



Rehabilitation and  
Retraining Trust

# **The Police Rehabilitation and Retraining Trust**

## **15 Retention and Disposal Schedule**

**Version 6**

**Date 25/01/2021**

## DOCUMENT CONTROL

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1	14/12/2015	Una Buchanan	New Policy
2	15/05/2018	Una Buchanan	Separation of policy into separate document
3	20/07/18	Una Buchanan	Updated for psychology additions
4	08/10/18	Una Buchanan	Updated to include reference to Health Records order; to update NIPS, FTR and contract retention periods.
5	05/02/19	Una Buchanan	Updated in respect of Access NI records and HR medical referrals
6	25/01/21	J R Hood	Update PD&T records section

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**Legislative and Regulatory Environment**

Public Records Act (NI) 1923

Disposal of Documents Order (NI) 1925

Public Records (Imperial Records) Order 1925

Freedom of Information Act 2000

Data Protection Act 1998, Data Protection Bill 2018, GDPR

Environmental Information Regulation 2004

Limitation Act 1980

Financial Services Act 2012

Government Accounting Northern Ireland (GANI) Regulations

Census Act (Northern Ireland) 1969

Health and Safety at Work (Northern Ireland) Order 1978

Control of Asbestos at Work Regulations (NI) 2003

Access to Health Records (Northern Ireland) Order 1993

## Contents

Purpose of Retention and Disposal Schedule .....	5
Schedules for the Retention and Destruction of Records .....	7
Client Services .....	7
Health and Safety .....	10
Premises .....	11
Audit, Accountability and Strategic Plans.....	12
Financial Management .....	13
Human Resources.....	14
Information and Communications .....	18
Technology & Telecommunications .....	19
Procurement.....	20
Legal Advice.....	21
Processes for Retaining and Destroying .....	22
Client Documents .....	22
Finance Papers .....	23
HR files.....	24
Annex A - Record Occurrence Sheet .....	25
Annex B - Location of files.....	26

## **Purpose of Retention and Disposal Schedule**

The PRRT Retention and Disposal Schedule (hereafter known as the Schedule) identifies the disposal arrangements for records created by PRRT. The Schedule complies with the requirements of the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R. & O. 1925 No.167). Commitment to operation and compliance of the disposal schedule is stated in the PRRT Records and Information Management Policy.

The guidelines stated in the Schedule are applied irrespective of format or media.

### **Format of the Schedule**

The Schedule follows a functional file plan. It reflects the functions, activities and transactions of PRRT rather than an organisational structure.

### **Operation of the Schedule**

#### **Closing of Records**

Records should be closed as soon as they have ceased to be of active use.

When a record is due to be closed the applicable administrative procedures for closure should be followed. Closing a record means that no documents can be edited and no further documents can be added. The record has now entered into its retention period, but can continue to be used for reference purposes, known as 'read-only'.

#### **Retention Period**

The retention period for each record is calculated from the point the record is closed. For example, if the retention period, as recorded on the Schedule is 5 years and the action is destroy, then a record closed on 10 October 2013 should be retained until 10 October 2018.

Records may also be tied to the financial year in which they operate, for example, a payment made in June 2013 will relate to the financial year 2013/14 and should be retained until March 2020 when the CFY plus 6 years will have passed.

#### **Categories of Disposal**

The two categories of disposal which relate to records are:

- **Destroy**

The records are disposed of securely and in line with departmental policies and procedures. The only exception to destruction is if the information is subject to an ongoing legal, audit or FOI case. Destruction must be approved by the Information Asset Owner (IAO).

- **Permanent Retention by PRRT**

The records are permanently retained by PRRT for administrative or legislative purposes and will be physically or digitally managed in an accessible format within accredited record keeping systems.

### **New/changed Functions**

If any functions or classes of records are created or changed during the life of the Schedule, and are not reflected in the current Schedule, advice must be taken from the Data Protection Officer and or Corporate Services Manager on whether there is a requirement for PRRT to re-draft, and resubmit the Schedule.

### **Recording Disposal Actions**

All records due for disposal must be recorded onto a Disposal List by each Business Area. These may take the form of a spreadsheet or database and contain the file/container name, relevant closure & disposal dates and Information Asset Owner approval details. This list *must* be retained permanently to provide transparency and accountability for the Department's disposal actions. Detailed information is contained within the Processes for Retention and Disposal section.

### **Roles and Responsibilities**

The roles and responsibilities are outlined below:

- **All Staff**

All members of staff are responsible for documenting their actions and decisions by creating records and for maintaining the records in accordance with records management best practice.

- **Information Asset Owners**

Information Asset Owners (IAOs) will have an understanding of the records held by their business area and will approve the disposal decisions, and associated mechanisms, to ensure compliance within their business area. Full details of IAO are listed in the PRRT Information Asset Register.

### **Commitment to Preserving Records**

PRRT is committed to ensuring that the records it receives/creates will be physically or digitally well maintained whilst in the custody of PRRT.

PRRT is committed to reviewing the Schedule every three years.

Date of next review 05/06/2021

## Schedules for the Retention and Destruction of Records

<b>Client Services</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Psychological Therapies Records	<ul style="list-style-type: none"> <li>• 20 years from last contact</li> <li>• 8 years after death if in treatment on demise</li> <li>• Up to 26th birthday for children or young people (16 years)</li> <li>• OH client records to be returned after 8 years to the OH department of the related contract (only if stated in the contract terms).</li> <li>• PSNI OH - client records to be destroyed after 8 years. Electronic copy of record to be made available electronically on discharge (contract to be updated for this).</li> <li>• Client Referral and Review Book</li> <li>• Clinical case flows</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy and/or return – refer to contract</li> <li>• Electronic copy to be available to PSNI OH on discharge; electronic client record to be destroyed after 8 years; PSNI OH informed – contract to be updated accordingly</li> <li>• Destroy every 6 months; April and October each year</li> <li>• Destroy every 2 weeks after each supervision session</li> </ul>

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<b>Client Services</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Physiotherapy Records	<ul style="list-style-type: none"> <li>• 8 years after discharge or death</li> <li>• OH client records to be held until client's 75th birthday or returned after 8 years to the OH department of the related contract (only if stated in the contract terms). This relates also to PRRT staff OH files.</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> <li>• Destroy and/or return – refer to contract</li> </ul>
Personal Development & Training records	<ul style="list-style-type: none"> <li>• 7 years after last contact if £2500 training support cap in place</li> <li>• Otherwise retain records until £2500 training support cap met.</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> </ul>
Personal Development and Training Student Assignment /Exam Submissions/Registration Details	3 years from the award of the qualification	Destroy
Personal Development and Training Curriculum Vitae Document	7 years from last date of contact	Destroy
Personal Development and Training Information Email Register	1 year from last contact date or when client requests removal from the register	Destroy
Full Time Reserve Records	8 years from induction or 6 years from the final date of contract plus CFY (whichever is longer) ties with financial information	Destroy
Northern Ireland Prison Service	4.5 years from induction or 6 years from the final date of contract plus CFY (whichever is longer) ties with financial information	Destroy



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Clinical Audit	5 years	Destroy
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<b>Health and Safety</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)	3 years after the date of last entry	Destroy
Accident Books, Accident Records / Reports	5 years from the occurrence of last entry	Destroy
Asbestos	40 years	Destroy
Claims	5 years from the occurrence of last entry	Destroy
H &S Inspections	5 years	Destroy
Health and Safety Assessments, Safety Representative consultations	Permanently	
H&S Meetings	5 years	Destroy
Policies and Procedures	Permanently Archive when no longer used	Permanently

<b>Premises</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Insurance	6 years plus CFY	Destroy
Maintenance records	3 years	Destroy
Refurbishment records	3 years	Destroy
Security	6 years plus CFY	Destroy
Premises Meetings	5 years	Destroy
CCTV Records	1 week	Destroy

<b>Audit, Accountability and Strategic Plans</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Internal Audit	6 years plus CFY	Destroy
External Audit	6 years plus CFY	Destroy
Fraud Management <ul style="list-style-type: none"> <li>• Annual fraud returns &amp; paperwork</li> <li>• Fraud investigations</li> </ul>	<ul style="list-style-type: none"> <li>• 6 years plus CFY</li> <li>• 6 years plus CFY or 1 year longer after conviction is spent if longer</li> </ul>	Destroy
Audit & Risk Committee Minutes & Papers	Permanently	Permanently
Board Minutes & Papers	Permanently	Permanently
Risk Register	Final copy at the end of each financial year	Permanently
Business Plans for each financial year	Permanently	Permanently
Senior Management Minutes	Permanently	Permanently
Policies and Procedures	Permanently  Archive when no longer used	Permanently

<b>Financial Management</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Accounting Records	6 years plus CFY	Destroy
Budgets	6 years plus CFY	Destroy
Business Cases	6 years plus CFY	Destroy
Actuarial Valuation Reports	Permanently	
Procurement contracts	6 years form the final date of contract plus CFY	Destroy
Policies and Procedures	Permanently Archive when no longer used	Permanently
Service Level Agreements	6 years from final date of SLA plus CFY	Destroy

<b>Human Resources</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
<p>Access NI</p> <ul style="list-style-type: none"> <li>Original Information</li> </ul>	<ul style="list-style-type: none"> <li>Until final decision is made about applicant's suitability. Should not exceed 6 months.</li> <li>If Access NI requires they may state the retention of the records for a longer period in exceptional circumstances where there is a requirement for statutory purposes.</li> </ul>	<p>Destroy</p>
<p>Access NI</p> <ul style="list-style-type: none"> <li>Access NI Record should be kept of: <ul style="list-style-type: none"> <li>The date of the disclosure</li> <li>The name of the subject of the disclosure</li> <li>The type of disclosure</li> <li>The position which the disclosure was applied for</li> <li>The unique number that was issued by Access NI for that disclosure; and</li> <li>The recruitment decision taken</li> </ul> </li> <li></li> </ul>	<p>6 years plus current financial year</p>	<p>Destroy</p>
<p>Personnel Files and Training Records (staff, associates, board members)</p>	<p>6 years plus CFY after employment has ended – The Limitation Act 1980</p>	<p>Destroy</p>

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Human Resources		
Record	Retention Period	Action
<p>Health (Personnel Record)</p> <ul style="list-style-type: none"> <li>• Health Declaration</li> <li>• Health Referrals (including OH)</li> <li>• Papers relating to injury whilst working</li> <li>• Medical reports of those exposed to substance hazardous to health including;                             <ul style="list-style-type: none"> <li>a. Lead</li> <li>b. Asbestos</li> <li>c. Compressed Air</li> <li>d. Radiation</li> </ul> </li> <li>• Medical self-certifications (unrelated to industrial injury)</li> <li>• Medical self-certifications (related to industrial injury)</li> <li>• Welfare Reports</li> </ul>	<ul style="list-style-type: none"> <li>• 6 years from date of leaving plus CFY</li> <li>• 6 years from date of leaving plus CFY</li> <li>• Until the age of 75</li> <li>a. 40 years from date last entry was made</li> <li>b. 40 years from date last entry was made</li> <li>c. 40 years from date last entry was made</li> <li>d. 50 years from date last entry was made</li> </ul> <p>In a-d above; whichever of the age of 75 or the number of years since the entry was made comes latest is the applicable date to go by.</p> <ul style="list-style-type: none"> <li>• 6 years from date of leaving plus CFY</li> <li>• 6 years from date of leaving plus CFY</li> <li>• 6 years from date of leaving plus CFY</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> <li>• Destroy</li> </ul>

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<b>Human Resources</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Pay and Pension (Personnel Records) Including overtime, expenses etc.	6 years plus CFY	Destroy
Income Tax and NI Returns, Tax Records and Inland revenue correspondence	6 years plus CFY after the year end to which they relate	The Income Tax (Employments) Regulations 1993
Redundancy Details, Payment calculations, refunds and notification documentation	6 years plus CFY from the date of redundancy	The Limitation Act 1980
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	6 years from the date of leaving plus CFY.	Destroy
Statutory Sick Pay records, calculations, certificates, self-certificates	6 years from the date of leaving plus CFY.	Destroy
Time sheets	6 years plus CFY	Destroy
Leave records	6 years from the date of leaving plus CFY.	Destroy
Policies and Procedures	Permanently Archive when no longer used	Permanently
Discipline including tribunal files	6 years from the date of leaving plus CFY.	Destroy
Training and Development	6 years from the date of leaving plus CFY.	Destroy
Absence management	6 years from the date of leaving plus CFY.	Destroy



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<b>Human Resources</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Equal opportunities monitoring	<ul style="list-style-type: none"> <li>• 3 years from date of application (if unsuccessful)</li> <li>• 3 years for employees from final date of leaving</li> </ul>	Destroy
CTC Records	<ul style="list-style-type: none"> <li>• Staff member /associate /contractor – 5 years (until renewal)</li> <li>• Leaver/revoked record – 3 months from date of leaving or clearance being revoked</li> </ul>	Destroy
Recruitment paperwork, Application forms and interview notes (for unsuccessful candidates)	<ul style="list-style-type: none"> <li>• 1 year from final date of interview</li> </ul>	Destroy
Parental Leave	<ul style="list-style-type: none"> <li>• 6 years from the date of leaving plus CFY.</li> </ul>	Destroy

<b>Information and Communications</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Complaints	2 years from closure of complaint	Destroy
Subject Access Requests	3 years from date information sent	Destroy
Record and information management; <ul style="list-style-type: none"> <li>• Retention schedule</li> <li>• Disposal lists and inventories</li> </ul>	Keep permanently	

<b>Technology &amp; Telecommunications</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Application and system support	5 years	Destroy
Systems management <ul style="list-style-type: none"> <li>• Backups</li> <li>• Emails</li> </ul>	<ul style="list-style-type: none"> <li>• 1 year from current date</li> <li>• Currently indefinitely</li> </ul>	<ul style="list-style-type: none"> <li>• Overwritten</li> <li>• Working towards a period of 3 months from September 2018</li> </ul>

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<b>Procurement</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Contract Paperwork of the successful tenderer	<ul style="list-style-type: none"> <li>• 8 years from the last date of client activity if relating to delivery of a healthcare service</li> <li>• 6 years plus CFY if a standard service delivery contract (to tie with accounting records)</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> <li>• Destroy</li> </ul>
Contract Paperwork of the unsuccessful tenderer	1 year from date of evaluation	<ul style="list-style-type: none"> <li>• Destroy</li> </ul>
Contract Management	<ul style="list-style-type: none"> <li>• 8 years from the last date of client activity if relating to delivery of a healthcare service</li> <li>• 6 years if a standard service delivery contract (to tie with accounting records)</li> </ul>	<ul style="list-style-type: none"> <li>• Destroy</li> <li>• Destroy</li> </ul>

<b>Legal Advice</b>		
<b>Record</b>	<b>Retention Period</b>	<b>Action</b>
Legal Advice  (depending on topic)	<ul style="list-style-type: none"><li>• 6 years</li></ul> OR <ul style="list-style-type: none"><li>• Permanently Keep</li></ul>	<ul style="list-style-type: none"><li>• Destroy</li></ul> <ul style="list-style-type: none"><li>• Permanently Keep</li></ul>

## Processes for Retaining and Destroying

### Client Documents

#### Files to be archived (From 1<sup>st</sup> January 2016)

1. All files identified for storage must have a record occurrence sheet completed (Annex A) which will require said file to be scanned onto TM2.
2. The file being scanned onto TM2 should be recorded on the appropriate spreadsheet. For each department these are listed as:
  - (ii) Data Retention Physio
  - (iii) Data Retention Psychology
  - (iiii) Data Retention Personal Development and Training
  - (ivi) Data Retention FTR
  - (vi) Data Retention NIPS

All information relating to the fields in this spreadsheet must be completed.

Files are stored on the N Drive\Data Retention and Destruction\Data Retention and Destruction spreadsheet\ (then department spreadsheet)

3. Once the file is scanned onto TM2 the file is destroyed, (unless it is an OHW file, see below). The record occurrence sheet; filed by department is kept by SA
4. OHW files are returned to PSNI OHW.

#### Client Returns – File is currently in the Archive

1. Client file is taken from the archive.
2. Spreadsheet is updated.
3. Record occurrence sheet is completed, this file will now be scanned onto TM2 and the paper file deleted.
4. Update spreadsheet.
5. When the file is destroyed the record occurrence sheet; filed by department is kept by SA

#### NIPS Files (Original Contract)

1. NIPS files must be stored in hard copy only as per contract conditions.
2. Client files are archived.
3. Spreadsheet is updated.
4. Record occurrence sheet is completed.
5. Update spreadsheet.
6. When the file is destroyed the record occurrence sheet; filed by department is kept by SA

#### Job Register

1. Electronic record held of job register clients
2. Records reviewed in line with retention policy
3. Record updated in line with retention policy
4. Electronic record deleted
5. Record of removal updated

## Finance Papers

- The retention period for all finance papers is current financial year plus six previous financial years, with the exception of those marked with an \* below.
- A record should be kept of what is put into each storage box – see file in folder:  
*Finance/5.Admin/aaFiling & destruction of documents/Boxes in storage and contents*
- A record should be kept of what is destroyed each year – see file in folder:  
*Finance/5.Admin / aaFiling & destruction of documents /Recording the Destruction of documents*

Below is a summary of the main papers that need to be put into storage at the end of each financial year.

- 1 Sales Invoices
- 2 Receipts
- 3 Credit Notes
- 4 Purchase Invoices
- 5 Bank Statements
- 6 Cash Forecasts to DOJ
- 7 Cash Drawdowns to DOJ
- 8 RBM (Resource Budgeting) Returns to DOJ
- 9 Departmental Board Reports to DOJ
- 10 Prompt Payment Returns to DOJ
- 11 Salaries/Payroll files - PRRT
- 12 Timesheets
- 13 Chip & Pin - Statement and Receipts
- 14 Payment Runs
- 15 Management Accounts
- 16 Year End Statutory Accounts
- 17 \*Supplier BACS details - only retain **current year and 1 previous year**)
- 18 \*Supplier Reconciliation Statements - only retain **current year and 1 previous year**
- 19 Supplier Queries
- 20 SLAs (once they are no longer in use put into storage )
- 21 \*Internal Audit Reports -**retain for current year plus 10 previous years**
- 22 Any other financial papers deemed necessary by Head of Finance and Shared Services

## HR files

- The retention period for the personnel files (p files) of former members of staff, Board Members and Associates is 6 years from the date of leaving. When a member of staff, Board Member or Associate leaves, their p file is removed from the filing cabinet housing current staff/Board Member or Associates files and stored in the leavers filing cabinet in the HR Manager's office.
- The retention period for recruitment paperwork is one year from the final date of interview. On completion of recruitment campaign all recruitment papers are archived in a secure cabinet in the HR Manager's office.
- The HR Administrator maintains the retention and disposal schedule for HR records and, on authorisation from the HR Manager, records are appropriately destroyed in line with their protective marking and the retention times detailed above
- A record is kept of the records destroyed (kept in a secure cabinet in the HR Manager's office)



## Annex A - Record Occurrence Sheet

Client Name

Client Force Number

This client has now ceased treatment

Yes

No

Date intervention ceased:

\_\_\_\_\_

This file can now be scanned onto TM2

Yes

No

Please insert date of last entry on client file in the table below.

	Date of last entry in file
1	
2	
3	

### ACTION

- Scan file onto TM2
- Administrator 1 (the person who scanned on file) double checks all is scanned on.
- Services Administration Manager spot checks all is scanned on (not the same person who scanned the file on)
- Head of Department confirms they are content this procedure has been followed and performs a spot check.
- Services administrator destroys file in accordance with the protective markings.
- Relevant spreadsheet is updated

Head of Department Approval:

Sign \_\_\_\_\_ Print \_\_\_\_\_ Date \_\_\_\_\_

Services Administration Manager Approval:

Sign \_\_\_\_\_ Print \_\_\_\_\_ Date \_\_\_\_\_

**Document confirmed destroyed.**

To be signed by the person responsible for physical destroying the file.

Sign \_\_\_\_\_ Print \_\_\_\_\_ Date \_\_\_\_\_

## **Annex B - Location of files**

### **Files archived (not yet ready to be destroyed)**

#### Healthcare:

All client files for clients not in treatment are stored in the secure storerooms on the ground floor of the main PRRT building. The rooms are access controlled with only those required to have access being able to enter.

PRRT - staff OH files (where staff have received either psychology or physio services). These files are stored in the HR office in a locked filing cabinet. The door to the HR office is also kept locked when unoccupied and limited staff has access to this office.

#### Full Time Reserve:

Client files for FTR are stored in the secure room in the training building.

#### Prison Service:

All old client files are stored in the secure room in the training building (old FTR filing room).

#### Finance Files:

All files outside of the current financial and the previous financial year are archived after each year-end audit is complete. These are stored in the training building in the storeroom at the back of the IT suite.

#### HR Files

All leavers' files and recruitment files are stored in the HR Manager's office

### **Live Files:**

#### Healthcare:

All live files are stored in the Services Administration (SA) room – this related to only Psychology files until First Assessment which are then destroyed; after this point the client file is electronic.

#### Prison Service:

All client files are stored in the SA room until after FA then scanned to TM2 and files destroyed.

#### Finance Files:

Live files are stored in the finance office. This consists of current year files and previous financial year file.

#### HR Files:

Live p files are stored in the HR Manager's office. Live recruitment files are stored in the secure HR cabinet within the Finance Office.