



For the Citizens'
Rights Agreements

Independent Monitoring Authority – Personal Data Retention Schedule

Category of Personal Data	Contains Personal Data	Retention Period	Rationale for Retention Period
Complainant personal details and the details of the complaint held within the Complaints Management System	Yes	Trigger: Resolution of the complaint Maximum: 7 years	It is necessary to retain this information to enable us to establish links between complaints and highlight systemic issues. This retention period is necessary as complaints can be received over a protracted time period. Electronic records will be permanently deleted, and paper records securely destroyed at the end of the retention period.
Citizens' Panel member details, including current members, former members and unsuccessful applicants	Yes	Trigger: Date application received Maximum: 3 years	It is necessary to retain the details of current panel members to maintain contact with the individual. The details of former panel members will be retained for no more than 12 months after completion of service for accountability purposes. Unsuccessful applicant details will be retained for 12 months after completion of the recruitment process, to enable us to contact the person should further vacancies arise
Paper copies of records that have been digitised	Yes	Trigger: Creation of digital record	Retain for no more than 30 days from date scanned. This allows time to check digital copies are useable before destruction.
Audio recordings	Yes	Trigger: transcription of recording Maximum 30 days	
Job applications and interview records of unsuccessful candidates This includes unsolicited job applications and CVs	Yes	Trigger: start date of last successful candidate from a recruitment campaign Maximum: 2 years	Requirement of the Civil Service Commission recommend retaining all recruitment records for 2 years following the last appointment made from a campaign. Reserve lists run for 12 months from the date the candidate is notified of the outcome. Once deleted personal info is anonymised for statistical analysis.
Subject Access Requests (SAR) - including information compiled for the purposes of meeting the request	Yes	Trigger: Date of last action related to the SAR Maximum: 2 years	To permit requestors to make any necessary appeals. Also allows us to identify excessive and manifestly unfounded requests.
Submissions as required by ministers or policy teams, other correspondence with Private Office, Chief Executives' Offices, etc including Ministerial responses to submissions and other documents	Yes	Trigger: Date of last correspondence Maximum: 7 years	Retain to allow for appeals then destroy. Electronic records will be permanently deleted, and paper records securely destroyed.
Responses to Information requests made under: Freedom of Information Act; or Environmental Information Regulations	Yes	Trigger: Date enquiry closed Maximum: 3 years	Keep for three years from date enquiry closed (whether routine or ICO). Electronic records will be permanently deleted, and paper records securely destroyed.