Records Management, Retention & Disposal Policy

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Riverside Training is committed to the efficient management of our records for the effective delivery of our services, to document our principal activities and to maintain our corporate memory. This policy will detail the procedures for the retention and disposal of information to ensure that this is carried out consistently and that we fully document any actions taken.

The benefits of effective records management are:

- Protecting our business' critical records and improving business resilience
- Ensuring our information can be found and retrieved quickly and efficiently
- Complying with legal and regulatory requirements
- Reducing risk for litigation, audit and government investigations
- Minimising storage requirements and reducing costs

The principles outlined in this policy have been developed to provide a consistent approach to managing records throughout their lifecycle and regardless of their format, and to ensure that all legal requirements for the retention and disposal of records are adhered to in accordance with the following legislation: -

- The Public Records Act 1958
- The Freedom of Information Act 2000
- The Limitation Act 1980
- The Companies Act 2006
- The Data Protection Act 1998
- The General Data Protection Regulation (GDPR) 2018

Roles and responsibilities

The leadership team are responsible for the overall maintaining of effective and efficient record keeping in line with The Companies Act 2006, to include the keeping of adequate accounting records and the management and disposal of all others records that the business creates.

Within lines of the business, day-to-day responsibilities for Information and Records Management will be delegated by the SMG to the relevant department managers/leaders.

Public requests for information must be actioned in accordance with relevant legislation.
In accordance with this policy, all staff are responsible for managing, storing appropriately and disposing of the information they create and receive as part of their normal daily business activities.
Records and information management policy.

A record can be defined as information created, received and maintained as evidence and information by an organisation, in pursuance of legal obligations or in the transaction of business.

A document can take the form of physical paper document and can also be an electronic document, inclusive of a web page, an electronic file or a spreadsheet. Whatever form the document is in, it may still be subject to legislation that will dictate the length of time that this must be retained for.
Any information created by Riverside Training must be reviewed and disposed of routinely and in accordance with business retention and disposal schedules and all records must be traceable and retrievable. Records must be stored in environmental conditions that protect them from deterioration.
Retention and disposal policy.

Information held for longer than is necessary carries additional risk and cost. Records and information should only be retained when there is a business need to do so. Under GDPR legislation, personal data must not be retained for longer than is necessary for its lawful purpose.
Company records may be held in hard copy or electronic form. If they are held electronically, they must be capable of being reproduced in hard copy, as per The Companies Act 2006. The company must take the necessary precautions against falsification of records.

Whether certain documents, such as employment contracts, need to be retained for a minimum of 6 years has to be evaluated based on their content. For example, documents should be retained for at least 6 years if they contain rights and obligations not covered by other documentation. These must only be retained in accordance with the GDPR 2018.

The default standard retention period for HMRC records is 6 years plus current, otherwise known as 6 years + 1. This is defined as 6 years after the last entry in a record followed by first review or destruction to be carried out in the additional current (+ 1) accounting year.

After the maximum retention periods have lapsed, all documents should be either securely disposed of or all references to data subjects should be rendered unreadable (please refer to retention requirements for personal data below).

Records must only be retained beyond the default HMRC retention period if their retention can be justified for statutory, regulatory, legal or security reasons or for their historic value. The disposal periods for records retained for extended duration must be included within line of business retention schedules. The maximum retention period for HMRC records identified as having historic value is defined as 20 years after the last entry in the record, with an additional one calendar year for final review and transfer or destruction.

Retention requirements for personal data

GDPR Article 5(1)(e) about storage limitation specifies that personal data shall be kept 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 it 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) of GDPR.

Personal data must be periodically reviewed in accordance with retention schedules and if it is no longer needed it should be deleted or anonymised as appropriate. Anonymised data is not subject to GDPR. Any challenges to the retention of personal data must be considered in accordance with GDPR Article 17 (Right to erasure), if the processing is for law enforcement purposes. The right to erasure does not apply where we are legally obliged to process personal data or where the processing is necessary for performing our functions.

Where Riverside Training would be required to erase personal data, but the personal data must be maintained as evidence for legal purposes or for reasons of important public interest, we must (instead of erasing the personal data) restrict its processing.

Audit trail

Riverside Training is committed to keeping an audit trail in line with legislation for any records destroyed and disposed of and will keep the relevant destruction records to help demonstrate that the relevant information is no longer at risk and the business is compliant with relevant data protection laws.

Monitoring & Review

This policy is reviewed annually

Current Review Date	July 2026
Next Review Date	July 2027

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