



## Record Retention Policy

<b>Lead/Owner</b>	CEO
<b>Date of Approval</b>	14/03/2024
<b>Author/reviewer</b>	CEO/Board of Trustees
<b>Next review date</b>	14/03/2027
<b>Related Policies</b>	
<b>Level of approval</b>	Board of Trustees

### Introduction

The purpose of this policy is to ensure that records and documents of Compassionate Inverclyde are retained in a secure environment, are accessible to those who need them and are securely disposed of when they are no longer required for legal, business or historical reason.

The policy applies to all trustees, employees and volunteers of Compassionate Inverclyde.

The length of retention for each type of record will be determined by Compassionate Inverclyde Trustees. Their decision will be based on several factors, including legal requirements, best practice, storage costs and historical significance.

### Scope

The policy applies to records received and created by Compassionate Inverclyde including electronic documents, email, internet, databases, videos and hard copy.

### Data Protection

The policy will ensure that Compassionate Inverclyde complies with data protection legislation. This requires that Compassionate Inverclyde does not retain personal data for longer than is necessary.

The principles of the data protection legislation require that Compassionate Inverclyde must only keep data when there is a valid reason for doing so and the Trustees will ensure that the records kept meet at least one of the 6 valid reasons detailed in the legislation. Records will be held securely and will be kept only whilst there is a business or legal need for them. Records will be easily retrievable and will allow a natural person access to the information held by Compassionate Inverclyde with respect to their information should they request it.

Compassionate Inverclyde will ensure that data is secure when it is on any premises occupied by Compassionate Inverclyde. A record of the storage location will be maintained for all records.

All records created by or on behalf of Compassionate Inverclyde remain the property of Compassionate Inverclyde. Records, both hard copy and electronic will be securely disposed of or released in accordance with legislation and Compassionate Inverclyde business needs.

Compassionate Inverclyde will maintain retention schedules tracking the retention and disposal of records. The data owner is responsible for the storage and retrieval of records and will determine what will be kept and where and how the records will be kept.

### **Review and Audit**

Records will be reviewed by the data owner against the Record Retention Schedule on an annual basis. Where there is no longer a legal, business or historical requirement to retain the record a Disposal Request form will be completed and passed to the CEO.

The Disposal Request form will detail the method of disposal of the records. Where hard copy records are shredded, this will be to at least DIN 5 size. Electronic records must be securely destroyed, and all backups and copies must be included in the destruction of the records.

The Disposal Request form will include details of the records being disposed of, format of the data, either electronic or hard copy, proposed disposal method, proposed disposal date and brief explanation as to why the record is no longer being retained. When the Disposal Request is approved the form will be signed by the approving officer and the date of disposal will be added by the Data Owner. A copy of all Disposal Request forms will be held by CEO

### **Pandemic process**

During a pandemic or other emergency period if Compassionate Inverclyde cannot adhere to the record retention policy with respect to storage and disposal of records alternate arrangements will be made to ensure the secure storage of the charity's records. When it is possible to do so the approved record retention and disposal process will resume.

Examples of records included in the Record Retention Policy are given below. These will be dependent upon the activities of the charity. The policy should include records relating to governance, financial, personnel, health and safety, gift aid, property, grants, insurance and other activities relevant to its charitable purposes.

<b>Legislation</b>	<b>Examples of records</b>	<b>Retention period</b>	<b>*Data owner</b>
Charities Act 2005 & Companies Act	Minutes of Trustee meetings and decisions made as resolutions in writing. Minutes of General meetings and members resolutions passed other than at a General Meeting	Minimum period is 10 years however the charity policy is to permanently retain these records	Charity CEO /Secretary
Charities Act 2005 & Companies Act	Annual accounts and Annual review	Permanently	Charity CEO /Secretary
Charities Act 2005 & Companies Act	Purchase Invoices, Records of monies received and paid	6 years after the end of the current period	Financial Controller
HMRC	Employee details	6 years after the end of the current period	Financial Controller
Taxes Management Act	Income Tax Records, P45 and P60	6 years after the end of the current period	Chair of the board
Equality Act 2010 Limitations Act	Application forms and interview notes for unsuccessful candidates	Six months to a year	Chair of the board
RIDDOR Regulations	Accident books, records/reports	Legal requirement 3 years after last entry or end of investigation if later. Charity will retain for at least 6 years	Chair of the board

*\*Data Owner – Where charities do not have an appropriate staff member the Chair of the Board or the Chair of the appropriate committee will be the Data owner.*

The Record Retention Policy was approved by the Board of Trustees of Compassionate Inverclyde on 14/03/2024- and will be reviewed either on 14/03/2027 or an earlier date if a change to legislation or practice with respect to the retention and disposal of records is brought to the attention of the Board.

## Appendix (i) – Examples of items on a Records Retention Schedule

The schedule contains the following:

1. Name of the area creating or holding the records concerned, i.e. finance, personnel, health and safety, governance, services.
2. The version number of the schedule (numeric).
3. Reference numbers where these are applicable of the records.
4. Description of the records, e.g., Payroll, Purchase ledger, Sales ledger, Bank statements, gift aid, grants, leases, assets, trustee appointments, trustee expenses, service delivery, volunteer information, fundraising.
5. Legislation, if applicable relevant to retention period.
6. Disposal decision – either destroy, reconsider at a specified date, or transfer to permanent archives.
7. Timing of disposal e.g., minimum period where instant access is available or if necessary, off site storage until disposal.
8. Event that triggers disposal.
9. Responsible individual for triggering disposal process.
10. Date on which schedule agreed and signed.

### References

OSCR Trustee Duties - <https://www.oscr.org.uk/managing-a-charity/trustee-duties/>

NCVO Know How <https://knowhow.ncvo.org.uk/organisation/operations/legal/records>

Buzzacott

<https://www.buzzacott.co.uk/insights/retention-of-accounting-records-and-other-corporate-records>

UK GDPR and Data protection

<https://beta.ncvo.org.uk/help-and-guidance/digital-technology/data-protection-and-cybersecurity/gdpr-data-protection-law-brexit-and-how-keep-top-your-responsibilities/>

### Document version control

Version number	Change or update	Author or owner	Date
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1.0	First version	CEO	14/03/2024