

# DATA RETENTION SCHEDULE FOR .....BAPTIST CHURCH

## Introduction

This record retention schedule accompanies the .....Baptist Church Data Protection Policy and has been adopted in compliance with the storage limitation principle in the Retained General Data Protection Regulation (UK GDPR). It sets out the time periods that different types of documents and records must be retained for business and legal purposes. This is a lengthy document listing the many types of records used by .....Baptist Church and the applicable retention periods for each record type.

The retention periods are based on business needs and legal requirements. Information which is held longer than necessary carries additional risk and cost. Retention periods are independent of format and can therefore be applied to any medium whether paper or electronic. Data retention periods are listed below but please note that some software systems used by ..... Baptist Church may retain data for a limited period of days after being deleted before it is irretrievable (for example, MS Outlook mailbox data is retained for 30 days after being deleted).

This policy applies to all charity trustees (usually the minister, deacons and elders or Leadership Team), staff, volunteers and any other persons who process personal data in their role within the church. If you maintain any types of records that are not listed in this schedule, and it is not clear from the existing record types in this schedule which retention period should apply, please contact the ..... Baptist Church Data Protection Officer/Trustee for guidance.

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| Section              | Documents  | Retention period   | Reason  | Action after Retention Period |
|----------------------|--|--|---|-------------------------------|
| <b>Employment/HR</b> | All information relating to recruitment, selection and development whilst in post  | 6 years after post-holder has left your employment   | Limitation Act 1980 <sup>(1)</sup>                                      | Destroy                       |
|                      | Information on any disciplinary or grievance matter that is still 'live' on the individual's personnel file, including information on any penalty or warning imposed       | 6 years after post-holder has left your employment   | Limitation Act 1980 <sup>(1)</sup>                                      | Destroy                       |
|                      | Information on an individual's health and sickness record, including information on any adjustment made to their working pattern, either on a temporary or permanent basis | 6 years after post-holder has left your employment   | Limitation Act 1980 <sup>(1)</sup>                                      | Destroy                       |
|                      | Redundancy records   | 6 years from date of redundancy  | Limitation Act 1980   | Destroy                       |
|                      | Information on any safeguarding concern or matter in which the employee was involved in any way  | 75 years after employment/role ceases (see Safeguarding Retention Schedule under Safeguarding below) | Requirements of the Independent Inquiry into Child Sexual Abuse (IICSA) | Not applicable                |
|                      | Parental leave records   | 18 years from the date of the birth of a child   | To enable future employers to check entitlement                         | Destroy                       |
|                      | Payroll records including correspondence with HMRC   | 6 years from the end of the financial year the records relate to.                                    | Charities Act and HMRC Rules  | Destroy                       |
|                      | Pensions Records   | According to the schedules set by the Pension provider   |   | Destroy                       |

| Section | Documents  | Retention period   | Reason  | Action after Retention Period |
|---------|--|--|---|-------------------------------|
|         | Application forms and interview notes for unsuccessful candidate | 6 months to a year   | 2010 Equality Act recommends six months. One year limitation for defamation actions under Limitation Act. | Destroy                       |
|         | Complaints records   | 1 year where complaint referred elsewhere otherwise 6 years from last action | Limitation Act 1980   | Destroy                       |

*(1) Six years is generally the time limit within which proceedings founded on contract may be brought*

|                |   |  |   |                                      |
|----------------|---|--|---|--------------------------------------|
| <b>Finance</b> | All financial records – invoices, bills, bank statements, paying in books etc       | 6 years from the end of the financial year the record relates to | Charities Act and HMRC Rules                              | Destroy                              |
|                | Gift Aid declarations   | 6 years after the last payment was made                          | HMRC Rules  | Destroy                              |
|                | Legacy information (i.e. documents which relate to a legacy received by the church) | 6 years after the deceased's estate has been wound up            | In line with requirements for other financial information | Destroy                              |
|                | Church Annual Accounts and Reports  | 10 years <sup>(2)</sup>  | Good practice   | Archive (e.g. County Archive Office) |
|                | Payroll records including correspondence with HMRC                                  | See Employment/HR above  | See Employment/HR above                                   | See Employment/HR above              |

*(2) These should be kept permanently somewhere. 10 years is the suggested minimum period the information is held by the church before sent to archives.*

|                |                                   |   |  |  |
|----------------|-----------------------------------|---|--|--|
| <b>General</b> | Correspondence (including emails) | Unless this relates to any other category of data listed here (e.g. finance, employment, safeguarding etc) correspondence should be kept for as long as is relevant. Churches might find it helpful for staff and volunteers to have an annual 'purge' of all correspondence and destroy any which is no longer relevant. |  |  |
|----------------|-----------------------------------|---|--|--|

| Section                  | Documents   | Retention period   | Reason   | Action after Retention Period                                    |
|--------------------------|---|--|--|--|
| <b>Health and Safety</b> | Reportable accidents / accident book              | 3 years after date of entry or end of any investigation if later                         | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 | Destroy  |
|                          | Records documenting external inspections          | 3 years after date of inspection   | Good practice  | Destroy  |
| <b>Insurance</b>         | Public liability policies and certificates        | Permanently  | Historical claims/commercial practice  | Store securely with electronic copy as backup                    |
|                          | Employer's liability policies                     | Permanently  | Employers' Liability (Compulsory Insurance) Regulations 1998 suggests 40 years | Store securely with electronic copy as backup                    |
|                          | Sundry insurance policies and insurance schedules | Until claims under policy are barred or 6 years after policy lapses, whichever is longer | Commercial practice  | Destroy  |
|                          | Claims correspondence                             | 6 years after last action  | Commercial practice  | Destroy  |
| <b>Meetings</b>          | Church Meeting Minutes                            | 10 years from the date of the meeting <sup>(3)</sup>                                     | Good practice  | Archive (e.g. County Archive Office)                             |
|                          | Trustee Meeting Minutes                           | 10 years from the date of the meeting <sup>(3)</sup>                                     | Good practice  | Archive (e.g. County Archive Office)                             |
|                          | Minutes of internal groups                        | 5 years from the date of the meeting   | Good practice  | Destroy unless of particular value in which case send to Archive |

*(3) These should be kept permanently somewhere. 10 years is the suggested minimum period the information is held by the church before sent to archives.*

| Section           | Documents   | Retention period  | Reason        | Action after Retention Period |
|-------------------|---|---|---------------|-------------------------------|
| <b>Membership</b> | Church Membership List (Names)                          | Permanent but reviewed and updated regularly  | Good practice | To Archive if church closes   |
|                   | Contact details of Church Members and regular attenders | 6 months after individual has ceased to be a member or stopped attending church. <sup>[4]</sup> | Good practice | Destroy                       |
|                   | Church Contact list or Directory                        | 1 year after publication  | Good practice | Destroy                       |

(4) Unless individual asks for their details to be removed immediately

|                 |   |  |                     |   |
|-----------------|---|--|---------------------|---|
| <b>Property</b> | Title Deeds for property (where church holds their own)   | Permanently or until property is disposed of                         | Limitation Act 1980 | Keep copy for 6 years after property has been disposed of |
|                 | Leases  | 12 years after lease and liabilities under the lease have terminated | Limitation Act 1980 | Destroy   |
|                 | Final plans, designs and drawings of the building, planning consents, building certifications, collateral warranties, records of major refurbishments and redevelopments. | Permanently or until six years after property is disposed of         | Limitation Act 1980 | Destroy 6 years after property is disposed of             |

|                     |  |  |  |  |
|---------------------|--|--|--|--|
| <b>Safeguarding</b> | See separate Safeguarding Retention Schedule at <a href="http://www.baptist.org.uk/gdprsafeguarding">www.baptist.org.uk/gdprsafeguarding</a> |  |  |  |
|---------------------|--|--|--|--|

|   |   |                            |   |         |
|---|---|----------------------------|---|---------|
| <b>Website and communications platforms</b> | The website makes use of [ YouTube/Vimeo <i>insert as appropriate</i> ] for playing videos, webinars and live broadcasting. It also makes use of [ <i>insert relevant platform</i> ] for playing podcasts. For information on how [ <i>insert relevant platform</i> ] retain data | Subject to regular review. | Privacy and Electronic Communications Regulations 2003<br>Removed when no longer relevant otherwise retained for legitimate interest of supporting and resourcing church members (subject to individual data subjects' rights). | Destroy |
|---|---|----------------------------|---|---------|

| Section | Documents  | Retention period  | Reason  | Action after Retention Period |
|---------|--|---|---|-------------------------------|
|         | please see their respective privacy policies.                    |   |   |                               |
|         | Web articles   | Subject to regular review.  | Removed when no longer relevant otherwise retained for legitimate interest of supporting and resourcing church members (subject to individual data subjects' rights). | Destroy                       |
|         | Cookies, IP addresses, metrics data and other online identifiers | For information on how third-party social media and statistical providers retain data on our website visitors and details on types of cookies and how long they are retained for, please refer to their respective Cookies Privacy Policies | Good practice/Privacy and Electronic Communications Regulations 2003  | Destroy                       |