

# Data Retention and Disposal policy

## 1. Policy Control

Version	Description	Date
1.0	Created	14/02/2017
1.2	Update	19/04/2018
	Reviewed	April 2022

## 2. Policy

To encourage good management and simplicity of operation, Communities First Wessex (trading as Community First) CFW aims to retain the minimum amount of information and paperwork necessary for legal purposes and the smooth operation of the organisation. This also applies to electronic information.

CFW will keep some types of information for longer than others. Where the legal basis for processing data is consent; information will be kept for 'no longer than is necessary' this is considered to be up to two years after the subject last accessed CFW services, unless other bodies, such as funders, require CFW to keep the information longer under contract or where another lawful basis for processing information is used e.g. HMRC reporting purposes. The lawful basis for processing is identified for each activity and is documented. In each instance personal and special category data is minimised or anonymised wherever reasonable.

The following is a list of data subjects. A data subject is an individual about whom personal data is held. The following data subjects are permitted:

- a) Employees and Volunteers
- b) customers
- c) members or supporters
- d) third party suppliers
- e) representatives from partner agencies

The schedule below shows recommended periods for the retention of the various types of personal and or sensitive (special category) information records held by CFW:

Type	Item	Description	Disposal (maximum period)
1. Client /customer records	1.1	Enquiries	2 years from last contact
	1.2	Complaint Investigations	6 years
	1.3	Aggregated statistical reports	3 years
	1.4	Case files or Order history	3 years ( <i>unless required for longer under contract - in which case to be communicated via terms of service</i> )
	1.5	Payment history (financial records)	7 years
	1.6	FOI/SAR requests inc. associated correspondence	2 years if accepted otherwise 6 years
	1.7	Register of Complaints	5 years
	1.8	General Correspondence	2 years
	1.9	Safeguarding Concern Form and Associated investigations/ reports.	Indefinitely
2.0 Project records	2.1	contract monitoring Reports	3 years
	2.2	project specific policies and operating procedures	2 years from conclusion from area of work

	2.3	Impact Assessments (Privacy and Equality)	3 years
	2.4	Contacts inc. MoU and SLA or Grant Agreements	7 years
3.0 Workforce & personnel	3.1	Recruitment and selection material	6 months after the decision
	3.2	References	7 years
	3.3	employment contracts	7 years
	3.4	Leave and absence records	2 years
	3.5	Maternity leave records and certificates	3 years
	3.6	Performance records such as training, appraisal and disciplinary	2 years
	3.7	Employee's home address, Next of Kin details	six months from ending employment
	3.8	Payroll records and relevant supporting documents	7 years
	3.9	Whistleblowing	Permanently
	3.10	DBS - registration number and date of issue only	3 years from issue
	3.11	Accident records	3 years
4.0 Financial Records	4.1	Budgets and management accounts	3 years from FYE
	4.2	Annual accounts	Permanently
	4.3	External Audit reports	Permanently
	4.4	Bank/ Credit statements	7 years
	4.5	VAT returns	7 years
	4.6	Ledger	Permanently
	4.7	Invoices - Capital, revenue,	7 years

		rate and rent invoices and supporting estimates.	
	4.8	Employee expenses claims	3 years
	4.9	Debtors' records	7 years
5.0 Governance and Legal	5.1	Accident books and accident records	3 years from last entry
	5.2	Board meeting minutes	Permanently
	5.3	Memorandum of Understanding (MOU)	Permanently
	5.4	Trust Deed	12 years
	5.6	Supplier Contracts	7 years from end of contract
	5.7	litigation and formal legal advice	Permanently