



Wythenshawe Community Housing Group (WCHG) Data Retention Policy

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Approved by:	
Drafted by:	Wayne Squire
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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.

1.2. This Policy¹ 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 hold².

1.3. 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.

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: - 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	Review	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.	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. 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. 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. 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 Statutory Paternity Pay and Statutory Adoption Pay (Administration) Regulations 2002, reg 9 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 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) 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. 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.		<p>6 years from the end of the scheme year to which they relate or in which the event took place or, as applicable.</p> <p>6 years after the last payment of benefit.</p> <p>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.</p>	Review for potential need to retain longer as accounting and tax records	<p>Employers' Duties (Registration and Compliance) Regulations 2010, regs. 5-8 + As accounting records.</p> <p>Also the Pensions Regulator Detailed Guidance-9, Keeping Records, April 2015.</p>	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. Settlement agreements with staff = 20 years after employment ceases. 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. 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 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. 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. 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 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					