

## **DATA RETENTION POLICY**

### **THE CONGREGATION OF TAIN AND FEARN OF THE FREE CHURCH OF SCOTLAND IN NORTHERN PRESBYTERY**

#### **Introduction**

This Data Retention Policy specifies how long we retain various categories of personal data. This policy should be read alongside our Data Protection Policy and Privacy Notice, available upon request or via our website and noticeboard.

We process diverse types of personal data, such as membership details, baptismal records, employee and volunteer information, financial records (including payroll and Gift Aid), counselling and pastoral care details, attendance records, and property management data.

Personal data are retained in minutes of meetings, employment documents, congregational registers, consent forms, newsletters, letters, and email communications. Data should only be kept for as long as necessary for its original purpose, in line with UK GDPR data protection principles, ensuring it remains accurate and securely deleted or anonymised when no longer needed.

Retention of data beyond its original purpose is permissible only for public interest archiving, scientific or historical research, or statistical purposes, with appropriate safeguards..

#### **Retention of records**

Retention periods, detailed in the attached Schedule, depend on the purpose of holding data. Congregations must justify the ongoing retention of identifiable personal data.

Data must undergo a review before disposal after the retention period expires. The disposal method should ensure secure erasure or destruction..

#### **Disposal/erasure of records**

Documents containing personal data must be securely disposed of via shredding or confidential waste services. Electronic data, including emails, digital communications, and stored data, must be regularly reviewed and permanently deleted when no longer required. Deletion should ensure data is beyond practical retrieval and use. Documents containing personal information should be disposed of confidentially and securely either by shredding or by using confidential waste bins or sacks. Such documents may include, but are not limited to, those containing names and contact details, health-related information, information relating to pastoral matters and financial information.

Electronic communications including email, Facebook pages, twitter accounts etc. and all information stored digitally should also be reviewed regularly and if no longer required should be closed and/or permanently deleted. It is understood that the word “deletion” can mean different things in relation to electronic data, and that it is not always possible to erase all traces of it. The key issue is to put the

data beyond use. Therefore, it will normally be sufficient simply to delete the information, with no intention of it ever being used or accessed again by anyone. In addition to deleting personal information from a live system, it should also be deleted from any back-up of the information on that system.

### **Retention of records for archiving, research or statistical purposes**

Personal data may be kept indefinitely only if strictly for archiving in the public interest, scientific/historical research, or statistical analysis, with robust privacy safeguards (e.g., pseudonymisation). The Assembly Clerks' Office should be consulted for archiving guidance.

This Data Retention Policy will be regularly reviewed and updated to remain compliant with data protection legislation.

**Adopted:** [Insert Adoption Date]

**Implementation Responsibility:** Congregation Trustees

Tain and Fearn Free Church of Scotland, Scottish Charity Number SC013392

## Data Retention Schedule

Record	Retention Period
<b>MEETINGS</b>	
Minutes of Kirk Session, Deacons Court and Finance Committee meetings	Permanent (Per 2018 General Assembly)
Minutes of other meetings	6 years
Papers for meetings, including agendas and reports	Delete once there is no longer a need to retain these
<b>EMPLOYMENT, MEMBERS &amp; VOLUNTEERS</b>	
Pre-employment (of volunteers and paid workers) enquiries/applications/notes/letters/references	6 months after completion of recruitment (unless data to be retained for a future similar opportunity, in which case 1 year)
Advice (emails, letters) from Church solicitor or PVG Lead Signatory	100 years
Confidentiality Agreements	100 years
Covenants of Responsibilities	100 years
Safeguarding Risk Assessments	100 years
Complaints concerning people	100 years
Congregational Register	100 years
Safeguarding Audit for Congregations and Presbyteries	100 years
Transfer Forms	100 years
Employee records including: contracts, time records etc	Duration of employment + 6 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually - delete or correct out of date information
Miscellaneous contact information	Delete once there is no longer a need to retain such information
Miscellaneous letters and emails	Delete the email/confidentially destroy the letter once no longer required
Payroll and pension payment records	Minimum, 6 years, no maximum

Pension and retirement records	Minimum 6 years beyond final pension payment, no maximum
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## **PROPERTY & LEGAL**

Environmental studies	Permanent
Insurance claims/ applications	Permanent
Insurance disbursements and denials	Permanent
Insurance contracts and policies (Directors and Officers, General Liability, Property, Workers' Compensation)	Permanent
Leases	6 years after expiration
Property & land documents (including loan and mortgage contracts, title deeds)	Permanent
Warranties	Duration of warranty + 6 years
Documents relating to legal proceedings, potential or actual	Final settlement of matter or conclusion of any formal proceedings + 6 years
Hazardous material exposures	30 years
Injury and Illness Incident Reports (RIDDOR)	5 years
Construction documents	Permanent
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent
Sales and purchase records	10 years
Resolutions	Permanent
OSCR filings	5 years from date of filing
Contracts	6 years following expiration

## **FINANCE**

Audit and review workpapers	6 years from the end of the period in which the audit or review was concluded
Financial records, including invoices and expenses payable, income records, bank statements and all supporting documentation	6 years from end of year in which transaction made

Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
General ledgers	Permanent
Tax records	Minimum 6 years
Gift Aid Declarations	6 years from end of year in which final claim made or until any current enquiries completed
Gift Aid Records	6 years from end of year in which transaction made or until any current enquiries completed
Gift Aid Envelopes	One full month per year for 6 years
Legacies (general)	6 years after estate has been wound up
Legacies which create permanent endowment	Permanent