



Data Protection Policy

Applicability

This policy applies to:

- EPIC Housing
- All staff or home workers operating on behalf of EPIC Housing.

This policy is operational from 19 May 2021.

1.0 Context

This policy applies to information relating to identifiable individuals e.g., staff, applicants, former staff, clients, suppliers, and other third-party contacts.

2.0 Aims and Objectives

The purpose of this policy is to enable EPIC Housing to:

- Comply with our legal, regulatory, and corporate governance obligations and good practice
- Gather information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensure business policies are adhered to (such as policies covering email and internet use)
- Fulfill operational reasons, such as recording transactions, training, and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking
- Investigate complaints
- Check references, ensuring safe working practices, monitoring, and managing staff access to systems and facilities and staff absences, administration, and assessments
- Monitor staff conduct, disciplinary matters
- Market our business
- Improve services

3.0 Policy Statement

EPIC Housing will:

- Comply with both the law and good practice
- Respect individuals' rights
- Be open and honest with individuals whose data is held
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently

EPIC Housing recognises that its first priority under the DPA is to avoid causing harm to individuals. In the main this means:

- Complying with your rights,
- Keeping you informed about the data we hold, why we hold it and what we are doing with it,
- Keeping information securely in the right hands, and
- Holding good quality information.

Secondly, DPA aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, EPIC Housing will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used. This includes the right to erasure where data is no longer necessary and the right to rectification where the data is incorrect. Full details are available in the Privacy Notice issued at the point of gathering the data.

EPIC Housing has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes, leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way personal data is being used e.g., given out to general public.
- Failure to offer choices about use of contact details for staff, clients workers or employees.

In order to address these concerns, to accompany this policy, we have an accompanying Information Security policy, and we will issue Privacy Notices to explain what data we have, why we have it and what we will do with it. The Privacy Notice will also explain the data subjects' rights. We will offer training to staff where this is necessary and appropriate in the circumstances to ensure compliance with DPA. Such training will vary according to the role, responsibilities, and seniority of those being trained.

We will keep and manage data in line with the data retention schedule contained within this policy.

We have no intention to transfer data internationally.

The people responsible for Data Protection are currently the Chief Executive, Systems Manager and Compliance Manager with the following responsibilities:

- Briefing the board on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors
- Ensuring Data is stored securely
- Maintain a Data Audit and keep this up to date
- Reporting breaches to the Information Commissioners Office and the relevant Data Subject(s)

Significant breaches of this policy will be handled under EPIC Housing's disciplinary procedures which may amount to gross misconduct.

Subject Access Request

Any subject access requests will be led by the Data Protection Officer

Subject access requests must be in writing. All staff are required to pass on anything, which might be a subject access request to the Data Protection Officer without delay. The applicant will be given their data within 1 month unless there are complexities in the case which justify extending this to 2 months. You will be notified of any extensions to the deadline for response and the reasons as soon as possible.

We have the right to refuse a subject access request where data is requested at unreasonable intervals, manifestly unfounded or excessive. You will be notified of the reasons as soon as possible.

Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.

The required information will be provided in a permanent and portable form unless the applicant makes a specific request to be given supervised access in person.

You have the right to request the information we hold is rectified if it is inaccurate or incomplete. You should contact the Data Protection Officer and provide with the details of any inaccurate or incomplete data. We will then ensure that this is amended within one month. We may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.

4.0 Responsibilities

All staff are responsible for:

- Ensuring that they adhere this policy.
- Escalating any potential data protection breaches to the Compliance Manager as soon as possible.

The Compliance Manager is responsible for:

- Auditing adherence to the policy and procedure and providing assurance as to its effectiveness.

5.0 Training, Awareness and Competence

- We will ensure staff are trained in the enacting of this policy.
- We will ensure that we publicise our policy via our website.

6.0 Equality and Diversity Implications

Epic are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

7.0 Monitoring and Review

This policy will be reviewed every 3 years. A review may be conducted earlier if there are significant changes to either legislation or Epic's operating practices.

8.0 Associated Documents/ Policies

This policy should be read in conjunction with:

- Privacy Policy

Document Control	
Document Title	Data Protection Policy
Author	Compliance Manager
Version	0.2
Release Date	20.05.2021
Next Review Date	19.05.2024
Document Type	Policy
Approved By	Board
EIA Completed (Where Required)	No
Tenant Consultation (Where Appropriate)	No
Employee Handbook Amends (Where Appropriate)	No
External Consultation Required?	No

DATA RETENTION SCHEDULE

Document overview			Retention Schedule					
Reference	Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Action at end of retention period	Retention source	Reason for retention
1. Governance								
1.1	Governance	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)	Securely Destroy		Best practice
1.2	Governance	Governance documentation		N/A	Life of company	Securely Destroy		Required for charitable status.
1.3	Governance	Constitution, Aims and Objectives		Life of company	Life of company	Securely Destroy		Required for charitable status.
1.4	Governance	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	Securely Destroy	ICSA	Annual return and best practice.
1.5	Governance	Record of charitable registration		Life of company	Life of company	Securely Destroy	ICSA	Best practice.
1.6	Governance	Certificate of Incorporation		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 15	Legal compliance
1.7	Governance	Memorandum of Association		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 32	Legal compliance

1.8	Governance	Articles of Association/ Model Rules		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 32	Legal compliance
1.9	Governance	Certificate of registration with housing regulator		Life of company	Life of company	Securely Destroy	ICSA	Best practice
1.10	Governance	Record of registration and certificate of incorporation for change of name		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 80	Legal compliance
1.11	Governance	Registration documentation (Co-operative and Community Benefit Societies)		Life of company	Life of company	Securely Destroy	Co-operative and Community Benefit Societies Act 2014 section 3	Legal compliance
1.12	Governance	Internal Audit correspondence, terms of reference, meeting minutes, related papers, and reports	After audit	N/A	5 years	Securely Destroy		Best practice

1.13	Governance	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	Securely Destroy	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
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2. Data Governance								
2.1	Data Governance	Emails	No longer active	receipt of email	Archived after 6 months Destroyed after 2 years	Securely Destroy	Ofcom National archive guidance ranges from 90 days to four years.	Best practice
2.2	Data Governance	CCTV	Date of recording	Minimum time necessary	30 days	Securely Destroy	DPA	Best practice
2.3	Data Governance	Call Recordings	Date of recording	Minimum time necessary	6 months	Securely Destroy	FCA Handbook, conduct of business 11.8	Best practice
2.4	Data Governance	Data Subject Access Requests	Data sent	6 months	1 year	Securely Destroy	ICo	Best practice
2.5	Data Governance	Films / Videos	Date of recording	Minimum time necessary	3 years	Securely Destroy		Best practice
2.6	Data Governance	Data Breach Records	Date of recording	N/A	6 years	Securely Destroy		Best practice

2.7	Data Governance	Fraud Records	Date of recording	6 years	6 years	Securely Destroy	FCA Handbook	Best practice
2.8	Data Governance	Data Subject Access Requests	Data sent	6 months	1 year	Securely Destroy	ICO	Best practice
3. Meetings								
3.1	Meetings	Notice of meetings		N/A	6 years	Securely Destroy		In case of challenge to validity of meeting or resolutions
3.2	Meetings	Executive meeting agendas, papers, minutes, and resolutions		N/A	10 years	Securely Destroy		Best practice
3.3	Meetings	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	Securely Destroy	Companies Act 2006 section 248 and 249	Legal compliance
3.4	Meetings	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	Securely Destroy	Companies Act 2006 section 248 and 250	Best practice (if required to support minutes and resolutions)
3.5	Meetings	Shareholder meeting minutes and resolutions	Date of meeting	Life of company	Life of company	Securely Destroy	Companies Act 2006 section 356	Legal compliance
3.6	Meetings	Shareholder meeting agendas and papers	Date of meeting	N/A	Life of company	Securely Destroy		Best practice (if required to support minutes and resolutions)

3.7	Meetings	Minutes and resolutions of trustees (charities)	Date of meeting	Life of company	Life of company	Securely Destroy	Charity Commission requirement CC48	Legal compliance
4. Regulations and Statutory Returns								
4.1	Regulations and Statutory Returns	Audited financial statements	Submission	Minimum of 3 years	6 years	Securely Destroy	Companies Act 2006 section 388 and Professional Standards Authority and National Archives recommendations for best practice	Legal compliance and best practice
4.2	Regulations and Statutory Returns	Sealing register		Life of company	Life of company	Securely Destroy	Companies Act 1985	Legal compliance
4.3	Regulations and Statutory Returns	Annual Statutory Returns to the Regulator	Submission	Minimum of 1 year from submission	Life of company	Securely Destroy	Co-operative and Community Benefit Societies Act 2014 section 90	Legal compliance and best practice
4.4	Regulations and Statutory Returns	Register of directors and secretaries		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 162	Legal compliance
4.5	Regulations and Statutory Returns	Register of shareholding members		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 113	Legal compliance
4.6	Regulations and Statutory Returns	Register of share certificates		Life of company	Life of company	Securely Destroy	Companies Act 1984 s.325	Legal compliance

4.7	Regulations and Statutory Returns	Declarations of interest		Life of company	Life of company	Securely Destroy	Company Act 2006 section 177 (implied)	Legal compliance
4.8	Regulations and Statutory Returns	List of members (Communities & Benefit Society')		Life of company	Life of company	Securely Destroy	Registrar of Friendly Societies	Required by Registrar of Friendly Societies
4.9	Regulations and Statutory Returns	Nursing home and residential care homes registration certificates	End of management	N/A	7 years following end of management	Securely Destroy	Care Quality Commission Guidelines	Best practice
4.10	Regulations and Statutory Returns	Nursing home and residential care homes inspection reports	End of management	7 years following end of management	7 years following end of management	Securely Destroy	Care Quality Commission Guidelines and Limitation Act 1980	Legal compliance and best practice
5. Strategic Management								
5.1	Strategic	Business Plans and supporting documentation	End of Business Plan Period	N/A	5 years	Securely Destroy		Best practice
6. Insurance								

6.1	Insurance	<p>Current/former policies:</p> <ul style="list-style-type: none"> - 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	Review	<p>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.</p>	Legal compliance and best practice
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6.2	Insurance	Certificate of Employers' Liability Insurance	End of policy term	N/A	40 years	Offer to Archives	2008 regulations removed requirement to retain for 40 years but need to be mindful of 'long tail' industrial disease claims, etc.	Best practice
6.3	Insurance	Annual Insurance schedule	End of year	N/A	Life of company	Securely Destroy	As current and former policies are kept permanently (above), schedules should be too. Best practice	Best practice
6.4	Insurance	Claims and related correspondence	End of settlement	N/A	2 years	Securely Destroy	Zurich Municipal recommendation. NCVO recommends 3 years after settlement	Best practice
6.5	Insurance	Indemnities and guarantees	End of policy term	N/A	6 years after expiry	Securely Destroy	Limitations Act 1980, Limitation for legal proceedings. 12 years if related to land.	Legal compliance
6.6	Insurance	Group health policies	End of benefits	N/A	12 years after cessation of benefit	Securely Destroy		Best practice
7. Finance								

7.1	Finance	Accounting records for Limited Company		6 years	6 years	Securely Destroy	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	Finance	Accounting records for Communities & Benefit Society' Society or Charity		N/A	6 years	Securely Destroy		Best practice
7.3	Finance - Cheques and associated records	Cash books/sheets	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.4	Finance - Cheques and associated records	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	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

7.5	Finance - Cheques and associated records	Creditors' history records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.6	Finance - Cheques and associated records	Statements of accounts outstanding orders	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.7	Finance - Cheques and associated records	Vouchers – claims for payment, purchase orders, requisition for goods and services, accounts payable, invoices and so on	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.8	Finance - Cheques and associated records	Wages/salaries vouchers	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.9	Finance - Cheques and associated records	General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.10	Finance - Expenditure records	Cash books/sheets	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

7.11	Finance - Expenditure records	Other ledgers (such as contracts, costs, purchases)	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.12	Finance - Expenditure records	Journals – prime records for the raising of charges	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.13	Finance - Expenditure records	Journals – routine adjustments	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.14	Finance - Expenditure records	Trial balances - Year-end balances, reconciliations, and variations to support ledger balances and published accounts	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.15	Finance - Receipts and revenue records	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	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.16	Finance - Receipts and revenue records	Postal remittance books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

7.17	Finance - Receipts and revenue records	Receipt books/records for imposts (such as stamp duty, VAT receipt books)	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.18	Finance - Receipts and revenue records	Cash registers - Copies of forms, Reconciliation sheets	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.19	Finance - Receipts and revenue records	Audit rolls, Summaries/analysis records	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.20	Finance - Receipts and revenue records	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	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.21	Finance - Receipts and revenue records	Debits and refunds - Records relating to unrecoverable revenue, debts, and overpayments (such as register of debts written off, register of refunds)	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

7.22	Finance-Salaries and related records	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	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.23	Finance-Salaries and related records	Salary ledger card/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.24	Finance-Salaries and related records	Copies of salaries/wages payroll sheets	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.25	Finance-Purchase order records	Purchase order books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.26	Finance-Purchase order records	Railway/courier consignment books/ records/Travel warrants	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.27	Finance-Purchase order records	Goods inwards books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.28	Finance-Purchase order records	Delivery dockets, Stock/stores control cards/sheets/records	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

7.29	Finance - Financial Statements	Statements/summaries prepared for inclusion in quarterly/annual reports	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.30	Finance - Financial Statements	Periodic financial statements prepared for management on a regular basis	End of Financial Year	1 year	1 year	Destroy when cumulated into quarterly/annual reports	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.31	Finance - Asset register financial records	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	Review	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
7.32	Finance - Asset register financial records	Depreciation registers - Records relating to the calculation of annual depreciation	End of Financial Year	6 years after asset or last one in the register is disposed of	6 years after asset or last one in the register is disposed of	Review	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8. Other Banking Records								
8.1	Other Banking Records	Cancelled / Dishonoured Cheque	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.2	Other Banking Records	Paid/presented cheques	End of Financial Year	6 years	7 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.3	Other Banking Records	Record of cheques drawn for payment	End of Financial Year	6 years	7 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice

8.4	Other Banking Records	Bank deposit books/slips/butts	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.5	Other Banking Records	Bank deposit summary sheets - Summaries of daily banking	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.6	Other Banking Records	Bank reconciliations files/sheets	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.7	Other Banking Records	Bank statements, periodic reconciliations	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
8.8	Other Banking Records	Electronic banking and electronic funds transfer	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice	Legal compliance and best practice
9. Contracts and Agreements								
9.1	Contracts and Agreements	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)	Review	Limitation Act 1980.	Legal compliance
9.2	Contracts and Agreements	Contracts for the supply of goods or services, including professional services	Completion	6 years after completion (including any defects liability period)	6 years after completion (including any defects liability period)	Securely Destroy	Limitation Act 1980 (12 years if related to land).	Legal compliance

9.3	Contracts and Agreements	Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement	After purchase	N/A	3 years. Suggested limit: goods or services up to £10,000	Securely Destroy		Best practice.
9.4	Contracts and Agreements	Loan agreements	Last payment	N/A	12 years after last payment	Securely Destroy		Best practice
9.5	Contracts and Agreements	Licensing agreements	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.	Legal compliance
9.6	Contracts and Agreements	Rental and hire purchase agreements	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.	Legal compliance
9.7	Contracts and Agreements	Indemnities and guarantees	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.	Legal compliance
9.8	Contracts and Agreements	Documents relating to successful tender	End of contract	N/A	6 years	Securely Destroy		Best practice
9.9	Contracts and Agreements	Documents relating to unsuccessful tenders	After notification	N/A	2 years after notification	Securely Destroy		Best practice
9.10	Contracts and Agreements	Forms of tender		N/A	6 years	Securely Destroy		Best practice
9.11	Contracts and Agreements	Documentation relating to purchases of medical devices and medical equipment		N/A	11 years	Securely Destroy		Best practice

10. Charitable Donations

10.1	Charitable Donations	Deeds of covenant		N/A	12 years after last payment	Securely Destroy	TMA recommends 12 years after last payment. Limitation for legal proceedings if related to land.	Best practice
10.2	Charitable Donations	Index of donations granted		N/A	6 years	Securely Destroy	N/A	Best practice
10.3	Charitable Donations	Account documentation		3 Years	6 years	Securely Destroy	Companies Act recommends 3 years. Best practice	Best practice
11. Applications and Tenancy Records								
11.1	Application and Tenancy Records	Applications for accommodation	Offer accepted	N/A	6 years after offer accepted	Securely Destroy	Limitation Act 1980, section 2	Best practice
11.2	Application and Tenancy Records	Continuous Recording of lettings and sales (CORE) data record form		N/A	As long as it is deemed necessary to support social housing policy.	Securely Destroy	CORE Data Sharing Agreement 12.1	Best practice
11.3	Application and Tenancy Records	Housing Benefit notifications		N/A	2 Years	Securely Destroy	Recommendation from Chartered Institute of Housing. Good practice as per DWP guidance	Best practice
11.4	Application and Tenancy Records	Rent statements		N/A	2 years	Securely Destroy		Best practice

11.5	Application and Tenancy Records	Tenants' tenancy Files, including rent payment records, and details of any complaints and harassment cases		6 years	6 years' records plus current year	Securely Destroy	Limitations Act 1980	Legal compliance
11.6	Application and Tenancy Records	Former tenants' Tenancy Agreements, and details of their leaving	End of tenancy	6 years	6 years	Securely Destroy	Limitations Act 1980	Legal compliance
11.7	Application and Tenancy Records	Care plans for children and related documents		Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Securely Destroy	Arrangements for Placements of Children (General) Regulations 1999 and Children's Act 1989. Some documents may be transferred to subsequent caring agency.	Legal compliance
11.8	Application and Tenancy Records	Care plans/ case files for adults and related documents	End of support	8 years from end of care. (Adult Social Care)	8 years from end of care. (Adult Social Care)	Securely Destroy	Records Management Code of Practice for Health and Social Care 2016 Some documents may be transferred to subsequent caring agency.	Legal compliance

11.9	Application and Tenancy Records	Documentation, correspondence, and information provided by other agencies relating to special needs of current tenants		While tenancy continues	While tenancy continues	Securely Destroy		Best practice
11.10	Application and Tenancy Records	Records relating to offenders, ex-offenders and persons subject to cautions		While tenancy continues	While tenancy continues	Securely Destroy	NACRO	Best practice
11.11	Application and Tenancy Records	Safeguarding Referral		10 years	10 years	Securely Destroy	Statutory requirement under the Safeguarding Vulnerable Groups Act 2006 and Care Act 2014	Legal compliance
11.12	Application and Tenancy Records	Safeguarding Records - Serious Case Review		Minimum of 364 days or when notified Home Office has closed DHR	Minimum of 364 days or when notified Home Office has closed DHR	Securely Destroy	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
12. Tenancy Records								
12.1	Property Records	Rent registrations (superseded)	Superseded document	N/A	6 years	Securely Destroy	Rent Officer Handbook recommendation	Best practice
12.2	Property Records	Rent Registration (not superseded)		N/A	Life of company	Securely Destroy	Rent Officer Handbook recommendation	Best practice

12.3	Property Records	Fair rent documentation		N/A	6 years	Securely Destroy	Rent Officer Handbook recommendation	Best practice
12.4	Property Records	Leases and deeds of ownership		N/A	15 years after expiry.	Securely Destroy	NCVO	Best practice
12.5	Property Records	Copy of former leases	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.6	Property Records	Wayleaves, licences, and easements	Rights given or received cease	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.7	Property Records	Abstracts of title	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance

12.8	Property Records	Planning and building control permissions	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.9	Property Records	Searches	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.10	Property Records	Property maintenance records		6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.11	Property Records	Reports and professional opinions		6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance

12.12	Property Records	Development documentation	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
12.13	Property Records	Invoices		12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance
13. Vehicles								
13.1	Transport & Vehicles	Mileage records & defect sheets	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice
13.2	Transport & Vehicles	Maintenance records & MOT tests	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice
13.3	Transport & Vehicles	Copy Registrations	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice
13.4	Transport & Vehicles	Vehicle disposal log	Vehicle disposal	N/A	1 year	Securely Destroy		Best practice
13.5	Transport & Vehicles - Operators Licence Only	Operators Licence certificates and documents of title	N/A	Permanently	Permanently	Securely Destroy	Driver & Vehicle Standards Agency (DVSA) Operators Licence requirement	Legal compliance

13.6	Transport & Vehicles - Operators Licence Only	Mileage records & defect sheets	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
13.7	Transport & Vehicles - Operators Licence Only	Maintenance records & MOT tests <i>(up to 3.5T)</i>	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
13.8	Transport & Vehicles - Operators Licence Only	Maintenance records & MOT tests <i>(HGV over 3.5T)</i>	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
13.9	Transport & Vehicles - Operators Licence Only	Copy Registrations <i>(up to 3.5T)</i>	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice
13.10	Transport & Vehicles - Operators Licence Only	Copy Registrations <i>(HGV over 3.5T)</i>	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence	Best practice

14. Capital Assets

14.1	Capital Assets	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	Securely Destroy		Best practice
14.2	Capital Assets	Fixed Asset Register	NA	Permanently	Permanently	Securely Destroy	Charities Act	Legal compliance
15. Employees - Tax and Security								
15.1	Tax and Social Security	Record of taxable payments; record of tax deducted or refunded; record of earnings on which standard NI Contributions payable; record of employer's and employee NI contributions	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	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

15.2	Tax and Social Security	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	Securely Destroy	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
15.3	Tax and Social Security	Copies of notices to employees (e.g., P45, P60);	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years plus current year	Securely Destroy	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
15.4	Tax and Social Security	HMRC notice of code changes, pay & tax details		6 years	6 years	Securely Destroy	Taxes Management Act 1970	Legal compliance
15.5	Tax and Social Security	Expense Claims	After audit	3 years from the end of the tax year they relate to	6 years	Securely Destroy	HMRC	Best practice

15.6	Tax and Social Security	Record of sickness payments	On payment	6 years	6 years	Securely Destroy	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
15.7	Tax and Social Security	Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay	On payment	6 years	6 years	Securely Destroy	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

15.8	Tax and Social Security	Income Tax and NI returns	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance
15.9	Tax and Social Security	Redundancy details and record of payments & refunds	Date of redundancy	N/A	6 years	Securely Destroy	IPD recommended	Best practice
15.10	Tax and Social Security	Revenue and Customs approvals		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice
15.11	Tax and Social Security	Annual earnings summary	End of Financial Year	N/A	12 years	Securely Destroy		Best practice
15.12	Tax and Social Security	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	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance
15.13	Tax and Social Security	Actuarial valuation reports		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice

15.14	Tax and Social Security	Detailed returns of pension fund contributions; annual reconciliations of fund contributions		N/A	Permanently	Securely Destroy		Best practice
15.15	Tax and Social Security	Money purchase details	After transfer or value taken	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
15.16	Tax and Social Security	Qualifying service details	After transfer or value taken	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
15.17	Tax and Social Security	Investment policies	From end of benefits payable under policy	N/A	12 years	Securely Destroy	CIPD recommended	Best practice
15.18	Tax and Social Security	Trade Union agreements	Date of cessation	N/A	10 years after ceasing to be effective	Securely Destroy	CIPD recommended	Best practice
15.19	Tax and Social Security	Inland Revenue approvals		N/A	Life of company	Securely Destroy	CIPD recommended	Best practice
15.20	Tax and Social Security	Annual earnings summary	End of tax year	N/A	3 years from the end of the tax year they relate to	Securely Destroy	HMRC	Best practice
16. Human Resources - Pension Schemes								
16.1	Pension Schemes	Actuarial valuation reports		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice
16.2	Pension Schemes	Detailed returns of pension fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator	Best practice

16.3	Pension Schemes	Annual reconciliations of fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator	Best practice
16.4	Pension Schemes	Money purchase details	After transfer	N/A	6 years after transfer or value taken	Securely Destroy	CIPD recommended	Best practice
16.5	Pension Schemes	Qualifying service details	After transfer	N/A	6 years after transfer or value taken	Securely Destroy	CIPD recommended	Best practice
16.6	Pension Schemes	Investment policies	End of benefits payable under policy	N/A	12 years	Securely Destroy	CIPD recommended	Best practice
16.7	Pension Schemes	Pensioner records	After benefits cease	N/A	12 years after benefits cease	Securely Destroy	CIPD recommended	Best practice
16.8	Pension Schemes	Records relating to retirement benefits	After transfer or value taken	N/A	6 years	Securely Destroy	RBS(IP)R recommended	Best practice
17. Human Resources - Personnel Records								
17.1	Personnel Records	Records relating to retirement benefits	After a year of retirement	N/A	6 years	Securely Destroy	RBS(IP)R recommended	Best practice
17.2	Personnel Records	Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals	Leaving date	N/A	6 years	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings	Legal compliance

17.3	Personnel Records	Benefits and Deductions (Service contracts for directors (companies))	Date of cessation of directorship	3 years	6 years	Review	ICSA	Best practice
17.4	Personnel Records	Remuneration package	Leaving date	N/A	6 years	Review	Limitations Act 1980 Limitation for legal proceedings	Legal compliance
17.5	Personnel Records	Former employees' Human Resources files	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
17.6	Personnel Records	References to be provided for former employees	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
17.7	Personnel Records	Training Programmes	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
17.8	Personnel Records	Individual training records	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended	Best practice
17.9	Personnel Records	Short lists, interview notes and related application forms	Last Action	N/A	1 year	Securely Destroy	CIPD recommended	Best practice
17.10	Personnel Records	Application forms of non-short-listed candidates	After notification	1 year	1 year	Securely Destroy	Limitations Act 1980SDA & RRA recommend 3 months Commission for Racial Equality and Equal Opportunities recommends 6 months.	Legal compliance

17.11	Personnel Records	DBS certificate number	Date of clearance	Date of clearance + up to a maximum of 6 months	3 years	Review	DBS check code of practice (Home office)	Legal compliance Teign Housing hold only the certificate number but the system reminds HR to check again in 3 years.
17.12	Personnel Records	Timecards/ sheets	After audit	N/A	2 years	Securely Destroy	CIPD recommended	Best practice
17.13	Personnel Records	Trust deeds, rules, and minutes (for joint employee/employer sports/social clubs, etc. set up under trust)		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice
17.14	Personnel Records	Employer/Employee committee minutes (Staff Forum)		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice
17.15	Personnel Records	Parental leave records	Birth of child	N/A	18 years from birth of child	Securely Destroy	CIPD recommended	Best practice
18. Human Resources - Health & Safety								

18.1	Health & Safety	Medical records relating to control of asbestos		40 years	40 years	Securely Destroy	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
18.2	Health & Safety	Health and safety assessments; records of consultations with safety reps		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979	Legal compliance
18.3	Health & Safety	Health and safety policy statements		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979	Legal compliance
18.4	Health & Safety	Accident records, reports, accident books	Date of occurrence	3 years	6 years after date of occurrence/entry	Securely Destroy	RIDDOR Limitation for legal proceedingsRIDDOR 1995 and Limitation Act 1980Special rules apply concerning incidents involving hazardous substances.	Legal compliance

18.5	Health & Safety	Sickness records	Date of occurrence	3 years	6 years from date of sickness	Securely Destroy	The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended Professional Standards Agency	Legal compliance
18.6	Health & Safety	Health and safety statutory notices	Once compliant	6 years after compliance	6 years after compliance	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings	Legal compliance
19. Technical and Research Records								
19.1	Technical and Research	Technical and research records	After requirements have ended	N/A	12-15 years after requirements have ended for both records and reports and drawings and other data.	Securely Destroy	NCVO	Best practice
20. ASB case files and associated documents								
20.1	ASB case files and associated documents	ASB (Anti-social behaviour) case files and associated documents		N/A	5 years or until end of legal action	Securely Destroy		Best practice
21. Supporting people – subsidy claims / support plans / single assessments including supporting information								
21.1	Supporting People	Supporting people – subsidy claims / support plans / single assessments including supporting information		N/A	Duration of tenancy	Securely Destroy		Best practice

22. Resident Meetings								
22.1	Resident Meetings	Resident Meeting Minutes	From date of meeting	N/A	1 year	Securely Destroy	ICSA recommended	Best practice
23. Property Sales								
23.1	Home Ownership	New Sales applications	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2	Best practice
23.2	Property Sales	Registrations of interest	Sale of property	N/A	2 years	Securely Destroy		Best practice
23.3	Property Sales	Offer Details	Offer accepted	current year plus 6 years	6 years	Securely Destroy	Estate Agency Act 1979	Legal compliance
23.4	Property Sales	Completion documentation	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985	Best practice
23.6	Property Sales	Post purchase questionnaire/ customer feedback	Date of creation	N/A	3 years	Review	National Archives guidance	Best practice
23.6	Property Sales	Help to Buy applications	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2	Best practice
23.7	Property Sales	Resales (Shared Ownership)	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2	Best practice
23.8	Property Sales	Staircasing process documents	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985	Best practice
23.9	Property Sales	Right to Buy/ Acquire files	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985	Best practice