



**Kembhill Park Flood Group**  
**Registered Charity SC047830**  
**DATA RETENTION POLICY**

**1. Introduction**

- 1.1. Kembhill Park Flood Group (here after referred to as KPFPG) gathers personal information from individuals and external organisations as well as generating a wide range of personal data, all of which is recorded in documents and records, both in hard copy and electronic form.
- 1.2. Examples of the types of information accumulated and generated are set out in Appendix 1 of this policy and include but are not limited to minutes of AGM and Board of Trustees meetings; membership database; employment records; newsletters and other communications such as letters and emails.
- 1.3. In certain circumstances it will be necessary to retain documents to meet legal requirements and for operational needs. Document retention is also required to evidence agreements or events and to preserve information.
- 1.4. It is however not practical or appropriate to retain all records. Additionally, data protection principles require information to be as up to date and accurate as possible. It is therefore important that congregations have in place systems for the timely and secure disposal of documents that are no longer required.
- 1.5. This Data Retention Policy was adopted by the KPFPG Committee on [insert date] and will be implemented on a day to day basis.

**2. Roles and Responsibilities**

- 2.1. The KPFPG office bearers will adopt the retention and disposal guidance at Appendix 1 of this policy and strive to keep records up to date.

**3. Retention and Disposal Policy**

- 3.1. Decisions relating to the retention and disposal of data should be guided by:-



3.1.1. Appendix 1 – Document Retention Schedule – Guidance on the recommended and statutory minimum retention periods for specific types of documents and records.

3.1.2. Appendix 2 – Quick Guide to document retention.

3.2. In circumstances where the retention period for a specific document or category of documents has expired, a review should be carried out prior to disposal and consideration should be given to the method of disposal.

#### **4. Disposal**

4.1. Documents containing confidential or personal information should be disposed of either by shredding or by using confidential waste bins or sacks. Such documentation is likely to include financial details, contact lists with names and addresses and pastoral information.

4.2. Documents other than those containing confidential or personal information may be disposed of by recycling or binning.

4.3. Electronic communications including email, Facebook pages, twitter accounts etc and all information stored digitally should also be reviewed and if no longer required, closed and/or deleted so as to be put beyond use. This should not be done simply by archiving, which is not the same as deletion. It will often be sufficient simply to delete the information, with no intention of ever using or accessing it again, despite the fact that it may still exist in the electronic ether. Information will be deemed to be put beyond use if the KPFGB Committee is not able, or will not attempt, to use it to inform any decision in respect of any individual or in a manner that affects the individual in any way and does not give any other organisation access to it.

4.4. Deletion can also be effected by using one of the following methods of disposal:-

- Using secure deletion software which can overwrite data;
- Using the function of “restore to factory settings” (where information is not stored in a removeable format);
- Sending the device to a specialist who will securely delete the data.

## Appendix 1

### Illustrative Data Retention Schedule

This Schedule is provided as a guide to common types of documents but is not exhaustive.

**Avoid retaining information if there is no reason for doing so.**

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RECORD	RETENTION PERIOD
Minutes of meetings	6 years
Pre-employment enquiries/applications/notes/letters/references	6 months after completion of recruitment (unless data to be retained for a future similar opportunity, in which case 1 year)
Safeguarding Service confirmation of advice, emails, letters	100 years
Confidentiality Agreements	100 years
Covenants of Responsibility (managing those who pose a risk)	100 years
Safeguarding Service Risk Assessments	100 years
Complaints concerning people	100 years
Safeguarding Audit	100 years

Employee records including: contracts, time records etc	Duration of employment + 6 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually, delete out of date information
Miscellaneous contact information	Delete once there is no longer a requirement to hold such information
Documents relating to litigation or potential litigation	Until matter is concluded plus 6 years
Injury and Illness Incident Reports (RIDDOR)	5 years
Pension plans and retirement records	Permanent
Salary schedules; ranges for each job description	2 years
Payroll Records	Minimum, 6 years. No maximum
Contracts	6 years following expiration
Construction documents	Permanent
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent
Sales and purchase records	5 years
Resolutions	Permanent

Audit and review workpapers	5 years from the end of the period in which the audit or review was concluded
OSCR filings	5 years from date of filing
Records of financial donations	6 years
Accounts Payable and Receivables ledgers and schedules	6 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled cheques, deposit slips	Minimum of 6 years
Business expense records	6 years
Cash receipts	3 years
Cheque registers	Permanent
Electronic fund transfer documents	6 years
Employee expense reports	6 years
General ledgers	Permanent
Journal entries	6 years
Invoices	6 years

Petty cash vouchers	3 years
Tax records	Minimum 6 years
Filings of fees paid to professionals	6 years
Environmental studies	Permanent
Insurance claims/ applications	Permanent
Insurance disbursements and denials	Permanent
Insurance contracts and policies (Directors and Officers, General Liability, Property, Workers' Compensation)	Permanent
Leases	6 years after expiration
Real estate documents (including loan and mortgage contracts, title deeds)	Permanent
Warranties	Duration of warranty + 6 years
Records relating to potential, or actual, legal proceedings	Conclusion of any tribunal or litigation proceedings + 6 years

## Appendix 2

### General guidance for documents NOT included in the retention schedule.

On-going business use is subjective, but generally refers to documents still required for on-going projects, or documents that may still need to be referred to for on-going activities.

