



**Name of Policy: Document Retention Policy  
(Ref: G/23)**

**Purpose of Policy:**

The purpose of this policy is to provide clarity on what information is be retained and for how long.

<b>Policy Monitoring Details</b>	
<b>Department:</b>	Across the organisation
<b>Author:</b>	Kathryn Miller
<b>Status:</b>	Group
<b>Date Approved by Management Committee:</b>	<b>August 2017</b>
<b>Updated:</b>	
<b>Planned Review Date:</b>	5 years after approval
<b>Regulatory Outcomes being achieved:</b>	Regulatory Standards of Governance and Financial Management, Standard 3: The RSL manages its resources to ensure its financial well-being and economic effectiveness.
<b>Tenant Consultation Required:</b>	No
<b>Equalities Impact Assessment</b>	Initial

**Content List:**

**1.0 Introduction**

**2.0 Document Retention Schedule**

<b>1. Introduction</b>
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**1.1** In accordance with legislative requirements and for effective governance of the group, it is necessary to establish retention periods for all records created and maintained by the group.

## **2. Document Retention Schedule**

**2.1** Some documents are retained due to an administrative need. Examples are subject files and correspondence files. Once they are superseded by new information they can be confidentially destroyed. Some documents exist within a regulatory framework where specific legislation determines a minimum period in which the information must be kept.

**2.2** Some of the statutes that stipulate retention periods for documents are: Companies Act 2006. Consumer Protection Act 2015, Data Protection Act 1998 (to be superseded by the General Data Protection Regulations as of May 2018), Freedom of information Act 2000. Various government departments have also issued guidance (e.g. HMRC).

**2.3** The document retention schedule (per statute requirement/guidelines) has been attached as Appendix 1.

**2.2** The schedule will be reviewed every 5 years or as and when legislation or good practice changes.

## **3.0 Publicising this Policy:**

This is an internal policy and therefore does not need external publication, although will be available on request should it be sought by any tenant or stakeholder. The policy is available to all staff and will be incorporated within the staff handbook.

**DOCUMENT RETENTION SCHEDULE**

**APPENDIX 1**

<b>DOCUMENT</b>	<b>LOCATION</b>	<b>PURPOSE COLLECTED OR HELD</b>	<b>RETENTION PERIOD</b>	<b>AGENCIES EXCHANGED WITH/PASSED ON TO</b>	<b>PERSONAL DATA</b>	<b>SECTION RESPONSIBLE</b>
<b>INCORPORATION DOCUMENTS</b>		<b>Statutory</b>				<b>CEO</b>
Certificate of Incorporation	Safe		Permanently			
Association Rules (original)	Safe		Permanently			
Association Rules (current)	IT system		Permanently			
Standing Orders	IT system		Permanently			
Letter of charitable registration	Safe		Permanently			
Registration documentation (I & P Societies)	Safe		Permanently			
Certificate of registration with Scottish Housing	Safe		Permanently			
<b>MEETINGS</b>	<b>General Office, IT System, Archive</b>	<b>Administration of Association</b>		<b>Available for Public Inspection</b>		<b>CEO</b>
Notices of meetings	IT system		6 years			

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Management and sub-committee minutes	IT system		Permanently		YES	
Minutes and resolutions of MEAL	IT system		6 years			
<b>Registration and Statutory Returns</b>	<b>General Office, IT System, Archive</b>	<b>Compliance with Legislation</b>				
Annual returns to SHR	CSM		5 years	SHR		CS
ESSH	IT system					TSM-S
ARC	IT system		5 years	SHR		HM
Annual returns to SHR – working papers	CSM/HM/ TSM-S TSM - O  Identified on indicator summary sheet – IT system or hard copies		3 years	Available for inspection by SHR		CS/HM/ TSM-S/TSM-O

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Audited company returns and financial statements	CSM		Permanently			CS
Entitlement, Payments and Benefits	CEO Office		Permanently		YES	CEO
Register of Committee Members	CEO Office		Permanently		YES	CEO
Register of seals	CEO Office		Permanently		YES	CEO
Register of share certificates	CEO Office		Permanently		YES	CEO
List of members (I & P Societies)	IT system / audit file		Permanently		YES	CS
Data Protection Registration	CEO Office		Permanently			CEO
<b>Strategic Management</b>	<b>CEO Office</b>	<b>Administration of Association</b>				<b>CS</b>
Corporate plans & supporting documentation	IT system		5 year after plan completion			CEO
Insurances	CSM; IT system					
Current and former policies	IT system		Permanently			
Annual Insurance schedule	CS Office		6 years			

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Claims and related correspondence	IT system		3 Years after settlement		YES	
Indemnities and guarantees			6 years after expiry			
Employer's Liability Policies	CS Office		Mimimun of 40 years			
<b>Finance, Accounting &amp; Tax Records</b>	<b>CS section; IT System; Archive</b>	<b>Compliance with Legislation</b>				<b>CS</b>
Accounting records			5 years + current year			
Balance Sheets and supporting documentation			5 Years + current year			
Loan account documentation			Duration of loan + 6 years			
Housing Association Grant documentation	TSM - O		Permanently			CEO

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Signed Copy of report and accounts			Permanently			
Budgets and internal financial reports			2 years			
Tax returns and records			6 years			
VAT records/correspondence			6 years			
Orders and delivery notes			6 years			
Copy invoices			6 years			
Credit and debit notes			6 years			
Cash records			6 years			
Creditors, debtors & cash income control accounts			6 years			CS
<b>Other Banking Records</b>	<b>CS section; IT System; Archive</b>	<b>Administration of Association</b>				<b>CS</b>
Cheques			6 years			
Paying in counterfoils			6 years			
Bank statements and reconciliations			6 years			

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Instructions to bank			6 years		YES	
<b>Contracts and Agreements:</b>	<b>Department &amp; Property Files Archive</b>	<b>Administration of Association &amp; Compliance with Legislation</b>				<b>ALL</b>
Contracts under seal and/or executed as deeds	Solicitor/ Dev Files		12 years after completion (including any defects liability period)			CEO
Contracts for the supply of goods, works or services, including professional services	Department Files		Data permanently Correspondence 6 years after contract completion			ALL
Planned maintenance work	TS Office IT system Archive		Data permanently Correspondence 6 years after			TS



DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
			contract completion			
Licensing agreements	HMO Licence – HM Action Group File		6 years after expiry			HM
Rental and hire purchase agreements			6 years after expiry			CS
Indemnities, guarantees and warranties			6 years after expiry			ALL
Documents relating to successful tender			6 years after contract completion			ALL
Procurement Strategy Plan and Tender Register	IT system		Permanently			ALL
Documents relating to unsuccessful tenders			2 years after notification			ALL
Forms of tender			6 years after contract completion			ALL

<b>DOCUMENT</b>	<b>LOCATION</b>	<b>PURPOSE COLLECTED OR HELD</b>	<b>RETENTION PERIOD</b>	<b>AGENCIES EXCHANGED WITH/PASSED ON TO</b>	<b>PERSONAL DATA</b>	<b>SECTION RESPONSIBLE</b>
<b>Application and Tenancy Records</b>	<b>IT System; House Files; SST files; Register of Interests</b>	<b>Administration of Housing Management service</b>		<b>Contractors; Emergency Services; Housing Benefit; DWP; East Lothian Social Work Dept; Communities Scotland; other RSL's; Solicitors; Sheriffs; Care agencies; Supporting People Dept; Care Commission; NASS; Refuge Support Team; SCORE; Banks; Anti-social behaviour agencies; External &amp; Internal Auditors.</b>		<b>HM</b>
Applications for accommodation	Individual house files		Duration of tenancy		YES	
Housing Benefit notifications	Arrears files		Most recent notification only – available on line from CEC		YES	
Rent statements	On system		All rent information is		YES	

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
			retained permanently			
Current tenants' Tenancy Files, including rent payment records, and details of any complaints and harassment cases	House files		Duration of tenancy		YES	
Former tenants' Tenancy Files (other than tenancy agreements - see below), including rent payment records, and details of any complaints and harassment cases	IT system		End of tenancy		YES	
Former tenants' Tenancy Agreements, details of their leaving and summary of tenancy	Information on IT system, do not currently retain tenancy agreements		Permanently		YES	
Documentation, correspondence and information provided by other agencies relating to special needs of current tenants	House files and on system		Duration of tenancy		YES	

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Records relating to offenders, ex-offenders and persons subject to cautions	Confidential filing system, HM office		Duration of tenancy		YES	
<b>Property Records</b>	<b>Property Files Archive</b>	<b>Administration of Properties and Maintenance</b>				<b>TS</b>
Leases and deeds of ownership			While owned			CEO
Copy of former leases			Permanently			CEO
Wayleaves, licences and easements			Permanently			TS
Abstracts of title			Permanently			TS
Planning and building control permissions			Permanently			TS
Searches			Permanently			TS
Property maintenance records			Permanently			TS
Reports and professional opinions			Permanently			TS

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Construction, Maintenance and Development Tender Documents, Drawings and Bills of Quantities			Permanently			TS
Property Health & Safety Files			Permanently			TS
<b>Employees: Tax and Social Security</b>	<b>CS section; Stationery room; IT System; Archive</b>	<b>Administration of Payroll</b>		<b>Inland Revenue; DWP; External &amp; Internal Auditors</b>		<b>CS</b>
Record of taxable payments			6 years		YES	
Record of tax deducted or refunded			6 years		YES	
Record of earnings on which standard National Insurance Contributions payable			6 years		YES	
Record of employer's and employee's National Insurance Contributions			6 years		YES	

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
NIC contracted-out arrangements			6 years		YES	
Copies of notices to employee (e.g. P45, P60)			6 years		YES	
Inland Revenue notice of code changes, pay & tax details			6 years		YES	
Expense claims			6 years		YES	
Record of sickness payments			6 years		YES	
Record of maternity payments			6 years		YES	
Income tax and NI returns			6 years		YES	
Redundancy details and record of payments & refunds			12 years		YES	
Inland Revenue approvals			Permanently		YES	
Annual earnings summary			12 years		YES	
Record of employer & employee pension contributions			6 years		YES	
Record of employee pension membership	+ Personnel File		6 years after employment ceases		YES	

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<b>Employees (Personnel Procedures):</b>	<b>CEO's Office; IT System</b>	<b>Compliance with Employment Legislation</b>		<b>Inland Revenue; DWP; Pensions Trust; Child Support Agency; Police; Internal &amp; External Auditors; Regulator</b>		<b>CEO</b>
Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals			6 years after terms and conditions superseded		YES	
Disclosure Scotland Checks	CEO's Office only	Employee Checks	6 months	None	YES	
Former employees' Personnel Files			6 years		YES	
References to be provided for former employees			6 years	Prospective Employers	YES	
Training programmes			6 years		YES	
Individual training records	IT system		6 years after employment ceases		YES	Individual

DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Short lists, interview notes and related application forms of unsuccessful interviewees	Relevant Managers office		1 year		YES	SMT
Short lists, interview notes and related application form of successful applicant	Relevant Managers office		6 years after employment ceases		YES	SMT
Application forms of non-shortlisted candidates	Relevant Managers office		6 months		YES	SMT
Time sheets	IT system		2 years		YES	Relevant Supervisor
Trade union agreements			10 years after ceasing to be effective			CEO
<b>Employees: Health and Safety</b>	<b>General Office IT System</b>	<b>Compliance with Health &amp; Safety Legislation</b>				<b>CEO</b>
Health and Safety assessments	Safe		Permanently		YES	
Health and Safety policy statements	Safe		Permanently			



DOCUMENT	LOCATION	PURPOSE COLLECTED OR HELD	RETENTION PERIOD	AGENCIES EXCHANGED WITH/PASSED ON TO	PERSONAL DATA	SECTION RESPONSIBLE
Records of consultations with safety representatives			Permanently		YES	
Accident records, reports	Safe		6 years after occurrence		YES	
Accident books	Safe		6 years after date of last entry		YES	
Sickness records	IT system; CEO's Office		6 years		YES	
Health and safety statutory notices			6 years after compliance			