



## Data Retention and Disposal Policy

V.1 – March 2020

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<b>Consultation Required</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Equalities Impact Assessment</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Added to Website</b>	<b>Yes</b>		<b>No</b>	<b>x</b>

<b>SSHC Reference</b>	
<b>SHR Reference</b>	

### Related Documents

- **Data Protection Policy**
- **Freedom of Information Policy**
- **Record Management Policy**
- **Access to Information Policy**

## **Translation Statement**

If you have any difficulties reading this information or need further help understanding our processes please contact us. We can make this document available in a variety of formats. All you need to do is let us know what you need and we will try to assist.

## **Compliance**

This policy has been drafted to ensure that it complies with current legislation and industry good practice.

## **Equality & Diversity**

Fyne Homes is committed to providing services which embrace diversity and which promote equality of opportunity. As an employer we are also committed to equality and diversity within our workforce. Our goal is to ensure that these commitments, reinforced by our Values, are embedded in our day-to-day working practices.

## **Openness & Confidentiality**

Fyne Homes believes that its members, tenants and other interested parties should have access to information on how it conducts itself. This means that unless information requested is considered commercially sensitive or personally confidential it will be made available on request.

## **General Data Protection Regulations**

Fyne Homes recognises that the General Data Protection Regulations are an important piece of legislation to protect the rights of individuals in respect to any personal information that we may keep about them, whether on computer or in manual systems. We will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how your data will be used and the basis for processing your data is provided in our Transparency Statements

## **1. Introduction**

- 1.1 Our corporate information, records and data are important to how we conduct business and manage employees.
- 1.2 There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.
- 1.3 This Policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.
- 1.4 Failure to comply with this Policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.
- 1.5 This Policy covers all data that we hold or have control over. This includes physical data, such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data, such as e-mails and electronic documents. It applies to both personal data and non-personal data. In this Policy, we refer to this information and these records collectively as “data”.
- 1.6 This Policy also covers data that is held by third parties on our behalf, for example, cloud storage providers or offsite data storage.

## **2 Aim**

- 2.1 Through our data retention practices, we aim to meet the following commitments:
  - 2.1.1 We comply with legal and regulatory requirements to retain data.
  - 2.1.2 We comply with our data protection obligations, in particular, to keep personal data no longer than is necessary for the purposes for which it is processed.
  - 2.1.3 We handle, store and dispose of data responsibly and securely.
  - 2.1.4 We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason.
  - 2.1.5 We allocate appropriate resources, roles and responsibilities to data retention.
  - 2.1.6 We regularly remind employees of their data retention responsibilities.
  - 2.1.7 We regularly monitor and audit compliance with this Policy and update this Policy when required.

## **3 Links to vision and strategic priorities**

This policy aims to fulfil the needs of the Association’s Strategic Priorities, in particular: Meeting the needs and aspirations of our customers and respecting our customers, staff and committee and approaching our business and activities with openness and integrity

## **4. Legal framework**

4.1 This Policy acts in accordance with

- General Data Protection Regulation
- Data Protection Act 2018

## **5 Role and responsibilities**

5.1 We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised good practices. All employees must comply with this Policy. Failure to do so may subject us to serious civil and / or criminal liability.

5.2 Our Data Protection Officer (DPO) is responsible for identifying the proper period of retention for our data and for providing guidance and training to employees in relation to this Policy. Employees are, however, responsible for handling the destruction of data whose retention period has expired.

## **6 Recommended retention periods**

6.1 Certain data is more important to us and is therefore listed in the recommended retention periods set out in Appendix 1 as being required to be retained Life of organisation. This may be because we have a legal requirement to retain it Life of organisation (so that we can produce it in the future), or because we may need it as evidence of our transactions, or because it is important to the running of our business.

6.2 Some data may be discarded or deleted once it has served its useful purpose or the period for bringing any claims against us has expired. The recommended retention periods set out in Appendix 1 specify time periods for the retention of such data. Such data must not be retained beyond this period, unless a valid and strong business reason justifies its continued retention. If employees are unsure whether to retain certain data beyond the recommended retention period, they should consult the DPO.

6.3 Data may be retained in backups for up to an additional year over and above the recommended retention periods set out in Appendix 1 as a result of our internal backup processes.

6.4 If data is not listed in the recommended retention periods set out in Appendix 1, employees should consult the DPO for guidance.

## **7 Disposal and destruction of data**

7.1 Hard copy data must be destroyed by shredding and electronic data must be deleted securely. No hard copy data should be destroyed by recycling.

7.2 Data must not be destroyed if the DPO confirms that its continued retention is relevant and necessary for the purposes of legal proceedings in which we are involved.

## **8 Consequences of failure to comply**

8.1 We take compliance with this Policy very seriously. Failure to comply with the Policy may lead to disciplinary action for an employee under our procedures, and this action may result in dismissal for gross misconduct.

8.2 Any questions or concerns about this Policy should be directed to the DPO

## **9 Reviewing process**

9.1 This policy will be reviewed in line with the respective current Fyne Homes' policies, and/or where a change in legislation arises

9.2 If there is a procedural delay in the policy revision then the relative legislation in force at the time will prevail.

<b>Version number</b>	<b>Revision Date</b>	<b>Part of doc revised</b>	<b>Reason for revision</b>	<b>Approved by</b>

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
<b>Governance</b>					
Governance	Corporate Plans, Policies, Business Continuity, Risk Management and Strategies	Superseded document	N/A	1 year after superseded (longer if required for historical reasons)	Best practice
Governance	Governance documentation, including Rules		N/A	Life of organisation	Legal compliance
Governance	Risk Register			Life of organisation	Best practice
Governance	Constitution, Aims and Objectives		Life of organisation	Life of organisation	Legal compliance
Governance	Certificate of registration with Scottish Housing Regulator		Life of organisation	Life of organisation	Legal compliance
Governance	Record of registration and certificate of change of name		Life of organisation	Life of organisation	Legal compliance
Governance	Registration documentation (Co-operative and Community Benefit Societies)		Life of organisation	Life of organisation	Legal compliance
Governance	Registration as charity with the Office of the Scottish Charity Regulator		Life of organisation	Life of organisation	Legal compliance
Governance	Confirmation of Charitable Status from HMRC		Life of organisation	Life of organisation	Legal compliance
Governance	Internal audit correspondence, terms of reference, related papers and reports	After audit	N/A	5 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Governance	Committee member documents – apt letters, etc.	Membership ceases	6 years after board membership ceases though some details should be destroyed when membership ceases e.g. bank details etc.	6 years	Legal compliance
<b>Data Governance</b>					
Data Governance	Emails	No longer active	receipt of email	Archived after 6 months Destroyed after 2 years	Best practice
Data Governance	CCTV	Date of recording	Minimum time necessary	30 days	Best practice
Data Governance	Call Recordings	Date of recording	Minimum time necessary	12 months	Best practice
Data Governance	Data Subject Access Request files	Data sent	N/A	6 years	Best practice
Data Governance	Films / Videos	Date of recording	Minimum time necessary	3 years	Best practice
Data Governance	Data Breach Records	Date of recording	N/A	6 years	Best practice
Data Governance	Fraud Records	Date of recording	6 years	6 years	Best practice
Data Governance	Data Subject Access Requests /EIR Request Register	Data sent	N/A	6 years from date of register entry	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
<b>Meetings</b>					
Meetings	Notice of meetings	Date of meeting	N/A	6 years	In case of challenge to validity of meeting or resolutions
Meetings	Committee meeting agendas, papers, minutes and resolutions		N/A	Life of organisation	Best practice
<b>Regulations and Statutory Returns</b>					
Regulations and Statutory Returns	Audited financial statements	Submission	N/A	6 years	Legal compliance and best practice
Regulations and Statutory Returns	Annual Statutory Returns to the Scottish Housing Regulator	Submission	N/A	Life of organisation	Legal compliance and best practice
Regulations and Statutory Returns	Register of Committee members		Life of organisation	Life of organisation	Legal compliance
Regulations and Statutory Returns	Applications for membership	Cessation of membership		5 years from dates of end of membership	Best practice
Regulations and Statutory Returns	Register of share members, Full and abbreviated membership register		Life of organisation	Life of organisation	Legal compliance
Regulations and Statutory Returns	Register of share certificates		Life of organisation	Life of organisation	Legal compliance
Regulations and Statutory Returns	Declarations of interest (Committee and staff)		Life of organisation	Life of organisation	Legal compliance
Regulations and Statutory Returns	Register of gifts and hospitality and payments and benefits	Date of occurrence		10 years from date of register entry	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
<b>Strategic</b>					
Strategic	Business Plans and supporting documentation	End of Business Plan Period	N/A	5 years	Best practice
<b>Insurance</b>					
Insurance	Current/former policies	End of policy term	Life of organisation	Life of organisation	Legal compliance and best practice
Insurance	Certificate of Employers' Liability Insurance	End of policy term	N/A	40 years	Best practice
Insurance	Annual Insurance schedule	End of year	N/A	Life of organisation	Best practice
Insurance	Claims and related correspondence	End of settlement	N/A	2 years	Best practice
Insurance	Indemnities and guarantees	End of policy term	N/A	6 years after expiry	Legal compliance
Insurance	Group health policies	End of benefits	N/A	12 years after cessation of benefit	Best practice
<b>Finance</b>					
Finance	Accounting records	End of Financial Year	6 years	6 years	Legal compliance
Finance - Cheques and associated records	Cash books/sheets	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Cheques and associated records	Petty cash records/books/sheets Postage/courier account/cash records Register of postage expenditure	End of Financial Year	2 years	2 years	Legal compliance and best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
	Postage paid record Postage books sheets				
Finance - Cheques and associated records	Creditors' history records	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Cheques and associated records	Statements of accounts outstanding orders	End of Financial Year	2 years	2 years	Legal compliance and best practice
Finance - Cheques and associated records	Vouchers – claims for payment, purchase orders, requisition for goods and services, accounts payable, invoices and so on	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Cheques and associated records	Wages/salaries vouchers	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Cheques and associated records	General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Expenditure records	Cash books/sheets	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Expenditure	Other ledgers (such as contracts, costs, purchases)	End of Financial Year	2 years	2 years	Legal compliance and best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
records					
Finance - Expenditure records	Journals – prime records for the raising of charges	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Expenditure records	Journals – routine adjustments	End of Financial Year	2 years	2 years	Legal compliance and best practice
Finance - Expenditure records	Trial balances - Year-end balances, reconciliations and variations to support ledger balances and published accounts	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Receipts and revenue records	Receipt books/butts Office copies of receipts	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Receipts and revenue records	Postal remittance books/records	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Receipts and revenue records	Receipt books/records for imposts (such as VAT receipt books)	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Receipts and revenue records	Cash registers - Copies of forms, Reconciliation sheets	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Receipts and revenue records	Audit rolls, Summaries/analysis records	End of Financial Year	2 years	2 years	Legal compliance and best practice
Finance - Receipts and revenue records	Debtors' records and invoices - debit notes rendered on debtors (such as invoices paid/unpaid,	End of Financial Year	6 years	6 years	Legal compliance and best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
	registers of invoices, debtors ledgers)				
Finance - Receipts and revenue records	Debits and refunds - Records relating to unrecoverable revenue, debts and overpayments (such as register of debts written off, register of refunds)	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance- Salaries and related records	Employee pay histories	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance- Salaries and related records	Salary ledger card/records	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance- Salaries and related records	Copies of salaries/wages payroll sheets	End of Financial Year	2 years	2 years	Legal compliance and best practice
Finance- Purchase order records	Purchase order books/records	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Financial Statements	Statements/summaries prepared for inclusion in quarterly/annual reports	End of Financial Year	6 years	6 years	Legal compliance and best practice
Finance - Financial Statements	Periodic financial statements prepared for management on a regular basis	End of Financial Year	1 year	1 year	Legal compliance and best practice
Finance - Asset register financial records	Assets/equipment registers/records	End of Financial Year	6 years after asset or last one in the	6 years after asset or last one in the register is disposed of	Legal compliance and best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
			register is disposed of		
Finance - Asset register financial records	Depreciation registers - Records relating to the calculation of annual depreciation	End of Financial Year	6 years after asset or last one in the register is disposed of	6 years after asset or last one in the register is disposed of	Legal compliance and best practice
Other Banking Records	Cancelled / Dishonoured Cheque	End of Financial Year	2 years	2 years	Legal compliance and best practice
Other Banking Records	Paid/presented cheques	End of Financial Year	6 years	7 years	Legal compliance and best practice
Other Banking Records	Record of cheques drawn for payment	End of Financial Year	6 years	7 years	Legal compliance and best practice
Other Banking Records	Bank deposit books/slips/butts	End of Financial Year	2 years	2 years	Legal compliance and best practice
Other Banking Records	Bank deposit summary sheets - Summaries of daily banking	End of Financial Year	2 years	2 years	Legal compliance and best practice
Other Banking Records	Bank reconciliations files/sheets	End of Financial Year	2 years	2 years	Legal compliance and best practice
Other Banking Records	Bank statements, periodic reconciliations	End of Financial Year	2 years	2 years	Legal compliance and best practice
Other Banking Records	Electronic banking and electronic funds transfer	End of Financial Year	6 years	6 years	Legal compliance and best practice
<b>Contacts and Agreements</b>					
Contracts and Agreements	Contracts under seal	Completion	20 years after completion (including any defects)	20 years after completion (including any defects liability period)	Legal compliance

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
			liability period)		
Contracts and Agreements	Contracts for the supply of goods or services, including professional services	Completion	6 years after completion (including any defects liability period)	6 years after completion (including any defects liability period)	Legal compliance
Contracts and Agreements	Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement	After purchase	N/A	6 years. Suggested limit: goods or services up to £10,000	Best practice
Contracts and Agreements	Loan agreements		Life of organisation	Life of organisation	Best practice
Contracts and Agreements	Licensing agreements	Expiry of agreement	6 years after expiry	6 years	Legal compliance
Contracts and Agreements	Rental and hire purchase agreements	Expiry of agreement	6 years after expiry	6 years	Legal compliance
Contracts and Agreements	Indemnities and guarantees	Expiry of agreement	6 years after expiry	6 years	Legal compliance
Contracts and Agreements	Documents relating to successful tender	End of contract	N/A	6 years	Best practice
Contracts and Agreements	Documents relating to unsuccessful tenders	Contract award	N/A	3 years	Best practice
Contracts and Agreements	Forms of tender	Contract award	N/A	6 years	Best practice
Contracts and Agreements	Documentation relating to purchases of medical devices and medical equipment	Date of purchase	N/A	11 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Contracts and Agreements	Transfer Agreement	Date of stock transfer		30 years after the date of stock transfer	Best practice
<b>Charitable Donations</b>					
Charitable Donations	Index of donations granted	Date of donation	N/A	6 years	Best practice
Charitable Donations	Account documentation	Date of donation	3 Years	6 years	Best practice
<b>Applications and Tenancy Records</b>					
Application and Tenancy Records	Applications	End of tenancy	N/A	6 years	Best practice
Application and Tenancy Records	Unsuccessful housing applications	Notification of outcome of application		5 years after notification of outcome of application	Best practice
Application and Tenancy Records	Housing Benefit notifications	Date of notification	N/A	2 Years	Best practice
Application and Tenancy Records	Rent statements	Date of statement	N/A	2 years	Best practice
Application and Tenancy Records	Tenancy files, including rent payment records	End of tenancy	6 years	6 years	Best practice
Application and Tenancy Records	Complaints	Last action	N/A	6 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Application and Tenancy Records	Former tenants' tenancy agreements and details of their leaving	End of tenancy	6 years	6 years	Best practice
Application and Tenancy Records	Documentation, correspondence and information provided by other agencies relating to special needs of current tenants	End of tenancy	While tenancy continues	While tenancy continues	Best practice
Application and Tenancy Records	Records relating to offenders, ex-offenders and persons subject to cautions	End of tenancy	While tenancy continues	While tenancy continues	Best practice
Application and Tenancy Records	Tenant satisfaction surveys and consultations	Date of completion		3 years from date of completion	Best practice
ASB case files and associated documents	ASB (Anti-social behaviour) case files and associated documents	Date of occurrence / legal action	N/A	5 years or until end of legal action	Best practice
Home Ownership	New Sales applications	Offer accepted	6 years after offer accepted	6 years	Best practice
<b>Property Records</b>					
Property Records	Leases and titles to property	Termination of lease/ownership	N/A	20 years	Best practice
Property Records	Wayleaves, licences and servitudes	Rights given or received cease	20 years	20 years	Legal compliance
Property Records	Planning and building control permissions	Interest ceases	20 years	20 years	Legal compliance

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Property Records	Title searches undertaken prior to purchase of property	Interest ceases	20 years	20 years	Legal compliance
Property Records	Property maintenance records	Ownership	6 years	6 years or interest ceases, depending on whether interest ceases before or after 6 year period	Legal compliance
Property Records	Reports and professional opinions	Issue of report or professional opinion	6 years	6 years	Legal compliance
Property Records	Development documentation	Settlement of all issues	20 years	20 years	Legal compliance
Property Records	Invoices	End of Financial Year	12 years	12 years	Legal compliance
Property Records	Works orders	Completion of works		5 years from completions of works	Best practice
Property Records	Correspondence with tenant re works and adaptations	Completion of works		5 years from date of completion of works	Best practice
Property Records	Snagging Reports	Date of report		5 years from date of report	Best practice
Property Records	Stock condition surveys	Date of survey		5 years from date of survey	Best practice
Property Records	Electrical and gas safety inspections	Date of inspection		10 years from date of inspection for electrical safety inspections	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
				3 years from date of inspection for gas safety inspections	
Property Records	Insurance Claims	Date of claim		Depends on requirements of the insurer (but minimum 5 years from date of claim)	Best practice
Property Records	Factoring Agreement	Termination of factoring agreement		5 years from the date of termination of factoring agreement	Best practice
Property Records	Communal Works Requests	Completion of works		5 years from the date of completion of the works.	Best practice
<b>Vehicles</b>					
Transport & Vehicles	Mileage records & defect sheets	Vehicle disposal	N/A	2 years	Best practice
Transport & Vehicles	Maintenance records & MOT tests	Vehicle disposal	N/A	2 years	Best practice
Transport & Vehicles	Copy Registrations	Vehicle disposal	N/A	2 years	Best practice
Transport & Vehicles	Vehicle disposal log	Vehicle disposal	N/A	1 year	Best practice
<b>Capital Assets</b>					
Capital Assets	Fixed Asset Register	NA	Life of organisation	Life of organisation	Legal compliance
<b>Employees – Tax and Social Security</b>					

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Tax and Social Security	Record of taxable payments; record of tax deducted or refunded; record of earnings on which standard NI Contributions payable; record of employer's and employee NI contributions	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Legal compliance
Tax and Social Security	NIC contracted out arrangements; HMRC notice of code changes, pay and tax details.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Legal compliance
Tax and Social Security	Copies of notices to employees (e.g. P45, P60);	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years plus current year	Legal compliance
Tax and Social Security	Expense Claims	After audit	3 years from the end of the tax year they relate to	6 years	Best practice
Tax and Social Security	Record of sickness payments	On payment	6 years	6 years	Legal compliance
Tax and Social Security	Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay, including MAT B1 and other evidence	On payment	6 years	6 years	Legal compliance

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Tax and Social Security	Income Tax and NI returns	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Legal compliance
Tax and Social Security	Redundancy details and record of payments & refunds	Date of redundancy	N/A	6 years	Best practice
Tax and Social Security	Revenue and Customs approvals		N/A	Life of organisation	Best practice
Tax and Social Security	Annual earnings summary	End of Financial Year	N/A	12 years	Best practice
Tax and Social Security	Payroll/salary records, overtime, bonuses expenses, national living wage records etc.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years, except 3 years for national living wage records	Legal compliance
Tax and Social Security	Actuarial valuation reports		N/A	Life of organisation	Best practice
Tax and Social Security	Detailed returns of pension fund contributions; annual reconciliations of fund contributions		N/A	Life of organisation	Best practice
Tax and Social Security	Money purchase details	After transfer or value taken	N/A	6 years	Best practice
Tax and Social Security	Qualifying service details	After transfer or value taken	N/A	6 years	Best practice
Tax and Social Security	Investment policies	From end of benefits payable under policy	N/A	12 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Tax and Social Security	Trade Union agreements	Date of cessation	N/A	10 years after ceasing to be effective	Best practice
Tax and Social Security	HMRC approvals		N/A	Life of organisation	Best practice
Tax and Social Security	Annual earnings summary	End of tax year	N/A	3 years from the end of the tax year they relate to	Best practice
<b>Business Services - Pension Schemes</b>					
Pension Schemes	Actuarial valuation reports		N/A	Life of organisation	Best practice
Pension Schemes	Detailed returns of pension fund contributions	Date of contribution	N/A	6 years	Best practice
Pension Schemes	Annual reconciliations of fund contributions	Date of contribution	N/A	6 years	Best practice
Pension Schemes	Money purchase details	After transfer	N/A	6 years after transfer or value taken	Best practice
Pension Schemes	Qualifying service details	After transfer	N/A	6 years after transfer or value taken	Best practice
Pension Schemes	Investment policies	End of benefits payable under policy	N/A	12 years	Best practice
Pension Schemes	Pensioner records	After benefits cease	N/A	12 years after benefits cease	Best practice
Pension Schemes	Records relating to retirement benefits	After transfer or value taken	N/A	6 years	Best practice
<b>Human Resources – Personnel Records</b>					
Personnel Records	Records relating to retirement benefits	After a year of retirement	N/A	6 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Personnel Records	Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals	Leaving date	N/A	6 years	Legal compliance
Personnel Records	Remuneration package	Leaving date	N/A	6 years	Legal compliance
Personnel Records	Disciplinary investigations, including warnings	Conclusion of investigation		6 months after conclusion of stage 1 of investigation and 12 months after conclusion of stage 2 of investigation (at least 25 years in the case of disciplinary warning involving children or vulnerable adults)	
Personnel Records	Former employees' Human Resources files	Leaving date	N/A	6 years for all staff. Life of organisation for senior managers and executives	Best practice
Personnel Records	References to be provided for former employees	Leaving date	N/A	6 years	Best practice
Personnel Records	Records relating to compliance with Working Time Regulations including registration of work and rest period and working time opt out forms	Date of record creation		3 years from the date on which the record was made.	Legal compliance
Personnel Records	Copies of identification records	Termination of employment		6 years from date of termination of employment	Best practice
Personnel Records	Training Programmes	Leaving date	N/A	6 years	Best practice
Personnel Records	Individual training records	Leaving date	N/A	6 years	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Personnel Records	Short lists, interview notes and related application forms	Last Action	N/A	1 year	Best practice
Personnel Records	Application forms of non-short listed and unsuccessful at interview candidates	After notification	1 year	1 year	Legal compliance
Personnel Records	Disclosure Scotland certificate number	Date of receipt	Date of receipt + up to a maximum of 6 months	3 years	Legal compliance
Personnel Records	Time cards/ sheets	After audit	N/A	2 years	Best practice
Personnel Records	Employer/Employee committee minutes (Staff Forum)		N/A	Life of organisation	Best practice
Personnel Records	Parental leave records	Birth of child	N/A	5 years from birth of child, if child does not receive disability allowance  18 years from birth of child, if child receives disability allowance	Best practice
<b>Health and Safety</b>					
Health & Safety	Health and safety assessments; records of consultations with safety reps		Life of organisation	Life of organisation	Legal compliance
Health & Safety	Health and safety policy statements		Life of organisation	Life of organisation	Legal compliance
Health & Safety	Sickness records	Date of occurrence / termination of	3 months from date of sickness	6 years from termination of employment	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
		employment			
Health & Safety	Health and safety statutory notices	Once compliant	6 years after compliance	6 years after compliance	Legal compliance
Health & Safety	Records of reportable injuries, diseases or dangerous occurrences, including reportable incidents, reportable diagnoses and injury arising out of accident at work (and associated investigations and the accident book)	Date of occurrence	3 years from the date of entry	3 years from the date of entry	Legal compliance
Health & Safety	Records of reportable injuries, diseases or dangerous occurrences, including reportable incidents, reportable diagnoses and injury arising out of accidents involving children (and associated investigations and the accident book)	Date of occurrence	Until the child reaches the age of 21 years	Depends on specific requirements of insurer	Legal compliance
Health & Safety	Record of employees exposed to asbestos dust, including health records of each employee  Medical records and details of biological tests under the Control of Lead at Work Regulations  Medical records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	Date of occurrence	40 years from the date of the last entry made in the record	40 years from the date of the last entry made in the record	Legal compliance

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
Health & Safety	Records of monitoring of exposures to hazardous substances (where exposure monitoring is required under COSHH)	Date of occurrence	Where the record includes the personal exposures of identifiable employees, 40 years from the date of the last entry made in the record  Otherwise, 5 years from the date of the last entry made in the record	Where the record includes the personal exposures of identifiable employees, 40 years from the date of the last entry made in the record  Otherwise, 5 years from the date of the last entry made in the record	Legal compliance
Health & Safety	Records of tests and examinations of control systems and protective equipment under COSHH	Date of occurrence	5 years from the date on which the record was made	5 years from the date on which the record was made	Legal compliance
<b>Technical and Research</b>					
Technical and Research	Technical and research records	After requirements have ended	N/A	12-15 years after requirements have ended for both records and reports and drawings and other data.	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
<b>Property Sales</b>					
Property Sales	Registrations of interest	Sale of property	N/A	2 years	Best practice
Property Sales	Offer Details	Offer accepted	current year plus 6 years	6 years	Legal compliance
Property Sales	Completion documentation	Completion of Sale	12 years	12 years	Best practice
Property Sales	Post purchase questionnaire/customer feedback	Date of creation	N/A	3 years	Best practice
Property Sales	Shared Ownership	Offer accepted	6 years after offer accepted	6 years	Best practice
Property Sales	Right to Buy	Completion of Sale	12 years	12 years	Best practice
<b>PR, Communications and Website</b>					
<b>PR, Communications and Website</b>	Newsletter distribution list (post)	Recipient opt out		Until the recipient opts out of receiving the newsletter	Legal compliance
<b>PR, Communications and Website</b>	Social Media Posts			Depends on internal business requirements	Best practice
<b>PR, Communications and Website</b>	Website contact forms/requests/enquiries/complaints	Transfer to document management system		Delete as soon as the form/request/enquiry/complaint has been transferred to the document management system, although the original may be retained for audit trails purposes.	Best practice

Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Reason for retention
<b>PR, Communications and Website</b>	Photographs (including consent forms where available)	Subject objection to use of photo		Until the subject of the photograph objects to their photograph being used	Legal compliance
<b>Office Administration</b>					
<b>Office Administration</b>	Visitor book entries	Date of visit		6 months from date of visit	Best practice