



# **HARBOUR**

## **DATA RETENTION POLICY**

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| <b>Policy Owner</b>                                                                                                        | Director of Group Finance and Business Support                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Document author(s)</b>                                                                                                  | Group Business Support Manager                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Approved by</b>                                                                                                         | Group Leadership Team                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Date approved</b>                                                                                                       | April 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Next review date</b>                                                                                                    | April 2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Review cycle</b>                                                                                                        | 3 years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Communications &amp; training methods</b>                                                                               | <ul style="list-style-type: none"> <li>• Induction</li> <li>• Training</li> <li>• DocTract mandatory read</li> <li>• Team meetings</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Is a mandatory read required?</b>                                                                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Does this policy require to go on the website?</b>                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Who does this policy apply to e.g. GROUP or ENTITY NAME(S) NB if not all, check there is a separate policy in place</b> | Harbour                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>The policy has a direct link to the following Harbour policies and procedures</b>                                       | <ul style="list-style-type: none"> <li>• Data Protection Policy</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>This policy complies with the requirements of these legal and/or regulatory documents</b>                               | <ul style="list-style-type: none"> <li>• UK General Data Protection Regulation</li> <li>• Data Protection Act 2018</li> <li>• Freedom of Information (Scotland) Act 2002</li> <li>• Environmental Information (Scotland) Regulations 2004</li> <li>• Equality Act 2010</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Equality &amp; Diversity Impact (EI) Assessment Status</b>                                                              | This document was EDI Assessed by the Group Business Support Manager and the HR &OD Manager using Harbour's set procedure in April 2024 and is considered to be free of anything which may lead to any unfair discrimination in its application.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Data Protection Considerations</b>                                                                                      | <p>Our policies and procedures foster an approach of 'data protection by design and by default'</p> <p>In practice it means that our policies and procedures consider data protection issues, ie how to protect the data subject served by the policy or procedure; New systems, services, products and business practices involving personal data are designed and implemented to ensure personal data is protected by default; Data protection principles and safeguarding of individuals' rights are clear in the policy or procedure; And that if the policy or procedure aims to provide service to vulnerable groups (e.g. children) that the personal data is treated with extra protection.</p> |

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| <b>1.</b> | <b>INTRODUCTION</b>                                                                                                                                                                                                                                                                                                                                                                             |
| 1.1       | Our corporate information, records and data are important to how we conduct business and manage our colleagues.                                                                                                                                                                                                                                                                                 |
| 1.2       | There are legal and regulatory requirements for us to retain certain data, usually for a specified amount of time. We also retain data to help our business operate and to have information available when we need it. However, we do not need to retain all data indefinitely, and retaining data can expose us to risk as well as be a cost to our business.                                  |
| 1.3       | This Policy explains our requirements to retain data and to dispose of data and provides guidance on appropriate data handling and disposal.                                                                                                                                                                                                                                                    |
| 1.4       | Failure to comply with this Policy can expose us to fines and penalties, adverse publicity, difficulties in providing evidence when we need it and in running our business.                                                                                                                                                                                                                     |
| 1.5       | This Policy covers all data that we hold or have control over. This includes physical data, such as hard copy documents, contracts, notebooks, letters and invoices. It also includes electronic data, such as e-mails and electronic documents. It applies to both personal data and non-personal data. In this Policy, we refer to this information and these records collectively as “data”. |
| 1.6       | This Policy also covers data that is held by third parties on our behalf, for example, cloud storage providers or offsite data storage.                                                                                                                                                                                                                                                         |
| <b>2.</b> | <b>POLICY STATEMENT</b>                                                                                                                                                                                                                                                                                                                                                                         |
| 2.1       | Through our data retention practices, we aim to meet the following commitments:                                                                                                                                                                                                                                                                                                                 |
| 2.1.1     | We comply with legal and regulatory requirements to retain data.                                                                                                                                                                                                                                                                                                                                |
| 2.1.2     | We comply with our data protection obligations, in particular, to keep personal data no longer than is necessary for the purposes for which it is processed.                                                                                                                                                                                                                                    |
| 2.1.3     | We handle, store and dispose of data responsibly and securely.                                                                                                                                                                                                                                                                                                                                  |
| 2.1.4     | We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason.                                                                                                                                                                                                                                             |
| 2.1.5     | We allocate appropriate resources, roles and responsibilities to data retention.                                                                                                                                                                                                                                                                                                                |
| 2.1.6     | We regularly remind colleagues of their data retention responsibilities.                                                                                                                                                                                                                                                                                                                        |
| 2.1.7     | We regularly monitor and audit compliance with this Policy and update this Policy when required.                                                                                                                                                                                                                                                                                                |
| <b>3.</b> | <b>RESPONSIBILITIES UNDER THE POLICY</b>                                                                                                                                                                                                                                                                                                                                                        |
| 3.1       | We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised good practices. All colleagues must comply with this Policy. Failure to do so may subject us to serious civil and / or criminal liability.                                                                                                                                              |

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| 3.2       | Managers in conjunction with the Compliance and Performance Officer are responsible for identifying the proper period of retention for our data and for providing guidance and training to colleagues in relation to this Policy. Colleagues are, however, responsible for handling the destruction of data whose retention period has expired.                                                                                                                                                                                                                                |
| <b>4.</b> | <b>RECOMMENDED RETENTION PERIODS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.1       | Certain data is more important to us and is therefore listed in the recommended retention periods set out in the Schedule to this Policy as being required to be retained permanently. This may be because we have a legal requirement to retain it permanently (so that we can produce it in the future), or because we may need it as evidence of our transactions, or because it is important to the running of our business. The period specified for any personal data is the maximum and the period specified for any non-personal data is the minimum retention period. |
| 4.2       | Some data may be discarded or deleted once it has served its useful purpose or the period for bringing any claims against us has expired. The recommended retention periods set out in the Schedule to this Policy specify time periods for the retention of such data. Such data should not be retained beyond this period, unless a valid and strong business reason justifies its continued retention. If colleagues are unsure whether to retain certain data beyond the recommended retention period, they should consult the Compliance and Performance Officer.         |
| 4.3       | If data is not listed in the recommended retention periods set out in the Schedule to this Policy, Harbour's Data Protection Officer should be contacted for guidance.                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>5.</b> | <b>DISPOSAL AND DESTRUCTION OF DATA</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 5.1       | Hard copy data must be disposed of via confidential waste collection by the external contractor and electronic data must be deleted securely in a manner that it cannot be reconstituted after it has been deleted. No hard copy data should be destroyed by recycling.                                                                                                                                                                                                                                                                                                        |
| 5.2       | Data must not be destroyed if the Compliance and Performance Officer confirms that its continued retention is relevant and necessary for the purposes of legal proceedings in which we are involved.                                                                                                                                                                                                                                                                                                                                                                           |
| <b>6.</b> | <b>REVIEW AND UPDATES TO THIS POLICY</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6.1       | We will review and update this Policy in accordance with our data protection obligations and we may amend, update or supplement it from time to time and at least every 3 years or earlier, if required by changes in legislation.                                                                                                                                                                                                                                                                                                                                             |

## APPENDIX 1 – RECORDS MANAGEMENT STRATEGY

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>1.</b> | <b>INTRODUCTION</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1.1       | Harbour creates, handles and uses records of information to support its functions and operations as a registered social landlord in Scotland. These records contain information that is an invaluable resource and a significant operational asset to support such functions and operations. Harbour will adopt a systematic approach to records management. This is necessary to protect and preserve records to support Harbour's functions and operations and provide evidence of events, activities and transactions. |
| 1.2       | Guidance on the appropriate records management approach is detailed in this strategy and is part of Harbour's overall Retention Policy.                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.3       | Managing records appropriately reduces the costs and risks associated with retaining unnecessary information and is core to complying with legal and regulatory requirements, including: <ul style="list-style-type: none"><li>• UK General Data Protection Regulation;</li><li>• Data Protection Act 2018;</li><li>• Freedom of Information (Scotland) Act 2002;</li><li>• Environmental Information (Scotland) Regulations 2004;</li><li>• Equalities Act 2010</li></ul>                                                |
| 1.4       | Harbour will comply with the Scottish Ministers' Code of Practice on Records Management recommendations, issued under Section 61 of the Freedom of Information (Scotland) Act 2002.                                                                                                                                                                                                                                                                                                                                       |
| 1.5       | This strategy, as part of the Data Retention Policy, is an organisational commitment to effective records management at Harbour.                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>2.</b> | <b>RESPONSIBILITY AND SCOPE</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.1       | Managers are responsible for implementing this strategy, assisting colleagues in maintaining appropriate information audits for their departments, providing guidance on records retention and training staff on records management.                                                                                                                                                                                                                                                                                      |
| 2.2       | Records are documents (including written and typed documents and annotated copies), computer files, paper files, communications (including voicemails and SMS messages) and other material in all recorded formats, including electronic, paper, film, video (including CCTV footage), audio and others available through existing and emerging technologies.                                                                                                                                                             |
| <b>3.</b> | <b>RECORDS MANAGEMENT STRATEGY</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3.1       | Good records management relies on an effective strategy which is clear on how records should be held. For Harbour this would be "DIGITAL FIRST" – reducing reliance on paper records and holding digital records in the appropriate location. This supports the principles of Data Minimisation and Accuracy of Data in the UK GDPR principles.                                                                                                                                                                           |

3.2

The following table sets out the high-level strategy by department:

| Action           | Paper Records                                                                                                              | Emails                                                                                                                              | Digital Records                                                                                                                                                                                                  |
|------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What to do       | All paper records to be scanned and stored in the relevant department system such as MRI, HR System or shared drives.      | All emails and their attached files to be stored in the relevant section of the system or shared drive.                             | Held in relevant system or shared drive, in line with retention schedule and with suitable access controls in place                                                                                              |
| Follow up action | Paper records will then be shredded as soon as scan has been checked for accuracy.                                         | Emails can be deleted in line with Retention Schedule of 12 months.                                                                 | Backups and other data resilience solutions will be in line with the Retention schedule.                                                                                                                         |
| Exemptions       | Exemptions would be insurance and other certificates of incorporation, some contracts and as required under relevant laws. | Possible exemptions would be where there is a valid reason to hold for a legal requirement – such as criminal court case, tribunal. | Review of certain records may require them to be held for longer and as an exemption to the retention schedule – examples would be due to legal requirements, legitimate interest, or consent from data subject. |

4.

RECORDS MANAGEMENT PRINCIPLES

4.1

Records management can be described as the efficient and systematic control of the planning, creation, receipt, maintenance, use, distribution, storage and disposal / permanent preservation of records throughout their lifecycle.

4.2

It ensures that evidence of, and information about, Harbour’s activities and transactions is captured in its record keeping systems and maintained as viable records. It concerns placing controls around each stage of a record’s lifecycle, at the point of creation or receipt, during its maintenance and use and at ultimate disposal. Through such controls, Harbour can ensure its records demonstrate the key features of authenticity, reliability, integrity and accessibility.

4.3

The main benefits of good records management at Harbour are:

- promotes the creation and storage of accurate and reliable records in a managed environment, which provide an audit trail of actions.

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|           | <ul style="list-style-type: none"> <li>• increases organisational and administrative effectiveness, efficiency and service delivery through improved access to and retrieval of high quality records;</li> <li>• helps enhance information security by facilitating improved confidentiality, integrity and availability of records;</li> <li>• improves working environments and more economical use of physical and server space through reducing the retention of irrelevant, duplicate and out-of-date records;</li> <li>• promotes Harbour's physical and intellectual control of all records by knowing what records it has and how and where to retrieve them easily;</li> <li>• ensures that Harbour identifies and retains records of historical and evidential value to Harbour as a "corporate memory" and to assist in managing future recurrences of specific events;</li> <li>• helps to maintain audit trails relating to access and alteration of records;</li> <li>• improves information sharing and the provision of easy and timely access to the correct information at the right time, resulting in better quality decision making and thereby facilitating transparency and accountability for all actions;</li> <li>• manages business continuity risks by helping to identify records that are essential to continued operation which, if lost or destroyed, would seriously impair or disrupt Harbour's operations; and</li> <li>• assists in compliance with all legal and regulatory obligations, including responding to requests for information and personal data made to Harbour.</li> </ul> |
| 4.4       | <p>The risks to Harbour in not maintaining effective records management are:</p> <ul style="list-style-type: none"> <li>• poor quality decisions being made on the basis of inaccurate, incomplete or out-of-date records;</li> <li>• levels of service to customers and stakeholders being inconsistent due to records of previous actions being unavailable;</li> <li>• financial, legal or reputational loss if the necessary evidence of an activity or transaction is not available or cannot be relied upon in the event of, for example, regulatory intervention;</li> <li>• non-compliance with legal or regulatory requirements applicable to Harbour;</li> <li>• failure to identify, protect and retain records that are critical to business continuity;</li> <li>• additional costs incurred in storing records for longer than necessary; and</li> <li>• wasted time and resources in searching for records in response to a request received.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>5.</b> | <b>STORAGE OF AND ACCESS TO RECORDS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 5.1       | Records must be stored securely at Harbour's premises or at a secure location in accordance with Harbour's Data Protection Policy to minimise the risk of damage, loss or unauthorised access to the records.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.2       | Colleagues should only access records on a strict "need to know" basis, depending on the nature of a record and its relevance to the work of staff.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| <b>6.</b> | <b>RETENTION AND DESTRUCTION OF RECORDS</b>                                                                                                                                                                                                                                                            |
| 6.1       | Harbour's Data Retention Policy (Appendix 2) sets out how long records will normally be held and when they will be destroyed. Harbour will regularly review and update the Data Retention Policy with additional record types that it uses in the course of carrying out its functions and operations. |
| <b>7.</b> | <b>REVIEW AND UPDATES TO THIS STRATEGY</b>                                                                                                                                                                                                                                                             |
| 7.1       | Harbour will review and update this strategy in accordance with its legal obligations and may amend, update or supplement it from time to time and at least every 3 years or earlier, if required by changes in legislation or technology underlying its document management systems.                  |

**APPENDIX 2 – SCHEDULE  
RECOMMENDED DATA RETENTION PERIODS**

**Part 1: General Governance Incorporating Governance, Data Governance, Formal Meetings, Regulations and Statutory Returns, Strategic and Insurance**

| Document Overview    |                                                                                                  | Retention Schedule    |                                                                                   |                                                                     | Document Management                         |                                |
|----------------------|--------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------|--------------------------------|
| Function             | Record Type                                                                                      | Retention Trigger     | Minimum Retention Period                                                          | Recommended Retention Period                                        | Reason for Retention                        | Information Asset Owner        |
| <b>1. GOVERNANCE</b> |                                                                                                  |                       |                                                                                   |                                                                     |                                             |                                |
| Governance           | Organisation wide Corporate Plans, Policies, Business Continuity, Risk Management and Strategies | Superseded document   | N/A                                                                               | 1 year after superseded (longer if required for historical reasons) | Best Practice                               | Group Business Support Manager |
| Governance           | Governance Documentation                                                                         |                       | N/A                                                                               | Life of company                                                     | Required for charitable status              | Group Business Support Manager |
| Governance           | Constitution, Aims and Objectives                                                                |                       | Life of company                                                                   | Life of company                                                     | Required for charitable status              | Group Business Support Manager |
| Governance           | Record of HMRC confirmation of charitable status                                                 | End of financial year | Minimum 1 year to end of financial year – required for Annual Return as a minimum | Life of company                                                     | Annual return and best practice             | Group Business Support Manager |
| Governance           | Record of charitable registration                                                                |                       | Life of company                                                                   | Life of company                                                     | Best practice                               | Group Business Support Manager |
| Governance           | Certificate of Incorporation                                                                     |                       | Life of company                                                                   | Life of company                                                     | Legal requirement – s.15 Companies Act 2006 | Group Business Support Manager |

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|------------|--------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------|--------------------------------|
| Governance | Memorandum of Association                                                                        |                                 | Life of company                                                                                                            | Life of company | Legal requirement – s.32 Companies Act 2006                                   | Group Business Support Manager |
| Governance | Articles of Association / Model rules                                                            |                                 | Life of company                                                                                                            | Life of company | Legal requirement – s.32 Companies Act 2006                                   | Group Business Support Manager |
| Governance | Certificate of registration with housing regulator                                               |                                 | Life of company                                                                                                            | Life of company | Best practice                                                                 | Group Business Support Manager |
| Governance | Record of registration and certificate of incorporation for change of name                       | Closure of company              | Life of company                                                                                                            | Life of company | Legal requirement – s.15 Companies Act 2006                                   | Group Business Support Manager |
| Governance | Registration documentation (Co-operative and community benefit societies)                        |                                 | Life of company                                                                                                            | Life of company | Legal requirement – s.3 Co-operative and Community Benefit Societies Act 2014 | Group Business Support Manager |
| Governance | Merger documentation for Lorne Area Housing                                                      | Merger of organisations         | Life of company                                                                                                            | Life of company | Legal requirement – s.3 Co-operative and Community Benefit Societies Act 2014 | Group Business Support Manager |
| Governance | Internal audits, correspondence, terms of reference, meeting minutes, related papers and reports | After audit                     | 5 years                                                                                                                    | 6 years         | Prescription and Limitation (Scotland) Act 1973                               | Group Business Support Manager |
| Governance | Board member documents – appointment letters, SLAs, bank details etc                             | Termination of Board membership | 6 years after board membership ceases though some detail should be destroyed when membership ceases e.g. bank details etc. | 6 years         | Legal requirement - CA 2006                                                   | Group Business Support Manager |

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| 2. DATA GOVERNANCE |                                                                             |                                        |                        |                                                                                                                                                                             |                                                                                      |                                               |
|--------------------|-----------------------------------------------------------------------------|----------------------------------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------|
| Data Governance    | Emails                                                                      | Completion of issue / No longer active | Receipt of email       | If the email is to do with a particular matter, then it should be pdf and attached to the appropriate records management system/. Emails should be deleted after 12 months. | Legal requirement / best practice depending upon the nature of the email             | Group ICT and Business Transformation Manager |
| Data Governance    | CCTV                                                                        | Date of recording                      | Minimum time necessary | 30 days                                                                                                                                                                     | Best practice                                                                        | Group Business Support Manager                |
| Data Governance    | Telephone call recordings (masked)                                          | Date of recording                      | Minimum time necessary | 3 months                                                                                                                                                                    | Best practice                                                                        | Group Business Support Manager                |
| Data Governance    | Data Subjects Rights' Requests, including copies of Subject Access Requests | Date response sent to data subject     | 6 months               | 1 year                                                                                                                                                                      | Best practice: ICO                                                                   | Compliance and Performance Officer            |
| Data Governance    | Films / Videos                                                              | Date of recording                      | Minimum time necessary | 3 years                                                                                                                                                                     | Best practice                                                                        | Group Business Support Manager                |
| Data Governance    | Data Breach Records                                                         | Date of recording                      | 5 years                | 6 years                                                                                                                                                                     | Legal requirement – Prescription and Limitation (Scotland) Act 1973                  | Compliance and Performance Officer            |
| Data Governance    | Fraud Records                                                               | Date of recording                      | 6 years                | 6 years                                                                                                                                                                     | FCA Handbook – Best practice: ICO                                                    | Group Business Support Manager                |
| 3. FORMAL MEETINGS |                                                                             |                                        |                        |                                                                                                                                                                             |                                                                                      |                                               |
| Meetings           | Notice of meetings                                                          | Date of meeting                        | N/A                    | 6 years                                                                                                                                                                     | Best practice in the case of a challenge to the validity of a meeting or resolutions | Group Business Support Manager                |
| Meetings           | Executive meeting agendas, papers, minutes and resolutions                  | Date of meeting                        | N/A                    | 10 years                                                                                                                                                                    | Best practice in the case of a challenge to the validity of a meeting or resolutions | Group Business Support Manager                |

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|---------------------------------------------|-----------------------------------------------------|--------------------|----------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------|
| Meetings                                    | Board and Committee Meeting Minutes and Resolutions | Date of meeting    | 10 years from the date of the meeting or life of company | 10 years from the date of the meeting or life of company | Legal compliance – ss.248-249 Companies Act 2006                                                | Group Business Support Manager |
| Meetings                                    | Board and Committee meeting agendas and papers      | Date of meeting    | 10 years from the date of the meeting or life of company | 10 years from the date of the meeting or life of company | Legal compliance – s.248 and s.250 Companies Act 2006                                           | Group Business Support Manager |
| Meetings                                    | Shareholder meeting minute and resolutions          | Date of meeting    | Life of company                                          | Life of company                                          | Legal compliance – s.356 Companies Act 2006                                                     | Group Business Support Manager |
| Meetings                                    | Shareholder meeting agendas and papers              | Date of meeting    | N/A                                                      | Life of company                                          | Best practice (if required to support minutes and resolutions)                                  | Group Business Support Manager |
| Meetings                                    | Minutes and Resolutions of Trustees (charities)     | Date of meeting    | Life of company                                          | Life of company                                          | Legal Compliance                                                                                | Group Business Support Manager |
| <b>4. REGULATIONS AND STATUTORY RETURNS</b> |                                                     |                    |                                                          |                                                          |                                                                                                 |                                |
| Regulations and Statutory Returns           | Audited financial statements                        | Date of submission | Minimum of 6 years + current financial year              | 6 years + current financial year                         | Legal requirement                                                                               | Group Finance Manager          |
| Regulations and Statutory Returns           | Sealing Register                                    | Date of register   | Life of company                                          | Life of company                                          | Legal compliance – Companies Act 1985                                                           | Group Business Support Manager |
| Regulations and Statutory Returns           | Annual Statutory Returns to the Regulator           | Submission         | Minimum of 1 year from submission                        | Life of company                                          | Legal Compliance and best practice – s.90 Co-operative and Community Benefit Societies Act 2014 | Group Finance Manager          |
| Regulations and Statutory Returns           | Register of directors and secretaries               | Closure of company | Life of company                                          | Life of company                                          | Legal compliance – s.162 Companies Act 2006                                                     | Group Business Support Manager |
| Regulations and Statutory Returns           | Register of shareholding members                    | Closure of company | Life of company                                          | Life of company                                          | Legal compliance – s.113 Companies Act 2006                                                     | Group Business Support Manager |

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| Regulations and Statutory Returns | Register of share certificates                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Closure of company          | Life of company                     | Life of company                     | Legal compliance – s.325 Companies Act 1984                                                                                                     | Group Business Support Manager |
| Regulations and Statutory Returns | Declaration of interest                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Closure of company          | Life of company                     | Life of company                     | Legal compliance – s.177 Companies Act 2006                                                                                                     | Group Business Support Manager |
| Regulations and Statutory Returns | List of members (communities & Benefit Society')                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                             | Life of company                     | Life of company                     | Required by registrar of Friendly Societies                                                                                                     | Group Business Support Manager |
| Regulations and Statutory Returns | Nursing home and residential care homes registration certificates                                                                                                                                                                                                                                                                                                                                                                                                                                                         | End of management           | N/A                                 | 7 years following end of management | Best practice – Care Quality Commission Guidelines                                                                                              | Housing Services Manager       |
| Regulations and Statutory Returns | Nursing home and residential care homes inspection reports                                                                                                                                                                                                                                                                                                                                                                                                                                                                | End of management           | 7 years following end of management | 7 years following end of management | Legal compliance and best practice – Care Quality Commission Guidelines and Prescription and Limitation (Scotland) Act 1973                     | Housing Services Manager       |
| <b>5. STRATEGIC MANAGEMENT</b>    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                             |                                     |                                     |                                                                                                                                                 |                                |
| Strategic Management              | Business Plans and Supporting Documentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | End of Business Plan Period | N/A                                 | 5 years                             | Best practice                                                                                                                                   | Group Chief Executive          |
| <b>6. INSURANCE</b>               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                             |                                     |                                     |                                                                                                                                                 |                                |
| Insurance                         | Current/former policies: <ul style="list-style-type: none"> <li>- crime cover</li> <li>- engineering inspection</li> <li>- motor insurance</li> <li>- property damage</li> <li>- loss of commercial rent</li> <li>- housing contents</li> <li>- office contents</li> <li>- works in progress cover</li> <li>- business interruption cover</li> <li>- all risks cover</li> <li>- engineering insurance</li> <li>- personal accident for staff</li> <li>- professional indemnity</li> <li>- crime/fidelity cover</li> </ul> | End of policy term          | Life of company                     | Life of company                     | Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim.<br><br>Legal compliance and best practice | Finance Business Partner       |

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|           |                                               |                             |         |                                     |                                                                                                                                                  |                          |
|-----------|-----------------------------------------------|-----------------------------|---------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Insurance | Certificate of Employers' Liability Insurance | End of policy term          | N/A     | 40 years                            | Best practice: 2008 regulations removed requirement to retain for 40 years but need to be mindful of 'long tail' industrial disease claims, etc. | Finance Business Partner |
| Insurance | Annual Insurance Schedule                     | End of policy term          | N/A     | Life of company                     | As current and former policies are kept permanently (above), schedules should be too.<br>Best practice                                           | Finance Business Partner |
| Insurance | Claims and related correspondence             | End of settlement           | N/A     | 2 years                             | Best practice                                                                                                                                    | Finance Business Partner |
| Insurance | Indemnities and guarantees                    | End of term                 | 5 years | 6 years                             | Legal Compliance: Prescription and Limitation (Scotland) Act 1973                                                                                | Finance Business Partner |
| Insurance | Group health policies                         | End of cessation of benefit | N/A     | 12 years after cessation of benefit | Best practice                                                                                                                                    | Finance Business Partner |

## Part 2: Finance, Other Banking Records, Capital Assets

| Document Overview |                                        | Retention Schedule    |                          |                                     | Document Management                     |                         |
|-------------------|----------------------------------------|-----------------------|--------------------------|-------------------------------------|-----------------------------------------|-------------------------|
| Function          | Record Type                            | Retention Trigger     | Minimum Retention Period | Recommended Retention Period        | Reason for Retention                    | Information Asset Owner |
| <b>7. FINANCE</b> |                                        |                       |                          |                                     |                                         |                         |
| Finance           | Accounting records for limited company | End of financial year | 6 years                  | 6 years plus current financial year | Legal compliance: Companies Act Section | Group Finance Manager   |

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|                                          |                                                                                                                                                           |                       |         |                                     |                                                                                                                                                          |                          |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|                                          |                                                                                                                                                           |                       |         |                                     | 388 recommends 3 years. Taxes Management Act 1970 (TMA) Sec.20 (Taxes Management Act 1970) may require any documents relating to tax over 6 (plus) years |                          |
| Finance                                  | Accounting records for Communities & Benefit Society' Society or Charity                                                                                  |                       | N/A     | 6 years                             | Best practice                                                                                                                                            | Group Finance Manager    |
| Finance - Cheques and associated records | Cash books/sheets                                                                                                                                         | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice                                                                 | Finance Officer          |
| Finance - Cheques and associated records | Petty cash records/books/sheets<br>Postage/courier account/cash records<br>Register of postage expenditure<br>Postage paid record<br>Postage books sheets | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice                                                                 | Finance Business Partner |
| Finance - Cheques and associated records | Creditors' history records                                                                                                                                | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice                                                                 | Finance Business Partner |
| Finance - Cheques and associated records | Statements of accounts outstanding orders                                                                                                                 | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice                                                                 | Finance Business Partner |
| Finance - Cheques and associated records | Vouchers – claims for payment, purchase orders, requisition for goods and services, accounts payable, invoices and so on                                  | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice                                                                 | Finance Business Partner |
| Finance - Cheques and associated records | Wages/salaries vouchers                                                                                                                                   | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines,                                                                                              | Finance Team Leader      |

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|                                          |                                                                                                                                                          |                       |         |                                     |                                                                                          |                     |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------|-------------------------------------|------------------------------------------------------------------------------------------|---------------------|
|                                          |                                                                                                                                                          |                       |         |                                     | National Audit Office advice                                                             |                     |
| Finance - Cheques and associated records | General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information                            | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance - Expenditure records            | Cash books/sheets                                                                                                                                        | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |
| Finance - Expenditure records            | Other ledgers (such as contracts, costs, purchases)                                                                                                      | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance - Expenditure records            | Journals – prime records for the raising of charges                                                                                                      | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance - Expenditure records            | Journals – routine adjustments                                                                                                                           | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance - Expenditure records            | Trial balances - Year-end balances, reconciliations and variations to support ledger balances and published accounts                                     | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance - Receipts and revenue records   | Receipt books/butts<br>Office copies of receipts – cashiers', cash register, fines and costs, sale of publications, general receipt books/butts/ records | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |

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|                                        |                                                                                                                                                                                           |                       |         |                                     |                                                                                          |                          |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------|-------------------------------------|------------------------------------------------------------------------------------------|--------------------------|
| Finance - Receipts and revenue records | Postal remittance books/records                                                                                                                                                           | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer          |
| Finance - Receipts and revenue records | Receipt books/records for imposts (such as stamp duty, VAT receipt books)                                                                                                                 | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance - Receipts and revenue records | Cash registers - Copies of forms, Reconciliation sheets                                                                                                                                   | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer          |
| Finance - Receipts and revenue records | Audit rolls, Summaries/analysis records                                                                                                                                                   | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader      |
| Finance - Receipts and revenue records | Debtors' records and invoices - debit notes rendered on debtors (such as invoices paid/unpaid, registers of invoices, debtors ledgers)                                                    | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance - Receipts and revenue records | Debits and refunds - Records relating to unrecoverable revenue, debts and overpayments (such as register of debts written off, register of refunds)                                       | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance- Salaries and related records  | Employee pay histories<br>Note that the last three years' records must be kept for leavers, in either the personnel or finance records system, for the calculation of pension entitlement | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | MHR                      |
| Finance- Salaries and related records  | Salary ledger card/records                                                                                                                                                                | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines,                              | MHR                      |

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|---------------------------------------|--------------------------------------------------------------------------|-----------------------|---------|-------------------------------------|------------------------------------------------------------------------------------------|--------------------------|
|                                       |                                                                          |                       |         |                                     | National Audit Office advice                                                             |                          |
| Finance- Salaries and related records | Copies of salaries/wages payroll sheets                                  | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | MHR                      |
| Finance- Purchase order records       | Purchase order books/records                                             | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance- Purchase order records       | Railway/courier consignment books/ records/Travel warrants               | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance- Purchase order records       | Goods inwards books/records                                              | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance- Purchase order records       | Delivery dockets, Stock/stores control cards/sheets/records              | End of Financial Year | 2 years | 2 years                             | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Business Partner |
| Finance - Financial Statements        | Statements/summaries prepared for inclusion in quarterly/annual reports  | End of Financial Year | 6 years | 6 years plus current financial year | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader      |
| Finance - Financial Statements        | Periodic financial statements prepared for management on a regular basis | End of Financial Year | 1 year  | 1 year                              | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader      |

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|                                 |                   |                                                                                     |                       |                                                                |                                                                |                                                                                          |                     |
|---------------------------------|-------------------|-------------------------------------------------------------------------------------|-----------------------|----------------------------------------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------------|
| Finance register records        | - Asset financial | Assets/equipment registers/records                                                  | End of Financial Year | 6 years after asset or last one in the register is disposed of | 6 years after asset or last one in the register is disposed of | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| Finance register records        | - Asset financial | Depreciation registers - Records relating to the calculation of annual depreciation | End of Financial Year | 6 years after asset or last one in the register is disposed of | 6 years after asset or last one in the register is disposed of | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Team Leader |
| <b>8. OTHER BANKING RECORDS</b> |                   |                                                                                     |                       |                                                                |                                                                |                                                                                          |                     |
| Other Records                   | Banking           | Cancelled / Dishonoured Cheque                                                      | End of Financial Year | 2 years                                                        | 2 years                                                        | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |
| Other Records                   | Banking           | Paid/presented cheques                                                              | End of Financial Year | 6 years + current financial year                               | 7 years                                                        | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |
| Other Records                   | Banking           | Record of cheques drawn for payment                                                 | End of Financial Year | 6 years + current financial year                               | 7 years                                                        | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |
| Other Records                   | Banking           | Bank deposit books/slips/butts                                                      | End of Financial Year | 2 years                                                        | 2 years                                                        | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |
| Other Records                   | Banking           | Bank deposit summary sheets - Summaries of daily banking                            | End of Financial Year | 2 years                                                        | 2 years                                                        | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice | Finance Officer     |

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|                          |         |                                                                                                                                             |                                        |                             |                             |                                                                                           |                     |
|--------------------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------|-----------------------------|-------------------------------------------------------------------------------------------|---------------------|
| Other Records            | Banking | Bank reconciliations files/sheets                                                                                                           | End of Financial Year                  | 2 years                     | 2 years                     | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice  | Finance Officer     |
| Other Records            | Banking | Bank statements, periodic reconciliations                                                                                                   | End of Financial Year                  | 2 years                     | 2 years                     | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice  | Finance Officer     |
| Other Records            | Banking | Electronic banking and electronic funds transfer                                                                                            | End of Financial Year                  | 6 years                     | 6 years                     | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice  | Finance Officer     |
| Contracts and Agreements |         | Loan agreements                                                                                                                             | Last payment                           | 12 years after last payment | 12 years after last payment | Best practice                                                                             | Finance Manager     |
| <b>9. CAPITAL ASSETS</b> |         |                                                                                                                                             |                                        |                             |                             |                                                                                           |                     |
| Capital Assets           |         | Capital Assets including all land, property, housing stock, corporate buildings, play areas, vehicles, equipment, fixtures & fittings >£400 | Asset sold, transferred or disposed of | N/A                         | 6 years                     | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice  | Finance Team Leader |
| Capital Assets           |         | Fixed Asset Register                                                                                                                        | N/A                                    | Permanently                 | Permanently                 | Legal compliance and best practice: HM treasury guidelines, National Audit Office advice. | Finance Team Leader |

## Part 3: Contracts and Agreements

| Document Overview                   |                                                                                                                                          | Retention Schedule  |                                                                                                                                    |                                                                                                                                    | Document Management                                                                           |                         |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-------------------------|
| Function                            | Record Type                                                                                                                              | Retention Trigger   | Minimum Retention Period                                                                                                           | Recommended Retention Period                                                                                                       | Reason for Retention                                                                          | Information Asset Owner |
| <b>10. CONTRACTS AND AGREEMENTS</b> |                                                                                                                                          |                     |                                                                                                                                    |                                                                                                                                    |                                                                                               |                         |
| Contracts and Agreements            | Contracts under seal and/or executed as deeds                                                                                            | Completion          | For new build 12 years, for other contracts 12 months after completion (including any defects liability period)                    | For new build 12 years, for other contracts 12 months after completion (including any defects liability period)                    | Legal compliance: Prescription and Limitation (Scotland) Act 1973                             | Appropriate Manager     |
| Contracts and Agreements            | Contracts for the supply of goods or services, including professional services                                                           | Completion          | For new build consultancy services 12 years, for other contracts 5 years after completion (including any defects liability period) | For new build consultancy services 12 years, for other contracts 6 years after completion (including any defects liability period) | Legal compliance: Prescription and Limitation (Scotland) Act 1973 12 years if related to land | Appropriate Manager     |
| Contracts and Agreements            | Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement | After purchase      | N/A                                                                                                                                | 3 years. Suggested limit: goods or services up to £10,000                                                                          | Best practice                                                                                 | Appropriate Manager     |
| Contracts and Agreements            | Licensing agreements                                                                                                                     | Expiry of agreement | 5 years after expiry                                                                                                               | 6 years                                                                                                                            | Legal compliance: Prescription and                                                            | Appropriate Manager     |

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|--------------------------|--------------------------------------------|---------------------|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|---------------------|
|                          |                                            |                     |                      |                                                                                                                                                                           | Limitation (Scotland) Act 1973                                    |                     |
| Contracts and Agreements | Rental and hire purchase agreements        | Expiry of agreement | 5 years after expiry | 6 years                                                                                                                                                                   | Legal compliance: Prescription and Limitation (Scotland) Act 1973 | Finance Manager     |
| Contracts and Agreements | Indemnities and guarantees                 | Expiry of agreement | 2 years after expiry | For new build projects collateral warranties should be kept for 12 years. For all construction work, guarantees should be kept for the length of the guarantee + 2 years. | Legal compliance: Prescription and Limitation (Scotland) Act 1973 | Appropriate Manager |
| Contracts and Agreements | Documents relating to successful tender    | End of contract     | N/A                  | For new build projects letters of appointment should be kept for 12 years. Other contracts 12 months after final completion.                                              | Best practice                                                     | Appropriate Manager |
| Contracts and Agreements | Documents relating to unsuccessful tenders | After notification  | N/A                  | 1 year after notification                                                                                                                                                 | Best practice                                                     | Appropriate Manager |
|                          |                                            |                     |                      |                                                                                                                                                                           |                                                                   |                     |
|                          |                                            |                     |                      |                                                                                                                                                                           |                                                                   |                     |

## Part 4: Human Resources and Health & Safety

| Document Overview                     |                                                                                                                                                                                   | Retention Schedule    |                                                                                |                              | Document Management                                                                                                                                                                                                             |                         |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Function                              | Record Type                                                                                                                                                                       | Retention Trigger     | Minimum Retention Period                                                       | Recommended Retention Period | Reason for Retention                                                                                                                                                                                                            | Information Asset Owner |
| <b>11. EMPLOYEES TAX AND SECURITY</b> |                                                                                                                                                                                   |                       |                                                                                |                              |                                                                                                                                                                                                                                 |                         |
| Tax and Social Security               | Record of taxable payments; record of tax deducted or refunded; record of earnings on which standard NI Contributions payable; record of employer's and employee NI contributions | End of Financial Year | Not less than 3 years after the end of the financial year to which they relate | 6 years                      | Legal Compliance: HM Revenue and Customs requires retention of each payment for 3 years. Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996 | MHR                     |
| Tax and Social Security               | NIC contracted out arrangements; Inland Revenue notice of code changes, pay and tax details.                                                                                      | End of Financial Year | Not less than 3 years after the end of the financial year to which they relate | 6 years                      | Legal compliance: Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996. Taxes Management Act 1970                                             | MHR                     |

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|                         |                                                                                                                 |                       |                                                                                |                                     |                                                                                                                                                                                                                                                                                 |     |
|-------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| Tax and Social Security | Copies of notices to employees (e.g. P45, P60)                                                                  | End of Financial Year | Not less than 3 years after the end of the financial year to which they relate | 6 years plus current financial year | Legal compliance: Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996. Taxes Management Act 1970                                                                                             | MHR |
| Tax and Social Security | HMRC notice of code changes, pay & tax details                                                                  | End of Financial Year | 6 years                                                                        | 6 years                             | Legal compliance: Taxes Management Act 1970                                                                                                                                                                                                                                     | MHR |
| Tax and Social Security | Expenses claims                                                                                                 | End of Financial Year | 3 years from the end of the tax year they relate to                            | 6 years                             | Best practice: HMRC                                                                                                                                                                                                                                                             | MHR |
| Tax and Social Security | Record of sickness payments                                                                                     | On payment            | 6 years                                                                        | 6 years                             | Legal compliance: Taxes Management Act 1970<br>Inland Revenue require retention of each payment for 3 years.<br>SSPR recommends 3 years following year to which they relate                                                                                                     | MHR |
| Tax and Social Security | Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay | On payment            | 6 years                                                                        | 6 years                             | Legal compliance: The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended.<br>The Statutory Paternity Pay and Statutory Adoption Pay (admin) Regulations 2002 (SI 2002/2820) and Statutory Shared Parental Pay (Admin) regulations 2014 (SI 2014/2929) | MHR |
| Tax and Social Security | Income Tax and NI returns                                                                                       | End of Financial Year | Not less than 3 years after the end of the financial                           | 6 years                             | Legal compliance: Income Tax (PAYE) Regulations 2003 (SI                                                                                                                                                                                                                        | MHR |

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|                         |                                                                                              |                                           |                                                                                |             |                                                                                                                                                          |     |
|-------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                         |                                                                                              |                                           | year to which they relate                                                      |             | 2003/2682 Reg 97).<br>The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996                                                       |     |
| Tax and Social Security | Redundancy details and record of payments & refunds                                          | Date of redundancy                        | N/A                                                                            | 6 years     | Best practice: CIPD recommended                                                                                                                          | MHR |
| Tax and Social Security | Revenue and Customs approvals                                                                | N/A                                       | N/A                                                                            | Permanently | Best practice: CIPD recommended                                                                                                                          | MHR |
| Tax and Social Security | Annual earnings summary                                                                      | End of Financial Year                     | N/A                                                                            | 12 years    | Best practice                                                                                                                                            | MHR |
| Tax and Social Security | Payroll/ salary records, overtime, bonuses expenses etc.                                     | End of Financial Year                     | Not less than 3 years after the end of the financial year to which they relate | 3 years     | Legal compliance: Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996 | MHR |
| Tax and Social Security | Actuarial valuation reports                                                                  | N/A                                       | N/A                                                                            | Permanently | Best practice: CIPD recommended                                                                                                                          | MHR |
| Tax and Social Security | Detailed returns of pension fund contributions; annual reconciliations of fund contributions | N/A                                       | N/A                                                                            | Permanently | Best practice                                                                                                                                            | MHR |
| Tax and Social Security | Money purchase details                                                                       | After transfer or value taken             | N/A                                                                            | 6 years     | Best practice: CIPD recommended                                                                                                                          | MHR |
| Tax and Social Security | Qualifying service details                                                                   | After transfer or value taken             | N/A                                                                            | 6 years     | Best practice: CIPD recommended                                                                                                                          | MHR |
| Tax and Social Security | Investment policies                                                                          | From end of benefits payable under policy | N/A                                                                            | 12 years    | Best practice: CIPD recommended                                                                                                                          | MHR |

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|------------------------------------------------|------------------------------------------------|--------------------------------------|-----|-----------------------------------------------------------|-------------------------------------|-----------------|
| Tax and Social Security                        | Trade Union agreements                         | Date of cessation                    | N/A | 10 years after ceasing to be effective                    | Best practice: CIPD recommended     | MHR             |
| Tax and Social Security                        | Inland Revenue approvals                       | End of company                       | N/A | Life of company                                           | Best practice: CIPD recommended     | MHR             |
| Tax and Social Security                        | Annual earnings summary                        | End of Tax Year                      | N/A | 3 years from the end of the tax year to which they relate | Best practice: HMRC                 | MHR             |
| <b>12. HUMAN RESOURCES – PENSION SCHEMES</b>   |                                                |                                      |     |                                                           |                                     |                 |
| Pension Schemes                                | Actuarial valuation reports                    | N/A                                  | N/A | Permanently                                               | Best practice: CIPD recommended     | MHR             |
| Pension Schemes                                | Detailed returns of pension fund contributions | End of Financial Year                | N/A | 6 years                                                   | Best practice: Pensions Regulator   | MHR             |
| Pension Schemes                                | Annual reconciliations of fund contributions   | End of Financial Year                | N/A | 6 years                                                   | Best practice: Pensions Regulator   | MHR             |
| Pension Schemes                                | Money purchase details                         | After transfer                       | N/A | 6 years after transfer of value taken                     | Best practice: CIPD recommended     | MHR             |
| Pension Schemes                                | Qualifying service details                     | After transfer                       | N/A | 6 years after transfer of value taken                     | Best practice: CIPD recommended     | MHR             |
| Pension Schemes                                | Investment policies                            | End of benefits payable under policy | N/A | 12 years                                                  | Best practice: CIPD recommended     | MHR             |
| Pension Schemes                                | Pensioner records                              | After benefits cease                 | N/A | 12 years after benefits cease                             | Best practice: CIPD recommended     | MHR             |
| Pension Schemes                                | Records relating to retirement benefits        | After transfer or value taken        | N/A | 6 years                                                   | Best practice: RBS(IP)R recommended | MHR             |
| <b>13. HUMAN RESOURCES – PERSONNEL RECORDS</b> |                                                |                                      |     |                                                           |                                     |                 |
| Personnel Records                              | Records relating to retirement benefits        | After a year of retirement           | N/A | 6 years                                                   | Best practice: RBS(IP)R recommended | HR & OD Manager |

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|                   |                                                                                                                                                       |                                   |                                                 |             |                                                                                                                               |                 |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Personnel Records | Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals | Leaving date                      | N/A                                             | 6 years     | Legal compliance: *Limitation Act 1980<br>Limitation for legal proceedings                                                    | HR & OD Manager |
| Personnel Records | Benefits and Deductions (Service contracts for directors (companies))                                                                                 | Date of cessation of directorship | 3 years                                         | 6 years     | Best practice: ICSA                                                                                                           | HR & OD Manager |
| Personnel Records | Remuneration package                                                                                                                                  | Leaving date                      | N/A                                             | 6 years     | Legal compliance: Limitations Act 1980                                                                                        | HR & OD Manager |
| Personnel Records | Former employees' Human Resources files                                                                                                               | Leaving date                      | N/A                                             | 6 years     | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | References to be provided for former employees                                                                                                        | Leaving date                      | N/A                                             | 6 years     | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | Training Programmes                                                                                                                                   | Leaving date                      | N/A                                             | 6 years     | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | Individual Training Records                                                                                                                           | Leaving date                      | N/A                                             | 6 years     | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | Short lists, interview notes and related application forms                                                                                            | Recruitment decision              | N/A                                             | 1 year      | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | Application forms of non-short-listed candidates                                                                                                      | After notification                | 1 year                                          | 1 year      | Legal compliance: SDA & RRA recommend 3 months<br>Commission for Racial Equality and Equal Opportunities recommends 6 months. | HR & OD Manager |
| Personnel Records | DBS certificate number                                                                                                                                | Date of clearance                 | Date of clearance + up to a maximum of 6 months | 3 years     | Legal compliance practice (Home office)                                                                                       | HR & OD Manager |
| Personnel Records | Timecards/ sheets                                                                                                                                     | End of Financial Year             | N/A                                             | 2 years     | Best practice: CIPD recommended                                                                                               | HR & OD Manager |
| Personnel Records | Trust deeds, rules and minutes (for joint employee/employer sports/social clubs, etc. set up under trust)                                             |                                   | N/A                                             | Permanently | Best practice: CIPD recommended                                                                                               | HR & OD Manager |

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|                              |                                                                          |                     |                               |                               |                                                                                                                                                                                                                |                                |
|------------------------------|--------------------------------------------------------------------------|---------------------|-------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Personnel Records            | Employer / Employee committee minutes (Staff Forum)                      |                     | N/A                           | Permanently                   | Best practice: CIPD recommended                                                                                                                                                                                | HR & OD Manager                |
| <b>14. HEALTH AND SAFETY</b> |                                                                          |                     |                               |                               |                                                                                                                                                                                                                |                                |
| Health & Safety              | Medical records relating to control of asbestos                          | 40 years continuous | 40 years                      | 40 years                      | Legal compliance: 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 | HR & OD Manager                |
| Health & Safety              | Health and safety assessments; records of consultations with safety reps | N/A                 | Permanently                   | Permanently                   | Legal compliance: Health and Safety at Work Act 1979                                                                                                                                                           | Group Business Support Manager |
| Health & Safety              | Health and safety policy statements                                      | N/A                 | Permanently                   | Permanently                   | Legal compliance: Health and Safety at Work Act 1979                                                                                                                                                           | Group Business Support Manager |
| Health & Safety              | Accident records, reports, accident books                                | Date of occurrence  | 3 years or until person is 21 | 3 years or until person is 21 | Legal compliance: RIDDOR Limitation for legal proceedings RIDDOR 1995 and Prescription and Limitation (Scotland) Act 1973. Special rules apply concerning incidents involving hazardous substances.            | Group Business Support Manager |
| Health & Safety              | Sickness records                                                         | Date of occurrence  | 3 years                       | 6 years from date of sickness | Legal compliance: The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended Professional Standards Agency                                                                                     | HR & OD Manager                |

|                 |                                     |                |                          |                          |                                                                   |                 |
|-----------------|-------------------------------------|----------------|--------------------------|--------------------------|-------------------------------------------------------------------|-----------------|
| Health & Safety | Health and safety statutory notices | Once compliant | 5 years after compliance | 6 years after compliance | Legal compliance: Prescription and Limitation (Scotland) Act 1973 | HR & OD Manager |
|-----------------|-------------------------------------|----------------|--------------------------|--------------------------|-------------------------------------------------------------------|-----------------|

## Part 5: Marketing

| Document Overview |             | Retention Schedule |                          |                              | Document Management  |                                           |
|-------------------|-------------|--------------------|--------------------------|------------------------------|----------------------|-------------------------------------------|
| Function          | Record Type | Retention Trigger  | Minimum Retention Period | Recommended Retention Period | Reason for Retention | Information Asset Owner                   |
| 15. MARKETING     |             |                    |                          |                              |                      |                                           |
| Marketing         | Consent     | n/a                | n/a                      | 2 years                      | Best practice        | Group Communication and Marketing Manager |
| Marketing         | Soft Opt-In | n/a                | n/a                      | 2 years                      | Best practice        | Group Communication and Marketing Manager |
| Customer Insights | Profiling   |                    |                          | 2 years                      |                      | Housing Services Manager                  |

## Part 6: Vehicles

| Document Overview                             |                                                       | Retention Schedule |                          |                              | Document Management                                                                                     |                         |
|-----------------------------------------------|-------------------------------------------------------|--------------------|--------------------------|------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------|
| Function                                      | Record Type                                           | Retention Trigger  | Minimum Retention Period | Recommended Retention Period | Reason for Retention                                                                                    | Information Asset Owner |
| 16. VEHICLES                                  |                                                       |                    |                          |                              |                                                                                                         |                         |
| Transport Vehicles                            | & Mileage records & defect sheets                     | Vehicle disposal   | N/A                      | 2 years                      | Best practice                                                                                           | Appropriate Manager     |
| Transport Vehicles                            | & Maintenance records & MOT tests                     | Vehicle disposal   | N/A                      | 2 years                      | Best practice                                                                                           | Appropriate Manager     |
| Transport Vehicles                            | & Copy Registrations                                  | Vehicle disposal   | N/A                      | 2 years                      | Best practice                                                                                           | Appropriate Manager     |
| Transport Vehicles                            | & Vehicle disposal log                                | Vehicle disposal   | N/A                      | 1 year                       | Best practice                                                                                           | Appropriate Manager     |
| Transport & Vehicles - Operators Licence Only | Operators Licence certificates and documents of title | N/A                | Permanently              | Permanently                  | Legal compliance: Driver & Vehicle Standards Agency (DVSA) Operators Licence requirement                | Appropriate Manager     |
| Transport & Vehicles - Operators Licence Only | Mileage records & defect sheets                       | Vehicle disposal   | 15 months                | 2 years                      | Best practice: 2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence | Appropriate Manager     |
| Transport & Vehicles - Operators Licence Only | Maintenance records & MOT tests (up to 3.5T)          | Vehicle disposal   | 15 months                | 2 years                      | Best practice: 2 years is best practice. DVSA requirement to                                            | Appropriate Manager     |

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|                                               |                                                 |                  |           |         |                                                                                                            |                     |
|-----------------------------------------------|-------------------------------------------------|------------------|-----------|---------|------------------------------------------------------------------------------------------------------------|---------------------|
|                                               |                                                 |                  |           |         | keep for 15 months under Operators Licence                                                                 |                     |
| Transport & Vehicles - Operators Licence Only | Maintenance records & MOT tests (HGV over 3.5T) | Vehicle disposal | 15 months | 2 years | Best practice: 2 years is best practice.<br>DVSA requirement to keep for 15 months under Operators Licence | Appropriate Manager |
| Transport & Vehicles - Operators Licence Only | Copy Registrations (up to 3.5T)                 | Vehicle disposal | 15 months | 2 years | Best practice: 2 years is best practice.<br>DVSA requirement to keep for 15 months under Operators Licence | Appropriate Manager |
| Transport & Vehicles - Operators Licence Only | Copy Registrations (HGV over 3.5T)              | Vehicle disposal | 15 months | 2 years | Best practice: 2 years is best practice.<br>DVSA requirement to keep for 15 months under Operators Licence | Appropriate Manager |

## Part 8: Housing Applications and Tenancy Records

| Document Overview                           |                                                                    | Retention Schedule |                          |                                   | Document Management                             |                                        |
|---------------------------------------------|--------------------------------------------------------------------|--------------------|--------------------------|-----------------------------------|-------------------------------------------------|----------------------------------------|
| Function                                    | Record Type                                                        | Retention Trigger  | Minimum Retention Period | Recommended Retention Period      | Reason for Retention                            | Information Asset Owner                |
| <b>17. APPLICATIONS AND TENANCY RECORDS</b> |                                                                    |                    |                          |                                   |                                                 |                                        |
| Application and Tenancy Records             | Applications for accommodation                                     | Offer accepted     | N/A                      | 6 years after offer accepted      | Best practice: Limitation Act 1980, section 2   | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records             | Continuous Recording of lettings and sales (CORE) data record form |                    | N/A                      | As long as it is deemed necessary | Best practice: CORE Data Sharing Agreement 12.1 | Housing Team Leader / Lettings Manager |

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|                                 |                                                                                                                       |                |                                               |                                               |                                                                                                                                                         |                                        |
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|                                 |                                                                                                                       |                |                                               | to support social housing policy.             |                                                                                                                                                         |                                        |
| Application and Tenancy Records | Housing Benefit notifications                                                                                         |                | N/A                                           | 2 Years                                       | Best practice: Recommendation from Chartered Institute of Housing. Good practice as per DWP guidance                                                    | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Rent statements                                                                                                       |                | N/A                                           | 2 years                                       | Best practice                                                                                                                                           | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Tenants' tenancy Files, including rent payment records, and details of any complaints and harassment cases            | Continuous     | 5 years                                       | 6 years                                       | Legal compliance: Prescription and Limitation (Scotland) Act 1973                                                                                       | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Former tenants' Tenancy Agreements, and details of their leaving                                                      | End of tenancy | 5 years                                       | 6 years                                       | Legal compliance: Prescription and Limitation (Scotland) Act 1973                                                                                       | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Care plans for children and related documents                                                                         |                | 5 years                                       | 6 years                                       | Legal compliance: Prescription and Limitation (Scotland) Act 1973                                                                                       | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Care plans/ case files for adults and related documents                                                               | End of support | 8 years from end of care. (Adult Social Care) | 8 years from end of care. (Adult Social Care) | Legal compliance: Records Management Code of Practice for Health and Social Care 2016<br>Some documents may be transferred to subsequent caring agency. | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Documentation, correspondence and information provided by other agencies relating to special needs of current tenants |                | 6 years                                       | 6 years                                       | Best practice                                                                                                                                           | Housing Team Leader / Lettings Manager |
| Application and Tenancy Records | Records relating to offenders, ex-offenders, and persons subject to cautions                                          |                | 2-5 years based on severity of crime          | 2-5 years based on severity of crime          | Best practice: NACRO                                                                                                                                    | Housing Team Leader / Lettings Manager |

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|                                 |                                            |                                |                                                                 |                                                                                                                                |                                                                                                                                                                           |                                                                             |
|---------------------------------|--------------------------------------------|--------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Application and Tenancy records | Sex offenders                              | End of tenancy                 | 25 years or 6 years after termination of tenancy                | 25 years or 6 years after termination of tenancy                                                                               | Best guidance                                                                                                                                                             | Housing Team Leader / Lettings Manager                                      |
| Application and Tenancy Records | Safeguarding Referral                      |                                | 10 years                                                        | 10 years                                                                                                                       | Legal compliance:                                                                                                                                                         | Housing Team Leader / Lettings Manager                                      |
| Application and Tenancy Records | Safeguarding Records - Serious Case Review |                                | Minimum of 364 days or when notified Home Office has closed DHR | Minimum of 364 days or when notified Home Office has closed DHR                                                                | Legal compliance: 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 | Housing Services Manager                                                    |
| <b>18. PROPERTY RECORDS</b>     |                                            |                                |                                                                 |                                                                                                                                |                                                                                                                                                                           |                                                                             |
| Property Records                | Rent registrations (superseded)            | Superseded document            | N/A                                                             | 6 years                                                                                                                        | Best practice: Rent Officer Handbook recommendation                                                                                                                       | Housing Services Manager                                                    |
| Property Records                | Rent Registration (not superseded)         |                                | N/A                                                             | Life of company                                                                                                                | Best practice: Rent Officer Handbook recommendation                                                                                                                       | Housing Services Manager                                                    |
| Property Records                | Fair rent documentation                    |                                | N/A                                                             | 6 years                                                                                                                        | Best practice: Rent Officer Handbook recommendation                                                                                                                       | Housing Services Manager                                                    |
| Property Records                | Leases and deeds of ownership              |                                | N/A                                                             | 15 years after expiry.                                                                                                         | Best practice                                                                                                                                                             | Asset Manager                                                               |
| Property Records                | Copy of former leases                      | Settlement of all issues       | 12 years                                                        | 12 years                                                                                                                       | Legal Compliance: Limitation for legal action relating to land or contracts under seal.                                                                                   | Asset Manager                                                               |
| Property Records                | Wayleaves, licences and easements          | Rights given or received cease | 12 years                                                        | 12 years<br>NB. Documentation for long term loan applications will need to be retained for the life of the property, to ensure | Legal Compliance: Limitation for legal action relating to land or contracts under seal.<br>Loan financing                                                                 | Development/Assets Manager (depending on whether new build or major repair) |

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|                  |                                           |                 |                                | developments can be re-secured in future                                                                                                                                |                                                                                                           |                                                                             |
| Property Records | Abstracts of title                        | Interest ceases | 12 years after interest ceases | 12 years<br>NB. Documentation for long term loan applications will need to be retained for the life of the property, to ensure developments can be re-secured in future | Legal Compliance: Limitation for legal action relating to land or contracts under seal.<br>Loan financing | Development/Assets Manager (depending on whether new build or major repair) |
| Property Records | Planning and building control permissions | Interest ceases | 12 years after interest ceases | 12 years<br>NB. Documentation for long term loan applications will need to be retained for the life of the property, to ensure developments can be re-secured in future | Legal Compliance: Limitation for legal action relating to land or contracts under seal.<br>Loan financing | Development/Assets Manager (depending on whether new build or major repair) |
| Property Records | Searches                                  | Interest ceases | 12 years after interest ceases | 12 years                                                                                                                                                                | Legal Compliance: Limitation for legal action relating to land or contracts under seal.                   | Development/Assets Manager (depending on whether new build or major repair) |
| Property Records | Property maintenance records              |                 | 6 years                        | 6 years                                                                                                                                                                 | Legal Compliance: Limitation for legal action relating to land or contracts under seal.                   | Housing Services Manager                                                    |
| Property Records | Reports and professional opinions         |                 | 6 years                        | 6 years<br>NB. Documentation for long term loan applications will need to be retained                                                                                   | Legal Compliance: Limitation for legal action relating to land or contracts under seal.<br>Loan financing | Development/Assets Manager (depending on whether new build or major repair) |

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|                  |                                                                |                          |                      | for the life of the property, to ensure developments can be re-secured in future                                                                                        |                                                                                                           |                     |
| Property Records | Development documentation                                      | Settlement of all issues | 12 years             | 12 years<br>NB. Documentation for long term loan applications will need to be retained for the life of the property, to ensure developments can be re-secured in future | Legal Compliance: Limitation for legal action relating to land or contracts under seal.<br>Loan financing | Development Manager |
| Property Records | CDM Health and Safety files and as-built construction drawings | For life of building     | For life of building | For life of building                                                                                                                                                    | Legal compliance (CDM Regulations 2015) and on-going maintenance                                          | Appropriate Manager |

## 19. TECHNICAL AND RESEARCH RECORDS

|                        |                                |                               |     |                                                                                                                                                                                                                                                                    |               |                     |
|------------------------|--------------------------------|-------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|
| Technical and Research | Technical and research records | After requirements have ended | N/A | 12-15 years after requirements have ended for both records and reports and drawings and other data.<br>NB. Documentation for long term loan applications will need to be retained for the life of the property, to ensure developments can be re-secured in future | Best practice | Appropriate Manager |
|------------------------|--------------------------------|-------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|

## 20. ASB CASE FILES AND ASSOCIATED DOCUMENTS

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|                                                                                                                     |                                                                                                          |                                       |                              |                                      |                                               |                                                                   |
|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|---------------------------------------|------------------------------|--------------------------------------|-----------------------------------------------|-------------------------------------------------------------------|
| ASB case files and associated documents                                                                             | ASB (Anti-social behaviour) case files and associated documents                                          |                                       | N/A                          | 2 years or until end of legal action | Best practice                                 | Housing Team Leader / Lettings Manager                            |
| <b>21. SUPPORTING PEOPLE – SUBSIDY CLAIMS / SUPPORT PLANS / SINGLE ASSESSMENTS INCLUDING SUPPORTING INFORMATION</b> |                                                                                                          |                                       |                              |                                      |                                               |                                                                   |
| Supporting People                                                                                                   | Supporting people – subsidy claims / support plans / single assessments including supporting information | 6 months after service provision ends | 6 years                      | 6 years                              | Best practice                                 | Placemaking Manager or Tenancy Support Team Leader as appropriate |
| <b>22. RESIDENT MEETINGS</b>                                                                                        |                                                                                                          |                                       |                              |                                      |                                               |                                                                   |
| Resident Meetings                                                                                                   | Resident Meeting Minutes                                                                                 | From date of meeting                  | N/A                          | 1 year                               | Best practice: ICSA recommended               | Tenant Participation Coordinator                                  |
| <b>23. PROPERTY SALES</b>                                                                                           |                                                                                                          |                                       |                              |                                      |                                               |                                                                   |
| Home Ownership                                                                                                      | New Sales applications                                                                                   | Offer accepted                        | 6 years after offer accepted | 6 years                              | Best practice: Limitation Act 1980, section 2 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Registrations of interest                                                                                | Sale of property                      | N/A                          | 2 years                              | Best practice                                 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Offer Details                                                                                            | Offer accepted                        | current year plus 6 years    | 6 years                              | Legal compliance: Estate Agency Act 1979      | Housing Team Leader                                               |
| Property Sales                                                                                                      | Completion documentation                                                                                 | Completion of Sale                    | 12 years                     | 12 years                             | Best practice                                 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Post purchase questionnaire/ customer feedback                                                           | Date of creation                      | N/A                          | 3 years                              | Best practice: National Archives guidance     | Housing Team Leader                                               |
| Property Sales                                                                                                      | Help to Buy applications                                                                                 | Offer accepted                        | 6 years after offer accepted | 6 years                              | Best practice: Limitation Act 1980, section 2 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Resales (Shared Ownership)                                                                               | Offer accepted                        | 6 years after offer accepted | 6 years                              | Best practice: Limitation Act 1980, section 2 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Staircasing process documents                                                                            | Completion of Sale                    | 12 years                     | 12 years                             | Best practice                                 | Housing Team Leader                                               |
| Property Sales                                                                                                      | Right to Buy/ Acquire files                                                                              | Completion of Sale                    | 12 years                     | 12 years                             | Best practice                                 | Housing Team Leader                                               |