



RECORDS RETENTION POLICY

DATE APPROVED:	4 December 2025	DATE OF NEXT REVIEW:	December 2027
POLICY OWNER(S):	Data Protection Officer		
DESIGNATION:	Centre-wide		
APPROVED BY:	Board of Trustees		

Purpose of policy	Sets out a required length of time for all records retained under the Charity's Data Protection Policy
Links to other policies	<ul style="list-style-type: none"> Data Protection Policy Privacy Notices Business Continuity and Emergency Planning Policy Bring your Own Device Policy Internet Filtering Policy Information Security Policy Communications, Email and Internet Policy Clear Desk Policy

1. Introduction

- 1.1 This Records Retention Policy has been approved by the Board of Trustees (the Trustees) of St Elizabeth's Centre ("the Charity"). The Charity is registered with the Office of the Information Commissioner with registration number ZA673699.
- 1.2 The Records Retention Policy sets out the rules the Charity follows to satisfy the legal and regulatory requirements for us to retain certain specified data within the parameters of data protection legislation. This policy sets out how the Charity manages and tracks documents and provides openness and transparency to staff and service users.
- 1.3 The Records Retention Policy supports the organised creation, retrieval, appropriate storage and preservation of our operational records. It also supports the appropriate disposal of documents with no continuing business, legal or historical significance.
- 1.4 As a charity, the actual period for records to be kept will depend on a number of factors, including but not necessarily limited to:
- legal requirements
 - storage costs
 - the Charity's need to access the document
 - historical value
 - industry standards or best practice.
 - archival needs (permanent preservation).
 - decision by senior management (in the absence of guidance on the above).

2. Scope of the Policy

- 2.1 This policy encompasses data that we hold or have control over:
- records created by or on behalf of the Charity and staff carrying out their duties for the Charity
 - records received by any member of staff or volunteers for the Charity
 - hard copy and electronic records including but not necessarily limited to Internet and Intranet sites, databases, emails, films and videos
 - personal data and non-personal data.
- 2.2 This policy covers data that is held by third parties on our behalf, for example cloud storage providers or offsite records storage. It also covers data that belongs to us but is held by employees on personal devices in accordance with our BRING YOUR OWN DEVICE POLICY.

3. Data Protection

- 3.1 This policy will ensure that the Charity is compliant with applicable data protection legislation, which requires that we do not retain personal data for longer than is necessary.

3.2 To comply with the principles of data protection legislation, we must:

- only keep information for as long as there is a business need
- keep records secure, whether electronic or paper
- ensure records are retrievable and easily traced
- allow a person access to information held about them, should they request it.

3.3 It follows that the Charity must:

- destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- keep data secure while it remains in any office
- keep track of where information is stored
- continue to apply these good practices to avoid stockpiling papers in the future.

4. Policy

4.1 All records created by or on behalf of the Charity belong to the Charity. This includes any rights or copyright in the context, except where specifically provided under copyright legislation.

4.2 All records received on behalf of the Charity as part of its business will be its property, which may be disposed of or released as the Charity sees fit or as required by law. Originators' and owners' rights will be fully respected in accordance with legislation.

4.3 Any confidential information that an employee may have obtained from a source outside of the Charity, such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by us. Unsolicited confidential information submitted to us should be refused, returned to the sender where possible, and deleted, if received via the internet.

4.4 Our data must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to our business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

5. Roles and Responsibilities

5.1 We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. All employees must comply with this policy, the Records Retention Schedule, any communications suspending data disposal and any specific instructions from a member of Executive Team. Failure to do so may subject us, our employees, and contractors to serious civil and/or criminal liability. An employee's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination. It is therefore the responsibility of everyone to understand and comply with this policy.

- 5.2 Responsibility for depositing and disposing of archive records lies with the CEO, Director of People, Director of Children's Services, Finance Director, Director of Adult Learning, Director of Children's Learning and Director of Business Development (Deputy CEO) as appropriate as the Head of Service and relevant information officer. It is their responsibility to ensure that complete and accurate records are retained in line with legislative requirements and agreed best practice.
- 5.3 Responsibility for managing and tracking records lies with the relevant Head of Service who is the information asset owner (the Data Owner) who:
- Will determine if a file is no longer required for current business usage, which can then be added to the archive.
 - Will identify data that has met its required retention period and supervise its destruction.
 - May choose to retain records for longer than the indicative periods given in the retention schedule in exceptional circumstances, for example, if they consider records to be of significant historical value or if the issue they are concerned remains 'live'.
- 5.4 Our Data Protection Officer (DPO) is responsible for advising on and monitoring our compliance with data protection laws which regulate personal data. Our DPO works with the Executive Team on the retention requirements for personal data and on monitoring compliance with this policy in relation to personal data.

6. Record Keeping

- 6.1 Records are reviewed against the Records Retention Schedule on an annual basis. Records that have passed their retention period and have no current ad-hoc requirement to retain the information (e.g. current or pending legal action or complaint) will be presented to their information asset owner for confirmation that disposal should be undertaken. A record will be maintained documenting, as a minimum, the record type, name of the record, any further metadata that will enable subsequent identification of the record being disposed (e.g. date range); date of disposal, authorising officer name and role. The decision of the Data Owner will be countersigned by the DPO.

7. Secure Disposal

- 7.1 All deleted records will be disposed of in a secure manner. In the case of paper records, these will be shredded and all information passed through confidential waste, which is then disposed of in a confidential manner. No shredded paper records will be passed through the general paper disposal process. In relation to electronic records these will be irretrievably deleted and this process will be co-ordinated with the IT department.
- 7.2 If data is not listed in the Records Retention Schedule, it is likely that it may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose or that it may be safely destroyed because it is not a formal or official record. However, if you consider

that there is an omission in the Records Retention Schedule, or if you are unsure whether or not a record can be deleted, please contact the DPO.

8. Where to go for Advice and Questions

8.1 Any questions about retention periods relevant to your role should be raised with your manager. Any questions about this policy should be referred to the DPO who is in charge of administering, enforcing, and updating this policy.

9. Breach Reporting and Audit

9.1 We are committed to enforcing this policy as it applies to all forms of data. The effectiveness of our efforts, however, depend largely on employees. If you feel that you or someone else may have breached this policy, you should report the incident immediately to your manager. If you are not comfortable bringing the matter up with your immediate line manager, or do not believe they have dealt with the matter properly, you should raise the matter with the DPO or a member of Executive Team. If employees do not report inappropriate conduct, we may not become aware of a possible breach of this policy and may not be able to take appropriate corrective action.

9.2 No one will be subject to and we do not allow any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or co-operating in related investigations.

9.3 The DPO and Executive Team will periodically review this policy and its procedures to ensure the Charity is in compliance with relevant new or amended laws, regulations or guidance. Additionally, we will regularly monitor compliance with this policy, including by carrying out audits.

Review: This policy will be reviewed every two years.

Date created: 25 September 2023

Version history:

Date	Approved by	Added to policy log
25 September 2023	Trustee Board	
26 November 2024	Trustee Board	
4 December 2025	Trustee Board	29 December 2025

RECORDS RETENTION SCHEDULE

Type of information	Retention Period	Data Owner
Donations / Fundraising		Finance Director
Information connected to donations – not including those who have expressed interest in leaving a gift to St Elizabeth's Centre	Retained for 10 years from the donors last gift	
Supporter Personal Information	Retained for 10 years from the donors' last gift	
Name and address of people who have asked not to be contacted again	Retained for 6 years	
Records of Donors expressed interest in leaving a gift in their Will to St Elizabeth's Centre	Retained until they expressly state they will not be leaving such a gift and are also not actively giving/engaging with the charity in other ways, OR until 7 full financial years have elapsed from our notification of their death.	
Information required for purpose of legacy gift administration	Retained for 7 years after the date the file was closed and 12 years after the date the file was closed for any disputed legacies. Will Trust files remain open until all of the income distributions have been received, and then will be deleted 7 years after closing of the file.	
Grants Casework and Beneficiary	Data reviewed after 3 years. Information connected to beneficiaries retained for a maximum of 5 years after the end of service delivery relationship.	

Gift Aid records	Retained for 6 years from donors last gift	
Marketing Records		CEO
Market research, marketing campaigns	2 years from completion	
Press releases	5 years from publication	
Website analytics reports from cookies etc.	2 years	
Newsletters	2 years from publication	
HR - Employment Records		Director of People
Job applications and interview records of unsuccessful candidates	12 months after notifying unsuccessful candidates, unless the Charity has an applicant's consent to keep their CV for future reference. In this case, the application form will give the applicant the opportunity to object to their details being retained	
Job applications and interview records of successful candidates	6 years after employment ceases	
Written particulars of employment, contracts of employment and changes to terms and conditions	6 years after employment ceases	
Right to work documentation including identification documents	6 years after employment ceases	
Immigration checks	2 years after the termination of employment	
DBS checks and disclosures of criminal records forms	As soon as practicable after the check has been completed and the outcome recorded (i.e.	

	whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months.	
Change of personal details notifications	No longer than 6 months after receiving this notification	
Emergency contact details	Destroyed on termination	
Personnel, disciplinary and training records	While employment continues and up to 6 years after employment ceases	
Annual leave records	6 years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards	
Working Time Regulations: <input type="checkbox"/> Opt out forms <input type="checkbox"/> Records of compliance with WTR	<input type="checkbox"/> 2 years from the date on which they were entered into <input type="checkbox"/> 2 years after the relevant period	
Allegations of a child protection nature against a member of staff including where the allegation is founded	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed.	
Financial and Payroll Records		Finance Director
Pension records	12 years	

Retirement benefits schemes – notifiable events (for example, relating to incapacity)	6 years from the end of the scheme year in which the event took place	
Payroll and wage records	6 years after end of financial year they relate to	
Maternity/Adoption/Paternity Leave records	6 years after end of financial year they relate to	
Statutory Sick Pay	6 years after end of financial year they relate to	
Current bank details	Until replaced/updated plus 6 years	
Supplier / Customer Invoices	6 years after end of financial year they relate to	
Budget reports (monitoring of actual against planned expenditure)	Retain current financial year + 1 year. Finance retains annual management accounts for CFY + 6 years	
Accounting Records (including VAT records)	6 years after end of financial year they relate to	
Contracts with Local Authorities	Contract period plus 6 years (12 years if Deed)	
Contracts with Suppliers	Contract period plus 6 years (12 years if Deed)	
SCHOOL / COLLEGE		Director of Children's Education & Director of Adult Learning
<u>Pupil Records</u>		
Admission Registers	Current Year of last entry + 6 Years	
Attendance registers	Date of Register + 3 Years	
Pupil's Education Record	End of Pupil relationship + 3 academic years where this is necessary to retain electronic records	

Special Educational Needs Files, review and individual Education plans	Until end of pupil relationship	
Child Protection information held on pupil file	To be retained in a sealed envelope for the same period of time as the Pupil Educational Record.	
All other records created such as conduct / behaviour	Termination of relationship with student + 3 Years if kept electronically on IMS	
Student Work	Return to student at end of academic year. If not possible retain for current academic year + 1 Year	
Safeguarding SEND records	LAC Children 75 Years – up to the age of 25	
Staff, building and governance records	6 Years	
Records relating to complaints dealt with by Government body	Date of resolution of complaint + 6 Years then review each case of contentious disputes	
Annual Records required by the Department of Education	Date of report + 10 Years	
Log Book maintained by Head Teacher	From date of entry + 6 Years minimum	
Minutes from SM Team	From meeting date + 3 Years	
Records created from Head Teachers, Deputy Head and other member of staff with administrative responsibilities	Closure of file + 6 Years	
All Correspondence created as above	From Date of creation + 3 Years then review	
Professional development plan	Life of Plan + 6 Years	
School Development plan	Life of Plan + 3 Years	
School / College Admissions Process	To the age of 25 for School placement + 6 Years for College	

All records in relation to creation and implementing Admissions policy	Life of Span + 3 Years then review	
If Admissions is successful	Date of admission + 1 Year and added to pupil file	
If Admission unsuccessful	Resolution of case + 1 Year	
Registry of admission	Preserved for 3 Years after entry	
Home Address details	Current year + 1 Year	
Records relating to creation and publication of the school / college brochure or prospective	Current Year + 1 Year	
Records of circulars to staff parents or pupils	Current Year + 1 year	
Newsletters and items with short operational use	Current Year + 1 Year	
Supplementary information form including additional information such as religion, medical conditions etc.	End of student relationship + 1 Year	
Visitors books and signing in sheets	Current year + 6 years then review	
Action Improvement plans	Life of plan + 3 Years	
Service Users Records		Director of Business Development (Deputy CEO)
Health Records – Adults	From the last entry of the calendar year + 8 Years reviewed annually	
Health Records – Children	From date of birth until the age of 25	
Financial and Administrative Records	From 8 years to the age of 25 + 6 years	
Personal information	From 8 years to the age of 25 + 6 years	
Destruction Certificates	From date of destruction + 20 Years	

Medical Files	20 Years	
Corporate Governance Records		Company Secretary
Minutes of Trustees Meetings	Indefinitely (10 year minimum from date of meeting)	
Minutes of Committee meetings (including Governors meetings)	Indefinitely (10 year minimum from date of meeting)	
Board Packs	Indefinitely (10 year minimum)	
Records relating to the transfer by the Daughters of the Cross	Indefinitely	
Register of Members	Indefinitely Entries for former members can be removed 10 years after the date they ceased to be members	
Register of Directors	Indefinitely	
Register of Directors Residential Addresses	Indefinitely; remove addresses of former directors after 6 years	
Resolutions	Indefinitely (10 year minimum)	
Instruments creating charges	Indefinitely	
Board and Committee Appointment Letters	6 years after appointment ends	
Historical records and archives about the Charity including former directors and persons of note	Indefinitely	
Facilities and Estates Records		CEO
Health & Safety inspections	6 years	

Property management and asset records	6 or 12 years, depending whether the agreement is executed as a simple contract or a deed	
Information regarding management of Centenary Close, Kelly Kearney, or Hume, Lewis and Vaughan	Please see CEO, Finance Director or Company Secretary	
CCTV Recordings	90 days for routine recordings	
Visitor Logs	6 months	
Building Contracts	15 years from practical completion	
Leases	12 years after the lease has ended	
Health & Safety files for building works	For the life of the building to which it relates	
IT Records		Finance Director
General information about internally developed IT infrastructure, software and systems for internal use	5 years from decommissioning of system	
General information about externally developed IT infrastructure, software and systems for internal or external use	5 years from decommissioning of system	
General information about internally developed IT infrastructure, software and systems for external use	5 years from decommissioning of system	
Systems monitoring (for example, to detect and prevent vulnerabilities and external threats)	Current year plus 1 year	
Business continuity and information security plans	3 years from when the plan is superseded	

Technical support and help-desk reports	3 years from end of system	
Contracts and agreements (software licences, support agreements, hardware agreements etc.)	6 years from expiry of agreement	
System backups	3 months	
Legal Records		CEO/Finance Director/Company Secretary
Legal advice and opinions (non-litigation)	6 years after life of service or matter the advice relates to	
Legal advice and other records relating to specific litigation or claim	6 years from settlement or withdrawal of claim	
Data subject access requests	6 years from closure of request	
Previous versions of policies, including IT policy, privacy policy, retention policy etc.	6 years from being superseded	
Monitoring and investigation requests	6 years from closure of investigation	
Insurance claims	3 years after settlement	