



**Cheshire**  
Pension Fund

# **Data Retention Schedule for Employers**

As an employer participating in the Local Government Pension Scheme (LGPS) administered by the Cheshire Pension Fund, you are responsible for retaining specific employee data to support accurate pension administration and comply with legal obligations.

This data retention schedule outlines:

- What types of data must be retained
- How long each type of data should be kept
- Why this data is needed
- How to manage and dispose of data securely when no longer required

It ensures compliance with:

- UK GDPR and Data Protection Act 2018
- LGPS regulations and audit requirements
- The Pensions Regulator (TPR) guidance
- Limitation Act 1980
- Cheshire Pension Fund's Personal Data Retention Policy

## **Key Principles**

Retain only what is required to administer the LGPS and comply with legal duties.

Records should be secure, accurate, kept up to date, not be kept for longer than necessary and securely disposed of when retention periods expire.

Apply appropriate technical and organisational measures to protect personal data.

Ensure that payroll providers and any third-party systems retain and manage data in line with this schedule.

If you delegate your payroll to a third party, you are still responsible and should ensure you retain info when you change providers. You must always retain the numbers of years' worth of data required, which may require you to obtain an extract from an existing payroll provider ahead of any move.

Type of Record	Description/ Examples	Retention Period	Rationale
<b>Member employment &amp; service records</b>	Start/leave dates, contract details, hours worked, breaks in service, pensionable pay	20 years	Needed to establish pension entitlement and deal with queries/ appeals/complaints
<b>Contributions &amp; deductions records</b>	Employer and employee contributions, AVCs, opt-outs, refunds	15 years after end of employment	HMRC & scheme administration requirements
<b>Ill-health retirement &amp; medical evidence</b>	Occupational health reports, decisions of IRMP (Independent Registered Medical Practitioner)	7 years	Potential appeals and disputes
<b>Dispute resolution (IDRP) &amp; complaints</b>	Stage 1 and Stage 2 determinations, Ombudsman referrals	15 years after closure of case	Required under LGPS Regs & Limitation Act
<b>Employer policy decisions</b>	Discretions policies, employer statements, governance records	Life of policy + 6 years	Supports compliance and audit trails.
<b>Payroll interface &amp; contribution files</b>	Monthly data returns, year-end files submitted to Fund	7 years	HMRC requirements and audit purposes
<b>Auto-enrolment records</b>	Opt-in/opt-out notices, communications	6 years	The Pensions Regulator requirements
<b>Member communications</b>	Statements, newsletters, notices	Current year + 6 years	Audit and governance purposes
<b>Personal identification documents</b>	Proof of identity, certificates	Date of leaving + 20 years	Required for benefit verification
<b>Administering Authority correspondence</b>	Admitted body agreements, bond/ guarantor documents)	Duration of agreement + 6 years	Required for scheme governance and legal compliance.

## **Disposal**

- Paper records: shredded and disposed of as confidential waste.
- Electronic records: securely deleted in accordance with IT security protocols.
- Medical records: Special category data must be securely deleted/physically destroyed with appropriate audit trail.

## **Review Cycle**

This retention schedule should be reviewed every three years or earlier if there are:

- Changes in legislation or LGPS regulations.
- Guidance issued by The Pensions Regulator, ICO, or administering authority.