

## Disposal and Retention Schedule

The Office of the Police Ombudsman for Northern Ireland provides an independent impartial police complaints system for the people and the police of Northern Ireland.

The Police Ombudsman for Northern Ireland was established under the Police (Northern Ireland) Act 1998 and opened on 6<sup>th</sup> November 2000. The Office is an executive Non Departmental Public Body (NDPB) of the Department of Justice (DOJ). It is not governed by a Board, but is headed by a Police Ombudsman as a Corporation Sole who is appointed by Royal Warrant and normally serves for a period of seven years.

The Office of the Police Ombudsman is constituted and operates independently of the Department of Justice, the Northern Ireland Policing Board (NIPB) and the Police Service of Northern Ireland (PSNI).

The Office is accountable to the Northern Ireland Assembly and is required to have regard to any guidance given by the DOJ.

### **Records management in the Police Ombudsman's Office**

The Office of the Police Ombudsman for Northern Ireland recognises information as a corporate asset and is committed to implementing a programme of Records Management which oversees the management of all business records. It considers Records Management as making a vital contribution to an effective and efficient organisation.

A vital part of this programme is the development and implementation of a Disposal and Retention Schedule.

This Schedule is a statement of the retention and disposal arrangement for records held by the Police Ombudsman's Office. Having a Schedule means that the organisation complies with public records legislation, follows good Data Protection practice and has systems in place to keep track of the information it holds.

Records are defined as recorded information, in any form, which has been created or received and maintained by the Police Ombudsman's Office or individual members of staff in the transaction of business, and which has been kept as evidence.

This document covers all information relating to investigations (case work), as well as corporate information which evidences how the Office has arrived at its decisions. The Office keeps both paper and electronic records. In the case of its investigative work it also keeps exhibits. The disposal or retention periods in this document apply to records held in all forms.

This Schedule complies with the requirements in the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R.& O.1925 No 167).

## **Definitions of Final Actions**

Following a period of retention, whether on-site or off, all records should either be destroyed or held permanently. The final column of the Schedule contains four different final actions. They are:

### Destruction by Police Ombudsman's Office:

The vast majority of records created or received by the Office will eventually be destroyed. This process will be a joint operation between the business unit and the Records Manager, and will follow detailed procedures which have been authorized by the Senior Management Team. Triggers from the Office's records management system, as well as other methods, will be used to highlight which records are due for destruction.

Records will be physically destroyed either on-site, or by the off-site storage provider, in a process which will be overseen by the Records Manager.

Records of all file destructions will be retained for audit purposes.

### Determined on Review:

For some of the Office's more significant records it is not possible to decide in advance when, or indeed if, they should be destroyed. The Office will conduct a Review with the Public Records Office of Northern Ireland (PRONI) at a period of around 15-20 years after closure to determine which are required for long-term historical or research purposes. If they are not required by PRONI, the records will be appraised by Ombudsman staff to determine if there is a business need to keep them.

### Retained by Police Ombudsman's Office:

These are records which are not required by the Public Records Office but which the Office has made a commitment to keep indefinitely, either because they are needed for business purposes, or they provide a historical record. If physical copies exist, they can be held either on-site or with the off-site storage provider.

### Transfer to PRONI:

These are files or records which PRONI has decided are of long-term historical research value and which will be held by them permanently. Around 20 years following case closure, the Office will work with PRONI to ensure the most appropriate ways to transfer both the paper and electronic files. Once transferred, the Office will retain full access rights to the records.

## **Roles and responsibilities**

The overall responsibility for ensuring that the organisation complies with the requirements of legislation affecting the management of records rests with the Chief Executive.

The Records Manager is responsible for implementing the Records Management Policy, providing guidance to staff on records management issues, overseeing the proper implementation of the Disposal Schedule, making recommendations to Senior Management in relation to records management issues, and liaising with the Public Record Office where appropriate.

All members of staff are responsible for documenting their actions and decisions, and for maintaining the records in accordance with the Office's agreed policies and practices.

**February 2015**

## Disposal and Retention Schedule

Work area	Description	File / record action	Retention Period	Final Action (see definitions for further explanation)
<b>Investigations</b>				
<i>Complaints Team</i>	Cases that do not go for full investigation (Informal Resolution, non-cooperation, outside remit, ill founded etc.)	Stored off-site 6 months after case closure.	3 years	Destruction by Police Ombudsman's Office
<i>Current Investigations</i>	Cases that are: not substantiated, have resulted in recommendations for minor disciplinary actions by PSNI, have not attracted significant public interest, or have no on-going business value.	Stored off-site 1 year after case closure.	7 years	Destruction by Police Ombudsman's Office
	Cases that have: on-going legal issues, are major criminal cases, have attracted significant public interest, have resulted in significant changes to policies of PSNI, PONI or Govt, or have on-going business value.	Stored off-site 1 year after case closure.	Review by PRONI after 15 - 20 years	Determined on Review.
<i>Historic Investigations</i>	Case files containing information classed as Confidential and above.	Stored on-site.	Permanent	Transferred to PRONI
	All other case files.	Stored off-site 1 year after case closure.	Permanent	Transferred to PRONI
<i>Confidential Unit (Intelligence material)</i>	Material related to cases where no action is taken against an officer, or there are recommendations for minor disciplinary actions by PSNI.	Stored on-site.	7 years	Destruction by Police Ombudsman's Office
	Material related to cases that are major criminal cases, have attracted significant public interest, or have resulted in significant changes to policy.	Stored on-site.	Review by PRONI after 20 years	Determined on Review

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
<b>Finance</b>				
<i>Management accounts</i>		Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Budgets</i>		Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Annual accounts</i>		Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Financial reporting</i>		Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Invoices</i>		Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Audit</i>	Files relating to internal audits	Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
	Files relating to external audits	Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Contractual records</i>	Procurement/tendering/ contract management - (all documents, including pre-contract phase, for successful bids)	Filed and closed at end of financial year. Off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
	Procurement/tendering/ contract management - (all documents for unsuccessful bids)	Filed and closed at end of financial year. Off-site after 2 years.	1 year	Destruction by Police Ombudsman's Office
<b>Human Resources</b>				
<i>Personnel File</i>	Includes: contract, job history, address and	Sent off-site after	Until age 100	Destruction by Police

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
	bank details, promotion documentation, leave, qualifications, references, internal job applications, building society references, security personnel files, death benefit forms and certificates, marriage certificates, maternity documents, sickness records, pension records, resignation letters.	employee leaves the Office.		Ombudsman's Office
<i>Performance records</i>	Appraisal reports/ documentation	Filed and closed at end of financial year. Sent off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Training records</i>	Documents relating to training events	Filed and closed at end of financial year. Sent off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Flexi records and Annual Leave</i>		Filed and closed at end of financial year.	2 years	Destruction by Police Ombudsman's Office
<i>Recruitment</i>	Unsuccessful applications	Filed and closed at end of financial year.	3 years	Destruction by Police Ombudsman's Office
	Security vetting records [See Addendum 1 at end of document for changes to this category of records]	Filed and closed at end of financial year. Retained on-site.	Until age 72	Destruction by Police Ombudsman's Office
<i>Medical records</i>		Filed and closed at end of financial year. Sent off-site after 2 years.	Until age 100	Destruction by Police Ombudsman's Office
<i>Remuneration and benefits/payroll</i>		Filed and closed at end of financial year. Sent off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office
<i>Sickness forms</i>		Filed and closed at end of financial year.	4 years	Destruction by Police Ombudsman's Office
<i>Employee relations</i>	Papers relating to disciplinary investigations	Filed and closed at end of investigation. Sent off-site after 2 years.	6 years	Destruction by Police Ombudsman's Office

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
<i>Equality monitoring forms</i>		Filed and closed at end of financial year.	6 years	Destruction by Police Ombudsman's Office
<b>Information and Communication</b>				
<i>Media issues</i>	Press releases – final version	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Press releases – preparation documents	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
	Special events documentation	Filed and closed at end of calendar year	6 years	Destruction by Police Ombudsman's Office
	Interviews given to media by senior staff	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
<i>Information management</i>	Information audits – final version	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Information audits – preparation documents	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
	Disposal schedules	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Documents relating to the compilation of disposal schedules	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
	Lists of records destroyed	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Lists of records transferred to PRONI	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Records relating to the transfer of records to on-site storage	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	CCTV camera footage		3 months	Destruction by Police Ombudsman's Office
	Mailing lists/contacts		When superseded	Destruction by Police Ombudsman's Office

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
	Visitors books		3 years	Destruction by Police Ombudsman's Office
<i>Requests for information</i>	Members of the public	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Other organisations	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Staff	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Data Protection Act requests	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Environmental Information Requests	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Freedom of Information Act requests	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
PQ/AQ	Records relating to management of questions tabled in parliament	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
<i>Website</i>	Website content	Formal review annually	When superseded	Destruction by Police Ombudsman's Office
<i>Internal communications</i>	Records relating to the Office Intranet	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
	Announcements, bulletins, corporate briefs	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
<i>Branding</i>	Administrative documents relating to branding	Filed and closed at end of calendar year	2 years	Destruction by Police Ombudsman's Office
<i>Marketing</i>	Publicity documents - final version	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Publicity - preparation documents	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
<i>Consultation</i>	Public consultation on minor issues	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
	Public consultation on major issues	Filed and closed at end	5 years	Destruction by Police



<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
		of calendar year		Ombudsman's Office
<b>Legal records</b>				
	Criminal cases, civil cases, IT claims, fair employment – all records	Filed and closed once case concluded.	7 years	Destruction by Police Ombudsman's Office
	Correspondence relating to above	Filed and closed once case concluded.	7 years	Destruction by Police Ombudsman's Office
<b>Corporate management</b>				
<i>Corporate planning</i>	Corporate plan/business plan - final	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Corporate plan/business plan - preparation documents	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
<i>Equality records</i>	Consultations, impact assessments	Filed and closed at end of consultation	5 years	Destruction by Police Ombudsman's Office
	Equality scheme and reports		Permanent	Retained by Police Ombudsman's Office
<i>Meetings</i>	All records relating to meetings held by sections or departments and minor working groups	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
	Senior Management – final minutes	Filed and closed at end of calendar year	Permanent	Retained by Police Ombudsman's Office
	Senior management meetings – preparation documents	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
	Working groups significantly affecting the organisations' functions – final minutes	Filed and closed at end of working group	First Review 5 years after closure	Determined on Review
	Working groups significantly affecting the organisations' functions – preparation documents	Filed and closed at end of working group	1 year	Destruction by Police Ombudsman's Office

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
<i>Policies</i>	Policies for the administrative and operational functions of the organisation – final copy		When superseded	Destruction by Police Ombudsman's Office
	Policies for admin and operational functions of the organisation – preparation documents	Filed and closed at end of calendar year	1 year	Destruction by Police Ombudsman's Office
<i>Procedures</i>	Descriptions of office procedures for each business unit.		When superseded	Destruction by Police Ombudsman's Office
<i>Gifts/hospitality register</i>		Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
<i>Risk management</i>	Risk register		When superseded	Destruction by Police Ombudsman's Office
	Documents in production of risk registers	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
<i>Business continuity</i>	Disaster planning records	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
	Current plan		When superseded	Destruction by Police Ombudsman's Office
<i>Customer complaints</i>	Maladministration cases brought by members of the public	Filed and closed at end of complaint	5 years	Destruction by Police Ombudsman's Office
<i>Project management</i>	Projects significantly affecting the organisations' functions	Filed and closed at end of project	First Review 5 years after closure	Determined on Review
	Minor projects	Filed and closed at end of project	5 years	Destruction by Police Ombudsman's Office
<i>Investigation reports</i>	Final version of all documents		Permanent	Retained by Police Ombudsman's Office
	Copies of draft reports	Filed and closed at end of calendar year	7 years	Destruction by Police Ombudsman's Office
<b>Information Technology</b>				

<b>Work area</b>	<b>Description</b>	<b>File / record action</b>	<b>Retention Period</b>	<b>Final Action</b> (see definitions for further explanation)
	User manuals, specifications, business requirements, databases	Filed and closed at end of calendar year	10 years	Destruction by Police Ombudsman's Office
	Equipment and system management	Filed and closed at end of calendar year	5 years	Destruction by Police Ombudsman's Office
	Support requests (helpdesk), user access forms, telephone call request forms etc.	Filed and closed at end of calendar year	2 years	Destruction by Police Ombudsman's Office
	PSNI Nominal Roll	Filed and closed at end of calendar year	3 years	Destruction by Police Ombudsman's Office
	Recordings of telephone calls		7 years	Destruction by the Police Ombudsman's Office
<b>Research &amp; Statistics</b>				
	Final versions of reports containing information useful for tracking and trending	Filed and closed at end of financial year	20 years	Destruction by Police Ombudsman's Office
	Other final reports	Filed and closed at end of financial year	2 years	Destruction by Police Ombudsman's Office
	Analysis material and draft reports(except KPI reports and professional standards thematic inspections)	Filed and closed at end of financial year	1 year	Destruction by Police Ombudsman's Office
	Survey forms	Filed and closed at end of financial year	2 years	Destruction by Police Ombudsman's Office
	KPI reports and professional standards thematic inspections	Filed and closed at end of financial year	Permanent	Retained by Police Ombudsman's Office
<b>Private Office</b>				
<i>Private Office correspondence</i>	All correspondence	Filed and closed at end of calendar year	Formal Review every 2 years	Determined on Review

## Addendum 1 – Amended Retention of Vetting Security Records

In June 2023, after consultation with ICO, UKSV and PRONI, Marie Anderson as Data Controller and the Senior Management Team approved the updated changes to the vetting security records. This is to ensure the Police Ombudsman Northern Ireland is in compliance with the current Data Protection Act 2018 and the General Data Protection Regulations.

The new retention period for vetting records is:

Type of file/record	Description/ Example of Record	Retention Period	Final Action
Vetting application – appointee and successful applicants that did not take up post	Copy of application form and all associated documentation, ie depending on security level: UK security vetting investigation report, subject interview report, supervisor interview report, referee interview reports, criminal justice record, Police National Computer (PNC) record, credit worthiness report, any additional correspondence between subject and vetting officer, final vetting decision	Until final decision	Destroy
Vetting Decision letter – appointee	Vetting decision letter	1 year from expiration of vetting	Destroy
Vetting application – vetting unsuccessful	Copy of application form and all associated documentation, as per 9.25 above	Until final decision appeal process exhausted	Destroy
Vetting – Annual Security Review for DV	Forms from data subject and line manager	1 year until either superseded by new form or having left our employment	Destroy

## Version History

Version	Date	Details
1	June 2013	Original version
1.1	July 2013	Added 'Nominal Roll' as a category under Information Technology.
1.2	December 2014	Telephone Calls added and Personnel Files altered. Audit information added.
2	February 2015	Version 2 agreed by SMT
2.1	June 2023	Version 2.1 - changes to the vetting records retention, in line with Data Protection Legislation - agreed by SMT