

| Function Description                              | Examples of Records   | Retention Action  |
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| <b>CORPORATE INFORMATION</b>                      |   |   |
| <b>Planning And Reporting</b>                     | The corporate planning and reporting activities   | Permanent – Public Record<br><br>Transfer to place of deposit after administrative use is concluded |
| <b>Statutory Returns and Reports</b>              | The process of preparing information to be passed on to Isle of Man government as part of statutory requirements <ul style="list-style-type: none"> <li>• Reports to IOM government</li> </ul>  | Transfer to place of deposit after administrative use is concluded<br>Destroy 7 years from closure  |
| <b>Statutory Reports</b>                          | <ul style="list-style-type: none"> <li>• Reports and codes of practice laid before Tynwald (Article 59 Applied GDPR; regulation 58 GDPR and LED Implementing Regulations 2018; section 58 FOIA)</li> <li>• Reports to Tynwald/ Committees (regulation 58 GDPR and LED Implementing Regulations 2018)</li> </ul> | Permanent – Public Record   |
| <b>Policy, Procedures, Strategy and Structure</b> | Activities that develop policies, procedures, strategies and structures<br>Policy, procedure, precedent, instructions <ul style="list-style-type: none"> <li>• Organisation charts</li> <li>• Records relating to policy implementation and development</li> </ul>  | Permanent – Public Record<br>Transfer to place of deposit after administrative use is concluded.    |

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| <b>Quality and Performance Management</b>   | The process of monitoring or reviewing the quality, efficiency, or performance of the Office  | Transfer to place of deposit after administrative use is concluded<br>Destroy 5 years from closure   |
| <b>Media Relations</b>  | Media publications concerning the Office  | Destroy after 3 years  |
| <b>External general complaints about the Office</b>   |   | Transfer to place of deposit after administrative use is concluded<br>Destroy 6 years after closure  |
| <b>Publications and Materials</b>   | Advice and guidance notes   | Keep copy permanently for IC reference   |
| <b>PERSONNEL ADMINISTRATION</b>   |   |  |
| <b>Whistleblowing by staff</b>  |   | Destroy 6 years after action completed (Limitation Act)  |
| <b>Generally undertaken by Office of Human Resources in conjunction with the Commissioner</b> |   |  |
| <b>Recruitment Records Notes</b>  | The selection of an individual for an established position.   | Destroy 1 year after recruitment has been finalised. (Excludes any correspondence or documents relating to successful candidate – transfer to OHR) |
| <b>Staff Monitoring</b>   | Performance, e.g. <ul style="list-style-type: none"> <li>• Probation reports</li> <li>• Performance plans</li> </ul> Process of monitoring staff leave and attendance | Destroy 5 years after action completed<br><br>Destroy 2 years after action completed   |
| <b>Employee Files</b>   | Records of formal disciplinary actions in employee file.  | Retain for review 6 years after last action  |
| <b>Grievances</b>   | Management of staff grievances. Records of formal grievances in employee file.  | Retain both paper and electronic for review 6 years after last action  |

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| <b>Termination of employment</b>         | Termination of employment as it relates to IC staff e.g. Early retirement and severance, Age retirement, Death in service, Redundancy. Records relating to individual employee files.   | Undertaken by OHR on behalf of the Commissioner   |
| <b>Staff Health and Safety</b>           | Management of health and safety as it relates to Information Commissioner' staff.   | Transfer to OHR for retention on completion   |
| <b>Personal Review/ Development</b>      | Staff annual appraisals   | Destroy 6 years after date of review  |
| <b>FINANCIAL MANAGEMENT</b>              |   |   |
| <b>Accounts &amp; Audit Reporting</b>    | <p>The process that consolidates financial transactions on an annual basis for corporate reporting purposes</p> <p>The process that supports and consolidates financial transactions on a periodic (less than annual) basis, superseding those from the previous period. Does not include journals and subsidiary ledgers and cash books, e.g.</p> <ul style="list-style-type: none"> <li>• Consolidated monthly/quarterly reports, monthly/quarterly financial statements, and working papers</li> <li>• Cashflow statements</li> <li>• Creditor listings and reports</li> </ul> <p>Balancing &amp; reconciling accounts eg Reconciliation/Account summaries</p> | <p>Undertaken by Treasury on behalf of the Commissioner</p> <p>Destroy 2 years after administrative use is concluded</p> <p>Destroy 2 years after administrative use is concluded</p> |
| <b>Financial Transactions Management</b> | <p>Management of the approvals process for purchase</p> <ul style="list-style-type: none"> <li>• Arrangements for the provision of goods and/or services</li> </ul>   | <p>Transfer to place of deposit after administrative use is concluded</p> <p>Destroy 6 years after the end of the financial year in which the records were created</p>                |

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|  | <p>Identification of the receipt, expenditure and write offs of public monies, e.g.</p> <ul style="list-style-type: none"> <li>• Allowances</li> <li>• Government Orders</li> <li>• Invoices</li> <li>• Credit card statements</li> <li>• Cash books</li> <li>• Receipts</li> <li>• Bank statements</li> <li>• Journals (annual)</li> <li>• Vouchers</li> </ul> | <p>Transfer to place of deposit after administrative use is concluded<br/> Destroy 6 years after the conclusion of the financial transaction that the record supports. This period may be reduced with the agreement of Customs and Excise and/or the Inland Revenue</p>  |
| <b>Financial Provisions Budgets and Estimates</b>  | The process of finalising annual budget   | Undertaken by Treasury on behalf of the Commissioner  |
| <b>REGULATORY ACTIVITIES</b>   |   |   |
| <b>Customer Contact</b>  | <p>Responding to requests for advice</p> <p>Potential complaints</p> <p>Providing early complaint resolution</p>  | <p>Review 1 year after folder closure then destroy</p> <p>Review 3 years after folder closure then destroy</p> <p>Review 3 years after folder closure then destroy</p>  |
| <b>Complaints made to Commissioner</b><br>under the Data Protection legislation and Unsolicited Communications Regulations | <p>Outcome to parties</p> <p>Administration documentation</p>   | <p>Permanent – Public Record<br/> Transfer to place of deposit after 2 years<br/> Transfer to PRO 6 years from closure -<br/> Preserve cases, marking as confidential and containing personal data and keep closed for 80 years (confidentiality of information – Reg 90 GDPR and LED Implementing Regulations 2018, FOIA section 64)</p> <p>Transfer to place of deposit after 2 years<br/> Destroy 6 years from closure or latest action (Limitation Act)</p> |



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| <b>Freedom of Information Act Decisions</b>                         | <p>Decision Notices</p> <p>Copies of withheld information supplied by public authorities</p> <p>Administration documentation</p>  | <p>Decision notices are published on the website<br/>Permanent – Public Record.</p> <p>Destroy, or return to public authority if requested, 6 months after issue of Decision Notice or Appeal</p> <p>Transfer to place of deposit after 2 years<br/>Destroy 6 years from closure</p> |
| <b>FOI Decision Notice Appeals to court</b>                         | <p>The handling of appeals against IC decisions under the Freedom of Information Act</p>  | <p>Permanent – Public Record</p> <p>Transfer to place of deposit after 2 years<br/>Transfer to PRO 6 years from closure (Limitations Act)</p>  |
| <b>Whistleblowing/ Protected Disclosures</b>                        | <p>Handling of protected disclosures made under the Employment Act 2006 to the Commissioner as a prescribed person pursuant to Public Interest Disclosure (Prescribed Persons) Order 2016</p> | <p>Destroy 6 years after closure (Limitation Act)</p>  |
| <b>REGISTRATION</b>   |   |  |
| <b>Administration of the register of controllers and processors</b> | <p>New registration record</p> <p>Renewal records</p> <p>Amendment records including Data protection officer/contact records</p> <p>Database register entries:</p>                            | <p>Retain for lifetime of register entry</p> <p>Retain current register entry plus previous year entry</p> <p>Destroy 2 years after date of change</p> <p>Retain for 6 years after registration expires/cancelled</p>  |
| <b>PRO requirements</b>   | <p>If any major change to the notification/registration process occurs, samples of register entries across various categories of data controller to be retained.</p>                          | <p>Permanent – Public Record<br/>Transfer to PRO</p>   |

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| <b>Other</b>  |   |   |
| <b>FOI requests made to IC</b>  | Request<br>Response to request<br><br>Compliance documentation  | Permanent – Public Record<br>Transfer to place of deposit after 2 years/last action<br>Transfer to PRO 6 years from closure<br><br>Transfer to place of deposit after 2 years<br>Destroy 6 years from closure or latest action (Limitation Act) |
| <b>Compliance with rights exercised under data protection legislation</b> | Request<br>Response to data subject<br>Compliance documentation | 6 years from last action – destroy (Limitation Act)   |

Updated: February 2021