**DATA RETENTION**

**POLICY**

**PURPOSE**

The purpose of this policy is to ensure that records and documents of SWRCCS 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 reasons. The policy applies to all trustees, employees, volunteers, members and users of SWRCCS.

The length of retention for each type of record is detailed below. This decision is based on several factors, including legal requirements, best practice and historical significance.

The policy applies to personal data received and created by SWRCCS including electronic documents, email, internet, databases, videos and hard copy.

**AIM**

The aim of this policy is to ensure that SWRCCS complies with data protection legislation and does not retain personal data for longer than is necessary. (See Data Protection Policy).

SWRCCSwill ensure that data is stored securely. All records created by or on behalf of SWRCCS remain the property of SWRCCS. Records, both hard copy and electronic will be securely disposed of or released in accordance with legislation and SWRCCS’s needs.

SWRCCS will maintain the Record Retention Schedule detailed below tracking the retention and disposal of records. The Coordinator is responsible for the storage and disposal of records and will determine what will be kept and where and how the personal data will be kept.

**Review and Audit**

Records will be reviewed against the Record Retention Schedule on an annual basis. Where there is no longer a legal, business or historical requirement to retain the personal data the records will be destroyed. Where hard copy records are shredded. Electronic records will be destroyed, and all backups and copies will be included in the destruction of the records. A Disposal Form including details of the records being disposed of, format of the data, either electronic or hard copy, disposal method, disposal date and a brief explanation as to why the record is no longer being retained will completed. A copy of all Disposal Forms will be held by the Coordinator.

**RECORD RETENTION SCHEDULE:**

**EFFECT ON VOLUNTEERS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of data** | **Legislation** | **Retention** | **Person responsible** |
| Application Form | Data Protection Act | Until retirement | Co-ordinator |
| Details of car & insurance | Data Protection Act | 2 years | Co-ordinator |
| Bank details | Data Protection Act | Until retirement | Co-ordinator |
| Claim forms | Data Protection Act | 6 years | Co-ordinator |

**EFFECT ON USERS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of data** | **Legislation** | **Retention** | **Person responsible** |
| Contact details & purpose of journey | Data Protection Act | 2 years | Co-ordinator |

**EFFECT ON STAFF**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of data** | **Legislation** | **Retention** | **Person responsible** |
| Employee details & income tax records (P45 & P60) | HMRC | 6 years | Co-ordinator |
| Purchase invoices, records of monies, grants, gift aid, etc. | Charities Act 2005 | 6 years | Co-ordinator |
| Application forms & interview notes for successful candidates |  | 6 years after retirement | Chair/Co-ordinator |
| Annual Appraisal notes |  | 6 years after retirement | Chair/Coordinator |
| Application forms & interview notes for unsuccessful candidates | Equality Act 2010Limitations Act | 6 months  | Chair/Co-ordinator |
| Accident/Incident records | RIDDOR regulations | Legal requirement 3 years after last entry or end of investigation if later. Charity will retain for at least 6 years | Co-ordinator |

**EFFECT ON TRUSTEES & MEMBERS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of data** | **Legislation** | **Retention** | **Person responsible** |
| 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 | Charities Act 2005 & Companies Act | Permanently | Co-ordinator |
| Annual Accounts & Annual review | Charities Act 2005 & Companies Act | Permanently | Co-ordinator |
| Membership/trustee application forms | Data Protection Act | 2 years after leaving | Co-ordinator |
| Trustee expense claim forms | Charities Act | 6 years | Co-ordinator |
| Trustee conflict of interest information | Data Protection Act | 6 years | Co-ordinator |

The Data Retention Policy will be reviewed every two years or earlier if a change to legislation with respect to the retention and disposal of records is brought to the attention of the Board.

**OTHER DOCUMENTS REFERENCED**

Data Protection Policy

<https://www.swrc-carscheme.co.uk/privacy>

Document version control

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Version number** | **Change or update** | **Author or owner** | **Date** | **Date Approved by Board** |
| 1.0 | First version | MP | 23/10/2024 | 18/02/2025 |
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**APPENDIX: RECORDS DISPOSAL FORM**

This form should be used in conjunction with the SWRCCS Data Retention Policy and the Record retention Schedule detailed within it.

If you require advice on the disposal process contact the Coordinator.

Before disposing of any records you must determine if there is a legal hold on the records that will prohibit disposal.

|  |
| --- |
| Name: |
| Date:  |
| Details of records to be disposed of:  |
| Check for legal hold on the records: Yes 🞏 (if yes do not dispose of the records) No 🞏 |
| Reason for disposal i.e. end of retention period : |
| Format:  | Hardcopy 🞏 | Electronic 🞏 | Other 🞏 |
| Method of disposal: | Destruction 🞏 |
| Transfer records to the Archive 🞏 |

Authorised by: