

Transform Data Retention Schedule

Reference	Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Action at end of retention period	Retention source	Reason for retention	Information Asset Owner	Contains Personal Data	Storage Format	Storage Location (s)	Site or System(s)	Hyperlink	System(s) Location(s)	
1. Governance																
1.1	Governance	Organisation wide Strategies and Policies	Superseded document	N/A	1 year after superseded (longer if required for historical reasons)	Securely Destroy		Best practice	Head of Governance & Assurance	Personal data	Electronic	SharePoint	Ms/Polices	https://transformhousing.sharepoint.com/sites/MyPolicesForms/Items.aspx		
1.2	Governance	Risk Management Framework and Register			5 years after end of reporting period	Securely Destroy			Head of Governance & Assurance	Personal data	Electronic	Sharepoint	Risk Register	https://transformhousing.sharepoint.com/sites/RiskRegister		
1.3	Governance	Business Continuity Plan	Superseded document		1 year after superseded (longer if required for historical reasons)	Securely Destroy			Head of Governance & Assurance	Personal data	Electronic	SharePoint	BCP Register	General		
1.4	Governance	Governance documentation		N/A	Life of company	Securely Destroy		Required for charitable status.	Head of Governance & Assurance	Personal data	Electronic	SharePoint	Governance Team	Governance Team - General - All Documents (sharepoint.com)		
1.6	Governance	Record of charitable registration		Life of company	Life of company	Securely Destroy	CGI	Best practice.	Executive Assistant	No	Both	Locked drawer at Bradmore; SharePoint	Governance Team/Charity Commission	Charity Commission Registration Certificate 264133.pdf		
1.7	Governance	Certificate of Incorporation		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 15	Legal compliance	Executive Assistant	No	Both	Locked drawer at Bradmore; SharePoint	Governance Team/Company Secretary	Certificate of Incorporation (SCDT) Ltd 13 June 1977 and Certificate of Incorporation (change of name SCDT) Ltd 8 SCDT 22 Feb 1984.pdf		
1.8	Governance	Articles of Association		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 32	Legal compliance	Head of Governance & Assurance	No	Both	SharePoint	Ms/Polices	https://transformhousing.sharepoint.com/sites/MyPolices/Governance/Transform%20Articles%20of%20Association%202024.pdf		
1.9	Governance	Certificate of registration with housing authorities		Life of company	Life of company	Securely Destroy	CGI	Best practice	Executive Assistant	No	Both					
1.10	Governance	Record of registration and certificate of incorporation for change of name		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 80	Legal compliance	Executive Assistant	No	Both	Locked drawer at Bradmore; SharePoint	Governance Team/Company Secretary	Certificate of Incorporation (SCDT) Ltd 13 June 1977 and Certificate of Incorporation (change of name SCDT) Ltd to SCDT 22 Feb 1984.pdf		
1.11	Governance	Internal Audit correspondence, terms of reference, meeting minutes, related papers and reports	After audit	N/A	5 years	Securely Destroy		Best practice	Head of Governance & Assurance	Personal data	Electronic	SharePoint	Internal Audit site	https://transformhousing.sharepoint.com/sites/InternalAudit/Shared%20Documents/15EP1264-%20InternalAudit%20Documents%20General		
1.12	Governance	Trustee and Committee Member documents - CV and covering letter References RTW documentation - copies of passport/living licence and confirmation of address Appointment Letter DBS Checks Induction Programme Appraisals Skills audit and matrices EDI information Fit and proper person checks Insurance declarations etc.	Membership ceases		6 years after board membership ceases (though some details should be destroyed when membership ceases e.g. bank details etc.)	Securely Destroy	GDPR Article 5(1) (e) requires that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary CA 2006 recommendation for docs post termination of directorship	Legal compliance	Executive Assistant	Special (sensitive) data	Electronic	SharePoint	Governance Team/Board Member Recruitment channel	Board Recruitment		
2. Data Governance																
2.1	Data Governance	Emails	No longer active		receipt of email	Securely Destroy	Ofcom National archive guidance ranges from 90 days to four years. From 1 November 2024, all email boxes relating to colleagues who leave Transform should be deleted within 6 months of their date of leaving Transform. The onus is on the relevant line manager to ensure that any emails which need to be retained are saved as a record.	Best practice	Relevant Head of Service	Personal data			Microsoft Outlook and M365	Various accounts		
2.2	Data Governance	CCTV	Date of recording	Minimum time necessary	30 days (unless required for an investigation when it will be retained for up to 2 years)	Securely Destroy	DPA	Best practice	Head of Housing & Support	Personal data	Electronic	IPMS CCTV System	Remote Desktop (VPN)			
2.3	Data Governance	Meeting Recordings	Date of recording	Minimum time necessary	Automatically deleted after 21 days, unless downloaded. If downloaded 6 months.	Securely Destroy	FCA Handbook, conduct of business	Best practice	AI	Personal data	Electronic	MS Teams	Various			
2.4	Data Governance	Data Subject Access Requests	Date sent	6 months	1 year	Securely Destroy	ICO	Best practice	Head of Governance & Assurance	Special (sensitive) data	Both	SharePoint	DSAR team site	Data Subject Access Requests - DSARS - General - All Documents (sharepoint.com)	Internal Audit General Microsoft Teams	
2.5	Data Governance	Films / Videos	Date of recording	Minimum time necessary	Videos and films containing personal data will be deleted in line with our standard retention period of 6 years. However where there is footage of historical interest this may be retained for longer as an archive record.	Securely Destroy		Best practice	AI	Personal data						
2.6	Data Governance	Data Breach Records	Date of recording	N/A	6 years	Securely Destroy		Best practice	Head of Governance & Assurance	Special (sensitive) data	Electronic	SharePoint	Data Protection/DSO site	https://transformhousing.sharepoint.com/sites/DataProtection/Shared%20Documents/FormalBreaches.aspx?Page=C1D4041200001E68C4301924A8665426915EP1264-%20Data%20Protection%20Records%20SharePoint%20Documents%20General		
2.7	Data Governance	Colleague note books and diaries (physical)	Date of completion	N/A	Keep for 12 months. If colleague leaves Transform any content forming official record should be scanned before immediate destruction.	Securely Destroy		Best practice	AI	Special (sensitive) data	Hard Copy					
2.8	Data Governance	Fraud Records	Date of recording	6 years	6 years	Securely Destroy	FCA Handbook	Best practice	Head of Governance & Assurance	Special (sensitive) data	Electronic	SharePoint	Governance Team	Governance Team - General - All Documents (sharepoint.com)		
2.9	Data Governance	Photos and videos stored on work mobile phones	Date of recording		6 months	Securely Destroy	Email Management Policy		Head of Governance & Assurance	Special (sensitive) data	Electronic	SharePoint				
2.10	Data Governance	WhatsApp Messages, Text and Photos on work mobile phones	Date of Message		6 months	Securely Destroy	WhatsApp Policy	Review messages. Any messages which need to be retained as a record should be saved to the Client or Property team folder. Any other items should be securely destroyed.	AI	Personal data	Electronic	Mobile Phone				
2.11	Data Governance	Teams Net	Date of Call		30 days	Securely Destroy			Head of Digital & Information Systems	Personal data	Electronic	Mobile Phone	TeamsNet Call Log			
2.12	Data Governance	Freshdesk IT Helpdesk Requests	Date of Call		180 days. Once deleted retained for a further 30 days after deletion	Securely Destroy			Head of Digital & Information Systems	Personal data	Electronic					
2.13	Data Governance	LMA Helpdesk Requests	Date of Call		Archived after 30 days.	Securely Destroy			Head of Digital & Information Systems	Personal data	Electronic		Freshdesk LMA Support Desk			
3. Meetings																
3.1	Meetings	Notice of General meetings		N/A	6 years	Securely Destroy		In case of challenge to validity of meeting/resolutions	Executive Assistant	Personal data	Both	Locked drawer at Bradmore; SharePoint	Governance-Exec/Board and Committee paper (drafts)	Governance - Exec Board and Committee papers (drafts) Microsoft Teams		
3.2	Meetings	Executive meeting agendas, papers, minutes and resolutions		N/A	10 years	Securely Destroy		Best practice	Executive Assistant	Personal data	Electronic	SharePoint	Exec Team	Meeting notes and actions		
3.3	Meetings	Board and Committee meeting minutes and resolutions	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company	Securely Destroy	Companies Act 2006 section 248 and 249	Legal compliance	Executive Assistant	Personal data	Both	Locked drawer at Bradmore; SharePoint, OneDrive (older docs)	Governance-Exec/Board and Committee paper (drafts)	Governance - Exec Board and Committee papers (drafts) Microsoft Teams		
3.4	Meetings	Board and Committee meeting agendas and papers	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company	Securely Destroy	Companies Act 2006 section 248 and 250	Best practice (if required to support minutes and resolutions)	Executive Assistant	Personal data	Both	Locked drawer at Bradmore; SharePoint, OneDrive (older docs)	Governance-Exec/Board and Committee paper (drafts)	Governance - Exec Board and Committee papers (drafts) Microsoft Teams		
3.5	Meetings	General meeting minutes and resolutions	Date of meeting	Life of company	Life of company	Securely Destroy	Companies Act 2006 section 356	Legal compliance	Executive Assistant	Personal data	Both	Locked drawer at Bradmore; SharePoint	Governance-Exec/Board and Committee paper (drafts)	Governance - Exec Board and Committee papers (drafts) Microsoft Teams		
3.6	Meetings	General meeting agendas and papers	Date of meeting	N/A	Life of company	Securely Destroy		Best practice (if required to support minutes and resolutions)	Executive Assistant	Personal data	Both	Locked drawer at Bradmore; SharePoint	Governance-Exec/Board and Committee paper (drafts)	Governance - Exec Board and Committee papers (drafts) Microsoft Teams		
4. Regulations and Statutory Returns																
4.1	Regulations and Statutory Returns	Audited financial statements	Submission	Minimum of 3 years	Life of company	Securely Destroy	Companies Act 2006 section 388 and Professional Standards Authority and National Archives recommendations for best practice	Legal compliance and best practice	Head of Finance	Personal data	Electronic	SharePoint	Ms/Corporate Documents	M3 - Corporate Documents - All Documents (sharepoint.com)		
4.2	Regulations and Statutory Returns	Seating register		Life of company	Life of company	Securely Destroy	Companies Act 1985	Legal compliance	Head of Governance & Assurance	Personal data	Electronic	SharePoint	Governance Team/General	Governance Team - General - All Documents (sharepoint.com)		
4.3	Regulations and Statutory Returns	Annual Statutory Returns to the Regulators	Submission	Minimum of 1 year from submission	Life of company	Securely Destroy	Co-operative and Community Benefit Societies Act 2014 section 90	Legal compliance and best practice	Head of Governance & Assurance	Personal data	Electronic	SharePoint	Governance Exec/Regulatory Returns	https://transformhousing.sharepoint.com/Forms/Governance-Exec/RegulatoryReturns/Forms/ReturnsForm.aspx?Page=C1D4041200001E68C4301924A8665426915EP1264-%20Returns		
4.4	Regulations and Statutory Returns	Register of directors and secretaries		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 162	Legal compliance	Executive Assistant	Personal data	Electronic	SharePoint	Governance Team	Transform Register at October 2023.xlsx		
4.5	Regulations and Statutory Returns	Register of members		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 113	Legal compliance	Executive Assistant	Personal data	Electronic	SharePoint	Governance Team	Transform Register at October 2023.xlsx		
4.6	Regulations and Statutory Returns	Register of share certificates		Life of company	Life of company	Securely Destroy	Companies Act 1984 s.325	Legal compliance	Executive Assistant	Personal data	Electronic					
4.7	Regulations and Statutory Returns	Declarations of interest		Life of company	Life of company	Securely Destroy	Company Act 2006 section 177 (simplified)	Legal compliance	Head of Governance & Assurance	Personal data	Electronic	SharePoint and Forms	Compliance site	https://transformhousing.sharepoint.com/sites/Compliance/Shared%20Documents/FormalBreaches.aspx?Page=C1D4041200001E68C4301924A8665426915EP1264-%20Data%20Protection%20Records%20SharePoint%20Documents%20General		
5. Strategic Management																
5.1	Strategic	Business Plans and supporting documentation	End of Business Plan Period	N/A	5 years	Securely Destroy		Best practice	Executive Assistant	No	Electronic	SharePoint	Business Planning site	https://transformhousing.sharepoint.com/sites/BusinessPlanning/Shared%20Documents/FormalBreaches.aspx?Page=C1D4041200001E68C4301924A8665426915EP1264-%20Data%20Protection%20Records%20SharePoint%20Documents%20General		

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10. Fundraising and Charitable Donations																
10.1	Charitable Donations	Deeds of covenant		N/A	12 years after last payment	Securely Destroy	TMA recommends 12 years after last payment. Limitation for legal proceedings if related to land.	Best practice	Director of Client Services	No						
10.2	Charitable Donations	Index of donations granted		N/A	6 years	Securely Destroy	N/A	Best practice	Director of Client Services	No						
10.3	Charitable Donations	Account documentation		3 Years	6 years	Securely Destroy	Companies Act recommends 3 years. Best practice	Best practice	Director of Client Services	No						
10.4	Fundraising volunteers	Personal data of donors	After last donation.	6 years (major donations over £500 will be held indefinitely)		Securely Destroy	insurance	To keep donors informed of their donation and other fundraising campaigns	Director of Client Services	No						
10.5	Fundraising volunteers	Gift aid declaration	After the last donation	6 years		Securely Destroy		HMRC Tax Audit	Director of Client Services	No						
11. Applications and Tenancy Records																
11.1	Client Records	Client referrals and assessments (prospective/unsuccessful applications)	Assessment/decision notification		12 months	Securely Destroy		Best practice	Head of Housing & Support	Special (sensitive) data	Both	Local teams	SharePoint	Paper Records in Offices/A1		
11.2	Client Records	Continuous Recording of Lettings and Sales (CORE) data recording form	End of tenancy	N/A	As long as it is deemed necessary to support social housing policy.	Securely Destroy	CORE Data Sharing Agreement 12.1	Best practice	Head of Housing & Support	Special (sensitive) data	Both	Local teams	Sharepoint	Paper Records in Offices/A1		
11.3	Client Records	Young People's records for OFSTED regulated accommodation	End of tenancy/support	Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Securely Destroy	Regulation 24 Supported Accommodation Regulations including Quality Standards	Legal compliance	Head of Housing & Support	Special (sensitive) data	Both	Local teams	Sharepoint	Paper Records in Offices/A1		
11.4	Client Records	Client case file including: Referral forms Copy of tenancy agreement (where relevant) Copies of scanned documents such as proof of ID Rent payment records and rent statements Case notes Records of any complaints or harassment correspondence benefits claims Letters from 3rd parties records relating to any offences, cautions or as an offender records relating to termination of tenancy or support contract any subsequent referrals or serious case	End of tenancy and/or support		6 years from end of support	Securely Destroy	Limitations Act 1980	Legal compliance	Head of Housing & Support	Special (sensitive) data	Both	Local teams	Sharepoint	Paper Records in Offices/A1		
11.5	Client Records	Client referrals from HMPPS Criminal Justice records and assessments	End of tenancy	6 years	6 years	Securely Destroy	Limitations Act 1980	Legal compliance	Head of Housing & Support	Special (sensitive) data	Electronic	Pyramid Secure email service for the criminal justice system	Remote Desktop (VPN) CJSM			
11.6	Client Records	Case notes electronically on Pyramid	End of tenancy/ support	6 years	6 years	Securely Destroy	Limitations Act 1980	Legal compliance	Head of Housing & Support	Special (sensitive) data	Electronic	Pyramid	Remote Desktop (VPN)			
11.7.1	Client Records	Information Reporting - Accidents	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.2	Client Records	Information Reporting - Incidents	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.3	Client Records	Information Reporting - Complaints	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.4	Client Records	Information Reporting - Complaints	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.5	Client Records	Information Reporting - Safeguarding	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.6	Client Records	Information Reporting - NISP	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.7	Client Records	Information Reporting - NTT	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.8	Client Records	Information Reporting - Unexpected Deaths	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.9	Client Records	Information Reporting - ASB	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.10	Client Records	Information Reporting - Combined Voids Move-out Form	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.11	Client Records	Information Reporting - New Client	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.12	Client Records	Information Reporting - Internal Transfer	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.13	Client Records	Information Reporting - Complaints Case Management System. It is important that all correspondence relating to the Complaint is transferred to the Client's File	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.14	Client Records	Information Reporting - Safeguarding Case Management System	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.15	Client Records	Information Reporting - Wokingham Drop-in	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.7.16	Client Records	Information Reporting - Exit Questionnaire	Recording period		3 years from end of recording period.	Securely Destroy	Limitations Act 1980	Legal compliance	Performance Data Officer	Yes	MS Forms/Excel	Teams Folder	Sharepoint/Teams			
11.9	Client Records	Emails and attachments in sent items and in boxes which relate to clients College Emails are auto deleted after 2 years. Former colleague email boxes are deleted 6 months after they leave. EMAILS AND ATTACHMENTS WHICH NEED TO BE RETAINED AS A RECORD MUST BE UPLOADED TO THE CLIENT'S FOLDER ON TEAM/SHAREPOINT AND NOT RETAINED IN EMAIL ACCOUNTS. to support or housing management services provided/ offered to clients. Photos and texts on mobile phones should not be kept on the phone any longer than 6 months. Mobile phone texts and photos are deleted from the phone when a colleague leaves so that the phone can be reallocated. PHOTOS AND TEXTS WHICH NEED TO BE RETAINED AS A RECORD MUST BE UPLOADED TO THE CLIENT'S FOLDER ON TEAM/SHAREPOINT AND NOT RETAINED ON THE MOBILE PHONE.	End of tenancy/ support	6 years	6 years	Securely Destroy	Limitations Act 1980	Legal compliance	Head of Housing & Support	Special (sensitive) data	Electronic	Local teams	Sharepoint	Paper Records in Offices/A1		
11.10	Client Records	WhatsApp messages relevant to support or housing management services provided/ offered to client. WhatsApp messages on mobile phones should not be kept on the phone any longer than 6 months. WhatsApp messages are deleted from the phone when a colleague leaves so that the phone can be reallocated. WHATSAPP MESSAGES WHICH NEED TO BE RETAINED AS A RECORD MUST BE UPLOADED TO THE CLIENT'S FOLDER ON TEAM/SHAREPOINT AND NOT RETAINED ON THE MOBILE PHONE.	End of tenancy/ support	6 years	6 years	Securely Destroy	Limitations Act 1980	Legal compliance	Head of Housing & Support	Personal data	Electronic	Local teams	Sharepoint	Paper Records in Offices/A1		
11.11	Client Records	Where care was provided as a registered Care Quality Commission provider applies to historic records only	End of care plan. Please note we ceased operation as a care provider in 2021.	6 years		Securely Destroy	Records Management Code of Practice - NHS Adult social care records (including care plans) s	Contact compliance	Head of Housing & Support	Personal data	Both	Local Teams and Archive	Sharepoint	Paper Records in Offices/A1		
12. Tenancy Records																
12.1	Property Records	NTT Entry Social Rent Setting, including 1999 valuations Affordable Rent Setting, including valuation <small>Leases, tenancies, tenancies on hold.</small> Leases and deeds of ownership		N/A	For life of asset and then 6 years after disposal of property	Securely Destroy	Rent Officer Handbook recommendation	Best practice	Head of Finance							
12.4	Property Records			N/A	15 years after expiry.	Securely Destroy	NOVO	Best practice	Executive Assistant	Personal data	Both	SharePoint, some also in locked cabinets at Bradmore	Senior Leadership Team	Contracts, Leases, Management Agreements, Nominations		
12.5	Property Records	Copy of former leases	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Executive Assistant	Personal data	Both	SharePoint, some also in locked cabinets at Bradmore	Senior Leadership Team	Contracts, Leases, Management Agreements, Nominations		
12.6	Property Records	Wayleaves, licences and easements	Rights given or received cease	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Executive Assistant	Personal data	Both	SharePoint, some also in locked cabinets at Bradmore	Senior Leadership Team	Contracts, Leases, Management Agreements, Nominations		
12.7	Property Records	Abstracts of title	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Executive Assistant	No	Electronic	SharePoint	Asset & Liability Global Register/Finance information	Lease Registry Title Deeds and Plans		
12.8	Property Records	Planning and building control permissions	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Development Manager	No						
12.9	Property Records	Searches	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Development Manager	No						

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12.10.1	Property Records	Property maintenance records: cyclical maintenance and improvements	Date of repair	6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Director of Asset Management & Capital Development	Personal data					
12.10.2	Property Records	Property maintenance records: responsive repairs orders	Date of repair	6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Director of Asset Management & Capital Development	Personal data					
12.10.3	Property Records	Property maintenance records: servicing and compliance	Date of servicing	6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Director of Asset Management & Capital Development	Personal data					
12.11	Property Records	Reports and professional opinions		6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Director of Asset Management & Capital Development	No					
12.12	Property Records	Development documentation	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Development Manager						
12.13	Property Records	Invoices		12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980	Legal compliance	Director of Asset Management & Capital Development						
13. Vehicles															
13.1	Transport & Vehicles	Mileage records & defect sheets	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice	Director of Asset Management & Capital Development						
13.2	Transport & Vehicles	Maintenance records & MOT tests	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice	Director of Asset Management & Capital Development						
13.3	Transport & Vehicles	Copy Registrations	Vehicle disposal	N/A	2 years	Securely Destroy		Best practice	Director of Asset Management & Capital Development						
13.4	Transport & Vehicles	Vehicle trackers	Date of records	N/A	12 months	Securely Destroy		Best practice	Director of Asset Management & Capital Development	Special (sensitive) data		Quarta			
13.5	Transport & Vehicles	Vehicle disposal log	Vehicle disposal	N/A	1 year	Securely Destroy		Best practice	Director of Asset Management & Capital Development						
14. Capital Assets															
14.1	Capital Assets	Capital Assets including all land, property, housing stock, corporate buildings, vehicles, equipment, fixtures & fittings >£500	Asset sold, transferred or disposed of	N/A	6 years after disposal of asset	Securely Destroy		Best practice	Director of Finance						
15. Colleagues - Tax and State Support															
15.1	Tax and State Support	Record of taxable payments, record of tax deducted or refunded; record of earnings or which standard NI Contributions payable; record of employer's and employee NI contributions	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	HM Revenue and Customs requires retention of each payment for 3 years. Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97); The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance	Head of Finance						
15.2	Tax and State Support	NIC contracted out arrangements and income tax HMRC notice of code changes, pay and tax details.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97); The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance	Head of Finance						
15.3	Tax and State Support	Copies of notices to employees (e.g. P45, P60)	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years plus current year	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97); The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance	Head of Finance						
15.5	Tax and State Support	Expense Claims	After audit	3 years from the end of the tax year they relate to	6 years	Securely Destroy	HMRC	Best practice	Head of Finance						
15.6	Tax and State Support	Record of sickness payments	On payment	6 years	6 years	Securely Destroy	Taxation Management Act 1970	Legal compliance	Head of Finance						
15.7	Tax and State Support	Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay	On payment	6 years	6 years	Securely Destroy	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1809) as amended; The Statutory Paternity Pay and Statutory Adoption Pay (admin.) Regulations 2002 (SI 2002/8200) and Statutory Shared Parental Pay (Admin.) regulations 2014 (SI 2014/2599)	Legal compliance	Head of Finance						
15.8	Tax and State Support	Income Tax and NI returns	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97); The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance	Head of Finance						
15.9	Tax and State Support	Redundancy details and record of arrears & refunds	Date of redundancy	N/A	6 years	Securely Destroy	IPD recommended	Best practice	Head of Finance						
15.11	Tax and State Support	Annual earnings summary	End of Financial Year	N/A	12 years	Securely Destroy		Best practice	Head of Finance						
15.12	Tax and State Support	Payroll salary records, overtime, bonuses expenses etc.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97); The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996	Legal compliance	Head of Finance						
16. Human Resources - Pension Schemes															
16.1	Pension Schemes	SHPIS and Royal London annual valuation reports		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice	Director of Finance						
16.2	Pension Schemes	Detailed returns of pension fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator	Best practice	Head of Finance						
16.3	Pension Schemes	Annual reconciliations of fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator	Best practice	Head of Finance						
16.7	Pension Schemes	Pensioner records (defined benefit schemes)	After benefits cease	N/A	12 years after benefits cease	Securely Destroy	CIPD recommended	Best practice	Head of Finance						
17. Human Resources - Colleague Records															
17.2	Colleague Records	Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals	end of tax year following leaving date	N/A	7 years	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings	Legal compliance	Director of Corporate Services	Personal data	Electronic	EDRM	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.3	Colleague Records	Benefits and Deductions (Service contracts for directors (company))	Date of cessation of directorship	3 years	7 years	Review	CSA	Best practice	Director of Corporate Services	Personal data					N/A don't currently remunerate Trustees
17.4	Colleague Records	Remuneration package	end of tax year following leaving date	N/A	7 years	Review	Limitations Act 1980 Limitation for legal proceedings	Legal compliance	Director of Corporate Services	Personal data		EDRM	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.5	Colleague Records	Former colleagues' Human Resources files	end of tax year following leaving date	N/A	7 years	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services	Special (sensitive) data	Electronic	EDRM	My HR/HR Net?	My HR/HR Net?	
17.6	Colleague Records	References to be provided for former employees	end of tax year following leaving date	N/A	7 years	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services	Personal data	Electronic	EDRM			
17.7	Colleague Records	Training Programmes	end of tax year following leaving date	N/A	7 years	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services	Personal data	Electronic	EDRM	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.8	Colleague Records	Individual training records	end of tax year following leaving date	N/A	7 years	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services	Personal data	Electronic	EDRM	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.9	Colleague Records	Short lists, interview notes and related application forms	Last Action	N/A	1 year	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services	Personal data	Electronic	EDRM (for successful applicants)	HR/HR	https://login.hireful.app/	
17.10	Colleague Records	Application forms of non-short listed candidates	After notification	1 year	1 year	Securely Destroy	Limitations Act 1980 SDA & RRA recommend 3 months Commission for Racial Equality and Equal Opportunities recommends 6 months	Legal compliance	Director of Corporate Services		Electronic	Teams	HR/HR	https://login.hireful.app/	
17.11	Colleague Records	DBS certificate number	Date of clearance	Date of clearance + up to a maximum of 6 months	3 years	Review	DBS check code of practice (Home office)	Legal compliance	Director of Corporate Services	Special (sensitive) data	Electronic		My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.12	Colleague Records	Time cards/ sheets	end of tax year following leaving date	N/A	7 years	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services		Electronic	TimeSheets are only required for extra hours call sleep in. Payroll hold these	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.13	Colleague Records	Employer/Employee committee minutes (Staff Forum)		N/A	Permanently	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services		Electronic	Sharepoint	My HR	https://transformhousing.sharepoint.com/sites/Staff_Forum/Meeting%20papers/Forms/AllItems.aspx	
17.14	Colleague Records	Parental leave records	Birth of child	N/A	18 years from birth of child	Securely Destroy	CIPD recommended	Best practice	Director of Corporate Services		Electronic	EDRM	My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.15	Colleague records	Health data, including absence records, occupational health reports (see also 16.5)	end of tax year following leaving date	7 years	7 years	Securely Destroy		Best practice	Director of Corporate Services				My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
17.16	Colleague records	Employee data relating Equality, Diversity and Inclusion	end of tax year following leaving date	7 years	7 years	Securely Destroy		Best practice	Director of Corporate Services				My HR	https://transformhousing.cascaadcloud.co.uk/index.aspx	
18. Human Resources - Health & Safety															
18.1	Health & Safety	Medical records relating to control of asbestos, where a colleague has been, or is liable to be, exposed to a substance hazardous to health	End of contract	40 years	40 years	Securely Destroy	The Control of Asbestos at Work Regulations 2002 (SI 2002/2675). Also see the Control of Asbestos Regulations 2006 (SI 2006/2739) and the Control of Asbestos Regulations 2012 (SI 2012/832)	Legal compliance	Head of Health & Safety	No					
18.2	Health & Safety	Health and safety assessments; records of consultations with safety reps		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979	Legal compliance	Head of Health & Safety						
18.3	Health & Safety	Health and safety policy statements		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979	Legal compliance	Head of Health & Safety						
18.4	Health & Safety	Accident records, reports, accident books	Date of occurrence	6 years after date of occurrence/event	3 years	Securely Destroy	RIDDOR Limitation for legal proceedings RIDDOR 1965 and Limitation Act 1980 Special rules apply concerning incidents involving hazardous substances.	Legal compliance	Head of Health & Safety	Special (sensitive) data					
18.5	Health & Safety	Health and safety statutory notices	Once compliant	6 years after compliance	6 years after compliance	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings	Legal compliance	Head of Health & Safety						
18.6	Health & Safety	License/working system records	Date of leaving	3 months after leaving/Transform	3 months after leaving/Transform	Securely Destroy		Best practice	Head of Health & Safety	Special (sensitive) data	Electronic	??	??	??	
19. Technical and Research Records															
19.1	Technical and Research	Technical and research records	After requirements have ended	N/A	12-15 years after requirements have ended for both records and reports and drawings and other data	Securely Destroy	NCVO	Best practice	Relevant Head of Service						
20. ASB case files and associated documents															
20.1	ASB case files and associated documents	ASB (Anti-social behaviour) case files and associated documents		N/A	6 years or until end of legal action	Securely Destroy		Best practice	Head of Housing & Support	Personal data	Both		Local services	Sharepoint	Sharepoint
21. Resident Meetings															
21.1	Resident Meetings, House Meetings/ Client Forum	Resident Meeting Minutes	From date of meeting	N/A	6 years	Securely Destroy	ICSA recommended	Best practice	Director of Client Services	No	Both		Local services/Teams/Central GIS site and DCB condrive	Sharepoint	Sharepoint
22. Property Sales															
22.1	Property Sales	Registrations of interest	Sale of property	N/A	2 years	Securely Destroy		Best practice	Development Manager						
22.2	Property Sales	Offer Details	Offer accepted	current year plus 6 years	6 years	Securely Destroy	Estate Agency Act 1979	Legal compliance	Development Manager						
22.3	Property Sales	Completion documentation	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985	Best practice	Development Manager						
22.4	Property Sales	Property sales	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985	Best practice	Development Manager						
23. Communications															
23.1	Communications	Direct marketing (incoming and outgoing) contact details	Through a website request, from that date	N/A	6 years	Delete the contacts	GDPR good practice?		Head of External Affairs and Communications	Personal data	Electronic		Marketing files and in the Copera folder on Sharepoint/OnDrive	MailChimp	
23.2	Communications	Promotional purposes		N/A	6 years	Delete the photos and videos or obtain further consent	GDPR good practice?		Head of External Affairs and Communications	Personal data	Electronic		On the website, social media and corporate publications and in the Media Library on Sharepoint/OnDrive	Sharepoint/OnDrive	https://transformhousing.sharepoint.com/sites/Ani-George and on our website, https://transformhousing.org.uk/client-portal/ , https://transformhousing.org.uk/about-us/
23.3	Communications	Photos and/or video footage (clients)	From when the photos or video footage were taken and stored	N/A	6 years	Delete the photos and videos or obtain further consent	GDPR good practice?		Head of External Affairs and Communications	Personal data	Electronic		On the website, social media and corporate publications and in the Media Library on Sharepoint/OnDrive	Sharepoint/OnDrive	https://transformhousing.sharepoint.com/sites/Ani-George plus, https://transformhousing.org.uk/about-us/

Reference	Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Action at end of retention period	Retention source	Reason for retention	Information Asset Owner	Contains Personal Data	Storage Format	Storage Location (s)	Site or System(s)	Hyperlink	System(s) Location(s)
23.4	Communications	Event activity and communications: contact details, photos, video footage	From the date of the event	NA	6 years, unless the data relates to clients in which case 1 year	Delete the contact details, photos and video footage	GDPR good practice?	For promotional purposes and to be able	Head of External Affairs and Communications	Personal data	Electronic	In the Comms folder on SharePointOneDrive	SharepointOneDrive	https://transformhousing.sharepoint.com/lists/Arvi-George	
23.5	Communications	Case-studies, articles and quotes, including contact details (clients)	From date of case-study sign-off	NA	12 months	Delete all personal data/info relating to the case-study including contacts	GDPR good practice?	For promotional purposes and to be able	Head of External Affairs and Communications	Personal data	Electronic	On the website, social media and corporate publications and in the Media Library on SharePointOneDrive	SharepointOneDrive	https://transformhousing.sharepoint.com/lists/Arvi-George and on our website https://transformhousing.org.uk/client-stories-and https://transformhousing.org.uk/news	
23.6	Communications	Case-studies, articles and quotes, including contact details (colleagues and business)	From date of case-study sign-off	NA	6 years, or when a colleague leaves Transform if they request removal	Delete all personal data/info relating to the case-study including contacts	GDPR good practice?	Promotional purposes and to contact individuals to obtain approval and consent Internal Support contracts Fundraising	Head of External Affairs and Communications	Personal data	Electronic	On the website, social media and corporate publications and in the Media Library on SharePointOneDrive	SharepointOneDrive	https://transformhousing.sharepoint.com/lists/Arvi-George and the website https://transformhousing.org.uk/about/people-and https://transformhousing.org.uk/news	
23.7	Communications	reputation audit communications: contact details and possibly quotes	From date collected	NA	6 years	Delete all contact details and quotes	GDPR good practice?	Promotional purposes Gaining an understanding of our reputation	Head of External Affairs and Communications	Personal data	Electronic	In the Comms folder on SharePointOneDrive	SharepointOneDrive	https://transformhousing.sharepoint.com/lists/Arvi-George	