

Retention Policy

Approved by: Alistair McDermott, CEO
Originator: Karen Johnson, Director of Business Delivery

Purpose and Context

This Policy covers all records, regardless of physical form, which are created, received and/ or maintained by ICON and its staff in the course of ICON business. All such records are ICON records and remain its property. This records are subject to this Retention Policy.

Definitions

Records: are all formats of information including documents, email, memoranda, minutes, audio-visual materials and business system data.

Policy Statement

ICON must retain certain records for operational purposes, and to demonstrate compliance with statutory or regulatory requirements. The Archives and Corporate Records Unit (ACRU) will provide advice on all aspects of record management to enable ICON to fulfil these requirements, and will identify best practice as a contribution towards general excellence in information management.

Related policies/procedures

- Policy and Procedure for Records; creation, management, storage and destruction

Procedure

1. Aim and Scope of Procedure

To set out the requirements for the management, handling, storage and destruction of Records (including opportunity and project records).

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Consultants

2. Procedure

ICON will maintain a schedule for each section listing the periods for which each type of record must be retained. These schedules are drawn up in consultation with the section taking into account any relevant compliance and operational requirements. The entire schedule is subject to the approval of the ICON’s Management Board.

Where records are identified as having a permanent historical value, they will be transferred to the Archives and Corporate Unit. The transfer of records to the ACRU must be agreed by the College Archive and Corporate Records Manger and the depositor and it must have been established prior to transfer that there is adequate storage space available. Permanent historical value if records is determined by a consideration of various factors such as their uniqueness, reliability, time span, accessibility (as regards interpretation of the records), and frequency of use (including both current and predicted research need). The records thus selected should adequately document the history and development of ICON and its various functions.

After records have been retained for the stated period, except where otherwise indicated, they should be destroyed.

Using the retention schedule:

Column (a) lists the different record types under separate headings. Sometimes you will need to refer to a different section to find the retention period for the type of record (e.g. all business units create finance records).

Column (b) states the section primarily responsible for the type of record. Where appropriate, more than one team is listed.

Column (c) indicates when a copy of the record (or on occasion the original) should be sent to the Archives and College Record Unit for permanent retention as an archive.

Column (d) states the recommended retention period for the record type. When the schedule refers to a starting point + number (e.g. current year + 7), the number refers to the number of years for which the record should be further retained.

Column (e) outlines any statutory, legal or other guidance that determines the retention period stated in column (d)

Column (f) contains additional relevant notes.

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Staff Responsibilities

Dr Alistair McDermott, Chief Executive Officer (CEO)

Ultimate responsibility for ensuring that Records are maintained for all Consultants, Clients and Staff by the policy and procedure being in place, and adhered to, and is used appropriately, with respect for confidentiality and privacy of individuals and in line with the requirements of in accordance with the applicable data protection legislation (the Data Protection Act 1998 (and any replacement laws) and, from 25 May 2018, the General Data Protection Regulations (the “GDPR”) and ICON’s Data Protection Policy, which follows College’s.

Dr Karen Johnson, Director of Business delivery

Responsible for ensuring that the content of the policy and procedure is in line with statutory requirements and professional guidance. Ensures that staff, as appropriate, are aware of the policy and procedure and how to apply it.

Staff

Responsible for compliance with the policy and procedure.

Policy Monitoring and Review

The policy will be reviewed, as a minimum every three years.

Staff training requirements

All staff to be aware of the policy and procedure and be aware of professional guidance on record keeping for staff.

Audit plan

Adherence to the stated policy will be audited through regular and on-going audit of records being handled in accordance to the retention schedule.

References

The Data Protection Act 1998 (and any replacement laws) and, from 25 May 2018, the General Data Protection Regulations (the “GDPR”) and ICON’s Data Protection Policy, which follows College’

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ICON RETENTION SCHEDULE					
Record Type	Responsible business unit/ person	Original / Copy sent to ACUR on creation for permanent retention?	Retention period	Statutory / legal compliance requirements / other guidance	Notes
(a)	(b)	(c)	(d)	(e)	(f)
Corporate Governance					
Memorandum of Agreement	Company Secretary	Y- copy	Permanent		Available on the Company's SharePoint
Board Minutes and Papers	Company Secretary	Y- copy	Permanent		Available on the Management's SharePoint
Management Minutes and Paper	Senior Management Team		Permanent		Available on the Company's SharePoint
Staff Briefings	Marketing & Communication Manager		Permanent		Available on the Company's SharePoint
Deeds (waived budget form)	Office Manager	Y - copy	Termination date + 12		
Planning					
Strategic Plan, including Mission Statement	CEO		Permanent		Available on Company website
Reports on performance to Management Team	Finance		Permanent		Available on the Company's SharePoint
Risk Register	Director of Business Delivery		Permanent	ICON risk register sent to Director of Risk every February	Available on College's Risk Management web pages
Consultancy					
Consultancy Proposals	Office Manager	Y-if original exists	Termination date + 6		Available on Company Deltek Vision
Client consultancy contracts	Office Manager	Y-if original exists	Termination date + 6		Available on Company Deltek Vision
Records documenting the delivery of consultancy projects which are undertaken:	Office Manager	Y-if original exists	Termination date + 6		Available on Company Deltek Vision
Consultancy Agreements	Office Manager	Y-if original exists	Termination date + 6		Available on Company Deltek Vision
Finance					
Annual Accounts signed copies	Finance		Permanent		
Staff pension records	HR/ Pensions		Permanent		
Processing of non-statutory deductions from salaries, deduction authorisations, tax code notices	Payroll	Current tax year + 6		Tax legislation	
Payroll Payments, salary advises , bank transfer reports	Payroll	Current tax year + 6		Tax legislation	
Purchase orders	All	Current tax year + 6		Tax legislation	retained electrically
Purchase invoices (receipt and purchase of)	Business Delivery Team	Current tax year + 6		Tax legislation	retained electrically
Sales invoices	Business Delivery Team	Current tax year + 6		Tax legislation	
Credit Notes	Business Delivery Team	Current tax year + 6		Tax legislation	
Remittance advises	Business Delivery Team	Current tax year + 6		Tax legislation	
BACS reports	Finance	Current tax year + 6		Tax legislation	
Expense claims (staff and non-staff)	Finance	Current tax year + 6		Tax legislation	
Petty cash claims / records documenting the handling of petty cash	Office Manager	Current tax year + 6		Tax legislation	
Assets/ Fixed asset register	Finance	Current tax year + 6			
Assessment of VAT liabilities	Finance	Current tax year + 6		Tax legislation	
VAT return	Finance	Current tax year + 6		Tax legislation	
Insurance Policies	Business Delivery Team	Retain until policy terminated + 6		Limitation Act	
Insurance Claims	Business Delivery Team	Retain until settlement of claim + 6		Limitation Act	

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Audit Reports					
Audit Reports	Internal Audit / KPMG	Y- copy	Completion of audit + 5	JISC recommendation	
Property Management					
Leases	CEO		Permanent - transferred to ACRU once no longer required by ICON		
Facilities Management					
Courier logs	Office Manager		Current + 1		
Postage logs	Office Manager		Current + 1		
Key issue/ return logs	Office Manager		Current + 1	GDPR	
Health and Safety					
Risk Assessments	Office Manager		Superseded + 3: safety permanent		
Reporting and investigations of accidents and dangerous occurrences	Office Manager		Closure of investigation + 40	Limitation Act 1980 + case law	
Accident book/ records/ reports	Office Manager		Retain from date of last entry + 3	H&S at Work Act 1974 Reporting of Injuries, Diseases and Dangerous Occurrences regulations 1995	Details put inputted onto Safety database
Health and Safety agenda, minutes and papers	Office Manager / Company Secretary		Permanent		
Human Resources					
HR Regulations, Policies and Codes of Practices	HR		Retain while current, then destroy		Available on Company SharePoint
			Retain while current, then transfer to		Available on Company SharePoint
Restructuring Documents	HR		ACRU when no longer required		
Appraisal forms (PRDP)	All Teams		Transfer to HR to be incorporated into HR staff file	GDPR; Equality Act 2010; Equal pay Act 1984 Equal Pay Act 1984	
Staff disciplinary / grievance case files	HR		HR: Closure of case + 7 (incorporated into the staff HR file)	Limitation Act 1980 GDPR	
Job evaluation criteria and grading schemes	HR		Permanent - added to staff file		
Job descriptions	HR		Permanent		
Individual staff files	HR		HR: Permanent - transfer to ARCU storage on termination of employment/ retirement (leavers file)	Limitation Act 1980 GDPR	
Building society / mortgage references	HR		Incorporate into HR staff file		
Recruitment documentation including authorisation to recruit, adverts, short listing notes etc.	HR		EEA nationals: current + 1 year Non EEA retain for duration of employment		

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Job Application Forms	HR		Successful candidates: retain form in HR staff file Unsuccessful candidates where non EEA national employed: Duration of successful candidate's employment Unsuccessful candidates where a EEA national is employed: 1 year then destroy		
Statutory maternity pay records	HR		Current tax year + 3	Statutory Maternity Pay Regulations 1986	
Records documenting the employees absence due to sickness	HR		Termination of employment + 40	IR CA 30	
Medical / self certificates unrelated to industrial injuries	HR		Retained during employment	Management of Health and Safety at Work regulations	
Records documenting the administration of payments made under the Statutory Sick Pay Scheme	HR		Current tax year + 3	Statutory Sick Pay (General) Regulations 1982 SI 1982/894 Regulation 13	
Records of parental leave taken	HR		Incorporate into HR staff file		
Redundancy details, calculation of payments, refunds, notification to the Secretary of State	HR		Permanent - added to staff file	Limitation Act 1980	
Exit questionnaire reports	HR		Current + 5 Years		
Communications to staff from HR	HR		Current + 5 Years		
Occupational Health					
Occupational Health clearance forms	HR		Current + 2 Years		
Health records where termination of employment is connected to health	HR		End of Employment + 50	Limitation period for personal injury claims	
Communications					
Induction materials	HR		Permanent		
Branding guidelines	Marketing		Until superseded		
Homepage	Marketing		Until superseded		
Records documenting the organisational events	Marketing		Completion + 1 Year		
Information Systems					
Information system Policies and Code of Practice	ICT		Permanent		
Specification and functional requirements for IT hardware, software and networks	ICT		Permanent		
Records of testing and operation of hardware, software	ICT		Permanent		
Backup schedules	ICT		Retain while current + 1		
Backup schedules	Deltek Vision		Retain while current		
Archiving Schedules	ICT		Permanent		
Design, development and implementation of IT systems	Business Delivery		Retain while current		

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