

Royal Mail Group

IM05 – Records Retention Policy

Requirements for the retention and disposal of Royal Mail Group's business records in compliance with its legal and regulatory obligations

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Please contact the Group Records Manager if you have any queries about this Policy.

Group Records Manager
Royal Mail Sheffield
Pond Street
Sheffield
S98 6HR

Tel: **GRO**



1. Introduction	<p>This Records Retention Policy sets out requirements for the retention and disposal of Royal Mail Group's business records in compliance with its legal and regulatory obligations. These include its legal obligations under the Data Protection Act 1998 and Public Records Act 1958.</p>
2. Overview / Purpose	<p>The purpose of this Policy is to specify Royal Mail Group's requirements for the retention and disposal of records of information produced or held in the course of its business.</p> <p>Forming part of this Policy is a set of 'Retention Schedules', which set out detailed requirements for the retention and disposal of various records held by Royal Mail Group. Royal Mail Group will keep the Retention Schedules up-to-date to reflect any changes in law or regulation, and to meet its operational and business requirements.</p> <p>This Policy is one of a set of policies and processes which support Royal Mail Group's Information Management Policy (IM01). As well as complying with this Policy, and its related guidance, please read the Information Management Policy (IM01).</p>
3. Scope	<p>For the purposes of this Policy, Royal Mail Group includes Parcelforce Worldwide. All subsidiaries and joint ventures of Royal Mail Group Ltd, including General Logistics Systems B.V. or GmbH & Co. OHG, will have their own equivalent policies.</p> <p>This Policy applies to Royal Mail Group, partner organisations and all employees, casuals, agents, interims, agency workers, contractors and sub-contractors, collectively referred to as 'Information Users', that work with or for these entities in handling business records.</p> <p>A 'business record' is any record of information held by Royal Mail Group, irrespective of medium, format, location or content. This includes employee records, customer records, administrative records (financial & accounting, complaints handling etc.), whether paper files, electronic documents, correspondence, databases, web pages, audio and video media and e-mails.</p> <p>The Policy is effective from 25 September 2013.</p>
4. Technical / Legislative Requirements	<p>Royal Mail Group has produced this Policy as part of its compliance with management of information, as described under section 46 (records Management) of the Lord Chancellor's Code of Practice. This Policy also addresses Royal Mail Group's obligations under privacy and data protection laws, including the EU Data Protection Directive (95/46/EC) and Privacy and Electronic Communications Directive (2002/58/EC), as implemented in the UK by the Data Protection Act 1998 and Privacy and Electronic Communications (EC Directive) Regulations 2003, and other applicable local laws.</p>

5. Supporting Policies	Links to the other policies and guidance related to, or referred to in, this Policy can be found under 'Related Information' below.
6. Policy Statement	<p>All Business Units and functions must have a Retention Schedule.</p> <p>Royal Mail Group will ensure that business records are retained and disposed of in a manner that supports its business needs and complies with its legal and regulatory obligations.</p>
7. Records Retention and Disposal Requirements	<p>All Information Users are responsible for complying with the following requirements:</p> <ul style="list-style-type: none"> • Information Users must retain and dispose of business records in accordance with the Retention Schedules and the requirements set out in the Information Security Classification Policy (ISEC03). • Information Users must securely dispose of business records before their retention period has passed, and in accordance with the relevant Retention Schedule and Royal Mail Group's Records and Information Disposal and Destruction Policy (IM06), unless there is a clear, identifiable and continuing need to keep them (for example, for legal or evidential purposes). Where Business Units are holding records that have exceeded the retention review date they should seek advice from the Group Records Manager. • Records with historical value must be identified as such on the relevant retention schedule, to be either offered to or transferred to the British Postal Museum and Archive. • Information Users must transfer business records with historical value to the British Postal Museum and Archive as soon as they are no longer in active use, or at the end of the retention review period. Business Units must not transfer records without first consulting the Group Records Manager. • If any Information User becomes aware of any conflict or difference between this Policy and any legal or regulatory requirement of Royal Mail Group, they must notify the Group Records Manager without delay (their contact details are in the 'Getting Help' box on the front of this Policy). • Where there is insufficient space to store records for long periods, records that are no longer active but have not reached the retention review period, can be transferred to Royal Mail's external storage supplier. Please see the 'External Storage' link in the Related Information section of this Policy.
8. Accountability for Records Retention and Disposal	Failing to comply with this Policy could cause Royal Mail Group to breach its legal and regulatory obligations. This could cause Royal Mail Group financial loss, result in regulatory enforcement action and sanctions and damage Royal Mail Group's brand. Any breach of law or condition may also result in criminal

	<p>prosecution or civil action where Royal Mail Group and individuals could be liable.</p> <p>All Information Users are responsible for complying with this Policy including being aware of and complying with the requirements of the appropriate Records Retention Schedules when handling records.</p> <p>Business Unit Managing Directors (or equivalents) are responsible for compliance with this Policy and the Records Retention Schedules relevant to their Business Units.</p> <p>Failure to comply with this Policy could result in disciplinary action.</p>
9. Where to go for Further Information	<p>Please refer to the 'Getting Help' box on the front of this Policy if you require information in relation to this Policy. Further information can also be found on the Company Secretary's website on the intranet.</p>
10. Related Information	<p>Royal Mail Group Information Management Policy (IM01) – Royal Mail Group Policy for managing information in accordance with legal and corporate responsibilities.</p> <p>Data Protection Policy (IM02) – sets out Royal Mail Group's commitment to collect, use and protect Personal Information in accordance with its legal and corporate responsibilities.</p> <p>Records and Information Disposal and Destruction Policy (IM06) – Requirements for the secure disposal or destruction of information waste in compliance with Royal Mail Group's legal and regulatory obligations.</p> <p>Information Security Classification Policy (ISEC03) – outlines Royal Mail Group's classification scheme in relation to the confidentiality of information and information systems.</p> <p>Records and Information Intranet Page – provides further information on Royal Mail Group's Records and Information handling.</p> <p>Keeping Records Guidance – explains why keeping employee records are important to Royal Mail Group and what constitutes good record keeping.</p>
11. Ownership and Review	<p>This document is owned by Royal Mail Group's Company Secretary and is managed and maintained on his behalf by the Group Information and Privacy Team.</p> <p>This Policy will be reviewed as deemed appropriate, but not less frequently than on an annual basis.</p> <p>Most recent review date: 25 September 2013 Next review date: 25 September 2014</p>