

MOD Corporate Internet www.mod.uk

Feedback retention policy

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Version	0.5

Document Control

Revision history

Date	Author	Version	Changes
2 April 2009	CIO-InfoSvcsInternetMgr	0.1	First draft
22 April 2009	CIO-InfoSvcsInternetMgr	0.2	Retention Schedule
3 June 2009	CIO-InfoSvcsInternetMgr	0.3	Storage
19 June 2009	CIO-InfoSvcsInternetMgr	0.3	Storage
October 2011	DMC-SecOnlinePolicy	0.4	Policy ownership
January 2012	DMC-SecOnlinePolicy	0.5	Retention schedule

Distribution

Date	Name	Version
2 April 2009	MOD Internet Team	0.1
21 April 2009	CIO-Access	0.1
22 April 2009	CIO-SvcsDD	0.2
May 2009	WGG	0.2
3 June 2009	Contact Us form owners	0.3
October 2011	DBS Internet Team	0.4
October 2011	Contact Us form owners	0.4
January 2012	All form owners	0.5

Ownership

This policy is owned and developed by DMC Sec Online Engagement in accordance with overall departmental policy.

Implementation of this policy is the responsibility of the DBS Internet Team, as the service delivery partner for the MOD website www.mod.uk.

For further details, contact DMC-SecOnlinePolicy@mod.uk

Summary

Policy on the retention, storage and disposal of feedback records sent to www.mod.uk through the [Contact us](#) page.

Introduction

1. The MOD welcomes and indeed encourages feedback through the provision of email forms on its website. Depending on the nature of your enquiry, you will be required to provide some personal details, which will include at least your name and a valid email address, to ensure that a reply can be sent to you.

2. The Data Protection Act 1998 (DPA98) contains eight principles for protecting personal data. Principle 5 Schedule 1 of DPA 98 states that:

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

To comply with this principle, this Retention Policy establishes the length of time that feedback records are retained for by the MOD Corporate Internet Team.

3. This Retention Policy is based upon the 'Ministry of Defence Data Protection Guidance Note 5 (GN5): Personal information document retention periods'; it is subordinate to overall departmental guidance and is subject to change following new legislation or changes to departmental policy.

Retention Criteria

4. The period of retention for feedback records will be determined by the retention criteria which are:

Administrative need

Email correspondence has a clear lifecycle:

- creation – the website user makes the decision to contact MOD via one of the forms available on www.mod.uk
- current use – the form is received and actioned by the appropriate channel(s) in MOD
- semi-currency – the form has been actioned and a reply sent. The information is kept to ensure an audit trail in case of further correspondence from the user

- non-currency – it is now safe to presume no further action is required and the record can be deleted.

Statutory requirement

Certain types of information are required by law or good practice to be held for a specified period of time. For the purpose of this Retention Policy the following types of information are included:

- Personal Information
- Grievances, or claims
- Vexatious correspondence

Retention Schedule

5. The following retention schedule will apply:

INFORMATION CATEGORY	RETENTION PERIOD	DETAIL AND REASONS
Personal information	1 year from date of last letter	Retain correspondence for 1 year from the date of the last letter.
Letters of complaint received from members of the public	5 years after action completed.	Retain letter for 5 years after action has been completed. A record holder may retain the correspondence for a longer period if there is sufficient justification. This should be subject to annual review.
Vexatious correspondents	5 years from date of last letter	Retain the correspondent's last letter for period of 5 years. There should be a 5 year rolling programme to review the records.

6. For the purpose of this policy, emails will be treated as letters.

7. This Retention Policy becomes operative on 1 July 2009. To keep administrative overheads to a minimum, all records up to and including 30 June 2009 will be kept for 10 years to ensure that no information regarding complaints or grievances and vexatious correspondence is lost.

Storage

8. Personal information records can be kept in the following formats:

- Online
- burnt to disc if online storage raise issues, e.g. storage space required
- hard copies (printouts) of emails

It is not necessary to keep multiple sets of records, e.g. online **and** on disc or paper copies. However, if a business area decides to keep multiple sets of records, they must ensure all sets are kept up to date, as required by DPA 98.

9. Emails of complaints and vexatious correspondence will be burnt on disc or printed out.

10. Discs/printouts will be kept securely in a lockable cabinet.

11. Online records are to be kept on secure MOD systems, JSP 440: The Defence Manual of Security-compliant.

Disposal

12. At the end of the retention period the records will be assessed to determine whether changes in legislation, or outstanding claims and enquiries require an extended retention period. If the retention period remains valid the records will be appraised for any historic value in accordance with departmental policy. All records not retained as archives will be destroyed or deleted.