

# Data Retention Management Policy

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## Context, Content & Purpose

### Key details

- Policy prepared by: Jo Pritchard
- Approved by: Board of Trustees
- Policy became operational on: 20.05.2018
- Next review date: 20.03.2021

The aim of this policy is to provide a framework which will govern decisions on whether a particular document should be retained or disposed of by ThePromise.

The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed by ThePromise or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding all staff, volunteers and trustees of ThePromise in understanding their obligations in retaining electronic and physical documents - including e-mail, Web files, text files, sound and movie files, PDF documents, all Microsoft Office or other formatted files, as well as physical documents held by individuals.

For retained documents, a framework for the appropriate retention period and format is provided in section 4.

**The responsible person is the Director, Jo Pritchard, supported by the board of trustees.**

### Contents

1. Policy statement
2. Our Policy
3. Roles and Responsibilities
4. Document Retention Schedule

## 1. Policy Statement

It is ThePromise's policy to maintain authentic, reliable and usable documents and records which are capable of supporting the organisation and its activities for as long as they are required or until there is no further statutory obligation to do so.

ThePromise will manage its records and data properly in accordance with legislation such as the Data Protection Act 1998, General Data Protection Regulations and best practice both in the sector and more broadly.

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# Data Retention Management Policy

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## 2. Our Policy

Information is one of ThePromise's most important assets; in the course of carrying out our strategic objectives, we accumulate information from both individuals and organisations.

This wide range of data and information is recorded in documents and records in different formats and media – for the purpose of this policy, the term documents and records includes information and data in both hard copy and electronic form.

Although not an exhaustive list, examples of items that can constitute documents and records include:

- Documents (including written and typed documents and annotated copies)
- Computer files (including word processor files, databases, spreadsheets and presentations)
- Records contained in computer systems (eg The Payroll software, internal Databases)
- Paper based files
- Electronic mail messages (voice and email)
- Calendar records
- Reports
- Voice recordings (including call recording)
- Internal instant-messenger chat
- Intranet and Internet Web pages

ThePromise will make all reasonable endeavours to keep documents and records that are accurate, reliable, ordered, complete, useful, up to date, accessible and will only retain documents and records where they are needed to achieve one or more of the following criteria:

- help us carry out or achieve our strategy
- be a sustainable organisation and deliver high quality support and services
- help us to make informed decisions
- protect the rights of employees and the public
- track policy changes and development
- make sure we comply with relevant legislation
- provide an audit trail to meet business, regulatory and legal requirements
- support continuity and consistency in management and administration
- make sure we are open, transparent and responsive
- support research and development
- promote our achievements
- provide historical background

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# Data Retention Management Policy

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## **A Document Retention Schedule is included as section 4 of this Policy document**

This schedule will show the generic retention period for each type of document or record held based on the criteria above.

No documents are stored off-site.

All documents and records exceeding the generic retention period will be disposed of within a secure manner or fully anonymised if deemed necessary for future reference.

## **3. Roles and responsibilities**

The Promise has a responsibility to ensure that its documents and records are managed well.

Different individuals working for and with The Promise have different roles in relation to documents and records management and these responsibilities are detailed below:

**The Director** is responsible for ensuring compliance with this policy.

**The Director and Board of Trustees** are responsible for considering and approving changes to this policy ensuring that:

- records management policy, standards and Document Retention Schedules are kept up to date and relevant
- raising staff awareness of document and records management providing advice and guidance to line managers and staff
- identifying risk areas for compliance with the records management policy and associated standards

**All staff, volunteers and trustees** must ensure that documents and records they receive, create, maintain or delete are dealt with in accordance with this Document Retention policy and other standards and procedures provided.

# Data Retention Management Policy

## 4. Document Retention Schedule

The Record Retention Schedule is organized as follows:

- A. Accounting and Finance
- B. Contracts
- C. Company Records
- D. Correspondence and Internal Memoranda
- E. Electronic Documents
- F. Grant Records
- G. Insurance Records
- H. Legal Files and Papers
- I. Miscellaneous
- J. Payroll Documents
- K. Pension Documents
- L. Personnel Records
- M. Tax Records

### A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	3 years
Bank Statements and Cancelled Checks	7 years
Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment
Credit card records (documents showing customer credit card number)	3 years

# Data Retention Management Policy

## B. CONTRACTS

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

## C. Company RECORDS

Record Type	Retention Period
Company Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of association, annual reports)	Permanent
Licenses and Permits	Permanent

## D. CORRESPONDENCE AND INTERNAL MEMORANDA

**General Principle:** Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

- Those pertaining to routine matters and having no significant, lasting consequences should be discarded **within three years** or anonymised if deemed necessary. Some examples include:
  - Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
  - Form letters that require no follow-up.
  - Letters of general inquiry and replies that complete a cycle of correspondence.
  - Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
  - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
  - Chronological correspondence files.

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## Data Retention Management Policy

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2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

### E. ELECTRONIC DOCUMENTS

1. **Electronic Mail:** Not all emails need to be retained, depending on the subject matter.
  - All e-mail—from internal or external sources—is to be deleted after 2 years.
  - Staff will strive to keep all but a minority of their e-mail related to business issues.
  - All business-related email will be held on the chosen server.
  - Staff will not store or transfer ThePromise-related e-mail on non-work-related computers except as necessary or appropriate for ThePromise purposes.
  - Staff will take care not to send confidential/proprietary information to outside sources without necessary security measures in place.
2. **Electronic Documents:** including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.
  - **PDF documents** – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy.
  - **Text/formatted files** - Staff will endeavour to conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents etc) and will delete or anonymise all those they consider unnecessary or outdated.
3. **Web Page Files: Internet Cookies**
  - All staff, volunteers and trustees are responsible for maintaining their web history and cookie and take reasonable steps to manage the storage and use of these, for example deleting every 1-2 months.

ThePromise does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all staff, volunteers and trustees to adhere to the guidelines specified in this policy.

ThePromise require all staff, volunteers and trustees to ensure they maintain a back-up of all electronic files (including email) in a relevant place (e.g. cloud storage or external hard drive)

In certain cases a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document unless the paper document solely holds the signature of authority.

## Data Retention Management Policy

### F. GRANT RECORDS

Record Type	Retention Period
Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period
All pertinent formal correspondence	7 years after completion of grant period
Report assessment forms	7 years after completion of grant period
Documentation relating to grantee evidence of invoices	7 years after completion of grant period

### G. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment
Certificates Issued to ThePromise	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance Policies (including expired policies)	Permanent

### H. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent

# Data Retention Management Policy

## I. MISCELLANEOUS

Record Type	Retention Period
Project Reports	3 years or until completion of project
Material of Historical Value (including pictures, publications)	Permanent
Policy and Procedures – Original	Current version with revision history
Policy and Procedures - Copies	Retain current version only
Annual Reports	Permanent

## J. PAYROLL DOCUMENTS

Record Type	Retention Period
Payroll Deductions	Termination + 7 years
Payroll Registers (gross and net)	7 years
Hours logs/Timesheets	3 years

## K. PENSION DOCUMENTS AND SUPPORTING EMPLOYEE DATA

**General Principle:** Pension documents and supporting employee data shall be kept in such a manner that at all times it can be established whether or not any pension is payable to any person and if so the amount of such pension.

Record Type	Retention Period
Retirement and Pension Records	Permanent

## L. PERSONNEL RECORDS

Record Type	Retention Period
Employee Personnel Records (including application forms, status change records, performance evaluations, training and qualification records)	7 years after separation
Employment Contracts – Individual	7 years after separation
Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Employment Records - All Non-Hired Applicants (including all applications and	2 years

## Data Retention Management Policy

<b>Record Type</b>	<b>Retention Period</b>
resumes - whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	
Job Descriptions	3 years after superseded

### M. TAX RECORDS

**General Principle:** ThePromise must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return.

These documents and records shall be kept for as long as the contents thereof may become material in the administration of tax laws.

<b>Record Type</b>	<b>Retention Period</b>
Tax-Exemption Documents and Related Correspondence	Permanent
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Franchise, Property	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns	Permanent
Government Audit Records	Permanent