



Data Retention Policy

Presented for Approval by the Management Committee 27 May 2025

Next Review: May 2027

1. Introduction

The UK General Data Protection Regulation (UK GDPR) provides that organisations which process personal data must not retain that data for any longer than is necessary for the purposes for which the personal data are processed.

2. Purpose of the Policy

This policy details Blochairn Housing Association's (BHA) approach to the retention, deletion and destruction of personal data. All BHA personnel are obliged to familiarise themselves with this policy and refer to it on an ongoing basis to ensure that its terms are implemented and complied with.

This procedure applies to all directors, associates, members, employees, volunteers, contractors (temporary and permanent) (referred to herein as 'BHA personnel').

3. Operation of this Policy

3.1 Storage of Personal Data

BHA stores personal data in a variety of ways. This includes hard copy documents, emails, digital documents stored on desktop computers, laptops, phones and other devices, data stored on our servers and in our cloud-based storage, along with data stored by third parties on our behalf.

When updating, rectifying, erasing and deleting any personal data, due care must be taken to ensure that all personal data held in all locations (including back-up storage) and in all forms is dealt with securely and to ensure that a consistent and accurate record of personal data is maintained

3.2 Retention of Personal Data

Different types of personal data may need to be retained for different periods of time depending on the purposes for which the data is processed and the legal and regulatory retention requirements in relation to certain categories of data.

In determining the appropriate retention period consideration should be given to the following factors:

- the purposes for which the personal data is processed;
- the legal basis for processing that personal data;
- legal requirements for retention (particularly employment and health and safety law); and

- regulatory requirements.

An appropriate retention period should be identified for each category of personal data. Data subjects must be informed of the retention period which applies to their personal data or, if there is no fixed retention period, the criteria used to determine that period; and where the purposes for which the data is processed have changed, any new retention period.

All personal data processed by BHA shall be retained in accordance with the periods set out in the retention schedule attached as Appendix 1, consisting of the following parts:

Part 1: General Governance, incorporating Governance, Data Governance, Formal Meetings, Regulations and Statutory Returns, Strategic and Insurance

Part 2: Finance, Other Banking Records and Capital Assets

Part 3: Contracts and Agreements

Part 4: Human Resources and Health & Safety

Part 5: Marketing

Part 6: Vehicles

Part 7: Housing Associations and Tenancy Records

Part 8: Legal Records for Solicitors

Personal data will be retained in accordance with the appropriate retention period and permanently deleted and/or securely destroyed in accordance with this policy. No personal data shall be destroyed or deleted other than in accordance with this policy.

3.3 Review and Deletion of Personal Data

A review of the personal data processed by BHA will be carried out every 2 years. During the course of this review we will:

- Review the retention periods for each category of personal data processed and whether any alteration to these periods is required
- Identify personal data which is due for destruction and deletion
- Arrange for the secure deletion and destruction of personal data which will no longer be retained

3.4 Monitoring and Reporting

Regular monitoring and audits will be undertaken by the Data Protection Lead and/or Data Protection Officer (DPO) to check compliance with the law, this policy and associated procedures. Any concerns will be raised with the DPO

4. Policy Review

This policy will be reviewed every two years or when required, by the Data Protection Officer, to address any weakness in the procedure or changes in legislation or best practice.

Data Retention Periods – Abridged Model RSL

This is the abridged retention model based on the SFHA guidance of 2018. It has been updated based on the RGDP review of January 2025.

The table below sets out retention periods for Personal Data held and processed by Blochairn Housing Association (BHA). It is intended to be used as a guide only and is not exhaustive. Refer to the Template full schedule for more details.

BHA recognises that not all Personal Data can be processed and retained for the same duration, and retention will depend on the individual circumstances relative to the Data Subject whose Personal Data is stored.

Section in Full retention schedule	Type of record	Recommended retention time
Part 1 Governance	Corporate documents	Life of company
	Data Governance	Email 12 months CCTV – 30 days BWV – 30 days Call recordings – 30-90 days Data breach records – 6 years Data subject requests – 1 years
	Board Members Documents	6 years from termination of board membership
	Board meetings/residents' meetings (e.g. Agendas, notice of meetings etc)	10 years

Section in Full retention schedule	Type of record	Recommended retention time
	Statutory returns	Life of the company
	Insurance	Life of the company
Part 2 Finance	Account records, cash books, purchase ledger	6 years plus current year
	Other periodic records	2 years
	Fixed asset register	Life of the company
Part 3 Contracts	Contracts for supply of goods and services	6 years from completion
	Loan agreements	12 years after last payment
	Documents relation to successful tenders	6 years
	Documents relating to unsuccessful form of tender	2 years after notification
Part 4 Human Resources & Health and safety	Personal files including training records and notes of disciplinary and grievance hearings	6 years from end of employment
	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	6 years from the date of the redundancy

Section in Full retention schedule	Type of record	Recommended retention time
	Application forms, interview notes	Unsuccessful 1 year from date of interviews. Successful applicants documents should be transferred to personal file.
	Documents proving the right to work in the UK	Records to be kept for 10 years after leaving employment.
	Facts relating to redundancies	6 years if less than 20 redundancies. 12 years if 20 or more redundancies.
	Payroll	6 years from the end of tax year
	Income tax, NI returns, correspondence with tax office	6 years from end of tax year
	Retirement benefits schemes – notifiable events, e.g. relating to incapacity	6 years from end of the scheme year in which the event took place
	Pensioners records	12 years after the benefit ceases
	Statutory maternity/paternity and adoption pay records, calculations, certificates	3 years after the end of the tax year to which they relate

Section in Full retention schedule	Type of record	Recommended retention time
	(MAT 1Bs) or other medical evidence	
	Parental Leave	18 years
	Statutory Sick Pay records, calculations, certificates, self-certificates	3 years
	Wages/salary records, expenses, bonuses	6 years
	Records relating to working time	2 years from the date they were made
	Accident books and records and reports of accidents	3 years after the date of the last entry
	Health and Safety assessments and records of consultations with safety representatives and committee	Permanently
	Health records	During employment and 6 plus 1 years thereafter if reason for termination of employment is connected to health
Part 5 Marketing	Profiling, consent, soft opt in	2 years

Section in Full retention schedule	Type of record	Recommended retention time
Part 6	Company car information	See employment – 6 years
Vehicles	Driver license	See employment – 6 years
Part 7	Applicants for accommodation	6 years after accepted offer
Housing application & tenancy records		
	Housing Benefits Notifications	2 years (SFHA duration of tenancy)
	Tenancy files	6 years (SFHA duration of tenancy)
	Former tenants' files (key info)	6 years from end of tenancy
	Third Party documents re care plans	6 years
	Records re offenders. Ex-offenders (sex offender register)	25 years or 6 years after termination of tenancy
	Lease documents	15 years after lease termination
	ASB case files	2 years/end of legal action
	Board meetings/residents' meetings (e.g. Agendas, notice of meetings etc)	1 year (this does not refer to minutes of meetings as these must be permanently retained)

Section in Full retention schedule	Type of record	Recommended retention time
	Minute of factoring meetings	Duration of appointment