# Data Retention Policy

| Policy Name: | Data Retention Policy |
|---|---|
| Status: | Version 2.4 |
| Approved by: | |
| Drafted by: | Wayne Squire |
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| E&D impact analysed: | N/A |
| Customer consultation: | N/A |
| Next Review Date: | July 2023 |

## 1. Introduction

1.1. It is essential for organisations to set out, and follow, time scales for retaining the data that it holds because:

- The General Data Protection Regulation requires organisations not to keep personal data longer than necessary (Article 5 of the GDPR).

- We need to retain certain documents for the purposes of possible future legal claims by and against WCHG. Periods of retention therefore need to take account the periods set down in the Limitation Act 1980 after which legal proceedings are time-barred (generally between 3 and 12 years depending on the type of claim).

- Storage space costs money.

- Digital storage also takes up file space and will only be of value if it is manageable and accessible.

- Subject access requests made under Article 15 of the GDPR requires us to disclose personal information held about a data subject. Holding unnecessary information will increase the time spent and the cost of processing such requests.

1.1. This Policy[1] sets out the length of time that records and documentation should be retained. It is important that records are retained for the period set out but not retained for more than 12 months beyond this timescale. For example, copy invoices should be kept for 6 years but it may be impracticable to destroy each invoice on its 6th anniversary. These records should however be disposed of within 12 months i.e. by the 7th anniversary. This gives adequate time to make arrangements for the proper disposal of the records. In exceptional circumstances records can be retained for longer, for instance due to legal hold[2].

1.2. All data when no longer required must be disposed of in a secure manner using the Group's confidential waste procedures. Confidential waste is collected in dedicated lockable containers at all Group premises.

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[1] The Group's Retention Policy is based on the National Housing Federation schedule issued October 2018, and guidance from the Information & Records Management Society.

[2] The CPR Practice Direction 31B states that 'as soon as litigation is contemplated, the parties' legal representatives must notify their clients of the need to preserve disclosable documents. The documents to be preserved include Electronic Documents which would otherwise be deleted in accordance with a document retention policy or otherwise deleted in the ordinary course of business'.

1.4     It is advisable to obtain legal advice on the admissibility of electronically formatted documents for presentation in a court of law before destroying a hard copy original document even if an electronic version is retained (for example signed contracts and similar documents the original of which may be central to legal proceedings).

1.5     The tables below list the principal documentation which Wythenshawe Community Housing Group should keep, together with details of retention periods.

1.6     In order to ensure that the schedule is implemented across the Group, teams must have their own local schedule (based on the tables below). Local schedules should be maintained and implemented by the relevant Data Champion, and any changes to local schedules should be approved by the Data & Information Manager, and the change (if agreed) should be reflected in the Group schedule. Likewise, any changes to the Group schedule will be communicated to the relevant Data Champion to implement locally.

1.7     This policy will be reviewed annually in line with other ICT policies.

# 1. Governance

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 1.1 | Governance | | Superseded document | 1 year after superseded (longer if required for historical reasons) | Securely Destroy | | Best practice |
| 1.2 | Governance | Governance documentation | | Life of company | Securely Destroy | | Required for charitable status. |
| 1.3 | Governance | Constitution, Aims and Objectives | | Life of company | Securely Destroy | | Required for charitable status. |
| 1.4 | Governance | Record of HMRC confirmation of charitable status | End of financial year | Life of company | Securely Destroy | ICSA | Annual return and best practice. |
| 1.5 | Governance | Record of charitable registration | | Life of company | Securely Destroy | ICSA | Best practice. |
| 1.6 | Governance | Certificate of Incorporation | | Life of company | Securely Destroy | Companies Act 2006 section 15 | Legal compliance |
| 1.7 | Governance | Memorandum of Association | | Life of company | Securely Destroy | Companies Act 2006 section 32 | Legal compliance |
| 1.8 | Governance | Articles of Association/ Model Rules | | Life of company | Securely Destroy | Companies Act 2006 section 32 | Legal compliance |
| 1.9 | Governance | Certificate of registration with housing regulator | | 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 | Securely Destroy | Companies Act 2006 section 80 | Legal compliance |
| 1.11 | Governance | Registration documentation (Co-operative and Community Benefit Societies) | | 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 | 5 years | Securely Destroy | | Best practice |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **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. | 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 |

## 2. Data Governance

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 2.1 | Data Governance | Emails | Date received | Archived after 1 year Destroyed after 6 years (role dependent ) | Securely Destroy | | Best practice & business requirement |
| 2.2 | Data Governance | CCTV | Date of recording | 30 days | Securely Destroy | DPA | Best practice |
| 2.3 | Data Governance | Call Recordings | Date of recording | 6 months | Securely Destroy | FCA Handbook, conduct of business 11.8 | Best practice |
| 2.4.1 | Data Governance | Data Subject Access Requests | Current year | 6 years | Securely Destroy | | Best practice |
| 2.4.2 | Data Governance | Data Subject Access Requests - where complaint has been made to the ICO | Current year | 6 years | Securely Destroy | | Best practice |
| 2.5 | Data Governance | Films / Videos / Photos | Date of recording | 5 years | Review | | Best practice |
| 2.6 | Data Governance | Data Protection Compliance Records including breach records | Date of recording | 6 years | Securely Destroy | | Best practice |
| 2.7 | Data Governance | Fraud Records | Date of recording | 6 years | Securely Destroy | FCA Handbook | Best practice |
| 2.8 | Data Governance | Website form data | | Not retained | Securely Destroy | | Best practice |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **2.9** | Data Governance | Social media messages | Date of message | 6 months | Securely Destroy | | Best practice |

## 3. Meetings

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **3.1** | Meetings | Notice of meetings | | 6 years | Securely Destroy | | In case of challenge to validity of meeting or resolutions |
| **3.2** | Meetings | Executive meeting agendas, papers, minutes and resolutions | | 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 | 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 | 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 | Securely Destroy | Companies Act 2006 section 356 | Legal compliance |
| **3.6** | Meetings | Shareholder meeting agendas and papers | Date of meeting | 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 | Securely Destroy | Charity Commission requirement CC48 | Legal compliance |

## 4. Regulations and Statutory Returns

| | Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 4.1 | Regulations and Statutory Returns | Audited financial statements | Submission | 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 | Securely Destroy | Companies Act 1985 | Legal compliance |
| 4.3 | Regulations and Statutory Returns | Annual Statutory Returns to the Regulator | 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 | Securely Destroy | Companies Act 2006 section 162 | Legal compliance |
| 4.5 | Regulations and Statutory Returns | Register of shareholding members | | 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 | Securely Destroy | Companies Act 1984 s.325 | Legal compliance |
| 4.7 | Regulations and Statutory Returns | Declarations of interest | | 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 | Securely Destroy | Registrar of Friendly Societies | Required by Registrar of Friendly Societies |

## 5. Strategic Management

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **5.1** | Strategic | Business Plans and supporting documentation | End of Business Plan Period | 5 years | Securely Destroy | | Best practice |

## 6. Insurance

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **6.1** | Insurance | Current/former policies:<br>- crime cover<br> - engineering inspection<br> - motor insurance<br> - property damage<br> - loss of commercial rent<br> - housing contents<br> - office contents<br> - works in progress cover<br> - business interruption cover<br> - all risks cover<br> - engineering insurance<br> - personal accident for staff<br> -  professional indemnity<br> -  crime/fidelity cover | End of policy term | Life of company | Review | Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim.<br>N.B. Housing Association Boards must annually reaffirm formally their continuation of the Voluntary Board Members Liability Policy (automatically provided via NHF membership). NCVO (National Council for Voluntary Organisations) recommends 3 years after lapse. | Legal compliance and best practice |
| **6.2** | Insurance | Certificate of Employers' Liability Insurance | End of policy term | 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 | Life of company | Securely Destroy | As current and former policies are kept permanently (above), schedules should be too.<br>Best practice | Best practice |
| **6.4** | Insurance | Claims and related correspondence | End of settlement | 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 | 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 | 12 years after cessation of benefit | Securely Destroy | | Best practice |

## 7. Finance

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 7.1 | Finance | Accounting records for Limited Company | | 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 | | 6 years | Securely Destroy | | Best practice |
| 7.3 | Finance - Cheques and associated records | Cash books/sheets | End of Financial Year | 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 | 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 | 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 | 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 | 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 | Securely Destroy | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 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 | 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 | 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 | 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 | 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 | 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 | 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 | 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 | Securely Destroy | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| **Ref.** | **Function** | **Record type** | **Retention trigger** | **WCHG retention period** | **Action at end of retention period** | **Retention source** | **Reason for retention** |
| **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 | 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 | 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 | 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 | 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 | 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 | 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 | Securely Destroy | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 7.24 | Finance-Salaries and related records | Copies of salaries/wages payroll sheets | End of Financial Year | 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 | 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 | 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 | 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 | 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 | 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 | 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 | Review | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **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 | Review | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

## 8. Other banking records

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 8.1 | Other Banking Records | Cancelled / Dishonoured Cheque | End of Financial Year | 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 | 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 | 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 | 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 | 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 | 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 | 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 | Securely Destroy | HM treasury guidelines, National Audit Office advice | Legal compliance and best practice |

## 9. Contracts and Agreements

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 9.1 | Contracts and Agreements | Contracts under seal and/or executed as deeds | Completion | 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) | 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 | 2 years. Suggested limit: goods or services up to £50,000 | Securely Destroy | | Best practice. |
| 9.4 | Contracts and Agreements | Loan agreements | Last payment | 12 years after last payment | Securely Destroy | | Best practice |
| 9.5 | Contracts and Agreements | Licensing agreements | Expiry of agreement | 6 years | Securely Destroy | Limitation Act 1980. | Legal compliance |
| 9.6 | Contracts and Agreements | Rental and hire purchase agreements | Expiry of agreement | 6 years | Securely Destroy | Limitation Act 1980. | Legal compliance |
| 9.7 | Contracts and Agreements | Indemnities and guarantees | Expiry of agreement | 6 years | Securely Destroy | Limitation Act 1980. | Legal compliance |
| 9.8 | Contracts and Agreements | Documents relating to successful tender | End of contract | 6 years | Securely Destroy | | Best practice |
| 9.9 | Contracts and Agreements | Documents relating to unsuccessful tenders | After notification | 2 years after notification | Securely Destroy | | Best practice |
| 9.10 | Contracts and Agreements | Forms of tender | | 6 years | Securely Destroy | | Best practice |
| 9.11 | Contracts and Agreements | Documentation relating to purchases of medical devices and medical equipment | | 11 years | Securely Destroy | | Best practice |

## 10. Charitable Donations

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| **Reference** | **Function** | **Record type** | **Retention trigger** | **WCHG retention period** | **Action at end of retention period** | **Retention source** | **Reason for retention** |
| **10.1** | Charitable Donations | Deeds of covenant | | 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 | | 6 years | Securely Destroy | N/A | Best practice |
| **10.3** | Charitable Donations | Account documentation | | 6 years | Securely Destroy | Companies Act recommends 3 years.<br>Best practice | Best practice |

## 11. Tenancy Records & Applications

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **11.1** | Application and Tenancy Records | Applications for accommodation | Offer accepted | 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 | | 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 | | 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 | | 2 years | Securely Destroy | | Best practice |
| **11.5** | Application and Tenancy Records | Tenants' tenancy Files, including tenancy agreements, rent payment records, and details of any complaints and harassment cases | End of tenancy | 6 years | Securely Destroy | Limitations Act 1980 | Legal compliance |
| **11.6** | Application and Tenancy Records | Former tenants' tenancy files | | See 11.5 | | | |
| **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) | 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 |

| | Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| Ref. | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 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) | 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 | Securely Destroy | | Best practice |
| 11.10 | Application and Tenancy Records | Records relating to offenders, ex-offenders and persons subject to cautions | Offer accepted | While tenancy continues | Securely Destroy | NACRO | Best practice |
| 11.11 | Application and Tenancy Records | Safeguarding Referral | | 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 | 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 |
| 11.13 | Application and Tenancy Records | ID documentation (in connection with housing applications or change of circumstances) - hardcopy | Decision made | Destroy copies / return originals to tenant | Securely Destroy | Common practice | Best practice |
| 11.14 | Application and Tenancy Records | ID documentation (in connection with housing applications or change of circumstances) - scanned copies | Decision made | Upload to Manchester Move, destroy our copies | Securely Destroy | Common practice | Best practice |

## 12. Property Records

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **12.1 – 12.3** | Property Records | These records are not applicable to WCHG | N/A | N/A | N/A | N/A | N/A |
| **12.4** | Property Records | Leases and deeds of ownership | | 15 years after expiry. | Securely Destroy | NCVO | Best practice |
| **12.5** | Property Records | Copy of former leases | Settlement of all issues | 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 | 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 | 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 | 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 | Securely Destroy | Limitation for legal action relating to land or contracts under seal. Limitations Act 1980 | Legal compliance |

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **12.10** | Property Records | Property maintenance records | | 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 | 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 | 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 | Securely Destroy | Limitation for legal action relating to land or contracts under seal. Limitations Act 1980 | Legal compliance |

## 13. Vehicles

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Ref | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **13.1** | Vehicles | Vehicle records (finance & maintenance) | Vehicle disposal | 7 years | Securely Destroy | | Best practice |
| **13.2** | Vehicles | Driving licence checks | Until superseded | Destroy | Securely Destroy | | Best practice |
| **13.3** | Vehicles | Driver logs | Driver action | 7 years | Securely Destroy | | Best practice |

## 14. Capital Assets

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **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 | 6 years | Securely Destroy | | Best practice |
| **14.2** | Capital Assets | Fixed Asset Register | NA | Permanently | Securely Destroy | Charities Act | Legal compliance |

## 15. Employees – Tax and Security

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **15.1** | Payroll and Leave | Records for the purposes of tax returns including wage or salary records, records of overtime and bonuses | End of financial year | 6 years from the end of the tax year to which they relate | Securely destroy | s12B, Taxes Management Act 1970 Sch 18, para 21 Finance Act 1998 | Legal compliance |
| **15.2** | Payroll and Leave | Expenses (including claims, authorisation and receipts); travel and subsistence; credit card statements. | End of financial year or closure of project | 6 years from end of Financial Year in which the claim is made.<br><br>Keep project-related record for Duration of project / contract + 10 years. | Securely Destroy | Statutory obligation to keep accounting records under the Companies Act 2006, Charities Act 2011 Chapter 25 s. 131, Value Added Tax Act 1994, Value Added Tax Regulations 1995 and Finance Act 1998. Also accountability to donors and reputational responsibility | Legal compliance, Legitimate interests |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 15.3 | Payroll and Leave | Statutory Sick Pay Records | End of financial year | 3 years after the end of the tax year to which they relate | Securely destroy | The Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014, in force from 6th April 2014, revoked regulation 13 of the 1982 Regulations which provides for records concerning payments of Statutory Sick Pay to be retained by employers. However, Regulation 13A of the 1982 regulations is still in force and an employer may be required to produce records to show SSP has been paid to their employees and Government guidance is to keep them. | Legal compliance |

| Document overview | | | Retention Schedule | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Reference** | **Function** | **Record type** | **Retention trigger** | **WCHG retention period** | **Action at end of retention period** | **Retention source** | **Reason for retention** |
| **15.4** | Payroll and Leave | Statutory maternity, paternity and shared parental pay records, calculations, certificates or other evidence | End of financial year | 3 years after the end of the tax year in which the period of statutory pay ends | Securely destroy | Statutory Maternity Pay (General) Regulations 1986, SI 1986/1960, reg 26<br><br>Statutory Paternity Pay and Statutory Adoption Pay (Administration) Regulations 2002, reg 9<br><br>Statutory Shared Parental Pay (Administration) Regulations 2014, reg 9 | Legal compliance |
| **15.5** | Payroll and Leave | National Minimum Wage Records | End of financial year | 3 years from the end of the pay reference period the records relate to | Securely destroy | Reg 59 National Minimum Wage Regulations 2015 | Legal compliance |
| **15.6** | Payroll and Leave | Pay As You Earn Records, including wage sheets and deductions working deeds | End of financial year | 3 years from the end of the tax year to which they relate | Securely destroy | Reg 97, Income Tax (Pay As You Earn) Regulations 2003 | Legal compliance |
| **15.7** | Payroll and Leave | Income tax and NI returns, income tax records and correspondence with HMRC | End of financial year | 3 years from the end of the tax year to which they relate | Securely destroy | Reg 97, Income Tax (Pay As You Earn) Regulations 2003 | Legal compliance |

| Document overview | | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **15.8** | Payroll and Leave | Leave forms<br>Starter Forms to advise Payroll of new member of staff, annual leave records , sickness records, Deductions reconciliations, details of benefits in kind and tax records (including Forms P6, P9D, P11D,P32, P45, P46/P38(S), P60)<br>Student loan repayment records | End of financial year | 6 years from the end of the tax year to which they relate | Securely Destroy | Based on requirements of Finance Act 1998 Schedule 18 Part III and Income Tax (Pay as You Earn) Regulations 2003 reg 97.<br><br>claims. | Legal compliance, Best Practice |

## 16. Human Resources - Pension Schemes

| Document overview | | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **16.1** | Pensions - Accounts | Accounts relating to the scheme, Books and other records on which such accounts and reports are based. | | Records evidencing an individual employee's pension contributions and entitlement should be retained until the death of the member's beneficiary. | Review for potential need to retain longer as accounting and tax records | Pensions Regulator Detailed Guidance-9, Keeping Records, April 2015. | Legal compliance |
| **16.2** | Pensions – Actuarial Valuation | Actuarial valuation reports | | Permanently | N/A | CIPD Recommended | Best practice |

| | Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| 16.3 | Pensions - Administration and Financial | Relevant records of jobholders and workers who become members, Opt-in notices, Joining notices, Contributions, Controlling directors as members of schemes, Insurance policy purchases, Membership records, Movement or transfer of assets, Participation of employers in a scheme, Payment to controlling directors, Payments in and out, Payments of pensions and benefits, Payments to leavers and employers, Payments to professional advisers, Purchase of annuities, Reporting of chargeable events, Retirement due to incapacity, Special contributions by employers, Transfers in and out. | | 6 years from the end of the scheme year to which they relate or in which the event took place or, as applicable.<br><br>6 years after the last payment of benefit.<br><br>Records evidencing an individual employee's pension contributions and entitlement should be retained until the death of the member's beneficiary, including Death Benefit Nomination and Revocation Forms. | Review for potential need to retain longer as accounting and tax records | Employers' Duties (Registration and Compliance) Regulations 2010, regs. 5-8 + As accounting records.<br><br>Also the Pensions Regulator Detailed Guidance-9, Keeping Records, April 2015. | Legal compliance |
| 16.4 | Pensions – Administration and Financial | Opt-out notices | | 4 years | Destroy securely | Pensions Regulator Detailed Guidance-9, Keeping Records, April 2015. | Legal compliance |

## 17. Human Resources - Personnel Records, Recruitment & Training

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Ref | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **17.1** | Personnel File | Records relating to individual staff member -  Change of terms form (to advise Payroll when salary, address, etc. changes), Induction, Undergraduate Scholarship Awards, Job History Security files, Appraisals, Personal Training, Leave,  Benefits, Leaving, Redundancy, Occupational Health (not COSHH) etc. | End of employment | Employee Record = End of employment + 6 years.<br><br>Settlement agreements with staff = 20 years after employment ceases.<br><br>Records evidencing an individual employee's pension contributions and entitlement should be retained until the death of the member's beneficiary. | Consider retaining summary record for reference purposes, else review to Destroy | Based on treating the employee relationship as an ordinary contract under the Limitation Act 1980, c. 58, s. 5.<br><br>Keeping of pension evidence is best practice – exceeds 6 year (from end of Scheme year) guidance within the Pension Act 2011 | Legal compliance |
| | Personnel File | Contracts, personnel and training records, written particulars of employment, changes to terms and conditions, directors' service contracts and any variations | End of employment | 6 years from the end of employment unless the document has been executed as a deed, in which case 12 years. | Securely destroy | s5, Limitation Act 1980<br><br>s228, Companies Act 2006 | Legal compliance |
| | Personnel File | Records relating to and/or showing compliance with Working Time Regulations 1998, including registration of work and rest periods and working time opt-out forms | End of reference period to which the working relates | 2 years from the date on which the record made | Securely destroy | Reg 9, Working Time Regulations 1998 | Legal compliance |
| | Personnel File | Records relating to annual leave, parental leave, sickness records and records of returning to work following sickness, maternity etc | End of tax year | 6 years from the end of the tax year in which the records were created | Securely destroy | s5, Limitation Act 1980 | Legal compliance |
| **17.2** | Personnel File | Records relating to individual staff member - disciplinary & grievance | | Employment Ceases + 6 years. | Securely Destroy | s5, Limitation Act 1980 | Legal compliance |
| | Personnel File | ID documents (e.g passport) | | 2 years from the date of termination of employment | Securely Destroy | Immigration (Restrictions on Employment) Order 2007 | Legal compliance |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **17.3** | Recruitment | Adverts | | 10 years | Securely Destroy | | Business need. |
| | | Authorisation to recruit | | Authorisation = Vacancy Filled + 6 years. | Securely Destroy | | Evidence and limitation of legal action. |
| | | Applications – unsuccessful | | Unsuccessful Applicants = filling of vacancy and notifying applicants + 12 months, then Destroy. | Securely Destroy | Applicants have 3 months to make claim via Tribunal if unsuccessful. Aligned to the Equality Act 2010 Code of Practice, Employment Statutory Code of Practice, Chapter 16. Retain for a further 9 months if applicant is to be kept on file for further opportunities. | Business need and limitation period for legal action. |
| | | Applications – successful (including CVs, references, interview notes and test results) | | Successful Applicants = Transfer to Personnel file.<br><br>Retain for 6 years following termination of employment | Securely Destroy | Limitation Act 1980 | Best Practice |
| | | Enquiries | | Records documenting enquiries about vacancies and requests for application forms = Completion of recruitment process. | Securely Destroy | | Business need (Legitimate Interests) |
| | | DBS (CRB) Checks. | Recruitment decision | No longer than necessary and a maximum of 6 months unless it is necessary for the ongoing employment relationship | Securely Destroy | Home Office Code of Practice For Registered Persons and other recipients of Disclosure Information.<br><br>The Information Commissioner's Office, Employment Practices Code (data protection). | Best practice |
| **17.4** | Training | Training needs analysis and budgets, Course Development and Delivery, Certification. | Course life span / delivery | 6 years | Securely Destroy | | Business need and limitation period for legal action. |

| Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Ref | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| | | For records documenting individual employees' training and development needs, see Personnel. | | Records containing individual feedback on training and development programmes = Completion of action taken following analysis of feedback. | Securely Destroy | | Business need. |
| | | | | Records documenting (anonymised) workforce feedback on training and development programmes = Completion of Programme + 6 years. | Securely Destroy | | Legal Accountability. |
| **17.4** | Volunteers | Treat the same as employee records | | | | | |

## 17A. Human Resources - industrial relations

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **17A.1** | Industrial / Employee Relations - Meetings | Works Council / Representative and Trade Union meetings, trade union agreements | | Review after 10 years of ceasing to be effective | Securely Destroy | Evidence and reference purposes. 10 years guidance is provided by the Chartered Institute of Personnel and Development. | Best practice |
| **17A.2** | Industrial / Employee Relations – Staff Grievances | Records documenting grievances raised by staff (which do not relate directly to their own contracts of employment), the company's response, action taken and the outcome. | Last action on case | 6 years from the termination of employment | Review for precedent value, else Destroy | | Legal accountability. |
| **17A.3** | Industrial / Employee Relations – Surveys | Records documenting the design of workforce surveys and consultations | Completion of survey/consultation | 6 years | Securely Destroy | | Legal accountability. |
| **17A.4** | Industrial / Employee Relations – Surveys | Records containing (identifiable) individual responses to workforce surveys and consultations | Completion of analysis of responses. | N/A | Securely Destroy | | Data Protection. |
| **17A.5** | Industrial / Employee Relations – Surveys | Records containing summary (anonymised) results of workforce surveys and consultations | Completion of survey | 6 years | Securely Destroy | | Legal accountability |

## 17B. Human Resources - organisational design

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **17B.1** | Organisational Design | Organisation Charts and Succession Planning. | | | Review for precedent value, else Destroy | Limitation of any legal action (and heritage value of organisation charts). | Best practice |

## 18. Health & Safety

| | Document overview | | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|---|
| **Reference** | **Function** | **Record type** | **Retention trigger** | **WCHG retention period** | **Action at end of retention period** | **Retention source** | | **Reason for retention** |
| **18.1** | Health & Safety | Medical records including occupational health surveillance reports and records relating to control of asbestos | Date of last entry | 40 years | Securely Destroy | HSE guidance<br><br>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 | Securely Destroy | Health and Safety at Work Act 1974 | | Legal compliance |
| **18.3** | Health & Safety | Health and safety policy statements | | Permanently | Securely Destroy | Health and Safety at Work Act 1974 | | Legal compliance |
| **18.4** | Health & Safety | Accident records, reports, accident books | Date of occurrence | 6 years after date of occurrence/entry | Securely Destroy | RIDDOR Limitation for legal proceedings RIDDOR 1995 and Limitation Act 1980 Special rules apply concerning incidents involving hazardous substances. | | Legal compliance |
| **18.5** | Health & Safety | Sickness records | | See HR schedule | | | | |
| **18.6** | Health & Safety | Health and safety statutory notices | Once compliant | 6 years after compliance | Securely Destroy | Limitations Act 1980 Limitation for legal proceedings | | Legal compliance |

## 19. Technical and Research Records

| | Document overview | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| **Reference** | **Function** | **Record type** | **Retention trigger** | **WCHG retention period** | **Action at end of retention period** | **Retention source** | **Reason for retention** |
| **19.1** | Technical and Research | Technical and research records | After requirements have ended | 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

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **20.1** | ASB case files and associated documents | ASB (Anti-social behaviour) case files and associated documents | Last action/case closed | 6 years | Securely Destroy | | Best practice |

## 21. Supporting people – subsidy claims / support plans / single assessments including supporting information

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **21.1** | Supporting People | Supporting people – subsidy claims / support plans / single assessments including supporting information | | Duration of tenancy | Securely Destroy | | Best practice |
| **21.2** | Supporting People | Financial inclusion case files | Closure of file | 6 years | Securely Destroy | | Audit purposes |

## 22. Resident Meetings

| | Document overview | | Retention Schedule | | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **22.1** | Resident Meetings | Resident Meeting Minutes | From date of meeting | 2 years | Securely Destroy | | Best practice |

## 23. Property Sales

| Document overview | | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **23.1** | Home Ownership | New Sales applications | Offer accepted | 6 years | Securely Destroy | Limitation Act 1980, section 2 | Best practice |
| **23.2** | Property Sales | Registrations of interest | Sale of property | 2 years | Securely Destroy | | Best practice |
| **23.3** | Property Sales | Offer Details | Offer accepted | 6 years | Securely Destroy | Estate Agency Act 1979 | Legal compliance |
| **23.4** | Property Sales | Completion documentation | Completion of Sale | 12 years | Securely Destroy | Housing Act 1985 | Best practice |
| **23.6** | Property Sales | Post purchase questionnaire/ customer feedback | Date of creation | 3 years | Review | National Archives guidance | Best practice |
| **23.6** | Property Sales | Help to Buy applications | Offer accepted | 6 years | Securely Destroy | Limitation Act 1980, section 2 | Best practice |
| **23.7** | Property Sales | Resales (Shared Ownership) | 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 | Securely Destroy | Housing Act 1985 | Best practice |
| **23.9** | Property Sales | Right to Buy/ Acquire files | Completion of Sale | 12 years | Securely Destroy | Housing Act 1985 | Best practice |

## 24. Community Initiatives

| Document overview | | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **24.1** | | Grant agreements: agreements where we have received a grant in order to deliver a project or service | | 7 years after termination of grant or as prescribed by the agreement | Securely Destroy | | |
| **24.2** | | Big Lottery Fund: summary profit and loss accounts, personnel records and invoices, which show how the grant has been used | | 7 years after termination of grant | Securely Destroy | Section 5.4 of BLF grant contract commits to this standard | |
| **24.3** | | Big Lottery Fund: Asset register for items purchased using grant funding for less than £50,000 | | 5 years from date of purchase or the length of the grant agreement, whichever is the shorter | Securely Destroy | Section 8.6 of BLF grant contract commits to this standard | Section 8.6 of BLF grant contract commits to this standard |
| **24.4** | | Big Lottery Fund: Asset register for items purchased using grant funding for over £50,000 | | 10 years after termination of grant | Securely Destroy | Section 8.6 of BLF grant contract commits to this standard | Section 8.6 of BLF grant contract commits to this standard |
| **24.5** | | Youth information advice and guidance service case notes | | 3 years after the individual has turned 25 | Securely Destroy | To be cautious, and given the increased likelihood of the individual having additional needs, 3 years after 25 is best practice. | Best practice |
| **24.6** | | Consent forms for hazardous activities for under 18s | | 3 years after the individual has turned 18 | Securely Destroy | Limitation for legal proceedings is 3 years after the individual turns 18. | Legal compliance |
| **24.7** | | Tenant License agreements for Enterprise Centre | End of agreement | 6 years | Securely Destroy | | |
| **24.8** | | Charitable donations made by us: Deeds of covenant | Last payment | 12 years | Securely Destroy | Limitation for legal proceedings if related to land | Legal compliance |
| **24.9** | | Charitable donations made by us: Index of donations granted | | 6 years | Securely Destroy | | Best practice |

| Document overview | | | | Retention Schedule | | | |
|---|---|---|---|---|---|---|---|
| Reference | Function | Record type | Retention trigger | WCHG retention period | Action at end of retention period | Retention source | Reason for retention |
| **24.10** | | Charitable donations made by us: Account documentation | | 6 years | Securely Destroy | | Best practice |
| **24.11** | | Service user records (e.g. community centres) | Last interaction | 5 years | Securely Destroy | | Best practice |
| **24.12** | | Volunteer timebank records - treat as timesheets - see HR schedule | | | | | |