



TRIPLE P UK LIMITED

DATA RETENTION SCHEDULE

Version No: 2

Date approved - April 2020

Date implemented - April 2020

Date reviewed – June 2022

Next review date - June 2023 or sooner should legislative change require.

Policy author - TPG Information Governance (IG) Team

Record Type	Country/Department (where none of these apply - Individuals) using records	Person with Responsibility for Data Retention and Destruction	Retention Start	Minimum Retention period	Maximum Retention period	Action at end of retention period
Corporate Governance						
Country Leads Meeting	Triple P UK Senior Management	TPUK CEO	Minutes Agreed/ Report Finalised	6 years	7 years	Review
Chief Executive Records	Triple P UK Senior Management	TPUK CEO	Creation	6 years	7 years	Review
Policies, Strategies and Operating Procedures including Business Plans, Strategic Plans, Business Continuity, Risk Management and Strategies	Triple P UK Senior Management	TPUK CEO / Head of Strategy & Public Affairs	When superseded	3 years	4 years	Review
Information created in relation to new policies, guidelines and research - created within TPUK/TPI to guide decision making re final drafts and significant supporting information.	Triple P UK Senior Management	TPUK CEO / TPUK Operations Manager	Last Action	6 years	7 years	Review

Leases, Licencing Agreements, Company formation documents, Patents / trademarks / copyright / intellectual property-	Head of Licencing &Strategic Alliances	Head of Licencing &Strategic Alliances	Termination of lease	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
Patents / trademarks / copyright / intellectual property	Head of Licencing &Strategic Alliances	Head of Licencing &Strategic Alliances	End of lifetime of patent or termination of licence/action	Lifetime of patent or 6 years from end of licence /action	Lifetime of patent or 7 years from end of licence /action	Review
Corporate Functions (Management, Operational Procedures & Budgeting and Forecasting)						
Corporate Records	Triple P UK Senior Management	TPUK Operations Manager	Creation	6 years	7 years	Review
Office Admin	Triple P UK Senior Management	TPUK Operations Manager	Last Action	Where not material - destroy on ongoing basis Where material - 3 years	Where not material - destroy on ongoing basis Where material - 4 years	Delete
Minutes and Associated Documents for Quarterly Team Meetings, TPOL BD IC Monthly Meetings, Monthly Management Meetings, Program and Practice Advisory Panel, also Meeting Activity Schedules, IC Assignment	Triple P UK Senior Management	CEO / Operations Manager	Last Action (e.g. Minutes Agreed, IC Assigned)	3 years	Electronic: 7 years. Paper: 2 years	Review
Operational Procedures - policies such as travel and meals. Sickness etc	Triple P UK Senior Management	CEO	When superseded	3 years	4 years	Review
Budgeting and Forecasting	TPUK and TPI Finance Department	TPUK CEO, TPUK Director & FINANCIAL CONTROLLER	When superseded	3 years	7 years	Review
Agencies						
Agency/Organisation – (CRM System Entry) (Engagement with significant stakeholders including government departments, health and early learning service providers and charities) Data includes lead and nominated contacts, projects, transaction records re purchase of TPOL codes, Triple P resources and Agency Training Courses	Data Entry Department	Group General Manager	Last Action (last engagement with agency)	6 years	7 years	Review

Agency/Organisation - Training Initiatives Records include Strategic Plans, Tenders & Proposals, Contract & Financial, Local Background Information, IC Documents, Presentations, Reports, Bespoke Comms	Triple P UK Staff / Contractors and TPI Dissemination & Implementation Support Team	CEO / Operations Manager with respect to records of Triple P UK and Head of Organisational Development with respect to records of TPI (Data Processor)	End of Initiative	6 years	7 years	Review
Agency/Organisation - TPOL Initiatives Records include Strategic Plans, Tenders & Proposals, Contract & Financial, Local Background Information, IC Documents, Presentations, Reports, Bespoke Comms	Triple P UK Staff / Contractors and TPI Dissemination & Implementation Support Team	CEO / Operations Manager with respect to records of Triple P UK and Head of Organisational Development with respect to records of TPI (Data Processor)	End of Initiative	6 years	7 years	Review
Agency/Organisation - PECE Initiatives Records include Strategic Plans, Tenders & Proposals, Contract & Financial, Local Background Information, IC Documents, Presentations, Reports, Bespoke Comms	Triple P UK Staff / Contractors and TPI Dissemination & Implementation Support Team	CEO / Operations Manager with respect to records of Triple P UK and Head of Organisational Development with respect to records of TPI (Data Processor)	End of Initiative	6 years	7 years	Review
Triple P Training Courses and Trainers						
Trainer Recruitment - Train the Trainer Data	TPI Training & IC Team	Head of Training	Train the Trainer event	Duration of work as Triple P Trainer + 6 years	Duration of work as Triple P Trainer + 7 years	Review
Complaints about Trainers/Courses	TPI Training & IC Team	Head of Training	See below rows re complaints			
Data Collected from Practitioners	TPI Training & IC Team	Head of Training	See below rows re practitioners			
Practitioners						
Record of practitioners Trained/Accredited to use the Positive Parenting Program (includes Names, contact information, qualifications, place of work and aspects of Triple P that they are trained/accredited in)	Data Entry Department	Group General Manager	Date of Training/Accreditation Course	70 years	71 years	Destroy
Registration Data (OE - OE website/registration forms)	TPUK Training Coordination (inc TPI)	TPUK Operations Manager	Date of Registration	1 year	2 years	Destroy
For OE course attendees - banking information	Finance	CFO	End of financial year when course occurred/paid for	6 Years	7 years	Review

Special Category Personal Data - Disclosure Form/Statement of Consent re impairment/special need	Data Entry Department	Manager of Training Coordination	Date of Training/Accreditation Course	1 year	2 years	Destroy
Special Category Personal Data - Disclosure Form/Statement of Consent re special dietary requirements	Data Entry Department	Manager of Training Coordination	Date of Training/Accreditation Course	1 year	2 years	Destroy
Record of Consent to electronic direct marketing (April 2020 onward)	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Consent Form Completed	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
Information provided by practitioners at training/accreditation (booklets)	Data Entry Department	Group General Manager	Date of Training/Accreditation Course	6 years	7 years Hard copies kept for 1 year max.	Destroy
Trainer notes regarding behaviour/performance at training/accreditation session	Data Entry Department	Manager of Training Coordination	See entry re Training Coordination (e Bundles) below			
Record of purchased materials	Order Controller	Group General Manager	Order Form Completed	Order Forms - 1 year CRM Record - 7 years	Order Forms - 2 years CRM Record - 10 years	Destroy
Legal Matters						
Documents associated with legal proceedings (prepared within TPG and by any UK solicitor/barrister providing legal service to Triple P UK/TPI)	TPUK CEO & Head of Licensing and Strategic Alliances & Support Team	Head of Licensing & Strategic Alliances & Direct Report	End of Matter/Case	10 years	11 years	Review
Legal Advice (UK solicitor/barrister providing legal services/advice)	TPUK CEO & TPI Business Services	Head of Licensing & Strategic Alliances & Direct Report	End of Matter/Case	10 years	11 years	Review
Insurance						
Policies and Renewal Documentation	Head of Licensing and Strategic Alliances & Support Team and CFO	CFO	Creation	6 years	7 Years	Review
Strategic Business Advice						
Business Advisory Services provided by various TPI personnel	TPUK CEO & TPI Business Services	TPUK CEO	Last Action	10 years	11 years	Review

Contractual Records						
Procurement Contracts - financial i.e. loans to TPUK	CFO	CFO	End of contract	15 years	16 years	Review
Procurement Contracts - e.g. procurement of legal or IT advice	TPUK CEO & TPI Business Services	Head of Licensing & Strategic Alliances & Direct Report	End of contract	6 years	7 years	Review
Tenders (successful)	Triple P UK and TPI Dissemination & Implementation Support Team	TPUK CEO	Tender unsuccessful	6 years	7 years	Review
Tenders (unsuccessful)	Triple P UK and TPI Dissemination & Implementation Support Team	TPUK CEO	Award of tender	6 years	7 years	Review
Contracts - e.g. Project Agreements and records of negotiations/amendments to contracts	TPUK CEO & TPI Business Services	Head of Licensing & Strategic Alliances & Direct Report	End of Agreement	6 years	7 years	Review
Data Processing Agreements and Data Transfer Agreements	TPUK CEO & TPI Business Services	Head of Licensing & Strategic Alliances & Direct Report	End of Agreement	6 years	7 years	Review
Human Resources (HR)						
Employment contract for Triple P UK Workers	TPI HR Department & TPI Business Services	Head of Licensing & Strategic Alliances & Direct Report	Execution of Contract	Duration of employment + 6 years	Duration of employment + 7 years	Review
Contracts regarding Triple P UK's Contractors (Contract Trainers and/or Contract Implementation Consultants)	TPI HR Department & TPI Business Services	Head of Organisational Development & Human Resources Manager	Execution of Contract	Duration of contractor services + 6 years	Duration of contractor services + 7 years	Review
Recruitment - CVs, Right to Work Documents, Enhanced DBS Checks, Psychometric Test Results, references, Recruitment decisions/records	TPI HR Department	Head of Organisational Development & Human Resources Manager	Recruitment	Where candidate is successful - duration of employment plus 2 years Where candidate isn't successful - 12 months	Where candidate is successful - duration of employment plus 3 years Where candidate isn't successful - 2 years	Review
Recruitment - Right to Work Documents	TPI HR Department	Head of Organisational Development & Human Resources Manager	Recruitment	Where candidate is successful - duration of employment plus 2 years Where candidate isn't successful - 12 months	Where candidate is successful - duration of employment plus 3 years Where candidate isn't successful - 2 years	Review

Enhanced DBS Checks & Associated Information (including ID documents) (may form part of recruitment process moving forward)	TPUK (Currently) TPI HR Department (if decision made to include checks in TPUK recruitment moving forward)	TPUK CEO (Currently) Head of Organisational Development & Human Resources Manager (If becomes part of recruitment process)	When Consent Given (currently) Possibly at Recruitment - in future	Currently for Triple P UK Employees - 6 months + duration of employment that check was done and any action that resulted If part of Recruitment moving Forward - [decide retention period when incorporated into recruitment process]	Currently for Triple P UK Employees - 6 months + duration of employment that check was done and any action that resulted If part of Recruitment moving Forward - [decide retention period when incorporated into recruitment process]	Review
Employee names, addresses, bank details, tax codes, employment history, employment contracts	TPI HR Department	Head of Organisational Development & Human Resources Manager	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Review
Employee/Contractor Record including employee files, personal development record, records of disciplinary action and grievances, record of performance management, records re accidents, ill health, job descriptions	TPI HR Department	Head of Organisational Development & Human Resources Manager	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Create Staff Record Summary then Review
Maternity, Paternity, Adoption and Sick Leave	TPI HR Department	Head of Organisational Development & Human Resources Manager	End of Financial Year after return from leave	3 years	4 years	Destroy
HR Operational Records including Business and Legal Advice, Investigations, Performance Management Actions	TPI HR Department	Head of Organisational Development & Human Resources Manager	Relevant Event - ie date of incident re investigations, date HR identified it required advice	Where it relates to a specific employee/contractor - duration of employment + 6 years General advice - 7 years Legal Advice - 10 years	Where it relates to a specific employee/contractor - duration of employment + 7 years General advice - 7 years Legal Advice - 11 years	Review
Employee/Contractor Record Summary	TPI HR Department	Head of Organisational Development & Human Resources Manager	DOB	100 years	101 years	Destroy
Third party emergency contact details provided by the employee/contractor	TPI HR Department	Head of Organisational Development & Human Resources Manager	End of Employment/Contractor Services	Immediate	Immediate	Destroy
Employee Training records & Contract Trainers or Contract IC Training records (of significant training)	TPI HR Department	Head of Organisational Development & Human Resources Manager	Creation/Time of Training	6 years after employee leaves/contractor agreement ends	7 years after employee leaves/contractor agreement ends	Review

Finance						
Historical Financial Records _Incorporation and Registration Files	TPI Finance Department	Financial Controller	Creation	Term of entity existence + 6 Years	Term of entity existence + 7 Years	Review
Historical Financial Records - General	TPI Finance Department	Financial Controller	Creation	6 Years	7 Years	Review
Bank and Credit Card	TPI Finance Department	Financial Controller	Creation	6 Years	7 Years	Review
Costing and Pricing Files	TPI Finance Department	Financial Controller	Creation	6 Years	7 Years	Review
Licencing and Partnerships (Financial Information and Agreements)	TPI Finance Department	Financial Controller	Creation	Term of contract existence + 6 Years	Term of contract existence + 7 Years	Review
Accounts	TPI Finance Department	Financial Controller	End of financial year	6 Years	7 years	Review
Tax Compliance	TPI Finance Department	Financial Controller	Creation	6 Years	7 Years	Review
Expenses	TPI Finance Department	Financial Controller	As incurred	6 years	7 years	Review
Final annual accounts report	TPI Finance Department	Financial Controller	Creation	6 Years	7 years	Review
Financial records of transactions	TPI Finance Department	Financial Controller	Creation	6 Years	7 years	Review
Petty Cash	TPI Finance Department	Financial Controller	Creation	2 Years	3 years	Destroy
Payroll - Salaries paid to employees	TPI Finance Department	Financial Controller	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Destroy
Payroll - Superannuation/Pension records	TPI Finance Department	Financial Controller	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Destroy
Payroll - Payslips	TPI Finance Department	Financial Controller	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Destroy
Payroll - Tax records/documentation	TPI Finance Department	Financial Controller	Start of employment	Duration of employment + 6 years	Duration of employment + 7 years	Destroy
Invoices	TPI Finance Department	Financial Controller	Creation	6 Years	7 years	Review
Purchase Orders	TPI Finance Department	Financial Controller	Creation	6 Years	7 years	Review

Information Technology (IT)						
Documents relating to IT system integral to its running and long-term use, IT Infrastructure, Information Security Measures,	TPI IT Department	TPI IT Manager	Last Action	6 years	7 years	Review
IT Back Ups	TPI IT Department	TPI IT Manager	Last Action	3 months	6 months	Destroy
Software licences	TPI IT Department	TPI IT Manager	Software Acquired	Lifetime of software	Lifetime of software + 1 year	Destroy
Audits of TPG's Security	TPI IT Department	TPI IT Manager	Audit Undertaken	6 years	7 years	Review
Records re cyber incidents	TPI IT Department	TPI IT Manager	Cyber Incident	6 years	7 years	Review
Disaster Recovery Plans	TPI IT Department	TPI IT Manager	Superseded	6 years	7 years	Destroy
Triple P Online (TPOL)						
Use by Individuals - registration data, user profile data, TPOL in-programme response data, Management System data	TPI IT Department & TPI Digital Services Department	IT Manager & Digital Manager	End of programme access period (12 months from registration for standard users. Access may be extended if required by the project or if requested by user and agreed by TPI).	1 year	2 years	De-identify
Use by individuals as part of projects - registration data, user profile data, TPOL in-programme response data, Management System data	TPI IT Department & TPI Digital Services Department	IT Manager & Digital Manager	End of programme access period (12 months from registration for standard users. Access may be extended if required by the project or if requested by user and agreed by TPI).	1 year	2 years	De-identify
Survey Responses	TPI IT Department & TPI Digital Services Department	Digital Manager & IT Manager	When survey response is provided	2 years	3 years	De-identify
Training Coordination						
Electronic Bundles	TPI Training Coordination Department TPI Data Entry Department	Manager of Training Coordination	End of accreditation event	6 years	7 years	Review

Trainer names, employee or contractor status, and sole trader or company details for contract trainers	TPI Training Coordination Department TPI Finance Department TPI HR Department	Manager of Training Coordination	Trainer leaves (whether an employee or contractor)	6 years	7 years	Review
Records of past training delivered, for Triple P UK - training held in the UK and Ireland.	TPI Training Coordination Department TPI Data Entry Department	Manager of Training Coordination	Date training/accreditation course delivered	6 years	7 years	Review
LOAs with Agencies or Agencies' Contracts/Agreements, negotiations and amendments	TPI Training Coordination Department TPI Finance Department	Manager of Training Coordination	End of Agreement/Contract	6 years	7 years	Review
Contracts with Trainers for delivering training/accreditation courses	TPI Training Coordination Department TPI Finance Department	Manager of Training Coordination	End of Agreement/Contract	6 years	7 years	Destroy
Communications, Public Relations & Publications						
Case studies and testimonials (inc client presentation and webinars)- with accompanying personal data, consent forms and potentially photos and video material	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Last Action	Lifetime of usage plus 7 years	Lifetime of usage plus 7 years	Delete
Website (Cookies)	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Creation of Cookie Consent	1 year	1 year	Destroy
Google Analytics Data Collection	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Event registration	26 months	26 months	Destroy
Hotjar website session recordings and feedback poll	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Event registration	1 year	1 year	Destroy
Consent to eDM - April 2020 Onwards	Data Entry Department	Group General Manager	Consent Form Completed	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
Subscription Preferences re eDM	Data Entry Department	Group General Manager	Subscription Preferences created	Life of organisation plus 6 years or until unsubscribe request received	Life of organisation plus 7 years or until unsubscribe request received	Review

Subscription Preferences re EDM	Data Entry Department	Group General Manager	Unsubscribe Request	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
TPOL registrations or PECE Online code registrations	TPI Communications and Public Relations Department & TPI Digital Services Department	Head of Triple P Communications (External 3rd Party Contractor)	Registration form completed	1 year	1 year	Destroy
TPUK Website contact request	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Contact Form Completed	3 months	1 year	Destroy
Triple P Provider records	TPI Communications and Public Relations Department & Data Entry Department	Group General Manager	Registration of completed training in CRM System	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
Triple P Provider records II	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Details submitted	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
PECE Webinar Registration	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Webinar Completed	1 month	1 month	Destroy
Publications	TPI Publications Department	Publications Manager	Last Action	25 years	25 years	Destroy
Public Affairs (Outsourced to 3rd Party - PLMR) Consultation responses (public facing and non-public facing), records relating to government relations with UK Government Departments, UK Political Parties, public affairs in relation to England, Scotland, Republic of Ireland, Northern Ireland and Wales	Public Affairs Department	TPUK CEO / Head of Strategy & Public Affairs	Provision or collection of information/creation of record	12 years	13 years	Review
Research						
Published papers, research conference presentations	Head of Organisational Development	Head of Organisational Development	Creation	Deleted straight away if not relevant for ongoing initiatives. Otherwise kept for 20 years.	20 years	Review
Research initiatives, evidence summaries	Head of Organisational Development	Head of Organisational Development	Creation	6 years.	20 years	Review

Research data sets	TPUK Research Projects	TPUK CEO & TPUK Operations Manager	Creation	2 years	20 years	Destroy
Suppliers						
Records of Suppliers (names, addresses, company details) & Supplier Agreements,	Triple P UK Senior Management	TPUK Operations Manager / Group General Manager	End of Supply	6 years	7 years	Review
Compliance - Data Protection						
Privacy Notices, Consent Forms (Templates)	Data Protection Officer and Data Project Team	DPO	When Superseded	6 years	7 years	Review
Records of Processing Activities, Consent (completed consent forms etc), Subject Access Requests/FOI Requests, Data Breaches, Destruction of data in line with Retention Policy etc	Data Protection Officer and Data Project Team	DPO	Creation	Life of organisation plus 6 years	Life of organisation plus 7 years	Review
Data Privacy Impact Assessments	Data Protection Officer and Data Project Team	DPO	Creation	6 years	7 years	Review
Data Breach Info including Incident Reports, Evidence, Internal communications	Data Protection Officer and Data Project Team	DPO	When suspected breach first identified	No breach or if breach isn't serious - 2 years Serious breach (ie reporting required) - 6 years after ICO closes its case re the breach	No breach or if breach isn't serious - 3 years Serious breach (ie reporting required) - 7 years after ICO closes its case re the breach	No breach or if breach isn't serious - Destroy Serious breach - Review
Data Processing Agreements and Data Transfer Agreements	See record above under "Contractual Documents"					
Information Rights Requests (e.g. Subject Access Requests and Freedom of Information Requests) - May include ID verification documents	Data Protection Officer and Data Project Team	DPO	Closure of the SAR/FOIR	2 years	3 years	If hasn't been escalated to the ICO, destroy. If it has, retain in line with complaints to the UK's ICO.

Complaints						
Complaints from Data Subjects regarding Data Protection Matters	Data Protection Officer and Data Project Team	DPO	Closure of the investigation into the complaint	2 years	3 years	If hasn't been escalated to the ICO, destroy. If it has, retain in line with complaints to the UK's ICO.
Complaints made to UK ICO (If made to any other Supervisory Authority - consider their guidance re retention periods)	Data Protection Officer and Data Project Team	DPO	Closure of the investigation into the complaint	2 years	3 years	Destroy
By Practitioners and/or Agencies about Training/Accreditation Courses or Trainers	Training and IC Team	Head of Training	Closure of the investigation into the complaint	4 years	5 years	Review
Practitioners and/or Agencies about other topics?	TPUK Senior Management, TPUK Dept Head of Training, and possibly TPI Communications and Public Relations Department	Head of Training	Closure of the investigation into the complaint	2 years	3 years	Review
By Families regarding Triple P	TPUK Senior Management, TPUK Dept Head of Training, and possibly TPI Communications and Public Relations Department	Head of Training	Closure of the investigation into the complaint	2 years	3 years	Review
By Families regarding use of their information in marketing/promotional activities	TPI Communications and Public Relations Department	Head of Triple P Communications (External 3rd Party Contractor)	Closure of the investigation into the complaint	2 years	3 years	Review
Email						
Triple P email accounts - emails with no ongoing value	Individuals	The person who has the account	creation	delete regularly as ongoing process	12 months	Destroy
Triple P email accounts - email with ongoing value	Individuals	The person who has the account	creation	save and retain/destroy in line with retention periods for records/matters they relate to		

Triple P email accounts	Individuals	The person who has the account	creation	This is controlled by the individual. The retention period for past employees is set by the Department head. Minimum is 7 Days.	Life of organisation	Destroy
-------------------------	-------------	--------------------------------	----------	---	----------------------	---------