



National Adult Literacy Agency

Áisíneacht Náisiúnta Litearthachta do Aosaigh

Record Retention Policy

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1 Introduction

The purpose of this Policy is to establish standards and procedures for the management of Records within the National Adult Literacy Agency (NALA). NALA is committed to establishing and endeavouring to maintain record management practices that align with best practices and legislative requirements. NALA also aims to ensure data retention reflects the 'data minimisation' and 'storage limitation' principles as outlined under Article 5 of the General Data Protection Regulation (GDPR).

2 Scope

This Policy applies to all Records, irrespective of format, held by, under the control of, or in the possession of NALA. It applies to all staff working in all departments and locations in NALA. It applies to all aspects of record maintenance and disposal. It includes all applications used to create records including, without being limited to, e-mail, database applications, cloud storage applications and any third party websites used to store the data of NALA. All information, written and electronic (including business email), created or received by staff of NALA, preserved in the form of Records, is covered by this Policy.

The policy covers Records containing personal data, including special category data. The retention periods set out for these types of records will reflect the data minimisation' and 'storage limitation' principles as outlined under Article 5 of the General Data Protection Regulation (GDPR).

The policy also covers important company records that contain no personal data but must be retained for a certain period of time under relevant legislation or where NALA has established that there is corporate or historical value in retaining.

When identifying and classifying NALA's data, it is important to also understand where that data may be stored, particularly for duplicate copies, so that this policy may be applied to all duplicates of the information.

This policy should be read in conjunction with the Data Protection Policy that endeavours to provide assistance to NALA's staff in meeting their obligations governing the retention and destruction of Records under the applicable legislation and the GDPR.

3 Purpose

This policy aims to ensure compliance with the following principles surrounding the retention of personal data as outlined under Article 5 of the GDPR:

- **Data Minimisation:** personal data shall be 'adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed'.
- **Storage Limitation:** personal data shall be 'kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed'.

The policy also aims to ensure minimum storage periods are documented for certain records that may be required by legislation.

A procedure for managing records will also be outlined to ensure that NALA:

- Formalises the management of record destruction and archival to ensure accurate maintenance and easy retrieval.
- Disposes appropriately of records in line with retention periods set out in the Retention Schedules contained in the Appendices of this Policy.
- Maintains records to meet its business needs.
- Conforms to any legal and statutory requirements relating to record keeping.
- Demonstrates accountability

4 Record Maintenance

4.1 Retention Periods

Retention periods depend on different criteria, including compliance with EU and Irish legislation, contractual obligations and best practice. These minimum legislative periods, where they exist, along with:

- operational and/or contractual necessities, and
- corporate, historic or educational value

influence the overall retention period for a record type.

Where applicable to the Record type, the age of a record is calculated from the end of the calendar month, following the last entry on the Record. Most records are reviewed on an annual basis. Where this is the case, and a record is to be deleted or anonymised, the relevant age of the record must have already passed for a record to be deleted or anonymised.

4.2 Retention beyond Agreed Periods

Records containing personal data should not be retained for longer than the agreed periods without approval from the Governance and Compliance Officer (GCO) or Chief Executive Officer (CEO). In order to receive approval, an employee should inform the Data Manager, who in turn should inform the GCO and CEO of the reason the records are to be retained and an assessment of the associated risks must be carried out. The Data Manager will generally be the member of management responsible for the team that processes and stores the data with some documented exceptions.

Where Records containing personal data are retained beyond the time periods specified in the relevant Retention Schedule, the justification relied upon should be documented by the Data Manager and retained to minimise the compliance risk.

4.3 Destruction before Agreed Periods

Records with a minimum retention period under legislation, whether they contain personal data or not should not be destroyed before the agreed period without approval from the Governance and Compliance Officer (GCO) or Chief Executive Officer (CEO). In order to receive approval, staff should inform the Data Manager, who in turn should inform the GCO and CEO of the reason the records are to be destroyed and an assessment of the associated risks must be carried out.

Where Records are destroyed before the agreed period specified in the relevant Retention Schedule, the justification relied upon should be documented by the Data Manager and retained to minimise the legal risk.

4.4 Retention Schedule

A Retention Schedule will apply to the records listed in the Appendices and will indicate when eligible records must be destroyed, deleted or archived.

4.5 Assessing the Value of Records

In conjunction with the retention periods included in this policy, NALA employees should exercise best practice when assessing the value of records. This includes the following:

- Be conservative in judgment and avoid inordinate degrees of risk.
- Consult the GCO if you wish to retain a record that it is likely to be needed in the future, and if the potential consequences of not having it would be substantial and are foreseeable at the time.
- If you are unsure about any elements on implementing retention, contact the GCO.

4.6 Third Party Data Retention

Data Processors who process personal data on behalf of NALA must securely destroy or return to NALA all copies of the personal data received from NALA in line with NALA's retention policies and schedules. This requirement must be set out in the appropriate data processing agreements between NALA and each data processor.

4.7 Record Archival

Some personal data records may be identified as worthy or necessary of permanent or long-term preservation because they provide a consolidated account of activities within an organisation over time. For example, HR may retain personal data as a requirement to discharge employee pensions.

Where permanent or long-term preservation is a requirement NALA will implement procedures for record archiving which may include methods such as referencing, paper based or electronic archiving.

4.8 Record Disposal

The final disposal of records containing personal data, either through transfer to archives or destruction, is carried out according to the Master Retention Schedule.

4.9 Disposal Authorisation

The destruction of records must be carried out in accordance with the Retention Schedules and any destruction procedures advised by the Governance and Compliance Officer. Any destruction of documents outside of this procedure must be authorised by the Governance and Compliance Officer.

4.10 Documenting Record Dispositions

A record in the form of a register is to be maintained by NALA and will act as verifiable authorised proof of destruction, archival or anonymisation.

The register will be permanently retained and will contain:

- Detail of the NALA records destroyed, archived or anonymised.
- Provide a summary of the personal data categories and the dates (such as: to/from) covered by the records.
- Specify the storage location of each record (or file).
- Specify the date of disposal, anonymisation or archival of each record (or file).
- Identify the NALA staff member who reviewed and actioned the data.
- Outline the authorisation for disposition.

A register for each year will be created by the Governance and Compliance Officer in Staff Information area of SharePoint for update by the Data Managers. A final copy will be taken at the end of each year and stored in the General Data Protection regulation area of SharePoint.

The Destruction Register will not contain any personal data from the records.

4.11 Methods of Disposal

Where personal records are to be destroyed after the retention period has expired, they should be destroyed by:

- Paper: Shredding
- Electronic: appropriate deletion relevant to the system used
- IT Hardware: provided to the Office Manager for destruction

4.12 Exceptions

There may be some scenarios where data cannot be deleted due to a valid legal exemption bound on the data such as the data being the subject of a criminal investigation or there is litigation in course. In these scenarios, it's important to ensure that records are not deleted.

Any exceptions must be notified to the GCO.

5 Responsibility & Ownership

All records, irrespective of format, created or received by personnel, during their work on behalf of NALA, are the property of NALA and subject to its overall control and thus will be disposed of in accordance with this policy. Individual personnel do not own records but have responsibility for managing records according to this policy.

Responsibility to manage the relevant records sits with the Data Manager as outlined in the Appendices. The Data Manager will generally be the member of management responsible for the team that processes and stores the data with some documented exceptions.

6 Confidentiality

NALA employees are reminded that they are bound by the obligations of their contracts of employment not to disclose any information obtained by them while performing their duties as a member of NALA staff.

7 Record Management Procedure

The Master Retention Schedule sets out the retention periods for each classification or record. It also sets out the frequency of which the records should be reviewed for appropriate destruction, such as monthly or annually. Review periods will generally be annually with some documented exceptions.

7.1 Disposal Procedure

January/February 2023 and each January thereafter

The GCO will launch the first Data Purging Week for all NALA Staff.

1. Advance notice will be given and all staff will be asked to set aside whatever amount of time necessary to review their personal OneDrives, email accounts and paper storage arrangements (both in the office and at home).
2. The purpose of the review will be to review these locations for the following records and to destroy them:
 - Duplicated Records

- Records containing personal data that should not be stored on their OneDrives/email accounts
 - Old Records
3. Data Managers will be informed that the ongoing process (documented below) will commence in January/February 2023.
 4. The GCO will arrange in advance with the Office Manager to ensure the shredder is emptied to provide adequate space for increased shredding and to ensure that the Office Manager is aware that there may be more paper to be recycled than usual.

January/February 2023 and each February thereafter

1. GCO will send an email to all Data Managers providing a link to the latest:
 - Retention Schedules
 - Retention Policy
 - Disposal Register
2. The email will instruct the Data Managers to review the documents for any errors, updates or omissions.
3. Following the correction of any errors, updates or omissions the GCO will then instruct the Data Managers execute the review and disposal of all records in line with the frequency outlined in the Retention Schedules and Retention Policy during the forthcoming year.
4. Throughout the year or at defined intervals the Data Managers will:
 - dispose of relevant Records in line with the principles of this policy
 - check and confirm that any automated destruction has occurred as planned
 - complete the Disposal Register as they go
 - raise any queries that arise in relation to section 4.2 and 4.3
5. The Data Managers will have some flexibility in relation to when they review the relevant records that are:
 - reviewed manually; and
 - have a review frequency of Annually.

For example, a Data Manager may prefer to dedicate an appropriate period of time to review all the records they are responsible for during a period that suits their schedule, such as the

Summer period or December. However, some Data Managers may prefer to review different categories of records throughout the year at regular intervals.

Where a record has a review frequency of monthly, there is less flexibility and this must be undertaken regularly throughout the year.

Each April, August and November

1. The GCO will review the Destruction register to track progress. They will issue reminders, either general, targeted or both, depending on progress, to all the Data Managers.

Each December

1. The GCO will recommend an end of year Data Review for all NALA Staff in preparation for the Data Purging Week in January.
2. Data Managers will be asked to review their Retention Schedules one final time to ensure all records for the relevant year have been reviewed.

All relevant records must be reviewed and destroyed where necessary by December of that year.

8 Reporting on Compliance

Each year the CEO, Finance and Corporate Services Manager and the Governance and Compliance Officer will prepare a report on compliance with this policy and procedure for the previous year. This report will be submitted to the first scheduled Audit, Finance and Risk Subcommittee meeting of the year. It will then be presented the next scheduled Board meeting if agreed by the Subcommittee.

Appendix I– Retention Schedules

RECORD RETENTION SCHEDULE			
General Record Type	Default Retention Period	Final Disposition	Rationale / Basis for Retention or Destruction
Membership			
Membership Records	Permanent Retention	Retain	Companies Act 2014
HR			
Employee HR File (Hard and Soft Copy)	Termination of employment plus 7 years	Delete	Variety of legislative requirements to retain certain parts of an employee's records for certain lengths of time such as:
Exception: <ul style="list-style-type: none"> • Parental Leave Records • Force Majeure Leave Records • Paternity Leave 	Minimum retention period: <ul style="list-style-type: none"> • 12 Years • 8 Years • 8 Years 		<ul style="list-style-type: none"> • Terms of Employment (Information) Act 1994 • Industrial Relations (Amendment) Act 2015 • Employment Permits Act 2006 • Employment Equality Act 1998 • Protection of Employees (Fixed Term Work) Act 2003 • Unfair Dismissals Act 1977 • Various Leave and Benefit Acts • Safety, Health and Welfare at Work Act 2005 Termination of employment plus 7 years satisfies the majority of our legal requirements and operational needs while not being excessive. Any exceptions are noted and will be retained for the minimum period required if this period has not yet expired upon 7 years post-employment.
HR Masterfile (Annual Spreadsheet)	7 Years	<ul style="list-style-type: none"> • Retain each year's document for 7 years • After 7 years review document and reduce data(Data Reduction) (Retain employee 	<ul style="list-style-type: none"> • Corporate knowledge • Legitimate interest <ul style="list-style-type: none"> ○ former employee queries ○ Permanent maintenance and additional data required for current employees

		names, job titles, dates of service/insurable employment and a valid reference to their pension records only)(Current data needed to manage current employees will be available in the Masterfile for the present year) and Archive	
Training and Development Register	7 Years	Delete	<ul style="list-style-type: none"> • Safety, Health and Welfare at Work Act 2005 • Employment Equality Act 1998 • Unfair Dismissals Act 1977 • Employment Equality Act 1998 • Workplace Relations Act 2015
Garda Vetting Records <ul style="list-style-type: none"> • Forms and Supporting documentation • Disclosure • Vetting Register 	<ul style="list-style-type: none"> • Retain until disclosure is received • Retain until assessed • 7 Years 	Data Reduction /Delete (Delete individual employees vetting history over 7 years old if they have left NALA employment)	<ul style="list-style-type: none"> • National Vetting Bureau (Children and Vulnerable Persons) Acts 2001 to 2016
Job Descriptions	10 Years	Archive	<ul style="list-style-type: none"> • Historic Value
Industrial Relations – Negotiations and Agreements	Permanent Retention	Retain	<ul style="list-style-type: none"> • The Industrial Relations Acts 1946 to 2015 • Corporate Value
Unsolicited Job Applications	No Retention	Delete	<ul style="list-style-type: none"> • None
Recruitment Records – solicited – not shortlisted	1 Year	Delete	<ul style="list-style-type: none"> • Employment Equality Act 1998
Recruitment Records – solicited – shortlisted - unsuccessful	7 Years	Delete	<ul style="list-style-type: none"> • Employment Equality Act 1998
Recruitment Records – solicited – shortlisted - successful	Termination of employment plus 7 years (In HR File)	Delete	<ul style="list-style-type: none"> • Employment Equality Act 1998 • Align with Employee HR file
Events			

Event Registration/Attendance Details	1 Year	Delete	GDPR – Retain no longer than is necessary.
AGM Attendance	2 Years	Delete	GDPR – Retain no longer than is necessary (needed for more than 1 year until next AGM is held and minutes approved).
Event Evaluation Details	1 Year	Delete	GDPR – Retain no longer than is necessary
Learner Records			
Learn With NALA – Active Users	<ul style="list-style-type: none"> Retain while Active 5 Years after Inactivity 	Delete/Anonymise	<ul style="list-style-type: none"> In Use Necessary for QQI
Learn With NALA – Unused accounts	1 Year	Delete	GDPR – Retain for no longer than is necessary
Salesforce Learner Records – Active Users	<ul style="list-style-type: none"> Retain while Active 5 Years after Inactivity 	Delete/Anonymise	<ul style="list-style-type: none"> In Use Necessary for QQI Aligns with LWN
Monthly Worksheet – learner contact details	None	Delete	<ul style="list-style-type: none"> GDPR Process is immediate
Worksheet Competition Winners	1 Year	Delete	GDPR – Retain for no longer than is necessary
QQI/QBS Reports	5 years	Delete	<ul style="list-style-type: none"> Qualifications and Quality Assurance (Education and Training) Act 2012 Align with LWN
Tutoring Service Hours Reports	7 Years	Delete	<ul style="list-style-type: none"> Align with employee records
Communications			
Personal Public Relations Material	Permanent Retention (Unless consent in withdrawn)	Retain/Archive	<ul style="list-style-type: none"> Consent given Historical Value
Website Form Records: - Contact Us - Plain English Queries	1 Year	Delete	GDPR – Retain for no longer than is necessary
Social Media Communications with Individuals	1 Year	Delete	GDPR – Retain for no longer than is necessary
Member Communications, Newsletters, Government Submissions, Lobbying Activities, Media Releases	Permanent Retention	Retain/Archive	No personal data, historic value.
Plain English Client Records	10 Years	Delete	<ul style="list-style-type: none"> Contractual Obligation Statute of Limitations Act 1957 Historic/Educational Value
Governance and Compliance			

Data Protection Registers: <ul style="list-style-type: none"> • Subject Access Requests • Information Requests • Data Security Breaches 	5 Years	Anonymise	Data Protection Act 2018
Legal Advice	Permanent Retention	Anonymise (if necessary)	Historic Value
Lobbying Activity Register	Permanent Retention	Retain	<ul style="list-style-type: none"> • Regulation of Lobbying Act 2015 • Publicly Available • Best Practice
AGM, Board and Board Subcommittee: <ul style="list-style-type: none"> • Agenda • Official Papers • Minutes 	Permanent Retention	Archive	<ul style="list-style-type: none"> • Companies Act 2014 • CRA Guidance
Board Member Records: <ul style="list-style-type: none"> • Register of Interests • Code of Conduct Forms • Training Records 	End of Term plus 6 years	Delete	<ul style="list-style-type: none"> • Companies Act 2014 • CRA Guidance • Best Practice
Board Member Records: <ul style="list-style-type: none"> • RBO Forms 	RBO to be updated immediately following end of Board Member terms and RBO form destroyed	Delete	GDPR – Retain for no longer than is necessary
Board Member Statutory Filings (CRO/CRA)	Permanent Retention	Retain	<ul style="list-style-type: none"> • Companies Act 2014 • Charities Act 2009 •
Company Statutory Filings (CRO/CRA)	Permanent Retention	Retain	<ul style="list-style-type: none"> • Companies Act 2014 • Charities Act 2009
Administration			
Client Complaints	Closure of Complaint plus 6 Years	Delete	<ul style="list-style-type: none"> • Statute of Limitations Act 1957 • Corporate Value
Freephone/Freetext/Email Queries	Closure of Query plus 6 Years	Delete	<ul style="list-style-type: none"> • Corporate Value • Consistency with complaints
Staff Contact Details	Keep up to date Previous Lists: 1 Year	Delete	<ul style="list-style-type: none"> • GDPR Article 5.1 - keep data up to date

Organisational Development/Management			
Strategy Development – Key Records	Until strategy is replaced plus 7 Years	Delete	<ul style="list-style-type: none"> • Good Practice • CRA Guidance • Strategic documents will be retained permanently as part of Board Papers
Policy Development – Key Records (All Policy types)	Until policy is replaced plus 7 Years	Delete	<ul style="list-style-type: none"> • Good Practice • Employment Law (HR Policy) • Policy documents will be retained permanently as part of Board Papers
Procedure Development – key Records (All procedure types)	Until procedure is replaced plus 7 Years	Delete	<ul style="list-style-type: none"> • Good Practice • Consistency with Strategy and Policy
Restructuring – Records documenting the management of organisational restructuring processes	Completion of Restructure plus 7 years	Delete	<ul style="list-style-type: none"> • Good Practice • Key documents will be held as part of Board Records
Health and Safety			
Safety Statement	Until policy is replaced plus 7 Years	Delete	<ul style="list-style-type: none"> • Good Practice • Consistency with Strategy and Policy • Key documents will be held as part of Board Records
Safety Inspections/ Audits/ Consultations/ Risk Assessments	7 Years	Delete	<ul style="list-style-type: none"> • Safety, Health and Welfare at Work (General Application) Regulations 2007 – S30 • Consistency
Safety Incident Records	10 Years	Delete	<ul style="list-style-type: none"> • Safety, Health and Welfare at Work (General Application) Regulations 2007 - S226
Risk Management			
Risk Identification, Assessment and Management Records	Until replaced plus 7 years	Delete	<ul style="list-style-type: none"> • Good Practice • Consistency with Strategy and Policy • Key documents will be held as part of Board Records
Business Continuity Management Records	Until Plan/policy replaced plus 7 years	Delete	<ul style="list-style-type: none"> • Good Practice • Consistency with Strategy and Policy • Key documents will be held as part of Board Records

Quality Management Scheme accreditation	Termination of Accreditation plus 1 year	Delete	<ul style="list-style-type: none"> • Good practice
Quality Audits	7 Years	Delete	<ul style="list-style-type: none"> • Good Practice • Consistency with safety audits • Key documents will be held as part of Board Records
Finance			<ul style="list-style-type: none"> •
Various Financial Data Records: <ul style="list-style-type: none"> • Accounts payable/receivable • Payroll records • Travel/expenses/invoice claims • Cheques • Income control accounts • Debtors Ledgers • Account reconciliations • Reports and Statistics 	Current Year plus 6 Years	<ul style="list-style-type: none"> • Delete • Permanently Retain 1 copy of all reports and statistics 	<ul style="list-style-type: none"> • Various • Finance Acts 1963,1968,1992 • Taxes Consolidation Act 1997 • Statute of Limitations 1957 • Companies Act 2014 • Corporate Value
Various Financial Documents: <ul style="list-style-type: none"> • Bank, Fee, GIRO, Treasury Statements • Tax Clearance certificates • Financial Statement, Audit Reports, Annual Reports • Audit Certificates 	Current Year plus 6 Years	Delete	<ul style="list-style-type: none"> • Various • Finance Acts 1963,1968,1992 • Taxes Consolidation Act 1997 • Statute of Limitations 1957 • Companies Act 2014
<ul style="list-style-type: none"> • Fixed Asset Register • Insurance Policies • Budgets 	Permanent Retention	Retain	<ul style="list-style-type: none"> • Finance Acts 1963,1968,1992 • Good practice
Procurement Records/tenders and quotations	Current Year plus 6 Years	Delete	<ul style="list-style-type: none"> • Various • Finance Acts 1963,1968,1992 • Statute of Limitations 1957 • Companies Act 2014
Contracts/Agreements	Termination of Contract plus 6 years	Delete	<ul style="list-style-type: none"> • Statute of Limitations Act 1957
Contracts/Agreements under seal	Termination of Contract plus 12 years	Delete	<ul style="list-style-type: none"> • Statute of Limitations Act 1957
Property Title	Retain during ownership	Transfer to owner	Required
Student Development Fund			

Student Development Fund Applications	1 Year	Delete	GDPR – Retain for no longer than is necessary
Student Development Fund – Report	6 Years	Archive	No personal data, historic value.
Research			
Research Data	Completion of research plus 6 months	Anonymise	GDPR – Retain for no longer than is necessary
Research Data (Anonymised)	Permanent Retention	Retain/Archive	No personal data, historic and educational value.
Research Project Administration Records	Duration specified in a contract or 10 years from submission of Research	Delete	Contractual Obligation

Appendix II – Glossary of Terms

Term	Definition
Data Controller	A person who (either alone or with others) determines the purposes and means of the processing of personal data. A data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information on computer or in structured manual files.
Data Manager	The Data Manager will generally be the member of management responsible for the team that processes and stores the data with some documented exceptions.
Data Minimisation	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
Data Processor	A person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of his employment. If an organisation or person holds or processes personal data but does not exercise responsibility for or control over the personal data, then they are deemed to be a "data processor".
Data Subject	A data subject is an individual who is the subject of personal data which is held by a data controller or processed by a data processor.
GDPR	The EU General Data Protection Regulation (GDPR) - Regulation 2016/679 which came into effect in May 2018. It has been transposed into Law in Ireland via the Data Protection Act 2018.
Personal Data	Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller
Processing	Processing means performing any operation or set of operations on data, including: <ul style="list-style-type: none"> ▪ Obtaining, recording or keeping data; ▪ Collecting, organising, storing, altering or adapting the data; ▪ Retrieving, consulting or using the data; ▪ Disclosing the information or data by transmitting; ▪ Disseminating or otherwise making it available; ▪ Aligning, combining, blocking, erasing or destroying the data.
Sensitive Personal Data	Also referred to as Special Categories Data, is any personal data relating to a person's racial origin; political opinions or religious or other beliefs; physical or mental health; sexual life; criminal convictions or the alleged commission of an offence; trade union membership.
Storage Limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject.

Appendix III – Version Control

Version	Changes	Author	Approved by Board	Date
1.0	Original Version	Governance and Compliance Officer	Yes	7 December 2022