

# Data Retention Policy

Version: 9

Last Updated: July 2022



## Contents

1.	Introduction	3
2.	Data Protection Act	3
3.	Asset and Liabilities Register	4
4.	Recommended Retention Periods	5
5.	Key to Statutory Retention Sources	30
6.	Further Information	30

### Appendix

#### A: Version History

## 1. Introduction

Effective management of data is an important part of good business practice. It helps maintain customers' trust in the organisation and ensures compliance with data protection regulations. Storing too much data for too long also brings additional costs to Connect. Maintaining an ever-growing set of paper files and archives takes up time and other resources. Digital storage also takes up file space and is only of value if it is manageable and accessible.

This guidance outlines which documents should be retained, and how long for. It is based on the NHF's guidelines dated October 2018 (. These guidelines have been reviewed by the NHF in light of the new Data Protection Legislation which came into effect in May 2018 (General Data Protection Regulations - GDPR). The schedule has been amended from the NHF recommendations to include additional areas which are not fully reflected in the NHF guidance, i.e. support, and some guidance has been removed where it does not apply to Connect, i.e. care provision.

It would be impossible to list all the documents Connect keeps but the table below lists the principal documentation, together with required retention periods. These generally align with statutory and recommended retention periods but have been amended where Connect recommends documentation is held for longer than suggested in the NHF guidance. Any updated retention periods which differ from the recommended length are indicated in blue in the table. These have been agreed by the Data Protection Working Group.

The relevant teams are responsible for managing their own data, both on systems and any paper files and are required to manage data that they hold as a team in line with this policy.

## 2. Data Protection Act

The Data Protection Act (DPA) 2018 came into force May 2018

The DPA is underpinned by eight principles that need to be followed to ensure full compliance. They are:

1. Personal information is to be obtained and processed fairly and lawfully.
2. It is to be processed for specified purposes
3. Personal information shall be adequate, relevant and not excessive in relation to the purpose for which it is processed
4. Personal information shall be accurate and kept up to date where necessary
5. Personal information is not to be kept for longer than is necessary for the purpose for which it is processed
6. It is to be processed in accordance with the rights of individuals under the DPA
7. Appropriate technical and organisational measures shall be taken to ensure the

- personal information is secured from damage or destruction
- 8. Not to transfer personal information to a country that does not offer an adequate level of protection for the privacy of the individual.

### 3. Asset and Liabilities Register

The key information Connect holds which is required for the effective management of our business can be accessed via the Assets and Liabilities Register. This can be accessed via the Hub.

## 4. Recommended Retention Periods

**NB In the table below, where the Statutory and Recommended Retention Periods differ, the Recommended Period is the one that should be followed**

### 1. Governance Documents

Ref	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
1.1	Organisation wide Corporate Plans, Policies, Business Continuity, Risk Management and Strategies	Superseded document	N/A	1 year after superseded (longer if required for historical reasons)  DPWG recommend keep permanently		Best practice
1.2	Governance documentation		N/A	Life of company		Required for charitable status.
1.3	Constitution, Aims and Objectives		Life of company	Life of company		Required for charitable status.
1.4	Record of HMRC confirmation of charitable status	End of financial year	Minimum 1 year to end of financial year - required for Annual Return as a minimum	Life of company	ICSA	Annual return and best practice.
1.5	Record of charitable registration		Life of company	Life of company	ICSA	Best practice.
1.6	Certificate of Incorporation		Life of company	Life of company	Companies Act 2006 section 15	Legal compliance
1.7	Memorandum of Association		Life of company	Life of company	Companies Act 2006 section 32	Legal compliance
1.8	Articles of Association/ Model Rules		Life of company	Life of company	Companies Act 2006 section 32	Legal compliance
1.9	Certificate of registration with housing regulator		Life of company	Life of company	ICSA	Best practice

<b>1.10</b>	Record of registration and certificate of incorporation for change of name		Life of company	Life of company	Companies Act 2006 section 80	Legal compliance
<b>1.11</b>	Registration documentation (Co-operative and Community Benefit Societies)		Life of company	Life of company	Co-operative and Community Benefit Societies Act 2014 section 3	Legal compliance
<b>1.12</b>	Internal Audit correspondence, terms of reference, meeting minutes, related papers and reports	After audit	N/A	5 years <a href="#">DPWG recommend keep 10 years</a>		Best practice
<b>1.13</b>	Board member documents – apt letters, SLAs, bank details 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	GDPR Article 5(1) (e) requires that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary CA 2006 recommendation for docs post termination of directorship	Legal compliance

## 2. Data Governance

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>2.1</b>	Emails	No longer active	receipt of email	Archived after 6 months Destroyed after 2 years <a href="#">IS working group recommend keep 7 years</a>	Ofcom National archive guidance ranges from 90 days to four years.	Best practice
<b>2.2</b>	CCTV	Date of recording	Minimum time necessary	30 days <a href="#">DPWG recommend keep 90 days</a>	DPA	Best practice Data needed for over 30 days practically.

2.3	Call Recordings	Date of recording	Minimum time necessary	6 months DPWG recommend keep 1 year	FCA Handbook, conduct of business 11.8	Best practice
2.4	Data Subject Access Requests	Last communication with data subject	6 months	1 year	ICO	Best practice
2.5	Films / Videos	Date of recording	Minimum time necessary	3 years		Best practice
2.6	Data Breach Records	Date of recording	N/A	6 years		Best practice
2.7	Fraud Records	Date of recording	6 years	6 years	FCA Handbook	Best practice

### 3. Meetings

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
3.1	Notice of meetings		N/A	6 years		In case of challenge to validity of meeting or resolutions
3.2	Executive meeting agendas, papers, minutes and resolutions		N/A	10 years		Best practice
3.3	Board and Committee meeting minutes and resolutions	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company DPWG recommend keep for life of company	Companies Act 2006 section 248 and 249	Legal compliance
3.4	Board and Committee meeting agendas and papers	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company DPWG recommend keep life of company	Companies Act 2006 section 248 and 250	Best practice (if required to support minutes and resolutions)
3.5	Shareholder meeting minutes and resolutions	Date of meeting	Life of company	Life of company	Companies Act 2006 section 356	Legal compliance
3.6	Shareholder meeting agendas and papers	Date of meeting	N/A	Life of company		Best practice (if required to support

						minutes and resolutions)
3.7	Minutes and resolutions of trustees (charities)	Date of meeting	Life of company	Life of company	Charity Commission requirement CC48	Legal compliance

#### 4. Regulation and Statutory Returns

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
4.1	Audited financial statements	Submission	Minimum of 3 years	6 years DPWG recommend keep permanently	Companies Act 2006 section 388 and Professional Standards Authority and National Archives recommendations for best practice	Legal compliance and best practice
4.2	Sealing register		Life of company	Life of company	Companies Act 1985	Legal compliance
4.3	Annual Statutory Returns to the Regulator	Submission	Minimum of 1 year from submission	Life of company	Co-operative and Community Benefit Societies Act 2014 section 90	Legal compliance and best practice
4.4	Register of directors and secretaries		Life of company	Life of company	Companies Act 2006 section 162	Legal compliance
4.5	Register of shareholding members		Life of company	Life of company	Companies Act 2006 section 113	Legal compliance
4.6	Register of share certificates		Life of company	Life of company	Companies Act 1984 s.325	Legal compliance
4.7	Declarations of interest		Life of company	Life of company	Company Act 2006 section 177 (implied)	Legal compliance
4.8	List of members (Communities & Benefit Society')		Life of company	Life of company	Registrar of Friendly Societies	Required by Registrar of Friendly Societies



### 5. Strategic Management

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
5.1	Business Plans and supporting documentation	End of Business Plan Period	N/A	5 years DPWG recommend keep for lifetime of company for plans		Best practice

### 6. Insurance

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
6.1	Current/former policies: - crime cover - engineering inspection - motor insurance - property damage - loss of commercial rent - housing contents - office contents - works in progress cover - business interruption cover - all risks cover - engineering insurance - personal accident for staff - professional indemnity - crime/fidelity cover	End of policy term	Life of company	Life of company	Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim. N.B. Housing Association Boards must annually reaffirm formally their continuation of the Voluntary Board Members Liability Policy (automatically provided via NHF membership). NCVO (National Council for Voluntary Organisations) recommends 3 years after lapse.	Legal compliance and best practice
6.2	Certificate of Employers' Liability Insurance	End of policy term	N/A	40 years DPWG recommend keep for life of company	2008 regulations removed requirement to retain for 40 years but need to be mindful of 'long tail'	Best practice

					industrial disease claims, etc.	
6.3	Annual Insurance schedule	End of year	N/A	Life of company	As current and former policies are kept permanently, schedules should be too. Best practice	Best practice
6.4	Claims and related correspondence	End of settlement	N/A	2 years DPWG recommend keep for 5 years.	Zurich Municipal recommendation. NCVO recommends 3 years after settlement	Best practice
6.5	Indemnities and guarantees	End of policy term	N/A	6 years after expiry	Limitations Act 1980, Limitation for legal proceedings. 12 years if related to land.	Legal compliance
6.6	Group health policies	End of benefits	N/A	12 years after cessation of benefit		Best practice

**7. Finance**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
7.1	Accounting records for Limited Company		6 years	6 years DPWG recommend keep for 10 years	Companies Act Section 388 recommends 3 years. Taxes Management Act 1970 (TMA) Sec20 (Taxes Management Act 1970) may require any documents relating to tax over 6 (plus) years	Legal compliance
7.2	Accounting records for Communities & Benefit Society' Society or Charity		N/A	6 years		Best practice

<b>7.3</b>	Cash books/sheets	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.4</b>	Petty cash records/books/sheets Postage/courier account/cash records Register of postage expenditure Postage paid record Postage books sheets	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.5</b>	Creditors' history records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.6</b>	Statements of accounts outstanding orders	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.7</b>	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	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.8</b>	Wages/salaries vouchers	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.9</b>	General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.10</b>	Cash books/sheets	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.11</b>	Other ledgers (such as contracts, costs, purchases)	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

<b>7.12</b>	Journals – prime records for the raising of charges	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.13</b>	Journals – routine adjustments	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.14</b>	Trial balances - Year-end balances, reconciliations and variations to support ledger balances and published accounts	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.15</b>	Receipt books/butts Office copies of receipts – cashiers’, cash register, fines and costs, sale of publications, general receipt books/butts/ records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.16</b>	Postal remittance books/records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.17</b>	Receipt books/records for imposts (such as stamp duty, VAT receipt books)	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.18</b>	Cash registers - Copies of forms, Reconciliation sheets	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.19</b>	Audit rolls, Summaries/analysis records	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.20</b>	Debtors’ records and invoices - debit notes rendered on debtors (such as invoices paid/unpaid, registers of invoices, debtors ledgers)	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

<b>7.21</b>	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	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.22</b>	Employee pay histories Note that the last three years' records must be kept for leavers, in either the personnel or finance records system, for the calculation of pension entitlement	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.23</b>	Salary ledger card/records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.24</b>	Copies of salaries/wages payroll sheets	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.25</b>	Purchase order books/records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.26</b>	Railway/courier consignment books/ records/Travel warrants	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.27</b>	Goods inwards books/records	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.28</b>	Delivery dockets, Stock/stores control cards/sheets/records	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.29</b>	Statements/summaries prepared for inclusion in quarterly/annual reports	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.30</b>	Periodic financial statements prepared for management on a regular basis	End of Financial Year	1 year	1 year	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

<b>7.31</b>	Assets/equipment registers/records	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	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>7.32</b>	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	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

### 8. Other Banking Records

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>8.1</b>	Cancelled / Dishonoured Cheque	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.2</b>	Paid/presented cheques	End of Financial Year	6 years	7 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.3</b>	Record of cheques drawn for payment	End of Financial Year	6 years	7 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.4</b>	Bank deposit books/slips/butts	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.5</b>	Bank deposit summary sheets - Summaries of daily banking	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.6</b>	Bank reconciliations files/sheets	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
<b>8.7</b>	Bank statements, periodic reconciliations	End of Financial Year	2 years	2 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

<b>8.8</b>	Electronic banking and electronic funds transfer	End of Financial Year	6 years	6 years	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
------------	--	-----------------------	---------	---------	--	------------------------------------

## 9. Contracts and Agreements

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>9.1</b>	Contracts under seal and/or executed as deeds	Completion	12 years after completion (including any defects liability period)	12 years after completion (including any defects liability period)	Limitation Act 1980.	Legal compliance
<b>9.2</b>	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)	Limitation Act 1980 (12 years if related to land).	Legal compliance
<b>9.3</b>	Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement	After purchase	N/A	3 years. Suggested limit: goods or services up to £10,000		Best practice.
<b>9.4</b>	Loan agreements	Last payment	N/A	12 years after last payment		Best practice
<b>9.5</b>	Licensing agreements	Expiry of agreement	6 years after expiry	6 years	Limitation Act 1980.	Legal compliance
<b>9.6</b>	Rental and hire purchase agreements	Expiry of agreement	6 years after expiry	6 years	Limitation Act 1980.	Legal compliance
<b>9.7</b>	Indemnities and guarantees	Expiry of agreement	6 years after expiry	6 years	Limitation Act 1980.	Legal compliance
<b>9.8</b>	Documents relating to successful tender	End of contract	N/A	6 years		Best practice
<b>9.9</b>	Documents relating to unsuccessful tenders	After notification	N/A	2 years after notification		Best practice
<b>9.10</b>	Forms of tender		N/A	6 years		Best practice

<b>9.11</b>	Documentation relating to purchases of medical devices and medical equipment		N/A	11 years		Best practice
-------------	--	--	-----	----------	--	---------------

**10. Charitable Donations**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>10.1</b>	Deeds of covenant		N/A	12 years after last payment	TMA recommends 12 years after last payment. Limitation for legal proceedings if related to land.	Best practice
<b>10.2</b>	Index of donations granted		N/A	6 years	N/A	Best practice
<b>10.3</b>	Account documentation		3 Years	6 years	Companies Act recommends 3 years. Best practice	Best practice

**11. Application and Customer Records, including support services**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>11.1</b>	Applications for accommodation – including supported housing and applications which are declined.	Offer accepted	N/A	6 years after offer accepted DPWG recommend 6 years after end of tenancy Applications which are declined to be kept for 6 years from application date.	Limitation Act 1980, section 2	Best practice
<b>11.2</b>	Continuous Recording of lettings and sales (CORE) data record form		N/A	As long as it is deemed necessary to support social housing policy.	CORE Data Sharing Agreement 12.1	Best practice



				DPWG agreed at least until the final dataset for the year is produced		
11.3	Housing Benefit notifications		N/A	2 Years DPWG recommend 6 years after end of tenancy/ resident of supported housing as part of tenancy record	Recommendation from Chartered Institute of Housing. Good practice as per DWP guidance	Best practice
11.4	Rent statements		N/A	2 years DPWG recommend 6 years after end of tenancy/ resident of supported housing as part of tenancy record		Best practice
11.5	Residents' Files, including rent payment records, CRM records, housefiles and details of any complaints, data relating to COVID status and compliance		6 years	6 years' records plus current year DPWG recommend 6 years after end of tenancy/ resident of supported housing as part of tenancy record	Limitations Act 1980	Legal compliance
11.6	Former tenants' Tenancy Agreements, and details of their leaving (including supported housing residents) . This includes forwarding address and reason for leaving.	End of tenancy	6 years	6 years DPWG agreed to keep for lifetime of company	Limitations Act 1980	Legal compliance
11.7	Care plans for children and related documents		Until 75 <sup>th</sup> year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Until 75 <sup>th</sup> year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Arrangements for Placements of Children (General) Regulations 1999 and Children's Act 1989. Some documents may be	Legal compliance

					transferred to subsequent caring agency.	
<b>11.8</b>	Documentation, correspondence and information provided by other agencies relating to special needs of current tenants	End of tenancy	While tenancy continues	While tenancy continues DPWG recommends for six years after tenancy/ resident of supported housing		Best practice
<b>11.9</b>	Records relating to offenders, ex-offenders and persons subject to cautions	End of tenancy	While tenancy continues	While tenancy continues DPWG recommend for six years after tenancy/ resident of supported housing	NACRO	Best practice
<b>11.10</b>	Safeguarding Referral and safeguarding casenotes	End of tenancy	10 years	10 years	Statutory requirement under the Safeguarding Vulnerable Groups Act 2006 and Care Act 2014	Legal compliance
<b>11.11</b>	Safeguarding Records – Serious Case Review	End of tenancy	Minimum of 364 days or when notified Home Office has closed DHR	Minimum of 364 days or when notified Home Office has closed DHR DPWG recommend 10 years from end of tenancy in line with above	Records relating to child protection should be kept for 7 years after your organisation’s last contact with the child and their family – NSPCC guidance	Legal compliance
<b>11.12</b>	Individual customer survey results and other records of customer engagement	From response to survey		Six years from completion of survey		
<b>11.13</b>	Floating support services – case notes, support plans etc	End of support		Six years from end of support unless different contractual arrangement – unless data held on Local		

				Authority systems which they manage.		
--	--	--	--	--------------------------------------	--	--

## 12. Property Records

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
12.1	Rent registrations (superseded)	Superseded document	N/A	6 years <a href="#">DPWG recommend keep for life of company</a>	Rent Officer Handbook recommendation	Best practice
12.2	Rent Registration (not superseded)		N/A	Life of company	Rent Officer Handbook recommendation	Best practice
12.3	Fair rent documentation		N/A	6 years	Rent Officer Handbook recommendation	Best practice
12.4	Leases and deeds of ownership		N/A	15 years after expiry. <a href="#">DPWG recommend to keep permanently</a>	NCVO	Best practice
12.5	Copy of former leases	Settlement of all issues	12 years	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.6	Wayleaves, licences and easements	Rights given or received cease	12 years	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.7	Abstracts of title	Interest ceases	12 years after interest ceases	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance

<b>12.8</b>	Planning and building control permissions	Interest ceases	12 years after interest ceases	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
<b>12.9</b>	Searches	Interest ceases	12 years after interest ceases	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
<b>12.10</b>	Property maintenance records		6 years	6 years DPWG recommend permanently, or for 6 years from sale of property.	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
<b>12.11</b>	Reports and professional opinions		6 years	6 years DPWG recommend permanently, or for 6 years from sale of property.	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
<b>12.12</b>	Development documentation	Settlement of all issues	12 years	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
<b>12.13</b>	Invoices		12 years	12 years	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance

**13. Vehicles**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>13.1</b>	Mileage records & defect sheets	Vehicle disposal	N/A	2 years		Best practice
<b>13.2</b>	Maintenance records & MOT tests	Vehicle disposal	N/A	2 years		Best practice
<b>13.3</b>	Copy Registrations	Vehicle disposal	N/A	2 years		Best practice

<b>13.4</b>	Vehicle disposal log	Vehicle disposal	N/A	1 year DPWG recommend 2 years for consistency		Best practice
<b>13.5</b>	Operator's Licence certificates and documents of title	N/A	Permanently	Permanently	Driver & Vehicle Standards Agency (DVSA) Operators Licence requirement	Legal compliance
<b>13.6</b>	Mileage records & defect sheets	Vehicle disposal	15 months	2 years	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
<b>13.7</b>	Maintenance records & MOT tests <i>(up to 3.5T)</i>	Vehicle disposal	15 months	2 years	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
<b>13.8</b>	Maintenance records & MOT tests <i>(HGV over 3.5T)</i>	Vehicle disposal	15 months	2 years	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
<b>13.9</b>	Copy Registrations <i>(up to 3.5T)</i>	Vehicle disposal	15 months	2 years	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
<b>13.10</b>	Copy Registrations <i>(HGV over 3.5T)</i>	Vehicle disposal	15 months	2 years	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice

**14. Capital Assets**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>14.1</b>	Capital Assets including all land, property, housing stock, corporate buildings, play areas, vehicles, equipment, fixtures & fittings >£400	Asset sold, transferred or disposed of	N/A	6 years		Best practice

<b>14.2</b>	Fixed Asset Register	NA	Permanently	Permanently	Charities Act	Legal compliance
-------------	----------------------	----	-------------	-------------	---------------	------------------

**15. Tax and Social Security**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>15.1</b>	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	HM Revenue and Customs requires retention of each payment for 3 years. Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance
<b>15.2</b>	NIC contracted out arrangements; Inland Revenue 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	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996. Taxes Management Act 1970	Legal compliance
<b>15.3</b>	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	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996.	Legal compliance

					Taxes Management Act 1970	
<b>15.4</b>	HMRC notice of code changes, pay & tax details		6 years	6 years	Taxes Management Act 1970	Legal compliance
<b>15.5</b>	Expense Claims	After audit	3 years from the end of the tax year they relate to	6 years	HMRC	Best practice
<b>15.6</b>	Record of sickness payments	On payment	6 years	6 years	Taxes Management Act 1970 Inland Revenue require retention of each payment for 3 years. SSPR recommends 3 years following year to which they relate	Legal compliance
<b>15.7</b>	Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay	On payment	6 years	6 years	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended. The Statutory Paternity Pay and Statutory Adoption Pay (admin) Regulations 2002 (SI 2002/2820) and Statutory Shared Parental Pay (Admin) regulations 2014 (SI 2014/2929)	Legal compliance

<b>15.8</b>	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	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97).  The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance
<b>15.9</b>	Redundancy details and record of payments & refunds	Date of redundancy	N/A	6 years	IPD recommended	Best practice
<b>15.10</b>	Revenue and Customs approvals		N/A	Permanently	CIPD recommended	Best practice
<b>15.11</b>	Annual earnings summary	End of Financial Year	N/A	12 years		Best practice
<b>15.12</b>	Payroll/ salary records, overtime, bonuses expenses etc.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	3 years	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97).  The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance
<b>15.13</b>	Actuarial valuation reports		N/A	Permanently	CIPD recommended	Best practice
<b>15.14</b>	Detailed returns of pension fund contributions; annual reconciliations of fund contributions		N/A	Permanently		Best practice
<b>15.15</b>	Money purchase details	After transfer or value taken	N/A	6 years	CIPD recommended	Best practice
<b>15.16</b>	Qualifying service details	After transfer or value taken	N/A	6 years	CIPD recommended	Best practice
<b>15.17</b>	Investment policies	From end of benefits payable under policy	N/A	12 years	CIPD recommended	Best practice



<b>15.18</b>	Trade Union agreements	Date of cessation	N/A	10 years after ceasing to be effective	CIPD recommended	Best practice
<b>15.19</b>	Inland Revenue approvals		N/A	Life of company	CIPD recommended	Best practice
<b>15.20</b>	Annual earnings summary	End of tax year	N/A	3 years from the end of the tax year they relate to	HMRC	Best practice

**16. Human Resources: Pension Schemes**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>16.1</b>	Actuarial valuation reports		N/A	Permanently	CIPD recommended	Best practice
<b>16.2</b>	Detailed returns of pension fund contributions		N/A	6 years	Pensions Regulator	Best practice
<b>16.3</b>	Annual reconciliations of fund contributions		N/A	6 years	Pensions Regulator	Best practice
<b>16.4</b>	Money purchase details	After transfer	N/A	6 years after transfer or value taken	CIPD recommended	Best practice
<b>16.5</b>	Qualifying service details	After transfer	N/A	6 years after transfer or value taken	CIPD recommended	Best practice
<b>16.6</b>	Investment policies	End of benefits payable under policy	N/A	12 years	CIPD recommended	Best practice
<b>16.7</b>	Pensioner records	After benefits cease	N/A	12 years after benefits cease	CIPD recommended	Best practice
<b>16.8</b>	Records relating to retirement benefits	After transfer or value taken	N/A	6 years	RBS(IP)R recommended	Best practice

**17. Personnel Records**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>17.1</b>	Records relating to retirement benefits	After a year of retirement	N/A	6 years	RBS(IP)R recommended	Best practice

<b>17.2</b>	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	Limitations Act 1980 Limitation for legal proceedings	Legal compliance
<b>17.3</b>	Benefits and Deductions (Service contracts for directors (companies))	Date of cessation of directorship	3 years	6 years	ICSA	Best practice
<b>17.4</b>	Remuneration package	Leaving date	N/A	6 years	Limitations Act 1980 Limitation for legal proceedings	Legal compliance
<b>17.5</b>	Former employees' Human Resources files (including data relating to COVID-19 status)	Leaving date	N/A	6 years	CIPD recommended	Best practice
<b>17.6</b>	References to be provided for former employees	Leaving date	N/A	6 years	CIPD recommended	Best practice
<b>17.7</b>	Training Programmes	Leaving date	N/A	6 years	CIPD recommended	Best practice
<b>17.8</b>	Individual training records	Leaving date	N/A	6 years	CIPD recommended	Best practice
<b>17.9</b>	Short lists, interview notes and related application forms	Last Action	N/A	1 year	CIPD recommended	Best practice
<b>17.10</b>	Application forms of non-short listed candidates	After notification	1 year	1 year	Limitations Act 1980 SDA & RRA recommend 3 months Commission for Racial Equality and Equal Opportunities recommends 6 months.	Legal compliance
<b>17.11</b>	DBS certificate number	Date of clearance	Date of clearance + up to a maximum of 6 months	3 years <a href="#">DPWG recommend keep for duration of employment plus 6 years</a>	DBS check code of practice (Home office)	Legal compliance
<b>17.12</b>	Time cards/ sheets	After audit	N/A	2 years	CIPD recommended	Best practice
<b>17.13</b>	Trust deeds, rules and minutes (for joint employee/employer sports/social clubs, etc. set up under trust)		N/A	Permanently	CIPD recommended	Best practice

<b>17.14</b>	Employer/Employee committee minutes (Staff Liaison Group)		N/A	Permanently	CIPD recommended	Best practice
<b>17.15</b>	Parental leave records	Birth of child	N/A	18 years from birth of child	CIPD recommended	Best practice

**18. Human Resources: Health and Safety**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>18.1</b>	Medical records relating to control of asbestos		40 years	40 years	The Control of Asbestos at Work Regulations 2002 (SI 2002/ 2675). Also see the Control of Asbestos Regulations 2006 (SI 2006/2739) and the Control of Asbestos Regulations 2012 (SI 2012/632	Legal compliance
<b>18.2</b>	Health and safety assessments; records of consultations with safety reps		Permanently	Permanently DPWG recommend on advice from H&S Consultant – keep office / scheme assessments 5 years, but permanently for reports on maintenance work.	Health and Safety at Work Act 1979	Legal compliance
<b>18.3</b>	Health and safety policy statements		Permanently	Permanently	Health and Safety at Work Act 1979	Legal compliance
<b>18.4</b>	Accident records, reports, accident books	Date of occurrence	3 years	6 years after date of occurrence/entry	RIDDOR Limitation for legal proceedings RIDDOR 1995 and Limitation Act 1980 Special rules apply concerning incidents	Legal compliance

					involving hazardous substances.	
<b>18.5</b>	Sickness records	Date of occurrence	3 years	6 years from date of sickness	The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended Professional Standards Agency	Legal compliance
<b>18.6</b>	Health and safety statutory notices	Once compliant	6 years after compliance	6 years after compliance	Limitations Act 1980 Limitation for legal proceedings	Legal compliance
<b>18.7</b>	Risk assessments, COSHH assessments and other Health and Safety Documentation	Replacement		6 years after replacement or update of documentation		

**19. Technical and Research**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>19.1</b>	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.	NCVO	Best practice

**20. ASB Case Files**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
<b>20.1</b>	ASB (Anti-social behaviour) case files and associated documents		N/A	5 years or until end of legal action		Best practice

				DPWG recommend keep for 6 years following end of tenancy		
--	--	--	--	--	--	--

**21. Resident Meetings**

Reference	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Retention source	Reason for retention
21.1	Resident Meeting Minutes	From date of meeting	N/A	1 year DPWG recommend 6 years for most meetings, SIF meetings kept for 10 years	ICSA recommended	Best practice

## 5. Key to Statutory Retention Sources

CA - Companies Act 2006
CAWR – Control of Asbestos at Work Regulations 1987
Ch A – Children’s Act 1989
DPA - GDPR – UK General Data Protection Regulations
IPSA - Industrial & Provident Societies Act 1965
IT(E)R - Income Tax (Employment) Regulations 1993
LA /Limitations for legal proceedings – Limitations Act 1980
RIDDOR - Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 1985
RBS(IP)R - Retirement Benefits Schemes (Information Powers) Regulations 1995
RRA - Race Relations Act 1976
SDA - Sex Discrimination Acts 1965 & 1975
SMPR - Statutory Maternity Pay Regulations 1982
SSPR - Statutory Sick Pay Regulations 1982
TMA - Taxes Management Act 1970
VATA - Value Added Tax Act 1994

## 6. Further Information

- Nat'l Council for Voluntary Organisations (NCVO) guidance online:

<http://www.ncvovol.org.uk/askncvo/index.asp?id=108&terms=document%20retention>

- The ICSA Guide to document retention 2<sup>nd</sup> edition, Andrew C Hamer ICSA publishing

# Appendix:

## A: Version History

Version	Date	Summary of Changes
9	July 2022	Reviewed and updated policy, including introductory wording. Reflected where DPWG agreed to hold data longer than for NHF guidance, i.e. customer files, housing applications and ASB case files.
8	December 2018	Amended dates issued by NHF with revisions and amended guidelines in relation to GDPR.
7	December 2017	Amended HR Archive details
6	September 2017	Amended ASB files to five years as per NHF recs
5	September 2015	Amended after IA in June 15 to include guidelines on retention of evidence related to SC setting – see page 13.
4	August 2013	Amended as per revised guidance from NHF dated 13.02.13. Changes as agreed by DPWG May 13. Full details of changes made = App 1 Locally Grown retention info included as per HL's instructions 14.08.13
3	October 2012	Clarification of retention of housing/leaseholders' information
2	October 2011	Clarification of retention of former tenant files
1	July 2009	Author RoR