



**NATIONAL  
LOTTERY FUNDED**

# Archive and Retention Policy

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## Introduction

The main aim of the archive and retention policy is to enable the Big Lottery Fund to have better management of records to support the business in making decisions.

This policy is required to support the organised creation, retrieval, proper storage and preservation of BIG's essential records, and to enable identification and destruction of information where there is no continuing business, legal or historical significance. It also helps us to comply with the requirements of relevant legislation.

As a publicly funded, accountable body, BIG must maintain records of potential interest to staff, stakeholders and members of the public. Records of activities and achievements contain accumulated experience, expertise and knowledge. BIG has 3 key principles that determine what information needs to be retained.

### 1. Information that needs to be kept by law

Certain pieces of legislation set out types of information that should be kept and how long they should be kept for, for example, the Health and Safety at Work Act. Where there is a legal requirement to keep information by law, we must do this. There are limits as to how long information needs to be kept for legal purposes.

## 2. Information that has ongoing business value

This is information that is of value to BIG, which is needed for both day to day activities and longer term strategic planning.

## 3. Information that is of archival value

Information of historical value is that which reflects the 'what, why and how' of government and should be selected for permanent preservation at The National Archives. This will include significant policy documents, records of significant decisions, documents about notable events, persons or public issues broadly encompassing:

- the principal policies and actions of the UK central government
- the decision making process in government
- the state's interaction with its citizens and the physical environment

We need to keep some information permanently to meet this need. For other types of information, we can safely destroy it after a certain period.

Most information is scheduled to be retained for 6 or 7 years. This is because of a concept known as the liability period, and is particularly relevant where we hold a contract with either a grant holder, supplier or where we have provided a service to another organisation.

You may find that some documents aren't listed within the retention schedule. The retention schedule lists the documents that it is essential to keep in line with the three principles above. If you have a definable ongoing business need to keep some information then it will generally be acceptable to retain it for as long as you need it.

Good archives support our business by enabling us to use knowledge to make better decisions and to have records available that can help to understand how decisions were made or how we followed our processes if there is a query or challenge.

Retaining information for longer than necessary creates cost for the business. There is the actual cost of storing information that is no longer needed either in offsite archives or within our IT infrastructure, as well as the cost to the organisation of not being able to use our information resources effectively to support us in our work.

This policy applies to all records at BIG, including electronic records.

## Data protection

This policy will ensure that BIG is complying with the golden rule of the Data Protection Act which requires that we do not store material about our customers, staff or other people who could be identified that has no business use.

To comply with the principles of the Data Protection Act 1998, an organisation must:

- only keep information for as long as there is a business need

- keep records secure, whether electronic or paper
- allow a person access to information held about them, should they request it.

It follows that BIG employees must:

- destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- keep data secure while it remains in any office
- keep track of where information is stored
- continue to apply these good practices to avoid stockpiling papers in the future.

## Freedom of Information

The Freedom of Information Act 2000 does not require organisations to keep all information in case it is requested. BIG must however, be able to locate and retrieve information that we hold when it is requested. Failure to respond to a request in the allocated time can have repercussions for BIG, including action from the Information Commissioner.

BIG staff can continue to destroy records in line with our archive and retention policy. The only exception is where information has been requested by a member of the public before the scheduled destruction date.

## Who owns the records that BIG holds?

All records created by or on behalf of the Big Lottery Fund's corporate, country and regional offices and staff in the course of their duties will belong to the Big Lottery Fund. This includes any rights or copyrights in the content, except where specifically provided under copyright legislation. This also extends to records produced by the National Lottery Charities Board, New Opportunities Fund, Community Fund and Millennium Commission.

All records received on behalf of the Big Lottery Fund as part of its business will be its property, which may be disposed of or released as BIG and its officers see fit or as required by law. Originators' and owners' rights will be fully respected in accordance with legislation.

Ownership of records for BIG Fund and non lottery programmes sits with the client. The legal division can provide more advice on this.

## Specialist retention schedules for non lottery programmes

Some non lottery funding programmes require enhanced retention schedules due to the audit requirements of funders and clients.

- The **Life Skills programme** in Wales is a co-financed programme with money from the European Social Fund. The retention period for certain pieces of information on this programme exceed the standard Big Lottery Fund retention periods, and so a bespoke retention schedule can be found at Annex 1b.
- The **Building Better Opportunities programme** is also co-financed with money from the European Social Fund with extended retention periods. Additional guidance on archiving, data and document retention for this programme can be found at Annex 1c, and the specific retention periods for this programme can be found at Annex 1d.

If bespoke retention schedules are needed on other non lottery programmes then this must be built into the programme development process, and agreed with the client as part of the contractual process.

## Who is responsible for ensuring that we look after our records?

Directors and divisional heads are responsible for ensuring that depositing and disposing of archive records happens effectively within their business areas. It is their responsibility to ensure that complete and accurate records are retained in line with legislative requirements (see Annex 2) and good practice.

Facilities staff support the business to send records to archive. Country and regional offices are currently responsible for their own archiving.

Staff will create, use, manage and preserve the records in accordance with all statutory requirements including the Freedom of Information Act 2000.

Responsibility for records created by or for board members lies with the board secretariat. Merged or changed regions, disbanded departments or completed projects rests with the directors/divisional heads of adjacent or successor regions.

The cost of storage and retrieval is significant and many business records have little value beyond accountability purposes. However, directors/divisional heads may choose to retain records for longer than the indicative periods given in the retention schedule, for example if they consider records to be of significant historical value or if the issue with which they are concerned remains 'live'.

## Disposal of records

BIG cannot retain all corporate data indefinitely. This is due to the financial cost of data storage, the need for well structured records to aid information retrieval and legal challenges in retaining personal data about our customers for longer than there is a clear need to do so.

At the end of their useful life, records should be confidentially destroyed. This can be done through our off site archiving provider. In general, records will not be retained beyond the lifespan indicated in the retention schedule unless the director/head of unit of the originating department indicates otherwise. The

retention period is computed from the end of the financial year to which the records relate.

In relation to lottery grant files, the retention period is calculated from the date that the end of grant report is completed.

Our off site archive providers cannot destroy our records without authorisation from BIG. It is the responsibility of the department that owns the records to order the destruction of the records.

## Specialist Deed Storage

All of the off-site storage used by the Fund complies with appropriate industry standards on archiving. A small amount of space is available in a specialist deed storage section to store deeds and other legal documentation. If access to this specific storage then please contact [foi@biglotteryfund.org.uk](mailto:foi@biglotteryfund.org.uk).

## Annex 1a – Standard Big Lottery Fund Retention Schedule

This guidance sets out what information we need to keep.

This retention schedule is to be used for all lottery funded programmes and internal documentation and electronic records. Some non-lottery programmes require longer retention periods due to audit requirements by funders.

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[Policy and Communications](#)

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File	Retention period (source)	Additional information
<b>1. Grant making</b>		
Electronic record of <ul style="list-style-type: none"> <li>• Name of organisation</li> <li>• Location of organisation</li> <li>• Location of project</li> <li>• Size of grant</li> <li>• Length of grant</li> <li>• Date awarded</li> <li>• Date completed</li> <li>• Summary of grant</li> </ul>	Indefinite. This information needs to be preserved permanently in an accessible format  (These are records of significant decisions which have ongoing historic value.)	This information will need to be transferred to a successor body or The National Archives in the event that Big Lottery Fund ceased to exist.

File	Retention period (source)	Additional information
<ul style="list-style-type: none"> <li>• Any classifiers to identify beneficiary groups</li> <li>• Any information on the outcomes achieved by the grant</li> </ul>		
Successful grant file with substantial historical significance	Permanent preservation with the National Archives (Public Records Act)	This would be a substantial grant of national significance, such as the Millennium Dome. Advice can be obtained from The National Archives
Hard copy of grant agreement	7 years from end of grant (Liability period)	The signed copy of the grant agreement must be kept in its paper form
All other grant documentation, including correspondence with customers, forms and other associated documentation	7 years from end of grant. All information should be stored electronically on FMS for applications received post launch  If the grant has assets, the details of these assets should be removed from the file and held for the asset liability period.  (Liability period)	If a full scanned copy of a grant file that predates FMS launch is scanned into FMS, the remaining paper file can be destroyed with the exception of the signed grant agreement
Unsuccessful application file / Outline Proposal Forms	2 years from decision (Best practice)	Records for applications received after FMS launch should be solely electronic.

File	Retention period (source)	Additional information
6. Unsuccessful application file/ Outline proposal for an organisation has been rejected on risk grounds	7 years from decision (Best practice)	
Non Lottery Grant files	Retention periods as above, but agreement may be needed from the client before destruction. Alternatively files can be transferred back to the client once the programme has closed.	
<b>2. Audit</b>		
Final Reports Fraud Investigations	7 years after legal proceedings (Best practice)	
Other Audit reports and documents	6 years from completion (Best practice)	
<b>3. Business Information</b>		
Strategic Plan, Business Plan, Risks etc	6 years from completion (Best practice)	
<b>4. Board</b>		
Board minutes and papers	Permanent preservation with National Archives	Review after 5 years for archival value
Other Board documents and details of appointments	6 years from creation (Best practice)	
All committee papers, minutes, agendas and appointments	6 years from creation (Best practice)	Consultation with The National Archives required before destruction.
<b>5. Finance</b>		

File	Retention period (source)	Additional information
Insurance - public liability policies, product liability policies, employers liability policies	Life of the organisation (Best practice)	
Group health policies, group personal accident policies	12 years after cessation of benefit (The Limitation Act 1980)	
Correspondence with Inland Revenue	Review every three years (Best practice)	
Internal correspondence	1 year (Best practice)	
All other financial records	6 years from creation (Tax Management Act 1970, The Limitation Act 1980, Value Added Tax Act 1994, Companies Act 1985)	
<b>6. Health and Safety</b>		
<b>7. Facilities</b>		
Property Acquisition (purchase, donation, lease, rental, transfer, etc)	Ownership of property, asset liability period	
Deeds and certificates	(Best practice)	
Personal exposure to hazardous materials by identifiable employee	40 years from incident (Best practice)	
Records of archived materials	For document retention period (Best practice)	
<b>8. HR</b>		
Job applications and interview records for unsuccessful applicants	6 months after notifying unsuccessful candidates (Sex Discrimination and Race Relations Acts)	

<b>File</b>	<b>Retention period (source)</b>	<b>Additional information</b>
Training History	2 years (Best practice)	
Current basic details (addresses etc)	Until superseded (Data Protection Act)	
Pension details	Held by the DTI or external pension provider	
All other HR documents	6 years after end of employment	
	(Employment Relations Act, Sex Discrimination Act, Race Relations Act)	
<b>9. Information Governance</b>		
Details of complaints, statistics and log	6 years from resolution (Best practice)	
Freedom of Information, Data Protection, Environmental Information Regulations. List of requests and responses	20 years with review for archive potential	This has a longer retention period as documents released under FOIA become public documents
<b>10. IT</b>		
Back up of email server	6 years (Best practice)	
Electronic Log Files Tripwire	1 Year on Server Backups retained for 6 Years (Best Practice)	Access to Logs on server restricted to IT  Security All backups are encrypted
Electronic Log Files Profile Tailor	1 Year on Server Backups retained for 6 Years (Best Practice)	Access to Logs on server restricted to IT

File	Retention period (source)	Additional information
		Security All backups are encrypted
Emails contained within archive	6 years (Best practice)	
User support	1 year (Best practice)	Emails are currently permanently archived with a company called RECALL every 4 <sup>th</sup> Friday.
Copy of website	Permanent preservation with the National Archives (The National Archives)	Copy to be made every 6 months and stored for 6 years if not requested by TNA
<b>11. Legal</b>		
Records on establishment and development of the organisation's legal framework and governance	Life of organisation (Best practice)	
Legal grant file (Legal opinion, certificate of title, deeds of dedication etc)	Asset liability period (Best practice)	Review for archival value
Litigation with third parties where legal precedents were set	Life of organisation (The Limitation Act 1980)	
Litigation with third parties with no legal precedents	6 years after settlement of case ( <i>The Limitation Act 1980</i> )	
Provision of Legal advice	6 years from date of advice (Best practice)	
Contracts under seal	12 years after termination (The Limitation Act 1980)	

<b>File</b>	<b>Retention period (source)</b>	<b>Additional information</b>
Other contracts and agreements	6 years after termination (The Limitation Act 1980)	
Unsuccessful tender documents	1 year after date of last paper (The Limitation Act 1980)	
<b>12. Policy and Communications</b>		
Details of events	3 years from creation (Best practice)	
All other documents	6 years from creation (Best practice)	
<b>13. Projects</b>		
All programmes and project team documents	6 years from completion of project	
<b>14. Telecommunications</b>		
BIG Advice Line call recordings	3 months from close of phone enquiry	

## Annex 1b – Life Skills Retention Schedule

This retention schedule has been developed for the Life Skills programme in Wales, a co-financed ESF programme. This programme has longer retention periods due to ESF audit requirements. Similar co-financed ESF programmes may need to use this schedule, but should seek advice from the legal division.

The Big Lottery Fund is responsible for maintaining adequate records to fully document all expenditure and for making them available, as required, to the Welsh European Funding Office (WEFO) and to auditors. Failure to provide supporting documentation relating to structural fund activity will result in a claw back of grant funding.

The EC requires WEFO, as Managing Authority for the Welsh Operational Programmes, and all participants in Structural Funds-related activity to retain **ALL** supporting documentation in relation to programme expenditure and audits, for a period of three years following payment of the final programme balance by the EC to the Welsh Ministers. This means **at least until 2024, but the Big Lottery Fund must retain all documents until WEFO advises otherwise.**

A full record of all grants made must be retained in line with BIG’s archive and retention policy.

File	Retention period (source)	Additional information
<b>1. Grant making</b>		
Unsuccessful tender documentation	Until 2024 as a minimum (WEFO Guidance)	
Successful compliant grant file without assets to include all records on <ul style="list-style-type: none"> <li>• project activity and beneficiaries</li> <li>• all correspondence</li> <li>• all applications and payment forms</li> </ul>	Until 2024 as a minimum Non-compliant files under dispute or investigations should be retained. (WEFO Guidance)	
Successful compliant grant file with assets	As above for main file (WEFO Guidance/Best practice)	Details of assets to be removed from file and stored separately for the asset liability period

File	Retention period (source)	Additional information
Successful grant file with historical significance	Permanent preservation with the National Archives  (Best practice)	
Details of support and aftercare offered to projects	Until 2024 as a minimum ( <i>WEFO Guidance</i> )	
Full details on each tendering exercise to include <ul style="list-style-type: none"> <li>• bidding process,</li> <li>• selection criteria,</li> <li>• justification for the appointment of the successful contractor and sector to which successful contractor relates,</li> <li>• exchanges of correspondence offering and accepting contracts,</li> <li>• tender report,</li> <li>• details of tenderers,</li> <li>• sources of match funding as a result of a procurement exercise;</li> </ul>	Until 2024 as a minimum  (WEFO Guidance)	
<b>2. HR</b>		
Staff time sheets	Until 2024 as a minimum  (WEFO Guidance)	
Salary details for staff working on the programme	Until 2024 as a minimum  (WEFO Guidance)	
<b>3. Finance</b>		
All financial records to include <ul style="list-style-type: none"> <li>• receipted invoices,</li> </ul>	Until 2024 as a minimum  (WEFO Guidance)	

File	Retention period (source)	Additional information
<ul style="list-style-type: none"> <li>• payments,</li> <li>• bank statements,</li> <li>• credit card statements,</li> <li>• evidence of match funding</li> <li>• other supporting accounting documentation to identify all incurred and defrayed expenditure claimed on a project</li> </ul>		
<b>4. Communications</b>		
<p>All documents relating to publicity of the Life Skills programme to include evidence of the activity undertaken to publicise structural fund support and comply with regulatory requirements</p> <ul style="list-style-type: none"> <li>• plaques,</li> <li>• press cuttings,</li> <li>• press releases,</li> <li>• advertisements,</li> <li>• photographs</li> <li>• marketing materials;</li> </ul>	Until 2024 as a minimum (WEFO Guidance)	
<b>5. Programme Development</b>		
All programmes and project team documents relating to Life Skills	Until 2024 as a minimum (WEFO Guidance)	
<b>6. Customer Correspondence</b>		
1. Details of complaints for the Life Skills programme	Until 2024 as a minimum (WEFO Guidance)	

File	Retention period (source)	Additional information
<b>7. Legal Service</b>		
Provision of Legal advice for Life Skills programme	Until 2024 as a minimum, or 6 years from date of advice, whichever is longer  (WEFO Guidance/ Best Practice)	
Contracts under seal for Life Skills programme	Until 2024 as a minimum, or 12 years after termination, whichever is longer  (WEFO Guidance/ The Limitation Act 1980)	
Other contracts and agreements for Life Skills programme	Until 2024 as a minimum, or 6 years after termination, whichever is longer  (WEFO Guidance/ The Limitation Act 1980)	
Unsuccessful tender documents for Life Skills programme	Until 2024 as a minimum  (WEFO Guidance)	
<b>8. Audit</b>		
Final Reports Fraud Investigations	Until 2024 as a minimum, or 7 years from legal proceedings, whichever is longer  (WEFO Guidance/ Best Practice)	
Other Audit reports and documents	Until 2024 as a minimum, or 6 years from creation, whichever is longer  (Best Practice)	
<b>9. Planning</b>		

File	Retention period (source)	Additional information
Strategic Plan, Business Plan, Risks etc relating to Life Skills programme	Until 2024 as a minimum ( <i>WEFO Guidance</i> )	
<b>10. Board</b>		
Board minutes and papers relating to Life Skills programme	Until 2024 as a minimum then review for permanent preservation with National Archives  (WEFO Guidance The National Archives)	

# Annex 1c – Guidance Big Lottery Fund Archiving, Data and Document Retention Policy for European Social Funding (Building Better Opportunities programme)

## 1.0 Introduction and Background

1.1 The Fund intends to use both electronic and paper-based methods of archiving data, documents and evidence for the European Social Funding (ESF) programme. The majority of retained information will be in the form of electronic data, although the original paper versions of legal documents will also be retained.

1.2 The methods of information retention, controls and provisions for information security outlined in this document are largely the existing practices of the Fund. The key programme-specific differences are:

- A longer retention period.
- Additional information and evidence requirements.
- Records must be kept for both ESF and match-funded / lottery-funded activity.

1.3 The Fund is aware of its obligation to retain all information in a complete and accessible format, as it may be audited at any point up to the 31<sup>st</sup> of December 2026. Failure to produce appropriate evidence and documentation when audited may result in claw back of prior claims by the Fund and grant-holders.

1.4 Whilst the Fund will retain information it has collected from grant-holders to support claims e.g. participant data, grant-holders will remain responsible for retaining full evidence of their own expenditure until the end of the retention period.

1.5 The Fund must retain all information until receiving permission from the MA for the England ESF programme - the Department of Work and Pensions - to dispose of it in a secure manner.

## 2.0 General Archiving and Retention Controls

2.1 Archived information for the Fund's own internal programmes must be retained for varying periods; the Fund has several organisational-level controls to ensure that this is achieved.

2.2 Final authority for the disposal of programme-specific information rests jointly with the Head of Funding Development (application, assessment and monitoring data) and Finance Director (financial information). Disposal cannot proceed unless both are in agreement.

2.3 An intranet-based archiving policy is maintained for each programme by the Information Governance Manager as a guide to employees (the guide for ESF is attached as Annex 1d Appendix A). The Manager will not carry out a disposal unless it is in line with the archiving policy and permission is granted by the roles specified above.

### 3.0 Archiving of Paper Documents

3.1 Four types of legal documents will have their original paper versions archived:

- Memorandums of Understanding (MOU's)
- Signed Grant Agreements
- The funding agreement between the Fund and Managing Authority
- Any support contracts

3.2 These will be archived by the Fund's existing service provider and clearly marked with the appropriate retention period. It is standard practice for the Fund to retain all Grant Agreements and, until recently, paper-based grant files. Previous retrieval requests to our service provider (e.g. in the event of grant-holder disputes) have been honoured in a timely fashion.

### 4.0 Systems Utilised for Archiving of Electronic Documents

4.1 The Fund utilises three systems for the retention of electronic documents:

- **The Funding Management System (FMS)** - a SAP-based system used for the recording of all application, assessment and grant monitoring information.
- **Kypera** - an intranet-based purchase ledger system used for the recording of invoices and staff expenses.
- **Iris** - the legal team document management system.

4.2 All electronic documents are backed-up at regular intervals and copies of retained information are stored by an approved data carrier.

### 5.0 Controls for Creation, Deletion and Amendment of Electronic Documents

5.1 A key feature of the FMS is that information entered into it cannot be deleted; scanned application forms, records of assessment scoring and grant monitoring reports etc can be updated however; the system will always retain the original records. Whenever an amendment takes place, the extent of the change and the date it was made are added to a write-only audit trail.

- 5.2 The FMS will allow the uploading and attachment of a variety of standard file types to individual project records and each project has its own Unique Reference Number. The Fund will add the additional information from grant-holders required by the programme to the FMS, for inclusion in the electronic grant file.
- 5.3 In order to avoid duplicate records being entered into the FMS, each project is cross-referenced to:
- The details of organisation delivering it
  - The grant-holder's primary organisational contact
  - The grant-holder's legally responsible contact
- 5.4 New applications / correspondence are checked against these records and any potential duplication is flagged by the FMS and investigated by the Fund's Data Quality and Verification team.
- 5.5 Purchase ledger invoices (for relevant goods and services purchased by the Fund) are scanned onto the Kypera system, through which they are authorised for payment. Although the system assigns each invoice a Unique Reference Number, staff members are also required to enter the supplier's invoice number at the time of scanning. If a supplier invoice number has previously been used, a warning is triggered.
- 5.6 As with the FMS, documents cannot be deleted from Kypera. An incorrect invoice can be marked as "deleted", in order to confirm that it should not be paid however; the scanned copy of the invoice and all notes confirming the reason for deletion remain available to view.
- 5.7 Staff travel and expenses are processed in the same way; each claim is assigned a Unique Reference number and must be backed up with scanned evidence of expenditure. All Purchase Ledger costs are backed by a write-only audit trail that confirms the date of authorisation and the name of the appropriate authorising budget-holder (i.e. a manager who can confirm the activity has taken place).
- 5.8 Timesheets for part-time staff will be processed via the Kypera system; no part-time hours will be charged to the programme cost centre until they have been effectively purchased by an appropriate operational manager.
- 5.9 All legal documents, with the exception of signed grant agreements, will be stored on the Iris legal document application.
- 5.10 In the event that a grant-holding organisation ceases to exist, the Fund will require them to forward all expenditure evidence to ourselves for storage until the end of the retention period.

## **6.0 System Replacement**

- 6.1 In the event that the FMS, Kypera or Iris, is replaced by another system, the Fund will transfer retained information to the new system, at the same level of detail.

## Annex 1d Appendix A – European Social Fund Archiving Guidance

This retention schedule has been developed for the European Social Fund programme in England (Building Better Opportunities), a co-financed EU programme. This programme has longer retention periods due to ESF audit requirements. Similar co-financed ESF programmes may need to use this schedule, but should seek advice from the legal division.

The Big Lottery Fund is responsible for maintaining adequate records to fully document all expenditure for both ESF and match-funded activity. These records must be readily available and accessible in order to be provided, as required, to the Managing Authority (MA) and to the relevant auditors for audit and verification activity.

As MA for the European Social Fund, the Department of Work and Pensions (DWP) requires the Big Lottery Fund in its role as Opt-In Organisation to retain **ALL** supporting documentation in relation to programme expenditure and audits, for a period of specified by the MA. **This date is currently the 31<sup>st</sup> of December 2026. The MA will contact us around this date to confirm that documents can be safely disposed of.**

The table below provides a guide to each type of record that must be retained:

File	Retention Period	Additional Information
<b>Grant Making</b>		
Unsuccessful application documentation, to include: <ul style="list-style-type: none"> <li>• Applications</li> <li>• Appraisal forms</li> <li>• Scoring</li> <li>• Correspondence</li> </ul>	Until end 2026 as a minimum.	To be stored on FMS.
Successful compliant grant file to include all records on: <ul style="list-style-type: none"> <li>• Applications</li> <li>• Appraisal forms</li> <li>• Scoring</li> <li>• Correspondence</li> <li>• Project activity and beneficiary data</li> <li>• All correspondence</li> </ul>	Until end 2026 as a minimum.	To be stored on FMS.  Programme rules do not allow the purchase of capital assets value in excess of £1,000, so no asset monitoring will be required.

File	Retention Period	Additional Information
<ul style="list-style-type: none"> <li>• All application and payment forms</li> <li>• All documentation required to ensure a complete audit trail of project expenditure.</li> <li>• Other supporting accounting documentation that identifies all incurred and defrayed project expenditure</li> </ul>		
<p>Non-compliant grant files or files for grants in dispute, to include:</p> <ul style="list-style-type: none"> <li>• All records retained for successful files</li> <li>• Details of dispute / non-compliance correspondence.</li> <li>• A record of the final decision made, its rationale and any follow-up action.</li> </ul>	<p>Until end 2026 as a minimum, or five years following closure of dispute or non-compliance investigation.</p>	<p>To be stored on FMS.</p>
<p>Successful grant file with historical significance/</p>	<p>Permanent preservation in national archive, as per best practice, in addition to FMS.</p>	<p>To be stored on FMS.</p>
<p>Full details of any tendering exercise (e.g. for support contracts), whether successful or unsuccessful, including:</p> <ul style="list-style-type: none"> <li>• Bidding process</li> <li>• Selection criteria</li> <li>• Justification for the appointment</li> </ul>	<p>Until end 2026 as a minimum</p>	<p>Full details of contracts providing support to applicants and grant-holders will be stored on the new FMS.</p> <p>All documents relating to procurement (contracts for good or services in</p>

File	Retention Period	Additional Information
<p>of a successful contractor</p> <ul style="list-style-type: none"> <li>• Exchanged correspondence offering and accepting contract</li> <li>• Tender report</li> <li>• Details of organisations submitting a tender</li> </ul>		excess of £10,000) will be stored on the Iris legal system.
<b>HR</b>		
Staff timesheets	Until end 2026 as a minimum	Stored on Kypera system.
Salary details for staff working on the programme	Until end 2026 as a minimum	Automatic - HR retain payroll data for 20 yrs after payment.
<b>Finance</b>		
<p>All financial records, including:</p> <ul style="list-style-type: none"> <li>• Invoices for administration costs</li> <li>• Payments to grant-holders</li> <li>• Bank statements</li> <li>• Credit card statements</li> </ul>	Until end 2026 as a minimum	Stored on Kypera system, with the exception of grant-holder payments (FMS).
<b>Communications</b>		
All documents relating to publicity of the European Social Fund programme including evidence that the programme publicity requirements have been met:	Until end 2026 as a minimum	<p>Project-specific evidence of publicity requirement fulfilment to be stored on new FMS.</p> <p>Overarching communications and updates to be stored on</p>

File	Retention Period	Additional Information
<ul style="list-style-type: none"> <li>• Evidence that project participants (ESF and match) have been informed that the project is ESF supported</li> <li>• Plaques</li> <li>• Press cuttings</li> <li>• Press releases</li> <li>• Advertisements</li> <li>• Photographs</li> <li>• Marketing materials</li> <li>• Website updates</li> <li>• Case studies</li> </ul>		internal servers in programme folder.
<b>Funding Development</b>		
All programme and project team documents relating to European Social Funding	Until end 2026 as a minimum	Stored on internal servers in programme folder.
<b>Customer Correspondence</b>		
Details of any complaints received for the European Social Fund	Until end 2026 as a minimum	<p>The Fund's existing customer complaints procedure can be found <a href="#">here</a> on our website.</p> <p>Complaints relating to individual projects will be stored on FMS, general complaints in programme folder.</p>
<b>Legal Services</b>		
Provision of legal advice for the European Social Fund programme	Until end 2026 as a minimum or 6 years from date of advice (whichever is longer)	Stored on Iris legal system internal servers in programme folder.

<b>File</b>	<b>Retention Period</b>	<b>Additional Information</b>
Agreements and contracts for European Social Fund programme	Until end 2026 as a minimum or 6 years after termination (whichever is longer)	Stored on new FMS and in paper archive.  Additional copies will be stored on the Iris legal system.
Grant agreements for all projects	Until end 2026 as a minimum or 6 years after termination (whichever is longer)	Stored on new FMS and in paper archive.
<b>Audit</b>		
Final reports and fraud investigation documents	Until end 2026 as a minimum or 7 years from legal proceedings (whichever is longer)	Stored on new FMS.
Other audit reports and documents	Until end 2026 as a minimum or 6 years from creation (whichever is longer)	Stored on internal servers in programme folder.
<b>Planning</b>		
Strategic plan, business plan and risk assessment documents	Until end 2026 as a minimum	Stored on internal servers in programme folder.
<b>Board</b>		
Board minutes and papers relating to European Social Fund programme	Until end 2026 as a minimum then review for a permanent preservation with National Archives	Stored on internal servers in programme folder.

In the event that the Fund makes the decision to replace Kypera, the Funding Management System or the Iris legal system it will undertake a transfer of ESF programme data to the new system.

The Fund does not intend to utilise the services of sub-providers or contractors to deliver this programme however; should this change, the Fund will ensure that sub-providers and/or contractors are fully informed of the detailed evidence and retention requirements. A contingency archiving policy, to guard against the risk of such organisations ceasing to trade, would also be drawn up.

## Annex 2 – Legislation

Information should be kept by the Big Lottery Fund for as long as it is needed to carry out its business objectives and to comply with any third party obligations. When deciding the retention periods for records, consideration should be given to these third party requirements. Documents that may be of national interest must be reviewed, to assess their archival value. These records may be transferred to National Archives for permanent preservation.

<b>Governance</b>	National Lottery etc Act 1993; The National Lottery Act 1998
<b>Financial regulations</b>	The Companies Act 1995; Value Added Tax Act 1994; Taxes Management Act 1970
<b>Employment regulations</b>	Employment Relations Act 1999 Collective Redundancies and Transfer of Undertaking (Protection of,) 1999 Maternity and Parental Leave Regulations 1999
<b>Equalities and Human Resources</b>	It is unlawful to discriminate on the grounds of sex/gender, marital status, race, religion, sexual orientation or disability in line with the following legislation:  Sex Discrimination Act 1975 and 1986; Equal Pay Act 1970; Race Relations Amendment Act 2000  Disability Discrimination Act 1995; The Northern Ireland Act 1998 (S75); The Welsh Language Act 1993; Human Rights Act 1998; Employment Rights Act 1996; Equal Pay Act 1970 (amendment 1986); Employment Acts 1980 and 1982; Supported by various codes of practice
<b>Health and Safety</b>	Health and Safety at Work Act 1974 with regulations enforceable under the Act including  Control of Substance Hazardous to Health - COSHH, Workplace (Health, Safety and Welfare) regulations, Environmental Protection Act
<b>Information Commissioner</b>	Data Protection 1998; Freedom of Information Act 2000; Environmental Information Regulations 2004
<b>National Archives</b>	Public Records Act 1958
<b>Other legislation</b>	Civil Evidence Act 1995 ; The Limitation Act 1980
<b>Best Practice</b>	Retention and disposal schedules recommended by the National Archives (former Public Records Office)