

## INFORMATION RETENTION AND DISPOSAL POLICY

**Classification: Management**

**Status: Approved**

<b>Policy Lead:</b>	DBS
<b>Date Approved:</b>	June 2022
<b>Last Review Date:</b>	December 2017
<b>Review Due Date:</b>	April 2025
<b>Review Period:</b>	3 years unless required earlier due to changes in the law, regulation, best practice or requirement of the Association

## REFERENCE PAGE

<b>Document Title:</b>	Information Retention & Disposal Policy
<b>Aim:</b>	To outline our approach to managing the retention and secure disposal of our information in line with our business requirements and legal obligations
<b>Objective:</b>	1 The Eildon Group will ensure that the highest standards of governance and partnership working are adhered to, including compliance with our regulatory frameworks
<b>Scope of Policy:</b>	Board & Staff
<b>Nominated Officer:</b>	Data Protection & Information Officer
<b>Approval Source:</b>	Executive Team
<b>Legal and Regulatory References:</b>	<p>There are various pieces of legislation which outline retention requirements. These include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Freedom of Information Act 2000 – including the Code of Practice Section 46 (FOIA)</li> <li>• The UK General Data Protection Regulations (GDPR)</li> <li>• Data Protection Act 2018 (DPA)</li> <li>•</li> </ul>
<b>Procedural References:</b>	<p>Data Protection Policy Freedom of Information and Environmental Information Policy Guide to Information</p>
<b>Consultation Completed:</b>	Yes - Staff
<b>Risk Implications:</b>	<p>1- Existing policy, minimal change This Schedule is part of the risk management framework for data protection.</p>
<b>Equalities Assessment:</b>	<p>All Eildon policies and key documents are developed with the clear objective of ensuring that they do not discriminate against any person and have negative impacts for equality groups. We will always welcome comments on the impact of a policy on particular groups of people in respect of, but not limited to, age, disability, gender reassignment, race, religion, sex or sexual orientation, being pregnant or on maternity leave and children's rights and wellbeing.</p>
<b>Accessibility:</b>	<p>Accessible electronically/online and in print. All documents can be translated and made available in audio, braille and large print versions upon request.</p>

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## 1. INTRODUCTION

The requirements outlined in this policy have been developed to provide a consistent approach to the retention and disposal of our information in line with business requirements and legal obligations.

This policy applies to all physical and digital information, regardless of storage location.

A key part of this policy is the Retention and Disposal Schedule contained in Appendix 1.

## 2. ROLES AND RESPONSIBILITIES

All Eildon staff are responsible for managing the information they create and receive as part of their normal daily business activities.

The following roles have specific responsibilities around the retention and disposal of information.

### **Information Asset Owner (IAO)**

IAOs ensure that all information assets under their control are following retention schedule rules. They have ownership of the information and are therefore responsible for ensuring adherence to the Retention and Disposal Schedule contained within this policy. They are responsible for authorising the destruction of information when required. They may delegate the operational responsibility for the upkeep of information assets, including the adherence to the Retention and Disposal Schedule to appropriate members of their team.

Information Asset Owners for Eildon information are identified in the Retention and Disposal Schedule in Appendix 1.

### **Data Protection & Information Officer (DPIO):**

DPIO monitors compliance with the retention schedule, whilst encouraging and working with staff to ensure ongoing conformity. Alongside this, the DPIO will report compliance with the retention schedule to individual IAO's and their teams. They will also implement any changes required to the schedule, once approved, in accordance with legislative and or business requirements and work to support the improvement in compliance with the schedule where needed.

### 3. RETENTION PERIODS

Our retention periods are driven by legislation, best practice and/or business need. If there is no legally defined retention period for corporate information, it is the responsibility of the relevant IAO(s) (with input from the DPIO) to determine an appropriate retention period.

We assign clearly defined retention periods to our information to ensure it is kept for the appropriate length of time. Each retention period has three elements:

- **Trigger** – the action which begins the retention period (e.g., ‘End of Financial Year’ or ‘End of Employment’)
- **Retention period** – the length of time the information will be kept
- **Action** – either ‘review’, ‘destroy’ or permanent preservation
  - If the action is ‘review’ the information must be reviewed to ensure it is no longer required before destruction. Outcomes of a review may be – dispose, mark for permanent preservation, or temporary extension to review again at a future date.
  - If the action is ‘destroy’, this means the information can be destroyed without being reviewed in line with our procedures.
  - If the action is ‘permanent preservation’ it will be kept indefinitely

#### Retention and Disposal Schedule

Our Retention and Disposal Schedule, Appendix 1, sets out the principal documentation which the Eildon Group should keep and our retention periods. Information must be kept for the length of time defined in the Schedule unless there is a legal requirement to destroy it sooner.

The Schedule is arranged in tables by function, rather than by directorate. By following a functional approach, we can ensure that the Schedule will not need to change in the event of organisational restructures and that information held by multiple directorates is only captured on the Schedule once.

#### Weeding

Not all information has long term value, and our Retention and Disposal Schedule does not include redundant, obsolete, or trivial information. Examples of information with limited value are:

- Draft documents
- Emails – Emails that provide evidence of decisions made should be saved to shared spaces, but other emails in the chain or emails that have no long-term value can be deleted
- Duplicate documents
- Research material

This should be destroyed periodically by each Directorate as part of normal routine housekeeping.

#### **4. REVIEW**

The Retention and Disposal Schedule will be reviewed on an annual basis by the DPIO with input from the Leadership Group and other key officers within the Eildon Group. The Executive Team will consider the outcome of this review and where required, approve the amendments proposed.

The DPIO will review the full Information Retention and Disposal Policy every 3 years. The Executive Team will consider the outcome of this review and where required, approve the amendments proposed.

## 5. APPENDIX 1 - RETENTION AND DISPOSAL SCHEDULE

<b>Governance</b>					
	<b>Retention Trigger</b>	<b>Retention Period</b>	<b>Action at end of Retention Period</b>	<b>Retention Source</b>	<b>Information Asset Owner</b>
Certificate of Incorporation	Creation	Permanent Record	Retained	Implied by CA, Sec.15.	Company Secretary
Certificate of change of company name	Creation	Permanent Record	Retained	Implied by CA, Sec.80.	Company Secretary
Memorandum & Articles of Association (original)	Creation	Permanent Record	Retained	Best practice.	Company Secretary
Articles of association (current)	Creation	Permanent Record	Retained	Best practice.	Company Secretary
Governance Documentation	Creation	Permanent Record	Retained	Required for charitable status.	Company Secretary
Constitution, Aims and Objectives	Creation	Permanent Record	Retained	Required for charitable status.	Company Secretary
Confirmation letter of charitable registration	Creation	Permanent Record	Retained	Best practice.	Company Secretary
HMRC confirmation of charitable status	Creation	Permanent Record	Retained	Best practice	Company Secretary
Registration documentation (I & P Societies)	Creation	Permanent Record	Retained	Best practice.	Company Secretary
Certificate of registration with the housing regulator	Creation	Permanent Record	Retained	Best practice.	Company Secretary
Board Member - personal data	End of Board membership	6 months	Review	DPA 2018: Data Minimisation principle.	Company Secretary
Board Member - information, documents and correspondence	End of Board membership	5 years	Review	DPA 2018: Data Minimisation principle. CA 2006 recommendation for docs post termination of directorship	Company Secretary
<b>Meetings</b>					
Notices of meetings (EHA,EEL)	End of financial year	6 years	Review	Best practice. In case of challenge to validity of meeting or resolutions.	Company Secretary
Board and committee minutes (companies)	Board Approval	Permanent Record	Retained	CA: Signed originals must be kept.	Company Secretary
Board resolutions (companies)	Board Approval	Permanent Record	Retained	CA: Signed originals must be kept.	Company Secretary
Minutes and resolutions of trustees (charities)	Board Approval	Permanent Record	Retained	Charity Commission requirement CC48	Company Secretary
Current and former policies	NA	Permanent Record	Retained	Legal Advice	CEO
Eildon wide Corporate Plans, Business Continuity, Risk Management and Strategies	Superseded	5 years	Destroy	Business Need	CEO

## Strategic Management

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Business case or Project plans & supporting documentation	Plan completion	5 years after plan completion	Destroy	Business Need	CEO

## Registrations and Statutory Returns

Annual returns to the regulator	End of financial year	5 years	Review	Best practice.	DBS
Audited company returns and financial statements (including I & P Societies' Annual Returns to Registrar of Friendly Societies)	Auditor Sign-off of Statements	Permanent Record	Retained	Best practice. Original Signed Copy	DBS
Declarations of interest	End of Board membership	5 years	Review	Limitation for legal proceedings.	Company Secretary
Register of directors and secretaries	NA	Permanent Record	Retained	CA	Company Secretary
Register of Shareholding Members	Creation of Record	Permanent Record	Review	Required by Registrar of Friendly Societies.	Company Secretary
Register of seals	Creation of Record	Permanent Record	Retained	Best practice.	Company Secretary
List of members (I & P Societies)	NA	Permanent Record	Retained	Best practice.	Company Secretary
Care Inspectorate reports	Once reported to ARCom	None	Destroy	Best Practice	DCS
Care Inspectorate registration certificates	Date of First Registration	Permanent Record	Retained	Best practice.	DCS
Care Inspectorate registration certificates	Following end of Eildon management of home	5 years	Review	Limitation for legal proceedings. Reports are public documents.	DCS

## Insurances

Annual Insurance schedule	End of policy period	6 years	Destroy	Best Practice	DBS
Claims and related correspondence	After Settlement	2 years after settlement	Review	Best Practice	DBS
Indemnities and guarantees	After expiry, 12 if related to land	6 years after expiry	Review	Legal limitation, although varies hence review	DBS
Group health policies	After cessation of benefit	12 years after cessation of benefit	Destroy	Best Practice	DBS
Employer's liability insurance certificate	From date of commencement	40 Years	Review	Best Practice. No longer legal requirement but need to be mindful of long-term industrial disease claims	DBS



## Finance, Accounting and Tax Records

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Accounting records for Limited Company	End of financial year	6 years	Destroy	CA Sec 388	DBS
Accounting records for I&P Society or Charity	End of financial year	6years	Destroy	OSCR, Best Practice	DBS
Balance sheets and supporting documents	End of financial year	10 years	Destroy	Best practice.	DBS
Loan account control reports	End of financial year	10 years	Destroy	Best practice.	DBS
Social Housing Grant documentation	Date of document	Permanently	Retained	Best practice.	DBS
Signed copy of report and accounts	Date of document	Permanently	Retained	Best practice.	DBS
Budgets and internal financial reports	End of financial year	2 years	Destroy	Best practice.	DBS
Tax returns and records	End of financial year	10 years	Destroy	TMA Section 20.	DBS
VAT records	End of financial year	6 years	Destroy	VATA	DBS
Orders and delivery notes	End of financial year	6 years	Destroy	VATA	DBS
Copy invoices	End of financial year	6 years	Destroy	VATA	DBS
Credit and debit notes	End of financial year	6 years	Destroy	VATA	DBS
Cash records & till rolls	End of financial year	6 years	Destroy	VATA	DBS
Journal transfer documents	End of financial year	6 years	Destroy	VATA	DBS
Creditors, debtors & cash income control accounts	End of financial year	6 years	Destroy	VATA	DBS
VAT related correspondence	End of financial year	6 years	Destroy	VATA	DBS
Other Banking Records					
Cheques	End of financial year	5 years	Destroy	Best Practice	DBS
Paying in counterfoils	End of financial year	5 years	Destroy	Best Practice	DBS
Bank statements and reconciliations	End of financial year	5 years	Destroy	CA	DBS
Instructions to Banks	End of financial year	5 years	Destroy	Best Practice	DBS

## Contracts and Agreements

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Contracts under seal and/or executed as deeds	After completion	12 years after completion (including any defects liability period)	Review	Best Practice.	DBS
Contracts for the receipt or supply of goods or services, including professional services	After completion	6 years after completion (including any defects liability period)	Destroy	Limitations Act	DBS
Contracts for a value of £5000 or less for the receipt or supply of goods and services, where there is no continuing maintenance or similar requirement	End of contract	3 years	Destroy	Best Practice	DBS
Loan agreements	Last payment	12 years after last payment	Destroy	Best Practice	DBS
Rental and hire purchase agreements	After expiry	5 years after expiry	Destroy	Best Practice	DBS
Indemnities and guarantees	After expiry	12 years after expiry	Destroy	Best Practice	DBS
Property related Deeds of ownership and covenant	Sale of property or land	7 years	Destroy	Best Practice.	DBS
Lease agreements	After expiry	6 years after expiry	Destroy	NCVO	DBS
Documents relating to successful tender	After contract end	5 years after end of contract	Destroy	Best Practice	DBS
Documents relating to unsuccessful tenders	After notification	5 years after notification	Destroy	Best Practice	DBS
Forms of tender	After tender closes	5 years	Destroy	Best Practice	DBS
Index of donations granted /donation records and documentation	End of financial year	6 years	Destroy	IRS guidance	DBS

## Application and Tenancy Records

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Electronic Applications for accommodation	Annual Review not completed	1 year	Destroy	Best Practice.	DCS
Withdrawn applications for accommodation	Date application withdrawn	1 Year	Destroy	Best Practice.	DCS
Housing Benefit notifications	Date of document	2 years	Destroy	CIOH	DCS
Tenancy Files, including rent payment records, details of any complaints and harassment cases, information provided by third parties, correspondence etc	End of tenancy	5 years	Destroy	Best Practice.	DCS
Non Constituted Customer Group - Meeting Minutes	Date of meeting	2 years	Destroy	DPA	DCS
Constituted Customer Group - Meeting minutes	Date of Meeting	5 Years	Destroy	Best Practice.	DCS
Support plans for current tenants - Most recent	Once loaded into Stori Care	None	Destroy	Business Need	DCS
Support plans for current tenants - Superseded	Date Superseded	None	Destroy	Business Need	DCS
Sheltered and Supported Resident information	End of tenancy	5 years	Destroy	Best Practice.	DCS
Records relating to offenders, ex-offenders and persons subject to cautions	End of tenancy	None	Review & Destroy	Best Practice.	DCS
Supporting People: subsidy claims, single assessments including supporting info.	From submission	2 years	Destroy	Best Practice.	DCS
Care and Support Returns Report (no personal info)	Date of report	2 years	Destroy	Best Practice.	DCS
Care and Support Returns to SBC	From end of financial year	2 years	Destroy	Best Practice.	DCS
Care and Support Contract Monitoring	Date of capture	2 years	Destroy	Best Practice.	DCS
Customer Surveys including annual satisfaction survey, monthly transactional survey and any other surveys undertaken with external parties.	Date of survey	5 years	Destroy	Business Need	DCS
GDPR requests including Subject Access Requests/Right to Erasure	End of Tenancy	5 Years	Destroy	Best Practice.	DCS
Customer Experience Hub Call Recordings	Date of call	30 days	Destroy	Best Practice.	DBS
Non Tenant Clients - data relating to contacts e.g MP's/MSP's	Date left office	1 year	Destroy	Best Practice	DCS
Non Tenant clients - contact information related to ASB case files & associated documents.	End of legal action or Case Closed	1 year	Destroy	Best Practice.	DCS

<b>Property Records</b>					
	<b>Retention Trigger</b>	<b>Retention Period</b>	<b>Action at end of Retention Period</b>	<b>Retention Source</b>	<b>Information Asset Owner</b>
Rent registrations (all)	Date of rent registration	5 years	Destroy	Best Practice.	DCS
Fair rent documentation	Date of rent registration it is related to.	5 years	Destroy	Best Practice.	DPA
Wayleaves, licences and easements	After rights given or received cease	12 years after rights given or received cease	Destroy	Best Practice.	DPA
Abstracts of title	After interest ceases	12 years after interest ceases.	Destroy	Best Practice.	DPA
Planning and building control permissions	After interest ceases	60 years after interest ceases	Destroy	Best Practice.	DPA
Legal Searches	After interest ceases	12 years after interest ceases	Destroy	Best Practice.	DPA
Property maintenance records - needs better definition - suggest General - e.g. servicing records, images, estimates	Date of event	5 years	Destroy	Best Practice.	DPA
Warranties, Guarantees and indemnities	Expiry of Warranty/Indemnity	None	Destroy	Best Practice.	DPA
Certifications	Date of certification	Gas - 1 year, Electrical 10 years, EPC - 10 years	Review	Best Practice.	DPA
Property records	Date of disposal or demolition	7 years	Destroy	Best Practice.	DPA
Reports and professional opinions	Date of event	5 years	Destroy	Best Practice.	DPA
Development documentation - general	After settlement of all issues/final retention payment made	12 years after settlement of all issues	Destroy	Best Practice.	DPA
Health and Safety/ Compliance Inspections Property	Date of Inspection	6 Years	Destroy	Best Practice	DPA
CCTV footage	Date of capture	30 days	Destroy	Best Practice.	DCS
<b>Vehicle Records</b>					
Mileage records	After disposal	2 years after disposal	Destroy	Best Practice.	DBS
Registration certificate (VC5)	Vehicle purchase date	None	Destroy	Best Practice.	DBS
Vehicle documentation - General e.g. Maintenance records, MOT tests , servicing etc	After disposal	2 years after disposal	Destroy	Best Practice.	DBS

## Capital Assets Records

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Capital Assets Register	After date sold, transferred or disposed of	Date of purchase to at least 6 years after date sold, transferred or disposed of.	Destroy	Best Practice.	DBS
Fixed Asset Register	NA	Permanently	Retain	CA Charities Act	DBS

## Employees: Tax and Social Security

Record of taxable payments	End of financial year	6 years	Destroy	TMA	CEO
Record of tax deducted or refunded	End of financial year	6 years	Destroy	TMA	CEO
Record of earnings on which standard National Insurance contributions payable	End of financial year	6 years	Destroy	TMA	CEO
Record of employer's and employee's National Insurance Contributions	End of financial year	6 years	Destroy	TMA	CEO
NIC contracted-out arrangements	End of financial year	6 years	Destroy	TMA	CEO
Copies of notices to employee (e.g. P45, P60)	End of financial year	6 years plus current year	Destroy	TMA	CEO
Inland Revenue notice of code changes, pay & tax details	End of financial year	6 years	Destroy	TMA	CEO
Expense claims	End of financial year	6 years after audit	Destroy		CEO
Record of sickness payments	End of financial year	6 years	Destroy	SSPR	CEO
Record of maternity payments	End of financial year	3 years	Destroy	SMPR	CEO
Income tax PAYE and NI returns	End of financial year	6 years	Destroy	IT(E)R	CEO
Redundancy details and record of Payments & Refunds	From date of redundancy	6 years	Destroy	Best Practice.	CEO
Facts relating to redundancies (less than 20 members of staff affected)		6 years if less than 20 redundancies, 12 years if 20 or more	Destroy	Best Practice.	CEO
Facts relating to redundancies (20 members of staff or more affected)		12 years if 20 or more	Destroy	Best Practice.	CEO
Inland Revenue approvals	NA	Permanently	Retain	Best Practice.	CEO
Annual earnings summary	End of financial year	12 years	Destroy	Best Practice.	CEO
Wage / Salary Records	End of financial year	6 Years	Destroy	TMA	CEO

## Employees: Pension Schemes

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Actuarial valuation reports	NA	Permanently	Retain	Best Practice.	CEO
Detailed returns of pension fund contributions	NA	Permanently	Retain	Best Practice.	CEO
Annual reconciliations of fund contributions	NA	Permanently	Retain	Best Practice.	CEO
Money purchase details	After transfer or value taken	6 years after transfer or value taken	Destroy	Best Practice.	CEO
Qualifying service details	After transfer or value taken	6 years after transfer or value taken	Destroy	Best Practice.	CEO
Investment policies	From end of benefits payable under policy	12 years from end of benefits payable under policy	Destroy	Best Practice.	CEO
Pensioner records	After benefit ceases	12 years after benefits cease	Destroy	Best Practice.	CEO
Records relating to retirement benefits	After year end	6 years after year of retirement	Destroy	RBS(IP)R	CEO

## Employees: Personal Procedures

Employee Files and Personal Development Records	End of employment	6 years.	Destroy	Best Practice.	CEO
Successful Recruitment Candidate Information (including third party referee details)	End of Employment	6 years	Destroy	Best Practice	CEO
Short lists, interview notes and all application forms ( unsuccessful candidates)	After closing date of vacancy (Successful docs moved to employee file)	1 year	Destroy	Best Practice.	CEO
Disclosure Certificate	Once loaded into Jane	None	Destroy	The Police Act 1997	CEO
PVG Scheme Record	Date of record	6 months	Destroy	Protection of Vulnerable Groups (Scotland) Act 2007	CEO
Disclosure or PVG risk assessments	End of Employment	6 years	Destroy	Best Practice.	CEO
Trust deeds, rules and minutes (for joint employee/employer sports/social clubs, etc, set up under trust)	NA	Permanently	Retain	Best Practice.	CEO
Employer/employee committee minutes	NA	Permanently	Retain	Best Practice.	CEO
Records relating to working time / Softworks / Rota Geek etc.	After audit	2 years	Destroy	WTR	CEO
Sickness records	Date of sickness	3 Years	Destroy	SSP	CEO
Parental Leave	From birth / adoption	5 years from birth / adoption	Destroy	WTR	CEO

### Employees: Health and Safety

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
Medical records relating to control of asbestos	From date of entry	40 years	Review	CAWR	CEO
Health and Safety assessments	Last Action	Permanently	Retain	Best Practice.	CEO
Records of consultations with safety representatives	Event Date	Permanently	Retain	Best Practice.	CEO
Accident records, reports	Date of incident	3 years from date of incident	Review	RIDDOR	CEO
Accident books	Date of incident	3 years	Review	Best Practice.	CEO
Health and safety statutory notices	Date of notice	5 years after compliance	Destroy	Best Practice.	CEO

### Communication Data Control

Colleague Outlook Mailboxes	Date of Email	2 years	Destroy	Business Need	DBS
Internal Email Mailboxes	Date of Email	2 Years	Destroy	Business Need	DBS
External Email Mailboxes	Date of Email	2 Years	Destroy	Business Need	DBS
Physical Correspondence	Once Scanned	0 Days	Destroy	Business Need	DBS
Teams Chat	Date of creation	2 Years	Destroy	Business Need	DBS
365 Group Mailboxes	Date of Email	2 Years	Destroy	Business Need	DBS
Colleague OneDrive	Date Created	2 Years	Destroy	Business Need	DBS
Press Releases, Campaigns and Projects	Date of creation	6 years	Destroy	Business Need	CEO
Staff Events and Briefings, Public Engagement	Date of creation	3 Years	Destroy	Business Need	CEO
Webinar / Live event recordings	Date of recording	1 Year	Destroy	Business Need	CEO
Communications with Journalists	Date of Email	3 Years	Destroy	Business Need	CEO
Analytics from Social Media, E-Newsletter and other digital communications	Date of creation	6 Years	Destroy	Business Need	CEO
Photographs - Image banks	Date of creation	6 Years	Destroy	Business Need	CEO
FOI and other Information Requests	Date of receipt	2 Years	Destroy	Business Need	DBS
Record of Data Breaches and related action taken	Date of event	6 Years	Destroy	Limitations Act	DBS

## Information Control

	Retention Trigger	Retention Period	Action at end of Retention Period	Retention Source	Information Asset Owner
FOI requests	Case Closed	2 Years	Destroy	Business Need	DBS
Breach Report and supporting documentation	Case Closed	6 Years	Destroy	Limitation Act 1980	DBS
Data Privacy Impact Assessments	Last update	6 Years	Review	Business Need	DBS
Documents relating to IT systems integral to their running and use	End of system use	1 Year	Review	Business Need	DBS
Projects and Corporate Programmes	Last Action	3 Years	Review	Business Need	DBS
IT Service Desk reports, service requests and knowledge	Last Action	3 Years	Destroy	Business Need	DBS
IT System Audit Logs	Last Action	1 Year	Destroy	Business Need	DBS
IT Back ups	Last Action	Up to 6 months	Destroy	Business Need	DBS