

## Data Retention Policy

<b>Version #:</b>	<b>Date:</b>	<b>Summary of Changes</b>
Version 8	December 2018	Amended dates issued by NHF with revisions and amended guidelines in relation to GDPR.
Version 7	December 2017	Amended HR Archive details
Version 6	September 2017	Amended ASB files to five years as per NHF recs
Version 5	September 2015	Amended after IA in June 15 to include guidelines on retention of evidence related to SC setting – see page 13.
Version 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
Version 3	October 2012	Clarification of retention of housing/leaseholders information
Version 2	October 2011	Clarification of retention of former tenant files
Version 1	July 2009	Author RoR

## **Introduction**

Storage space costs money. 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. What documents do we need to keep and for how long?

This guidance is based on the NHF's guidelines dated October 2018 (an updated version of their 2013 guidelines) and should provide you with answers. These guidelines have been reviewed by the NHF in light of the new Data Protection Legislation which came into effect May 2018 (General Data Protection Regulations -GDPR).

It would be impossible to list all the documents we keep but the table shown below lists the principal documentation, together with details of statutory and recommended retention periods.

## **Data Protection Act**

The Data Protection Act (DPA) 2018 came in to force May 2018 to replace the previous Data Protection Act 1998. The 2018 Act modernizes data protection laws in the UK to make them fit for purpose for our increasingly digital economy and society. It also provides a framework in which the rights and freedoms of individuals can be protected, to strike a balance between that requirement and our use of information for the purposes of our business.

The DPA is underpinned by eight principles that need to be followed to ensure full compliance with the Act. 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.

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

<b>1. Governance Documents</b>				
<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Certificate of Incorporation	N/A	N/A	Permanently	Implied by CA, Sec.15.
Certificate of change of company name	N/A	N/A	Permanently	Implied by CA, Sec. 80.
Memorandum and articles of association (original)	N/A	N/A	Permanently	Best practice.
Memorandum and articles of association (current)	Permanently	CA	Permanently	Best practice.
Governance Documentation	N/A	N/A	Permanently	Required for charitable status.
Constitution, Aims and Objectives	N/A	N/A	Permanently	Required for charitable status.
Letter of charitable registration	N/A	N/A	Permanently	Best practice.
HMRC confirmation of charitable status	N/A	N/A	Permanently	Best practice
Registration documentation (I & P Societies)	Permanently	IPSA	Permanently	Best practice.

## 1. Governance Documents

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Certificate of registration with housing regulator	N/A	N/A	Permanently	Best practice.
Board member documents – apt letters, SLA's, bank details etc.	N/A	N/A	6 years after Board membership ceases though some details should be destroyed when membership ceases eg bank details etc	DPA 1998 5 <sup>th</sup> principle. CA 2006 recommendation for docs post termination of directorship.

## 2. Meetings

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Notices of meetings	N/A	N/A	6 years	In case of challenge to validity of meeting or resolutions.
Board and committee minutes (companies)	Permanently	CA	Permanently	Signed originals must be kept.
Board resolutions (companies)	Permanently	CA	Permanently	Signed originals must be kept.
Minutes and resolutions of trustees (charities)	N/A	N/A	Permanently	Charity Commission requirement CC48

### 3. Registrations and Statutory Returns

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Annual returns to the regulator	N/A	N/A	5years	Best practice.
Audited company returns and financial statements (including I & P Societies' Annual Returns to Registrar of Friendly Societies)	N/A	N/A	Permanently	Best practice.
Declarations of interest	N/A	N/A	6 years	Limitation for legal proceedings.
Register of directors and secretaries	Permanently	CA	Permanently	
Register of Shareholding members	Permanently	CA	Permanently	Records may be removed from register 20 years after membership ceases.
Register of seals	N/A	N/A	Permanently	Best practice.
Register of share certificates	N/A	N/A	Permanently	Best practice.

### 3.Registrations and Statutory Returns

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
List of members (I & P Societies)	N/A	N/A	Permanently	Required by Registrar of Friendly Societies.
Nursing home and residential care homes registration certificates	N/A	N/A	Permanently	Best practice.
Nursing home and residential care homes inspection reports	N/A	N/A	6 years following end of management	Limitation for legal proceedings. Reports are public documents.

#### 4. Strategic Management

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Business plans & supporting documentation (e.g. organisation structures, aims, objectives, funding issues)	N/A	N/A	5 years after plan completion	Best practice.



## 5. Insurances

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Current and former policies	N/A	N/A	Permanently	Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim. NB Housing Association Boards must annually reaffirm formally their continuation of the Voluntary Board Members Liability Policy (automatically provided via NHF membership). NCVO recommends 3 years after
Annual Insurance schedule	N/A	N/A	6 years	Best practice.
Claims and related correspondence	N/A	N/A	2 years after settlement	Zurich Municipal recommendation. NCVO recommends 3 years after settlement
Indemnities and guarantees	N/A	N/A	6 years after expiry	Limitation for legal proceedings. 12 years if related to land.

## 5. Insurances

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Group health policies	N/A	N/A	12 years after cessation of benefit	Best practice
Employer's liability insurance certificate	At least 40 years	Employers' Liability (Compulsory Insurance) Regulations 1998	40 years <b>DPWG agreed Permanent</b>	2008 Regs removed requirement to retain for 40 yrs but need to be mindful of 'long tail' industrial disease claims

## 6. Finance, Accounting & Tax Records

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Accounting records for Limited Company	3 years	CA Sec 388	NHF guidance 6 years <b>DPWG agreed to keep at 10 years</b>	TMA Sec.20 may require any documents relating to tax over 6 (plus) years.
Accounting records for I&P Society or Charity	N/A	N/A	6years	Required by Registrar of Friendly Societies and Charity Commissioner.
Balance sheets and supporting documents	N/A	N/A	6 to 10 years	Best practice. To relate to accounting records.
Loan account control reports	N/A	N/A	6years	Best practice.
Social Housing Grant documentation	N/A	N/A	Permanently	Best practice.
Signed copy of report and accounts	N/A	N/A	Permanently	Best practice.
Budgets and internal financial reports	N/A	N/A	2 years	Best practice.

## 6. Finance, Accounting & Tax Records

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Tax returns and records	N/A	N/A	10years	TMA Sec.20 may require any documents relating to tax over 6 (plus) years.
VAT records	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
Orders and delivery notes	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
Copy invoices	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
Credit and debit notes	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.

## 6. Finance, Accounting & Tax Records

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Cash records & till rolls	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
Journal transfer documents	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
Creditors, debtors & cash income control accounts	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.
VAT related correspondence	6 years	VATA	6 years	Customs & Excise requirement for VAT registered bodies.

All evidence relating to service charge setting			Permanently	Recommendation of IA on Rent setting and SCs, June 2015.
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## 7. Other Banking Records (including Giro)

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Cheques	N/A	N/A	6 years	Limitation for legal proceedings.
Paying in counterfoils	N/A	N/A	6 years	Limitation for legal proceedings.
Bank statements and reconciliations	3 years <b>from the end of the financial year the transactions were made</b>	CA	6 years	Limitation for legal proceedings.
Instructions to bank	N/A	N/A	6 years	Limitation for legal proceedings.

## 8. Contracts and Agreements

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Contracts under seal and/or executed as deeds	N/A	N/A	12 years after completion (including any defects liability period)	Limitation for legal proceedings.
Contracts for the supply of goods or services, including professional services	N/A	N/A	6 years after completion (including any defects liability period)	Limitation for legal proceedings (12 years if related to land).
Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement	N/A	N/A	3 years	Best practice. Suggested limit: goods or services costing up to £10,000.
Loan agreements	N/A	N/A	12 years after last payment	Best practice.
Licensing agreements	N/A	N/A	6 years after expiry	Limitation for legal proceedings.



Rental and hire purchase agreements	N/A	N/A	6yearsafterexpiry	Limitation for legal proceedings.
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<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Indemnities and guarantees	N/A	N/A	6 years after expiry	Limitation for legal proceedings.
Documents relating to successful tender	N/A	N/A	6 years after end of contract	Best practice.
Documents relating to unsuccessful tenders	N/A	N/A	2 years after notification	Best practice.
Forms of tender	N/A	N/A	6 years	Best practice.

## 9. Charitable Donations

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Deeds of covenant	6 years after last payment	TMA	12 years after last payment	Limitation for legal proceedings if related to land.
Index of donations granted	N/A	N/A	6 years	Best practice.
Account documentation	3 years	CA	6 years	Best practice.

## 10. Application and Tenancy Records

**NB Information relating to leaseholders should be retained as per 'ordinary' tenant information ie as below.**

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Applications for accommodation	N/A	N/A	6 years after offer accepted	Best practice.
Continuous Recording of lettings and sales (CORE) data record form	N/A	N/A	None <b>DPWG agreed at least until final dataset for the year is produced</b> (usually around Aug/Sept)	Best practice in DPA compliance requires form to be destroyed immediately statistics have been recorded
Housing Benefit notifications	N/A	N/A	2 years	Recommendation of Institute of Rent Officers (now merged with CIH).
Rent statements	N/A	N/A	2 years	Best practice.

## 10. Application and Tenancy Records

**NB Information relating to leaseholders should be retained as per 'ordinary' tenant information ie as below.**

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Former tenants' Tenancy Agreements, and details of their leaving	N/A	N/A	6 years but <b>DPWG agreed to leave it at permanently</b>	Best practice with DPA compliance 5 <sup>th</sup> principle.
Current tenants' Tenancy Files, including rent payment records, and details of any complaints and harassment cases	N/A	N/A	In general, for the length of the tenancy and up to 6 years post tenancy. There may be occasion to weed very old, but still current files. Judgement should be used in what to keep and destroy. Any live issues must be kept.	Limitations Act 298- and Best practice with DPA compliance 5 <sup>th</sup> principle. For rent payment details best practice suggests live system holds 2 yrs records plus current yr.

Care plans for adults and related documents	N/A	N/A	Permanently	May be subject to DPA. Some documents may be transferred to subsequent caring agency.
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Documentation, correspondence and information provided by other agencies relating to special needs of current tenants	N/A	N/A	While tenancy continues	Information held on 'need to know' basis. Medical and Social Services records liable to be confidential. To be returned or passed to subsequent agency at end of tenancy, or
Records relating to offenders, ex-offenders and persons subject to cautions	N/A	N/A	While tenancy continues	Information held on 'need to know' basis. Police sourced records may be confidential. To be dealt with as required by police.

## 11. Locally Grown Files

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Locally Grown files			Retain until 2028	e-mail from HL 13.08.13 following an ERDF monitoring visit

## 12. Property Records

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Rent registrations (superseded)	N/A	N/A	6 years <b>DPWG agreed keep permanently</b>	6 years if it has been superseded by a subsequent registration.



<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Rent registrations (not superseded)	N/A	N/A	Permanently	When no new fair rent has been registered (for example because there is no longer a Rent Act tenant in the property) the maximum recoverable rent will be applicable if a Rent Act tenant is ever moved into the property.

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Fair rent documentation	N/A	N/A	6years	Rent Officer recommendation
Leases and deeds of ownership	N/A	NCVO	While owned. Deeds of title – permanently or until property disposed of. Leases – Fifteen years after expiry (from NCVO). <b>DPWG agreed keep</b>	Best practice.
Copy of former leases	N/A	N/A	12 years after settlement of all issues	Limitation for legal action relating to land or contracts under seal.
Wayleaves, licences and easements	N/A	N/A	12 years after rights given or received cease	Limitation for legal action relating to land or contracts under seal.
Abstracts of title	N/A	N/A	12 years after interest ceases	Limitation for legal action relating to land or contracts under seal.

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Planning and building control permissions	N/A	N/A	12 years after interest ceases	Limitation for legal action relating to land or contracts under seal.
Searches	N/A	N/A	12 years after interest ceases	Limitation for legal action relating to land or contracts under seal.
Property maintenance records	N/A	N/A	6 years	Limitation for legal action.
Reports and professional opinions	N/A	N/A	6 years	Limitation for legal action.
Development documentation	N/A	N/A	12 years after settlement of all issues	Limitation for legal action relating to land or contracts under seal.
Invoices	6 years	VATA	12 years	Limitation for legal action relating to land or contracts under seal.
VAT documentation	See Finance, Accounting & Tax Records section	See Finance, Accounting & Tax Records section	See Finance, Accounting & Tax Records section	See Finance, Accounting & Tax Records section
Insurance	See Insurances section	See Insurances section	See Insurances section	See section on insurance.

<b>13. Vehicles</b>				
<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Mileage records	N/A	N/A	2 years after disposal	Best practice.
Maintenance records, MOT tests	N/A	N/A	2 years after disposal	Best practice.
Copy registrations	N/A	N/A	2 years after disposal	Best practice.
<b>14. Capital Assets</b>	N/A	N/A	Date of purchase to at least 6 years after date sold, transferred or disposed of.	Best practice.
Fixed Asset Register	CA Charities Act	N/A	Permanently	

## 15. Employees: Tax and Social Security

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Record of taxable payments	6 years	TMA	6 years	Inland Revenue require retention of each payment for 3 years.
Record of tax deducted or refunded	6 years	TMA	6 years	Inland Revenue require retention of each payment for 3 years.
Record of earnings on which standard National Insurance Contributions payable	6 years	TMA	6 years	Inland Revenue require retention of each payment for 3 years.
Record of employer's and employee's National Insurance Contributions	6 years	TMA	6 years	Inland Revenue require retention of each payment for 3 years.
NIC contracted-out arrangements	6 years	TMA	6 years	
Copies of notices to employee (e.g. P45, P60)	6 years plus current year	TMA	6 years plus current year	

Inland Revenue notice of code changes, pay & tax details	6 years	TMA	6 years	
<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Expense claims	N/A	N/A	6 years after audit	Best practice.
Record of sickness payments	3 years following year to which they relate	SSPR	6 years	Inland Revenue require retention of each payment for 3 years.
Record of maternity payments	3 years following year to which they relate	SMPR	6 years	Inland Revenue require retention of each
Income tax and NI returns	3 years following year to which they relate	IT(E)R	6 years	Best practice.
Redundancy details and record of payments & refunds	N/A	N/A	12 years	Chartered Institute of Personnel and Development (CIPD) recommendation.
Inland Revenue approvals	N/A	N/A	Permanently	CIPD recommendation
Annual earnings summary	N/A	N/A	12 years	Best practice.

## 16. Employees: Pension Schemes

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Actuarial valuation reports	N/A	N/A	Permanently	CIPD recommendation.
Detailed returns of pension fund contributions	N/A	N/A	Permanently	Best practice.
Annual reconciliations of fund contributions	N/A	N/A	Permanently	Best practice.
Money purchase details	N/A	N/A	6 years after transfer or value taken	CIPD recommendation.
Qualifying service details	N/A	N/A	6 years after transfer or value taken	CIPD recommendation.
Investment policies	N/A	N/A	12 years from end of benefits payable under policy	CIPD recommendation.
Pensioner records	N/A	N/A	12 years after benefits cease	CIPD recommendation.
Records relating to retirement benefits	6 years after year of retirement	RBS(IP)R	6 years after year of retirement	Statutory requirement.

## 17. Employees (Personnel Procedures)

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals	N/A	N/A	6 years after last date of currency	Limitation for legal proceedings.
Service contracts for directors (companies)	3 years	CA	6 years after directorship ceases	Best practice.
Remuneration package	N/A	N/A	6 years after last date of currency	Limitation for legal proceedings.
Former employees' Personnel Files	N/A	N/A	6 years	CIPD recommendation.
References to be provided for former employees	N/A	N/A	20 years or until former employee reaches age 65 (whichever comes first)	Best practice.
Training programmes	N/A	N/A	6 years after completion	Best practice.
Individual training records	N/A	N/A	6 years after employment	CIPD recommendation.



<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Short lists, interview notes and related application forms	N/A	N/A	1 year	CIPD recommendation.
Application forms of non-shortlisted candidates	Three months after notification	SDA & RRA	6 months	Recommendation of Commission for Racial Equality and Equal Opportunities Commission. LA – 1 year limitation for defamations.
Disclosure and Barring Service (DBS) clearance documentation	Date of clearance + up to a maximum of six months		Date of clearance + up to a maximum of six months	DBS check code of practice (Home Office and Disclosure and Barring Service)
Time cards	N/A	N/A	2 years after audit	CIPD recommendation.
Trade union agreements	N/A	N/A	10 years after ceasing to	CIPD recommendation.
Trust deeds, rules and minutes (for joint employee/employer sports/social clubs, etc, set up under trust)	N/A	N/A	Permanently	CIPD recommendation.

Employer/employee committee minutes	N/A	N/A	Permanently	CIPD recommendation.
Insurance claims	See Insurances section	See Insurances section	See Insurances section	See Insurances section.

## 18. Employees: Health and Safety

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Medical records relating to control of asbestos	40 years	CAWR	40 years	
Health and Safety assessments	N/A	N/A	Permanently	CIPD recommendation.
Health and Safety policy statements	N/A	N/A	Permanently	Good practice.
Records of consultations with safety representatives	N/A	N/A	Permanently	CIPD recommendation.
Accident records, reports	3 years after date of occurrence	RIDDOR	6 years after date of occurrence	Limitation for legal proceedings. DPA.
Accident books	N/A	N/A	6 years after date of last entry	Limitation for legal proceedings.

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
Sickness records	Three years after the end of each tax year for Statutory Sick Pay purposes	SSP (general) regulations	6 years from end of sickness	Limitation for legal proceedings. NCVO recommends 3 years. However for industrial injuries not detectable within that period e.g. asbestos, the time period may be extended. Also for employees exposed to hazardous substances.

<b>Document</b>	<b>Statutory Retention</b>	<b>Statutory Retention Source</b>	<b>Recommended Retention</b>	<b>Comments</b>
Health and safety statutory notices	N/A	N/A	6 years after compliance	Limitation for legal proceedings
<b>19. Technical and research</b>				NCVO recommends 12-15 years after requirements have ended for both records & reports and drawings & other data
<b>20. ASB case files and associated documents</b>				5 years or until end of legal action.
<b>21. Supporting people – subsidy claims / support plans / single assessments including</b>				Duration of tenancy

Document	Statutory Retention	Statutory Retention Source	Recommended Retention	Comments
<b>22. Resident meeting minutes</b>	N/A	N/A	One year	DPA

### Key to Statutory Retention Sources

CA - Companies Act 2006
CAWR – Control of Asbestos at Work Regulations 1987
Ch A – Children’s Act 1989
DPA - Data Protection Act 1998
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

### 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 1 – amendments made Aug 13 as per NHF guidance Feb 13 discussed and agreed at DPWG May 13

Section changed (page ref = new doc)	What's changed?
P3. Governance Docs	Previously called Incorporation Docs
P3 Certificate of Incorp	Under 'Comments' - Section 15 changed from Section 13
P3 Certificate of change of co name	Under 'Comments' - Section 80 changed from Section 117
P3 HMRC confirmation of charitable status	<b>New addition</b> 'HMRC confirmation of charitable status – keep permanently'
P4 Board member documents – apt letters, SLA's bank details etc	<b>New addition</b> 'Board member documents – appt letters, SLAs, bank details etc'. '6 years after Board membership ceases though some details should be destroyed when membership ceases eg bank details etc'. 'DPA 1998 5 <sup>th</sup> principle. CA 2006 rec for docs post termination of directorship'
P5 Mins and resolutions of trustees (charities)	'Keep permanently' – previously said 6 years. Charity Commission requirement - CC48 = <b>new bit</b>
P6 Annual returns to the regulator	Instead of 'to TSA and HCA'
P6 Annual returns to the TSA and HCA Working papers	<b>Deleted completely</b>
P6 Register of shareholding members	Shareholding members replaces Board Members
P9 Insurances – current and former pols	Under comments <b>additional bit</b> 'and not necessarily the cause of the claim'
P9	HA Boards replaces RSL Boards
P10 E'ers's liability ins cert	Prev no comments now says '2008 regs removed requirement to retain for 40 yrs but need to be mindful of 'long tail' industrial disease claims etc Recommended retention period = 40 yrs <b>but DPWG agreed Permanent</b>
P11 Accounting records for Ltd Co	Stat Retention Source CA new bit = 'Sec 388' Rec Retention period = 6 years – previously said 10. <b>DPWG agreed leave at 10 years.</b>
P12 onwards ref to Revenue & Customs	Changed to Customs & Excise
P14 Bank states and reconciliations	Stat retention period just said 3 years prev now says '3 yrs from the end of the financial yr the transactions were made'

Section changed (page ref = new doc)	What's changed?
P18 Application and Tenancy Records Continuous Recording of lettings and sales (CORE) data record form	Stat retention source now says 'N/A', previously said 'CORE Instructional manual' Recommended ret period now says 'none', previously said 'At least until final data set for the year' Comments say 'Best practice in DPA compliance requires form to be destroyed immed statistics have been recorded' whereas pre said 'CORE instructional manual recs that landlords should decide themselves how long they retain the forms but that it would be prudent to retain them at least until the final data set for the yr is produced' <b>DPWG agreed at least until final dataset for year is produced</b>
P19 Tenants' tenancy files including rent payment records and details of any complaints & harassment	Previously indefinitely as per Indep HO rec. For rent payment details, best practice suggests live system holds 2 yrs records plus current year. Now says for the length of the tenancy and up to 6 years post tenancy.
P19 Former tenants' Tenancy Agreements and details of their leaving	Rec retention is 6 years, best practice with DPA compliance 5 <sup>th</sup> principle, but <b>DPWG agreed to stay with permanently.</b>
P21 Rent registration	Split into 2 now – Rent registrations (superceded) and Rent registrations (not superseded). Former to be kept for 6 years and latter to be kept permanently. <b>DPWG agreed keep permanently</b>
P22 Leases and deeds of ownership	Leases – 15 years after expiry - <b>addition of 'from NCVO'. DPWG agreed keep permanently.</b>
P24 Capital Assets	<b>New addition</b>
P25 Employees: tax & Social Security	Revenue & Custms amended to Inland Revenue from this point on
P25 Copies of notices to employee P45...	Changed from 6 years to 6 years plus current year
P27 Pensioner records	Changed from 12 years after benefits to 12 years after benefits cease
P29 Applic forms non-shortlisted cand's	Addition of - LA – 1 year limitation for defamations.
P29 CRB (Now DBS) clearance documentation	<b>New addition</b> – Recommended retention = date of clearance + up to a maximum of 6 months.
P30 Medical records relating to control of asbestos	Statutory Retention Source amended from 'Control of Asbestos Regulations 2006' to 'CAWR'. Comments 'Guidance suggests 40 years or until the employee reaches 80 years of age whichever is the longer' deleted.
P30 Accident records, reports	'DPA' <b>added</b> to Comments.
P31 Sickness records	Previously N/A re Stat Retention Period – now '3 years after the end of each tax year for Statutory Sick Pay purposes'. Previously N/A re Statutory Retention Source – now 'SSP (general) regulations'
P32 ASB case files and associated docs	5 years or until end of legal action (recommended) – <b>deleted. DPWG agreed current tenants = keep info, former tenant = keep 6 years.</b>



P32 Supporting people – subsidy claims/support plans/single assessments including supporting information	Duration of tenancy (recommended) – (recommended) <b>deleted</b>
P33 Resident meeting minutes	<b>New addition</b> – Recommended Retention Period = one year. Comments DPA.

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