

Data Retention Policy

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Policy created	//
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Corporate Fit	Internal Management Plan	✓
	Risk Register	✓
	Business Plan	✓
	Equalities Strategy	✓
	Legislation	✓



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Our policies provide a framework to underpin our vision and values, to help us achieve our strategic objectives.

Our Vision

Local people, local control.

By providing quality homes and services, we will create stronger communities and a better quality of life for our customers.

Our Values

- Focused on the needs of our customers and communities.
- Supportive of our staff and Committee members.
- Responsible, efficient, and innovative.
- Open and accountable.
- Inclusive and respectful.
- Fair and trustworthy.

Strategic Direction

Consolidation and improvement: Applicable to our core business as a landlord & property manager.

Growth: Through the new build opportunities, we are taking forward.

Partnerships: Where this can help to address shared goals and increase capacity and value.

Resilience: A key priority across all parts of our business.

Strategic Objectives

Services: Deliver quality, value for money services that meet customers' needs

Homes & neighbourhoods: Provide quality homes and neighbourhoods.

Assets: Manage our assets well, by spending wisely.

Communities: Work with local partners to provide or enable services and activities that benefit local people and our communities as a whole

Our people: Offer a great workplace environment that produces a positive staff culture and highly engaged staff.

Leadership & Financial: Maintain good governance and a strong financial business plan, to ensure we have the capacity to achieve our goals.

Our Equalities and Human Rights Commitment

We understand that people perform better when they can be themselves and we are committed to making the Association an environment where employees, customers, and stakeholders can be open and supported. We promote equality, diversity, and inclusion in all our policies and procedures to ensure that everyone is treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

Privacy Statement

As data controller we will collect and process personal data relating to you. We will only collect personal information when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our full Privacy Statements.

Policy Scope & Review

For the purpose of this policy the term Association will include all members of the Tollcross Housing Association Limited. Therefore, all employees, governing body members, volunteers, customers and other relevant stakeholders will be expected to adhere to this policy and/or procedure. All policies and procedures are reviewed every 3 years in line with best practice and current legislation. The Association reserves the right to make additions or alterations to this policy and procedure from time to time. Any timescales set out in this policy may be extended where required.

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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. 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.

2. Purpose and scope

- 2.1. This policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.
- 2.2. 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'.
- 2.3. This policy also covers data that is held by third parties on our behalf, for example, cloud storage providers or offsite data storage.

3. Responsibilities

- 3.1. 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.
- 3.2. Our Data Protection Lead, with advice from 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.
- 3.3. We take compliance with this policy very seriously. Failure to comply with the policy may lead to further action in line with our Disciplinary policy.

4. Guiding principles

- 4.1. Through our data retention practices, we aim to meet the following commitments:
 - We comply with legal and regulatory requirements concerning data retention.
 - We comply with our data protection obligations, in particular, the UK GDPR principle which states that we should keep personal data for no longer than is necessary for the purposes for which it is processed.
 - We handle, store and dispose of data responsibly and securely.
 - 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.

- We allocate appropriate resources, roles and responsibilities to data retention.
- We regularly remind employees of their data retention responsibilities.
- We regularly monitor and audit compliance with this Policy and update this Policy when required.

5. Retention Periods

- 5.1. Different types of personal data may need to be retained for different periods of time depending on the purposes for which the data is processed and the legal and regulatory retention requirements in relation to certain categories of data. In determining the appropriate retention period consideration should be given to the following factors:
- the purposes for which the personal data is processed;
 - the legal basis for processing that personal data;
 - legal requirements for retention (particularly employment and health and safety law); &
 - regulatory requirements.
- 5.2. An appropriate retention period should be identified for each category of personal data. Data subjects must be informed of the retention period which applies to their personal data or, if there is no fixed retention period, the criteria used to determine that period; and where the purposes for which the data is processed have changed, any new retention period.
- 5.3. All personal data processed by the Association shall be retained in accordance with the periods set out in the retention schedule below.
- 5.4. Personal data will be retained in accordance with the appropriate retention period and permanently deleted and/or securely destroyed in accordance with this policy. No personal data shall be destroyed or deleted other than in accordance with this policy.

6. Review, disposal and destruction of data

- 6.1. A review of the personal data will be carried out every 2 years. During the course of this review we will:
- Review the retention periods for each category of personal data processed and whether any alteration to these periods is required.
 - Identify personal data which is due for destruction and deletion.
 - Arrange for the secure deletion and destruction of personal data which will no longer be retained.
- 6.2. Hard copy data must be destroyed by shredding and electronic data must be deleted securely. No hard copy data should be destroyed by recycling.
- 6.3. Data must not be destroyed if the Data Protection Lead or DPO confirms that its continued retention is relevant and necessary for the purposes of legal proceedings in which we are involved.

7. Data Subject Rights

- 7.1. Under the UK GDPR data subjects are entitled, in certain circumstances to require the erasure of their personal data. Any request from a data subject must be passed to the Data Protection Lead as soon as possible.

- 7.2. A data subject may insist on erasure of their personal data where:
- it is no longer necessary for the purposes for which it was processed;
 - where consent has been withdrawn by the data subject;
 - where there is no legal basis for the processing of the data; or
 - where there is a legal obligation to delete the data.
- 7.3. The data subject's rights to erasure are not absolute and do not apply to personal data where processing is necessary for:
- exercising the rights of freedom of expression;
 - to comply with a legal obligation in the public interest or in the exercise of an official authority;
 - for public health reasons;
 - for archiving purposes; and
 - for the establishment, exercise or defence of legal claims.
- 7.4. Where personal data is erased following receipt of a request by a data subject, we will confirm in writing to the data subject that their personal data has been destroyed. Such a response shall be issued to the data subject unless it is impossible or requires disproportionate effort to do so.
- 7.5. Where any request for erasure is refused, we will advise the data subject in writing that their request has been refused and detail the reasons for refusal.
- 8. Monitor and review**
- 8.1. We will regularly monitor and audit our policy and process to ensure compliance with legislation and best practice.
- 8.2. This policy will be reviewed every 24 months or when required to address any weakness in the procedure or changes in legislation or best practice.

Appendix 1 – Equality Impact Assessment

Policy	Data Retention Policy		
EIA Completed by	Corporate Services	EIA Date	

Our policy review and Equality Impact Assessment has been completed in line with the Human Rights Act 1998 and has specifically considered the following Articles contained within the Act.

Article 6 – People have the right to a fair trial.

We aim to remove barriers, make reasonable adjustments, and provide support to tenants, customers, and other stakeholders when developing policies and delivering services which could potentially result in legal action being taken.

Article 8 – People’s right to respect for private life, family life and the home.

We aim to ensure policies and processes take positive steps to ensure our tenants, customers, and other stakeholders can enjoy their homes peacefully while ensuring we meet the interest of the wider community and protect the rights of others (e.g. anti-social issues, noise pollution, etc.).

Article 14 – All of the rights set out in the Act must be protected and applied without discrimination.

We aim to ensure that all policies (or relevant decisions made) do not discriminate based on a protected characteristic and where it does discriminate it is based on a prescribed purpose (e.g. sheltered housing).

1. Aims, objectives and purpose of the policy / proposal			
This policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.			
2. Who is intended to benefit from the policy / proposal?			
Customer, employees and any other data subjects.			
3. What outcomes are wanted from this policy / proposal?			
To ensure all employees, customer and any other stakeholders understand what is (1) expected of them and (2) what they can expect from the Association.			
4. Which protected characteristics could be affected by proposal?	<input type="checkbox"/> Age	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Religion or belief
	<input type="checkbox"/> Disability	<input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Sex
	<input type="checkbox"/> Race	<input type="checkbox"/> Pregnancy and maternity	<input type="checkbox"/> Sexual orientation
5. If the policy / proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.			
While we may collect some special category data. The actual process and policy does not have a direct impact on any protected characteristics.			
6. Describe the likely impact(s) the policy / proposal could have on the groups identified in part 4			
7. What actions are required to address the impacts arising from this assessment? (This might include; collecting data, putting monitoring in place, specific actions to mitigate negative impacts).			

Appendix 2 – Record Management Strategy

1. Introduction

The Association creates, handles and uses records of information to support its functions and operations as a registered social landlord in Scotland. These records contain information that is an invaluable resource and a significant operational asset to support such functions and operations. Tollcross Housing Association will adopt a systematic approach to records management. This is necessary to protect and preserve records to support the Association’s functions and operations and provide evidence of events, activities, and transactions.

Managing records appropriately reduces the costs and risks associated with retaining unnecessary information and is core to complying with legal and regulatory requirements, including:

- UK General Data Protection Regulation;
- Data Protection Act 2018;
- Freedom of Information (Scotland) Act 2002;
- Environmental Information (Scotland) Regulations 2004;
- Equalities Act 2010

We will comply with the Scottish Ministers’ Code of Practice on Records Management recommendations, issued under Section 61 of the Freedom of Information (Scotland) Act 2002. And this strategy, as part of the Data Retention Policy, is an organisational commitment to effective records management at Tollcross Housing Association .

2. Responsibility and scope

Managers are responsible for implementing this strategy, assisting staff in maintaining appropriate information audits for their departments, providing guidance on records retention and training staff on records management.

Records are documents (including written and typed documents and annotated copies), computer files, paper files, communications (including voicemails and SMS messages) and other material in all recorded formats, including electronic, paper, film, video (including CCTV footage), audio and others available through existing and emerging technologies.

3. Records management strategy

Good records management relies on an effective strategy which is clear on how records should be held. For the Association this would be “DIGITAL FIRST” – reducing reliance on paper records and holding digital records in the appropriate location. This supports the principles of Data Minimisation and Accuracy of Data in the UK GDPR principles. The following table sets out the high-level strategy.

Action	Paper records	Emails	Digital records
What to do	All paper records to be scanned and stored in the relevant department system such as SDM, HR System or share drives.	All emails and their attached files to be stored in the relevant section of the system or share drive.	Held in relevant system or share drive, in line with retention schedule and with suitable access controls in place.
Follow up action	Paper record will then be shredded as soon as scan has been checked for accuracy.	Emails can be deleted in line with Retention Schedule of 12 months.	Back-ups and other data resilience solutions will be in line with the Retention schedule.
Exemptions	Exemptions would be insurance and other certificates of incorporation and as required under relevant laws.	Possible exemptions would be where there is a requirement to hold for a legal requirement – such as criminal court case, tribunal.	Review of certain records may require them to be held for longer and as an exemption to the retention schedule – examples would be due to legal requirements, legitimate interest, consent from data subject.

4. Records management principles

Records management can be described as the efficient and systematic control of the planning, creation, receipt, maintenance, use, distribution, storage and disposal / permanent preservation of records throughout their lifecycle. It ensures that evidence of, and information about, the Association's activities and transactions is captured in its record keeping systems and maintained as viable records. It concerns placing controls around each stage of a record's lifecycle, at the point of creation or receipt, during its maintenance and use and at ultimate disposal. Through such controls, we can ensure its records demonstrate the key features of authenticity, reliability, integrity and accessibility. The main benefits of good records management are:

- promotes the creation and storage of accurate and reliable records in a managed environment, which provide an audit trail of actions.
- increases organisational and administrative effectiveness, efficiency and service delivery through improved access to and retrieval of high quality records;
- helps enhance information security by facilitating improved confidentiality, integrity and availability of records;
- improves working environments and more economical use of physical and server space through reducing the retention of irrelevant, duplicate and out-of-date records;
- promotes the Association's physical and intellectual control of all records by knowing what records it has and how and where to retrieve them easily;
- ensures that the Association identifies and retains records of historical and evidential value to the Association as a "corporate memory" and to assist in managing future recurrences of specific events;
- helps to maintain audit trails relating to access and alteration of records;
- improves information sharing and the provision of easy and timely access to the correct information at the right time, resulting in better quality decision making and thereby facilitating transparency and accountability for all actions;
- manages business continuity risks by helping to identify records that are essential to continued operation which, if lost or destroyed, would seriously impair or disrupt the Association's operations; and
- assists in compliance with all legal and regulatory obligations, including responding to requests for information and personal data made to the Association.

The risks to the Association in not maintaining effective records management are:

- poor quality decisions being made on the basis of inaccurate, incomplete or out-of-date records;
- levels of service to service users being inconsistent due to records of previous actions being unavailable;
- financial, legal or reputational loss if the necessary evidence of an activity or transaction is not available or cannot be relied upon in the event of, for example, regulatory intervention;
- non-compliance with legal or regulatory requirements applicable to the Association;
- failure to identify, protect and retain records that are critical to business continuity;
- additional costs incurred in storing records for longer than necessary; and
- wasted time and resources in searching for records in response to a request received.

5. Storage of and access to records

Records must be stored securely at the Association's premises or at a secure location in accordance with the Association's Data Protection Policy to minimise the risk of damage, loss or unauthorised access to the records. Staff should only access records on a strict "need to know" basis, depending on the nature of a record and its relevance to the work of staff.

6. Retention and destruction of records

Our Data Retention Policy sets out how long records will normally be held and when they will be destroyed. We will regularly review and update the Data Retention Policy with additional record types that it uses in the course of carrying out its functions and operations.

Appendix 3 – Data Retention Schedule

Type of data	Retention period	Responsible dept.
Governance and Management		
<ul style="list-style-type: none"> - Certificate of registration as a registered social landlord from SHR - Confirmation of registration as a Scottish charity from OSCR - Confirmation of charitable status from HMRC - Certificate of registration as a registered society with the FCA - Certificate of registration as a care provider with the Care Inspectorate - Rules and Standing Orders (current and previous versions) 	Permanent	Corporate Finance Finance Finance Housing Management Corporate
<ul style="list-style-type: none"> - Applications for membership 	5 years from date of end of membership	Corporate
<ul style="list-style-type: none"> - Full membership register - Abbreviated membership register - Register of share certificates - Register of tenant organisations 	Permanent	Corporate for all
<ul style="list-style-type: none"> - Board member declarations of interest - Board member documents, including appointment letters and bank details 	6 years from end of Board membership	Corporate for all
<ul style="list-style-type: none"> - Board (and AGM and SGM) minutes and resolutions (including special resolutions) 	Permanent	Corporate
<ul style="list-style-type: none"> - Board (and AGM and SGM) papers (including notice of Board meetings, AGMs and SGMs) 	6 years from date of issue	Corporate
<ul style="list-style-type: none"> - Register of Board members 	Permanent	Corporate
<ul style="list-style-type: none"> - Register of payments and benefits - Register of gifts and hospitality 	10 years from date of register entry	Corporate
<ul style="list-style-type: none"> - Annual return on the Scottish Social Housing Charter, including supporting information - Loan portfolio return - Audited financial statement return - 5 year financial projections 	5 years from date of submission	Corporate Finance Finance
<ul style="list-style-type: none"> - Annual return to the FCA - Annual return to OSCR 	Permanent	Finance Finance
<ul style="list-style-type: none"> - Business plans and supporting documentation - Business continuity plans 	5 years from date of completion	Finance for all
<ul style="list-style-type: none"> - Risk registers 	Permanent	CEO
Housing Management and Financial Inclusion / Income Maximisation		
<ul style="list-style-type: none"> - Housing application form (including equalities and medical information) - Tenancy offer letters - Tenant visit records - Tenancy agreement* - Emergency contact information / next of kin - Correspondence to and from tenants - Tenants' contact details - Tenants' identity documentation - Pet permissions - Alterations permissions - Changes to tenancy, including assignments, changes to joint tenancy, mutual exchange requests, sublets and succession forms and letters 	6 years from date of end of tenancy * Could retain the front page containing the tenant's name and the signature page of the original hard copy tenancy agreement, provided that a copy of the blank version of the standard tenancy agreement is retained. Some courts may	Housing Management for all

Type of data	Retention period	Responsible dept.
<ul style="list-style-type: none"> - Powers of attorney / mandates of authority - Guardianship documentation - Tenancy reference requests (received and provided) - Housing Benefit related documentation, including applications, claims (including reinstatement claims), consent mandates and correspondence to and from local authority Housing Benefit department - Universal Credit related documentation - Referrals for money and benefits advice - Correspondence to and from DWP - Correspondence to and from local authority Social Work department - Correspondence to and from support agencies - Occupational therapists' reports - Anti-social behaviour incidents, including Police reports, complaints, witness statements and noise recordings - End of tenancy form - Eviction case files - Void process documentation - Communications with local authority regarding allocations - Diary notes on document management system - Court letters, documents and notices of proceedings, court reports, correspondence with solicitors and correspondence to and from Shelter 	<p>accept an electronic / scanned version of the tenancy agreement, but this depends on how advanced the document management system is in terms of creating and retaining audit trails of scanned documents i.e. whether it is possible to prove beyond doubt that the scanned version is authentic and has not been altered following its scan to the document management system.</p>	
<ul style="list-style-type: none"> - Abandonment files 	6 years from the date of last action	Housing Management
<ul style="list-style-type: none"> - Unsuccessful housing applications 	5 years after notification of outcome of application	Housing Management
<ul style="list-style-type: none"> - Tenant satisfaction surveys and consultations 	3 years from date of completion	Corporate
<ul style="list-style-type: none"> - Advice regarding benefits, debts arrears reduction and income maximisation, including details of referrals to, and contact with, other agencies 	6 months from the date of last action	Housing Management
<ul style="list-style-type: none"> - Records of contact with children 	Information relating to children (as dependents) may be subject to extended data retention periods, depending on insurer's requirements. This could be up to 100 years after the last contact with the child.	Housing Management
<ul style="list-style-type: none"> - Records relating to 'Cash for Kids' payments 	6 months after payments made to tenants	Housing Management
Maintenance and Works		
<ul style="list-style-type: none"> - Gas servicing schedule - Decanting records - Inspection / complaint file notes 	5 years from date of end of tenancy	Maintenance for all

Type of data	Retention period	Responsible dept.
<ul style="list-style-type: none"> - Housing Association Grant documentation for stage 3 adaptations - Correspondence with tenant re: works and adaptations - Works orders 	5 years from date of completion of works	Maintenance for all
<ul style="list-style-type: none"> - Snagging reports 	5 years from date of report	Maintenance
<ul style="list-style-type: none"> - Stock condition surveys 	5 years from date of survey	Maintenance
<ul style="list-style-type: none"> - Electrical and gas safety inspections 	6 years from date of inspection	Maintenance
<ul style="list-style-type: none"> - Insurance claims 	Depends on the requirements of the insurer (but minimum of 5 years from date of claim)	Maintenance/ Finance
Housing Support		
<ul style="list-style-type: none"> - Care and support plans 	Permanent	Housing Management
<ul style="list-style-type: none"> - Contact notes - Occupancy agreement - Health and communication needs 	5 years from date of end of occupancy	Housing Management
<ul style="list-style-type: none"> - Care Inspectorate inspection reports 	5 years from the end of the period of inspection	Housing Management
Factoring		
<ul style="list-style-type: none"> - Factoring agreement 	5 years from date of termination of factoring agreement	Finance
<ul style="list-style-type: none"> - Communal work requests 	5 years from the date of completion of works	Finance
Finance, Pensions and Insurance		
<ul style="list-style-type: none"> - Accounting records (including cheque counterfoils, bank statements and reconciliations and charitable donations made) - Auditing records - Balance sheets and supporting documents - VAT records and correspondence - Invoices - Credit and debit notes - Cash records, including petty cash - Creditor and debtor accounts - Orders and delivery notes 	7 years from the end of the relevant financial year	Finance for all
<ul style="list-style-type: none"> - Signed versions of accounts - Grant funding (HAG, etc.) 	Permanent	Finance
<ul style="list-style-type: none"> - Budgets and internal financial reports 	2 years from the end of the relevant financial year	Finance
<ul style="list-style-type: none"> - Tax returns 	10 years from the end of the relevant financial year	Finance

Type of data	Retention period	Responsible dept.
– Tenant financial information, including bank details	7 years from the date of payment	Housing Management/ Finance
– Rent payments and rent statements – Arrears correspondence – Debt recovery, earnings and bank arrestment – Bankruptcy information	5 years from date of end of tenancy	Housing Management/ Finance
– Rent refunds	7 years from the date of refund	Housing Management/ Finance
– Employee salary records, records of overtime, bonuses and benefits in kind – Pay As You Earn (PAYE) records, including wage sheets, deductions, working sheets, calculations of the PAYE income of employees and relevant payments to them, the deduction of tax from, or accounting for tax in respect of, such payments	7 years from date of termination of employment	Finance for all
– Employee bank account details	Termination of employment (once final payments have been made)	Corporate/ Finance
– Copies of notices to employees (e.g. P45, P60) – HMRC correspondence in relation to tax codes, pay and tax details – Travel and subsistence payments (including expense claims and payments), season ticket advances and loans to employees – Employee income tax records – Records of income on which National Insurance contributions are payable – Records of employer's and employee's National Insurance contributions – Correspondence with HMRC	7 years after the end of the relevant financial year	Finance for all
– National minimum wage requirements records, including hours worked	3 years, beginning with the day upon which the pay reference period immediately following that to which they relate ends	Finance
– Statutory sick, maternity, paternity and shared parental pay records, calculations, certificates or other evidence	3 years after the end of the relevant financial year	Finance
– Pension actuarial valuation reports – Returns of pension fund contributions – Annual reconciliations of pension fund contributions	Permanent	Finance
– Documentation relating to retirement benefits	6 years after the date of employee retirement	Finance
– Pensioner records and investment policies	12 years after end of benefits payable under policy	Finance
– Current and former insurance policies and certificates	Permanent	Finance
– Annual insurance schedules	6 years from the end of period of insurance	Finance

Type of data	Retention period	Responsible dept.
Information Requests and Complaints		
<ul style="list-style-type: none"> - GDPR subject access request register - Third party disclosure register - Environmental information request register 	6 years from date of register entry	Corporate for all
<ul style="list-style-type: none"> - GDPR subject access request case files, personal data provided, including legal advice and internal communications regarding request - Environmental information request case file, including record of correspondence with applicant and information provided 	3 years from date of response / last contact	Corporate for all
<ul style="list-style-type: none"> - Complaints to the Information Commissioner (GDPR) and the Scottish Information Commissioner (environmental information) - Stage 2 complaints, correspondence with the SPSO and complaints performance reports - Data security incident and breach investigation documentation 	6 years from date of last action / report production / end of investigation	Corporate for all
<ul style="list-style-type: none"> - GDPR general compliance records 	3 years	Corporate
<ul style="list-style-type: none"> - Data security incident and breach register 	Permanent	Corporate
Health and Safety		
<ul style="list-style-type: none"> - Health and safety assessments - Health and safety policy statements - Records of consultations with safety representatives 	Permanent	Corporate for all
<ul style="list-style-type: none"> - Health and safety statutory notices 	6 years after compliance	Corporate
<ul style="list-style-type: none"> - 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) 	5 years from date of the entry	Corporate
<ul style="list-style-type: none"> - 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) 	Depends on the requirements of the insurer (but minimum of 25 years)	Corporate
<ul style="list-style-type: none"> - 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) 	40 years from the date of the last entry made in the record	Corporate
<ul style="list-style-type: none"> - Records of monitoring of exposures to hazardous substances (where exposure monitoring is required under COSHH) 	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.	Corporate
<ul style="list-style-type: none"> - Records of tests and examinations of control systems and protective equipment under COSHH 	5 years from the date on which the record was made	Corporate

Type of data	Retention period	Responsible dept.
Recruitment and Human Resources		
<ul style="list-style-type: none"> - Rejected job applicant records, including application letters or forms (including equal opportunities monitoring forms), CVs (including copies of qualifications), references and other pre-employment checks, interview notes, assessment and psychometric test results and correspondence concerning application 	<p>6 months from date of notification of rejection</p> <p>Speculative applications, which are not received in response to an advertised post, may be destroyed immediately if they are not pursued</p>	Corporate
<ul style="list-style-type: none"> - Application records of successful candidates, including application letters or forms (including equal opportunities monitoring forms), CVs (including copies of qualifications), references and other pre-employment checks, interview notes, assessment and psychometric test results and correspondence concerning employment 	7 years from date of termination of employment	Corporate
<ul style="list-style-type: none"> - Criminal records requirement assessments for a particular post, including criminal records information forms, Disclosure Scotland and PVG checks and certificates 	12 months after the assessment was last used. All other information, as soon as practicable after the check has been completed and the outcome recorded, unless the DPO assesses – in exceptional circumstances – that retention is relevant to the ongoing employment relationship, in which case, maximum retention period of 6 months after the check has been completed	Corporate
<ul style="list-style-type: none"> - Copies of identification documents 	2 years from date of termination of employment	Corporate
<ul style="list-style-type: none"> - Identification documents of foreign nationals (including right to work) 	2.5 years from date of termination of employment	Corporate
<ul style="list-style-type: none"> - Employment contracts, including personnel and training records, written particulars of employment and changes to terms and conditions of employment - Employee performance and conduct records, probationary period reviews, review meeting and assessment interviews, appraisals and evaluations and promotions and demotions - Death benefit nomination and revocation forms - Resignation, termination and retirement records - Grievances - Collective workforce agreements 	7 years from date of termination of employment	Corporate

Type of data	Retention period	Responsible dept.
- Records concerning temporary employees		
- Disciplinary investigations, including warnings	6 months after conclusion of investigation (at least 25 years in the case of disciplinary warnings involving children or vulnerable adults)	Corporate
- Records relating to and / or showing compliance with Working Time Regulations, including registration of work and rest periods and working time opt-out forms	3 years from the date on which the record was made	Corporate
- Annual leave records - Sickness records - Records of return to work meetings following sickness, maternity, etc.	7 years after the end of the relevant financial year	Corporate
- Trade union agreements	10 years after ceasing to be effective	Corporate
- Occupational health records	40 years after completion of assessment	Corporate
- Redundancy records	7 years from date of redundancy	Corporate
Contracts and Procurement		
- Transfer Agreement	30 years after the date of stock transfer	CEO
- Contracts executed under seal	20 years after the end of the contract	Finance/ Corporate
- Contracts for the supply of goods or services, including professional services - Documentation relating to small one-off purchases of goods and services where there is no continuing maintenance or similar requirement - Licensing agreements - Rental and hire purchase agreements - Indemnities and guarantees	6 years after the end of the contract	Corporate
- Loan agreements - Right to buy sale documents	Permanent	Finance
- Forms of tender	6 years after notification of award decision	All
- Document relating to unsuccessful tenderers	3 years after contract award	All
- Documents relating to successful tenderers	6 years after the end of the contract	All
Property Records		

Type of data	Retention period	Responsible dept.
- Leases and titles to property	20 years after the end of the lease / ownership ceases	Housing Management
- Development documentation	20 years after settlement of all issues	CEO/ Finance
- Wayleaves, licences and servitudes	20 years after the rights that were granted or received cease to exist	CEO
- Planning and building control permissions - Title searches undertaken prior to purchase of property	20 years after ownership ceases	CEO
- Property maintenance records	During ownership of property or 5 years after the maintenance works were undertaken, depending on whether ownership ceases before or after the 5 year period	Maintenance
- Reports and professional opinions on property-related matters	6 years after the report or professional opinion was issued	Maintenance/ Housing Management
Vehicles		
- Ownership and registration documentation - Maintenance records, including MOT tests and servicing - Mileage records	2 years after the date of disposal of vehicle	Corporate
PR, Communications and Website		
- Newsletter distribution lists (post)	Until the recipient opts out of receiving the newsletter	Corporate
- Social media posts	Depends on internal business requirements	NA
- Website contact forms / requests / enquiries / complaints	Delete once the form / request / enquiry / complaint has been transferred to the document management system / complaints handling system	Corporate
- Photographs (including consent forms, where available)	Until the subject of the photograph objects to their photograph being used	Corporate
Office and Administration		
- Visitor book entries	6 months from date of visit	Corporate