

1. All data and records will be stored in accordance with the security requirements of the Data Protection Legislation and in the most convenient and appropriate location having regard to the period of retention required and the frequency with which access will be made to the record.
2. Data and records which are active should be stored in the most appropriate place for their purpose commensurate with security requirements.
3. Data and records which are no longer active, due to their age or subject, should be stored in the most appropriate place for their purpose.
4. The degree of security required for file storage will reflect the sensitivity and confidential nature of any material recorded.
5. Any data file or record which contains personal data of any form can be considered as confidential in nature.
6. Data and records should not be kept for longer than is necessary. This principle finds statutory form in the Data Protection Legislation, which requires that personal data processed for any purpose "shall not be kept for longer than is necessary for that purpose". All groups are required to have regard to the Guidelines for Retention of Personal Data attached hereto.
7. Any data that is to be disposed must be safely disposed of for example by shredding. Any group which does not have access to a shredder should pass material to the Church Administrator who will undertake secure shredding.
8. Special care must be given to disposing of data stored in electronic media. Guidance will be given by the Church Leadership team to any group which has stored personal data relating to its members on for example personal computers which are to be disposed of.

Guidelines for Retention of Personal Data

Types of Data	Suggested Retention Period
Personnel files of employees and voluntary workers (e.g. Ministry Trainees) who have not worked with children or vulnerable adults. Includes any training records and health records.	<ul style="list-style-type: none">• 6 years from the end of their time on staff
Personnel files of employees and voluntary workers (e.g. Ministry Trainees) who have worked with children or vulnerable adults.	<ul style="list-style-type: none">• 75 years from the end of their time on staff

Types of Data	Suggested Retention Period
Includes any training records and health records.	
Clergy personnel records – where there are no safeguarding allegations and investigations	<ul style="list-style-type: none"> • 75 years from the end of their time on staff
Clergy Personal records where there are safeguarding allegations and investigations regardless of the findings	<ul style="list-style-type: none"> • 50 years from the date of the cleric’s death.
Statutory Maternity Pay records and calculations	<ul style="list-style-type: none"> • As Above • (Statutory Maternity Pay (General) Regulations 1986)
Statutory Sick Pay records and calculations	<ul style="list-style-type: none"> • As Above • (Statutory Sick Pay (General) Regulations 1982)
Notes associated with grievances or disciplinary hearings/action taken.	<ul style="list-style-type: none"> • 10 years from the date of the grievance/disciplinary (for staff not involved with children or vulnerable adults) • 75 years from the end of their time on staff (for staff involved with children or vulnerable adults) • Separate retention dates for clergy (see above).
Application forms / interview notes	<ul style="list-style-type: none"> • Maximum of one year from the date of the interviews for those not subsequently employed. If employed, retain in personnel file.
Church member information	<ul style="list-style-type: none"> • Check for accuracy once a year • Record that adult was a member – permanent • Secure destruction of personal data other than name and fact of membership – three years after cease to be a member of the church.
<p>Information relating to children</p> <p><i>NB. You may find it helpful to read the following article:</i></p> <p>http://safeinchurch.org.uk/record-retention</p>	<ul style="list-style-type: none"> • Check for accuracy once a year • Record that child was a member of the group (e.g. registers for Sunday Club, First Steps, Grafted, etc.) – permanent • Secure destruction of personal data (e.g. permission forms) other than name and fact of membership – once the child has reached the age of 21.
Risk Assessment for any event involving children	<ul style="list-style-type: none"> • Keep for 50 years.

Types of Data	Suggested Retention Period
Risk Assessment for any event not involving children	<ul style="list-style-type: none"> • Keep for 6 years.
Church group member information	<ul style="list-style-type: none"> • Check for accuracy once a year • Record that adult was a member of group – permanent • Secure destruction of personal data other than name and fact of membership – three years after cease to be a member of the church.
All financial records (including correspondence with HMRC, Pensions Regulator, payroll records, etc.)	<ul style="list-style-type: none"> • Retain for at least 6 years after the end of the tax year to which the records relate.
Accident books, and records and reports of accidents	<ul style="list-style-type: none"> • (for Adults) 3 years after the date of the last entry • (for children) three years after the child attains 18 years (RIDDOR 1985)
Committee Minutes (PCC, F&SC, MAG, Fabric etc.)	<ul style="list-style-type: none"> • Kept permanently
Church registers (Marriage. Baptism and other official records)	<ul style="list-style-type: none"> • Kept permanently
Safeguarding concerns, DBS application forms and references, DBS No. and date.	<ul style="list-style-type: none"> • Keep for 75 years
Subject Access Request	<ul style="list-style-type: none"> • 1 year following completion of the request • (Data Protection Act 2018)
Formal complaints	<ul style="list-style-type: none"> • 10 years from the date of the complaint
Whistleblowing documents	<ul style="list-style-type: none"> • 6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately. • (Public Interest disclosure Act 1998 and recommended IAPP practice.)