, date/time, booking description and the identity of the person/ group booking the room. Records of requests and bookings for rooms, including records of any decisions the Institution makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, employees of the Institution and for visiting speakers.	until 12 months after the date of the event
Security	Names and addresses for delivery of mail and other items, including parcel receipt and management records: containing names of recipient, location of parcel and who signed for it.	six months

Category	Description	Minimum retention period
Personal	Application forms and interview notes (for unsuccessful candidates).	six months.
Personal	Successful job applicant documents application letter CV job description job advert two forms of ID references	 six years after employment ceases details transferred over to personnel file
Personal	Appointment records: criminal conviction and Disclosure and Barring Service information.	for one year following appointment to the relevant role. Information relating to criminal convictions collected in the course of the recruitment process should be deleted once the DBS check has yielded a satisfactory or unsatisfactory result. DBS certificate information should be retained for six months from the date of appointment
Personal	Equality monitoring data. This may consist of data concerning health, sexuality, ethnicity or religious beliefs.	permanently but only held and processed in anonymised form
Personal	Personal details name address emergency contact details date of birth sex education tax code national insurance number details of any known work-relevant disability passport, right to work and visa information	 six years after employment ceases after which only a summary of service needs to be kept: name, position held, dates of employment, final salary - to be kept 10 years after employment ceases
Personal	 Terms and conditions of employment signed contract salary details probationary periods hours of work holiday entitlement benefits of employment amendments to contract 	six years after employment ceases

Category	Description	Minimum retention period
Personal	Employment history with IChemE (including termination) date employment began job title(s) present job/job description promotions resignation letter details of dismissal requests for references copies of references given exit interview	six years after employment ceases
Personal	Next of kin/emergency contact data.	this data should be destroyed within six months of the date of termination of employment
Personal	Photographs.	 permanently where intended for general usage - verbal permission from employee will be sufficient to demonstrate consent where intended for marketing or promotional material - explicit written permission will be obtained
Personal	Annual appraisals/assessment records/training PDRs PRP scoring one-to-one notes development/training plans training undertaken (certificate/venue/date) training agreement	six years after employment ceases
Personal	Warning letters.	 written warnings should only remain 'live' for a fixed period. Suggested periods are: six months for a first written warning one year for a final written warning only exceed these limits if it is justifiable

Category	Description	Minimum retention period
Personal	 Disciplinary minutes of meetings letters/hearings/consultations/evidence development plans 	 six years after employment ceases - only for actual disciplinary matters Unused evidence/warnings/general discussions that have not led to a disciplinary should be kept no longer than is absolutely necessary for the purpose in which it is being held - recommended to be kept for one year after employment ceases
Personal	Personnel files for CEOs and senior management team (or equivalents).	held permanently for historical purposes
Personal	Conflict of interest declarations.	these records should be kept for six years from the termination of employment. If declarations are mentioned during governing body sessions, the minutes should be retained in the institution archiive in perpetuity
Personal	Records relating to children and young adults (ie work experience).	until the person reaches age 21
Personal	Payroll information/PAYE records annual salary hourly rate (if applicable) overtime bonuses expenses national minimum wage	six years after employment ceases
Personal	Terms and conditions of employment signed contract salary details probationary periods hours of work holiday entitlement benefits of employment amendments to contract	six years after employment ceases
Personal	Redundancy details calculations of payments refunds notifications to individuals and HMRC details of redundancy pooling/scoring results	six years from the date of the redundancy

Category	Description	Minimum retention period
Personal	Sickness self-certified sickness medical notes/reports calculation of pay record of absence dates	six years after employment ceases
Personal	 Statutory maternity/paternity/adoption leave authorisation of leave for maternity/paternity - MAT B1 certificate or other medical evidence calculations of pay matching certificates medical evidence 	for SMP/SPP/SAP purposes: three years after the end of the tax year they relate to
Personal	Parental leave authorisation of leave matching certificates calculations of pay	for SMP/SPP/SAP purposes: three years after the end of the tax year they relate to
Personal	Other absence/annual leave authorised/unauthorised leave unpaid leave flexi holiday requests special/other leave requests	three years after the end of the tax year they relate to
Personal	 Health and safety assessments and consultations / IChemE policies and procedures handbook declarations confirmations of policies and procedures employee assessments training records formal communications to employees display screen equipment consultations with safety representatives risk assessments method statements handbooks/policies monitoring and maintenance records accident report book and relevant medical records 	 records relating to individuals kept on personal files for six years after employment ceases general IChemE H&S records should be kept permanently. it is recommended that accident records be kept for 12 years as a personal injury claim could still be made up to this point minimum of 40 years for medical records in relation to biological tests, COSHH, asbestos. minimum of 50 years for medical records in relation to radiation

Category	Description	Minimum retention period
Personal	Medical questionnaires, notes and occupational health reports, including specifics of health issues, records of consequent adjustments, and communications relating thereto.	records relating to occupational health should be retained for six years from the termination of employment. Medical records relating to the Control of Asbestos at Work Regulations or Control of Substances Hazardous to Health Regulations should be retained for 50 years
Personal	Defined Contribution Pension Scheme - Standard Life pension/investment details life assurance next of kin details expression of wish	six years after employment ceases
Personal	Defined Benefiit Pension Scheme pension/investment details life assurance next of kin details expression of wish	12 years after the benefit ceases
Personal	Pension contribution records.	permanently
Personal	Pension scheme documents trust deeds and scheme rules trustee minute books records of pensioners money purchase details investment policies	permanently
Personal	Property documents title deeds for property leases valuation reports	permanently
Personal	 Insurance employers' liability, public liability, product liability certificates etc group health and group personal accident policies other insurance documents and details of claims made 	 permanently 12 years after benefit ceases three years after lapse/settlement of claim

Category	Description	Min	nimum retention period
Personal	Company vehicle documents mileage maintenance MOT registration records	-	two years after the vehicle has been disposed of
Personal	Details of attendance at, and participation in, Institution administrative meetings, including governing body, sub-committees and working groups.		permanently
Personal	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.		this data should be retained for a period of six years from the termination of employment, unless there is compelling justification for the data to be retained for a longer period eg in connection with legal advice, or in relation to auditing obligations

Category	Description	Minimum retention period
IT	Computer and email information, including login/username, equipment allocated, and details of when individuals connected or logged in to IChemE networks, records of internet usage. Records of which users have printed documents and at what time/date, details of any charges for printing. We also hold records of the level of access permission users have to the system and which areas (eg staff, visitor, administrator). We may also hold encrypted/obfuscated password information and records of internet usage (including records of sites visited, time and date of visit).	records should be destroyed one year after closure of IT accounts
IT	Emails sent via Office 365.	emails will be stored for a maximum of 2 years. Any content required after this period should be stored in line with the relevant section of this policy
IT	Information security, firewall, security and PC misuse incident log files consisting of the date and time of incident, which user (name and/or user name), details of the incident and any consequential action taken.	six years from the date you learn of the incident
IT	IT support logs and records consisting of user names/contact information, dates and times of requests/problems, details of requests and details of steps taken and resolution of requests.	 IT support logs should be retained for one year
IT	Records of telephone calls made and received (records of numbers called to/from, duration of calls).	records should be retained for one year

Category	Description	Minimum retention period
Membership	Membership applicationsFor members and potential members: contact details, name, address, telephone numbers, employment details, academic qualifications (including scanned degree certificates), CV's, applicant reports (that are usually signed by a manager).Note: this also includes all accreditations or registrations associated with membership.	 incomplete, unsubmitted applications will be retained for a minimum of one year for Fellow, Associate Member, Affiliate Member or RPEQ. All other grades will be retained for a minimum of three years for six years after application was completed with either an unsuccessful or successful outcome
Membership	Membership record Contact details, name, address, telephone numbers, accreditations or registrations associated with membership, grade, correspondence, offices held.	for six years after membership lapses
Membership	CPD Sampling – name, email, CPD evidence, peer review assessments.	for six years after the sample was taken
Membership	ACTS applications and supporting evidence - including application form, annual review, training manual, status report and assessment form, visit outcome letter.	 inactive records should be retained for six years after their membership of ACTS has ended active records should be retained for: nine years for visit documentation five years for annual reviews

Category	Description	Minimum retention period
Other	Benevolent Fund claim details – name, address, date of birth, telephone number, financial details.	records should be retained for six years

Appendix B - Records disposal template

Disposal of records

Department:	
Your name:	
Date:	
Title of record:	
Format:	
Reason for disposal:	
Method for disposal:	
Date of disposal:	

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