

Sensitive Document Retention Review Checklist

A practical checklist to review what sensitive documents you store, why you retain them, who can access them, and when they should be removed.

1. Identify the Document

- ☐ What type of sensitive document is this?
- ☐ Is it a driver's license, ID card, employee record, financial document, medical document, contract, or another sensitive record?
- ☐ Which department or process collects it?
- ☐ Who is responsible for managing it?

2. Confirm Why It Is Being Retained

- ☐ Is there a clear business reason for keeping this document?
- ☐ Is retention required by law, regulation, contract, audit, or internal policy?
- ☐ Is the original purpose for collecting the document still active?
- ☐ Has the retention reason been documented?

3. Know Where the Document Is Stored

- ☐ Is there one approved storage location?
- ☐ Are duplicate copies stored in email inboxes, shared folders, employee devices, or other systems?
- ☐ Can the organization quickly locate the authoritative copy?
- ☐ Are sensitive documents mixed with general business files?

4. Review Who Can Access It

- ☐ Is access limited to employees who actually need it?
- ☐ Have former employees or contractors had their access removed?
- ☐ Are external users or third parties able to access the document?
- ☐ Are role-based permissions being reviewed regularly?
- ☐ Can access activity be traced if needed?

5. Check the Retention Period

- ☐ Is there a defined retention period for this document type?
- ☐ Is the retention period based on applicable legal, regulatory, contractual, or business requirements?
- ☐ Is there a review date assigned?
- ☐ Are documents being kept simply because storage is available?

6. Plan What Happens at the End of Retention

- ☐ Is there a documented disposition process?
- ☐ Does the document require approval before disposal?
- ☐ Is the organization able to confirm when disposition occurred?
- ☐ Are legal holds, audits, or active disputes checked before disposal?
- ☐ Are duplicate or unnecessary copies included in the review?

7. Check Auditability and Accountability

- ☐ Can the organization see who viewed, changed, moved, or shared the document?
- ☐ Is there a clear owner responsible for the document category?
- ☐ Can the organization demonstrate its retention process during an audit or review?
- ☐ Is the latest approved version easy to identify?