



Document retention and disposal

Revision history

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1.0	November 2015	FW/MB	HJ	Approved
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Please refer to Camphill Village Trust's intranet for latest version.

1. Background – Why do we need a policy?

1.1 Camphill Village Trust recognises that its records are an important asset and a key resource to effective operation and accountability. Like any asset, they require careful management and this policy sets out the Charity's responsibilities and activities in regard to the management/retention of its records.

1.2 The effective management of records in all formats depends as much on their efficient disposal as well as their long-term preservation. Records disposal policies are essential for effective records management.

1.3 There are certain documents and paperwork that we are required to retain for set periods of time after the event and this includes electronic information. Electronic information is captured on laptops and computers and includes instant messaging, mobile phones and data recorders.

1.4 This policy sets out the legal requirements and different factors that determine the length of time various documents must be kept. People who use the services and people who work in the charity must have their personal records held securely and confidentially.

1.5 Records must be kept for the correct amount of time. This policy lists the required periods of retention for different categories of records. Once these retention periods have been reached the records can be securely destroyed.

1.6 It should be noted that local commissioning bodies may require the retention of service records for longer periods and any local agreement must be observed.



2. Purpose and Scope - What is the aim/who is it for?

2.1 This policy applies to both manual and computerised records held by the Charity in all its operations. The timescales for retention and destruction of manual and computerised records are the same.

2.2 The General Data Protection Regulation (GDPR) requires that records shall be processed lawfully for specified, explicit and legitimate purposes, be adequate, relevant and not excessive for the purpose/s for which they are held; accurate and where necessary kept up to date and not kept for longer than is necessary for its purpose/s. (See CVT's Data Protection policy).

2.3 These principles require CVT to have procedures in place which cover the review of information held by them in relation to the retention and destruction of records. CVT staff must follow this procedure to ensure we fulfil our legal obligations in relation to these principles.

3. What are the retention periods for financial records?

3.1 The charity follows the recommendations/guidance of CQC, HMRC, The Information Commissioners Office, Companies House and the Charity Commission. The majority of financial documentation must be retained for a maximum of six years plus the current year. The table below sets out the charity's requirements with regard to financial documentation.

3.2 The accounting records you must keep include the following, but this list is not exhaustive:

- Cash books
- Invoices / Receipts
- All accounts systems (Advanced) electronic information
- Bank statements
- Vat Information



Type of manual (or electronic) record	Minimum period to keep the record for
Payroll, PAYE records (to include the CIS scheme records) must be kept for three years after the end of the tax year to which they relate (Income Tax (PAYE) Regulations 2003 reg 97).	6 years after the financial year to which it relates. (No reduction)
Purchase invoices, copy sales invoices, credit notes, debit notes, authenticated receipts.	
Legacy Paperwork	
Ledgers and cashbooks	
Bank statements and paying -in-books, management accounts, annual accounts	
Any record relating to the VAT account	
Leases	15 years after expiry
Annual accounts	30 years (CQC requirement)
Land registry Title Deeds and relevant documents	Permanently (unless in the case of a property, it is sold or disposed of).
Trust documents or related paperwork	

3.3 If a record falls within more than one of the categories above, apply the longer retention period. Any record that serves more than one purpose must be kept for the longest period required by those purposes.

4. What are the retention periods for operational service records?

4.1 In line with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 and the contractual requirements of local authority commissioners, the charity keeps records relating to each person we support in respect support provided and any regulated activity undertaken.

4.2 All records must be maintained and held securely until they are required to be destroyed. The charity has adopted the retention periods for such documents previously specified by the Care Quality Commission.

4.3 These are minimum retention periods and local authority agreements may require longer retention periods e.g.6 years after termination or expiry of service agreement.



Type of manual (or electronic) record	Minimum period to keep the record for
Record of people we support	
Care/support records including needs and risk assessments, support plans, daily records, personal finance records	As long as required by local commissioning framework; archive until 3 years after person dies or leaves. After 3 years check with commissioning body whether to destroy or return to them.
Deprivation of liberty/use of restraint	3 years
Other services	
CQC inspection reports	Until superseded
CQC notification	3 years
Communication books	3 years
Daily rotas	5 years
Handover sheets	3 years
On-call records	3 years
Team meeting minutes	3 years
Safeguarding records	10 years
Incident/accident records	10 years
Health and safety, equipment and maintenance	
COSHH data sheets and risk assessments	Until superseded
DSE risk assessments	Retain in staff file (40 years)
Designated driver form	Until superseded
Vehicle checks	3 years
Electrical testing	3 years
Electrical testing (hardwire)	Until superseded
Emergency plans	3 years
Equipment maintenance	3 years
Fire log	3 years
Food hygiene records	3 years
Gas safety check records	3 years
Hot/cold water records	3 years
General risk assessment and H&S audit	3 years
Maintenance of premises	3 years
Statutory H&S inspections	40 years



5. What are the retention periods for staff records?

5.1 From the perspective of the GDPR careful management of personal data is key to overall compliance. GDPR requires that where organisations process personal data, that data shall be adequate, relevant and not excessive for the purpose(s) for which it is processed. This principle of data minimisation is supported by the requirement that personal data not be kept for longer than necessary for the purpose it was processed for.

Type of manual (or electrical) record	Minimum period to keep the record for
Pre-commencement checks/form with supporting documentation (behind form in order)	Retain all for 40 years
Correspondence and file notes (most recent on top)	Retain leavers' form for 40 years. Retain all other correspondence for 7 years and 7 on leaving
Annual leave, sickness, TOIL, pay related documentation (most recent on top)	Retain for 7 years Incident/accident form retain for 10 years
Key documentation (most recent on top) Employment details / Volunteer agreement Job/Role descriptions Starting details and all subsequent versions Conditional offer/invitation letter	Retain for 7 years upon leaving
Induction and supervision records, annual reviews Individual learning plans Training & qualifications certificates since joining Policy & procedure receipts (most recent on top)	Retain for 7 years and 7 years on leaving BUT maintain summary record of all training and qualifications undertaken and retain 40 years
Additional checks since joining (most recent on top) Driving licence, MOT, insurance - annually Disclosure renewal - 3 years	Remove after 3 years and 7 years on leaving Retain evidence that disclosure obtained for 40 years having followed disclosure policy
Recruitment and selection records	1 year after staff leave



6. What are the retention periods for fundraising and donors?

6.1 Personal data must not be kept longer than is necessary. This means that data that is being processed for a particular purpose must not be kept unless it is still required for that purpose.

6.2 The charity maintains a 'suppression list' (containing details of individuals who have asked not to receive direct marketing material).

6.3 Before deleting any information it is important to consider whether there are any other legal requirements that mean certain elements of the data need to be retained.

6.4 The database stores donation history, direct debit forms and standing order form instructions electronically indefinitely. Hard copies are kept for a minimum of 7 years. All data is shredded prior to disposal.

Type of manual (or electronic) record	Minimum period to keep the record for
Donation forms	7 years after the financial year to which it relates. If scanned and stored, then refer to 6.1 of this policy.
Direct debit forms/ standing order instructions	
Bank statements	
Invoices	
Remittances	
Cheque Books and Paying in slips	
Credit cards	Originals retained for 7 years after the financial year to which they relate. For security purposes, scanned copies MUST NOT be stored electronically.

7. What about electronic mail records?

7.1 The charity recommends that emails over 5 years old and not used in the last 2 years are deleted unless otherwise indicated.

7.2 The charity uses Office 365 system for its email service. Office 365 provides extensive capabilities for automatic retention/deletion and archiving of emails and these facilities will be used by CVT IT to ensure that email use is managed in accordance with this policy.

8. Other

8.1 In the unlikely event of the charity closing the charity will arrange for all its accounting books and records to be kept for three years.



9. What are the procedures for document disposal?

9.1 Records should be destroyed using the appropriate method: for paper: shredding or destruction via a reputable disposal company in securely fastened and labelled sacks or deletion for electronic records.

9.2 A Document Disposal Register of destroyed records will be maintained. Enough detail will be recorded to identify which records have been destroyed. It is not sufficient to indicate that a quantity of records have been destroyed on a certain date. Enough details should be retained to identify which records have been destroyed.

9.3 For records not covered by these guidelines contact the Information Manager for further advice.

10. Equality Impact Assessment

10.1 This policy has been assessed using an equality impact assessment initial screening template in order to meet current equality requirements.

Responsible individual: Director of HR & Governance

Endorsed by: Approved by Senior Management Team under delegated powers from the Board of Trustees

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