

# DATA RETENTION SCHEDULE FOR THE BAPTIST UNION OF GREAT BRITAIN

## Introduction

This record retention schedule accompanies the Data Protection Policy of the Baptist Union of Great Britain (“BUGB”). 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 BUGB and the applicable retention periods for each record type. You need not read the entire document but rather should focus on the types of records relevant to your role.

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.

This policy applies to all staff, which for these purposes includes employees, temporary and agency workers, other contractors, interns and volunteers. 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 BUGB Data Protection Officer/Legal Services Manager, Caroline Sanderson, for guidance.

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Section	Type of Data/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 our 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 our employment	Limitation Act 1980	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 our employment	Limitation Act 1980	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 2011 and HMRC Rules	Destroy
	Pensions Records	According to the schedules set by the Pension provider		Destroy

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
	Application forms, CVs, references and interview notes for unsuccessful candidates	6 months	Equality Act 2010 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 contractual claims 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 BUGB)	6 years after the deceased's estate has been wound up	In line with requirements for other financial information	Destroy or, if legacy of historical significance, send to the Angus Library
	Annual Accounts and Reports	10 years then retain permanently in archives	These records provide evidence of the development of the organisation plus Charity Commission requirements	Send to the Angus Library
	Payroll records including correspondence with HMRC	See Employment/HR above	See Employment/HR above	See Employment/HR above
	Baptist Union Loan Fund files	Permanently	For historical/reference purposes	Paper files to be stored at BUGB archive (Harrier Park) Electronic copy documents (post 2017) saved to church files (stored in cloud)

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
	Church deposit files (held by BUC). Records of names of signatories to accounts, email contacts and signatures for a church.	Personal data kept for 6 years after the deposit account is closed	Data Protection Act 2018 Limitation Act 1980	Destroy
	Church investment files (held by BUC). Records of names of signatories to accounts, email contacts and signatures for a church.	Personal data kept for 6 years after investment account is closed	Data Protection Act 2018 Limitation Act 1980	Destroy
<b>General</b>	Correspondence (including emails) and other records	Unless covered by any other category of data listed here, files should be kept for 6 years and then destroyed.		
<b>Legal and Property</b>	Trust matters (see also Deeds below)	End of trust period or date of vesting plus 6 years	Limitation Act 1980	Destroy, return to church or archive at Angus Library if of Baptist historical interest
	Church Deeds	Foundation Deeds and those containing trusts over church land to be kept permanently	Charitable trusts/Good practice/Historical interest	Deeds may be sent to archive at the Angus Library if the trust property sold and sale proceeds from trust assets distributed to ultimate beneficiary
	Files relating to property sales and purchases	6 years from date of completion	Limitation Act 1980	Destroy
	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	Permanently or until six years after property is disposed of	Limitation Act 1980	Destroy 6 years after property is disposed of

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	warranties, records of major refurbishments and redevelopments.			
	Listed Building files	Permanently	The Ecclesiastical Exemption (Listed Buildings and Conservation Areas) Order 1994 (S.I. 1994 No 1771)	Store safely at Harrier Park or send to County Archive or Historic England
	Church correspondence files	Permanently	For reference purposes and handling queries relating to trusts, insurance cover and historical claims	Paper files stored at BUGB archive (Harrier Park) Electronic copy documents (post 2017) saved to church files (stored in cloud)
	Information files	6 years from closure of file or permanently	Reference and historical interest	Review of files to be carried out after 6 years to determine whether the information should be retained for historical record or reference purposes. Either destroy or store at Harrier Park/Angus Library.
<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

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	Product liability policies	Permanently	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
	Professional Indemnity Insurance policies	Permanently	Commercial practice	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>Data held on the National Baptist Database (ThankQ)</b>	Contact details of ministers	All details of accredited ministers/nationally recognised retained until their death but contact details for non-accredited ministers retained for 1 year after their role has ended	Historical interest and safeguarding purposes	Destroy where appropriate Contact details and out of date details to be deleted from database – ongoing All unnecessary roles recorded on database to be deleted - ongoing
	Church secretary, treasurer and DBS verifier(s) and key roles for all member churches and records of contacts in Regional Associations and Baptist Colleges	Contact details retained for 1 after their role has ended but names and dates of roles retained forever	Historical interest/safeguarding purposes	Destroy where appropriate Contact details and out of date details to be deleted from database – ongoing All unnecessary roles recorded on database to be deleted - ongoing

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
	Details of BUGB Trustees, BUC Directors and members of BUGB Council or other BUGB committees	Contact details retained for 1 after their role has ended but names and dates of roles retained forever	Historical interest/safeguarding purposes	Destroy where appropriate Contact details and out of date details to be deleted from database – ongoing All unnecessary roles recorded on database to be deleted - ongoing
	Details of contact persons in non BUGB member churches (may be in membership with Regional Association) or churches in trust with BUC	Contact details retained for 1 year after their role has ended but names and dates of roles retained forever	Historical interest/safeguarding purposes	Destroy where appropriate Contact details and out of date details to be deleted from database – ongoing All unnecessary roles recorded on database to be deleted - ongoing
<b>Ministerial Files</b> The Ministries Team’s Privacy Notice can be read here: <a href="http://www.baptist.org.uk/privacy">www.baptist.org.uk/privacy</a>	Files held on the Ministries Information Exchange (MIX) database for accredited ministers, non-accredited ministers and those who are nationally recognised for ministry	75 years from the date of retirement. For a minister who ends his or her accreditation or recognised status with the Union prior to retirement, 75 years from the date accreditation/recognition ceases.	For the purpose of historic safeguarding investigations or in case of legal claims arising from allegations against a minister or recognised person, or a claim by the minister/recognised person against the Union. Where a minister ends their accreditation or nationally recognised status prior to their retirement, some information will be retained in case of a future wish to return to ministry.	Destroy after 75 years. If minister or person recognised for ministry is in good standing with the Union when they end their accreditation/recognition, a data minimisation review of the file will be carried out. All documents on the file should be destroyed with the exception of the following documents which shall be retained for 75 years: <ul style="list-style-type: none"> <li>• Application forms and supporting information</li> <li>• College reports</li> </ul>

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
				<ul style="list-style-type: none"> <li>• NAM process reports</li> <li>• Any complaints of serious or gross misconduct</li> <li>• A record of where the individual has been in ministry</li> <li>• Safeguarding training and enhanced disclosure record.</li> </ul>
	<p>Special category and criminal convictions etc (“criminal offence data”) relating to accredited ministers, non-accredited ministers and those who are nationally recognised for ministry</p>	<p>75 years from the date of retirement. For a minister who ends his or her accreditation or recognised status with the Union prior to retirement, 75 years from the date accreditation/recognition ceases.</p>	<p>To safeguard against any risks posed to others under Article 6(1)(f) GDPR where the processing is necessary for the purposes of the legitimate interests of the Union, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.</p> <p>Where it fulfils one of the substantial public interest conditions from Schedule 1, Part 2 of the Data Protection Act 2018, in particular, Conditions 10, 11, 12, 18 and 19 and Condition 31 from Schedule 1, Part 3 of the Data Protection Act 2018.</p> <p>See the BUGB Data Protection policy and Appropriate Policy</p>	<p>Destroy after 75 years.</p>



Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
			Document (Schedule 2 of the policy) on the BUGB website.	
	<p>Special category or criminal offence data relating to “low-level concerns” i.e. where there are concerns in relation to a data subject that are not (or not yet) sufficiently serious to raise with the police or are not subject to a disciplinary process.</p> <p>The retention of low-level concern data enables patterns of repeated behaviour which may indicate that there is an underlying serious safeguarding concern to be identified and assessed, to mitigate the risk of individuals committing criminal offences (including of a sexual nature) and to assess individuals’ ongoing suitability for ministry, including by reference to risks they may pose to others.</p>	To be reviewed after 10 years to determine whether data should be retained in line with other ministerial records for 75 years or destroyed	Conditions 10, 11, 12, 18, 19 and 31 of Schedule 1 Data Protection Act 2018 as set out above.	Destroy
<b>Safeguarding</b>	Records are kept in line with BUGB Safeguarding Retention Schedule at <a href="http://www.baptist.org.uk/gdprsafeguarding">www.baptist.org.uk/gdprsafeguarding</a> .			
The Safeguarding Team’s Privacy Notice can be read here: <a href="http://www.baptist.org.uk/privacy">www.baptist.org.uk/privacy</a>	Special category and criminal offence data relating to a child or any individual in membership with or associated with a Baptist church or organisation in membership with the Baptist Union of Great Britain	See the BUGB Safeguarding Retention Schedule at <a href="http://www.baptist.org.uk/gdprsafeguarding">www.baptist.org.uk/gdprsafeguarding</a>	To safeguard against any risks posed to others under Article 6(1)(f) GDPR where the processing is necessary for the purposes of the legitimate interests of the Union, except where such interests are overridden by the interests or fundamental rights and freedoms	Destroy after 75 years.

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			<p>of the data subject which require protection of personal data, in particular where the data subject is a child.</p> <p>Where it fulfils one of the substantial public interest conditions from Schedule 1, Part 2 of the Data Protection Act 2018, in particular, Conditions 10, 11, 12, 18 and 19 and Condition 31 from Schedule 1, Part 3 of the Data Protection Act 2018.</p> <p>See the BUGB Data Protection policy and Appropriate Policy Document (Schedule 2 of the policy) on the BUGB website.</p>	
	<p>Special category or criminal offence data relating to “low-level safeguarding concerns” i.e. where there are concerns in relation to a data subject that are not (or not yet) sufficiently serious to raise with the police or are not subject to a disciplinary process. This data is used primarily to assist with decisions about the ongoing accreditation of ministers, to mitigate the risk of individuals committing criminal offences (including of a sexual nature), and to ensure that information about safeguarding concerns about ministers, leaders and church members can be shared appropriately when such</p>	<p>To be reviewed after 10 years to determine whether data should be retained in line with other safeguarding records for 75 years or destroyed</p>	<p>Conditions 10, 11, 12, 18, 19 and 31 of Schedule 1 Data Protection Act 2018 as set out above.</p>	<p>Destroy</p>

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
	individuals move between churches or organisations.			
<b>Crisis Media</b>	Email correspondence, detail of BUGB or BUGB member crisis event and media statements	Correspondence and media statements – 6 years after last action/investigation concluded  Personal data relating to crisis event - 1 year after last action/investigation concluded	Data Protection Act and Limitation Act 1980	Destroy  Destroy
<b>Website</b>	Use of Cookies – see Cookies Privacy Policy at: <a href="https://www.baptist.org.uk/User/CookiesPolicy.aspx">https://www.baptist.org.uk/User/CookiesPolicy.aspx</a>			
<b>Governance and Meetings</b>	BUGB Council Minutes	10 years from the date of the meeting	Good practice/Data Protection Act	Secure storage/send to the Angus Library
	BUGB Trustee Meeting Minutes	10 years from the date of the meeting	Good practice/Data Protection Act	Secure storage/send to the Angus Library
	Other meeting minutes	10 years from the date of the meeting	Good practice/Data Protection Act	Secure storage/send to the Angus Library
	Governing documents – BUGB Constitution and old versions	Permanently	Charity Commission requirements/historical interest/show development of organisation	Not applicable

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
<b>Company records for related organisations:</b>  <b>Baptist Union Corporation Limited/Baptist Assembly Limited/Baptist House Limited/Baptist Holiday Fellowship Limited/General Baptist Association of the New Connexion/Baptist Times Limited</b>	Certificate of incorporation	Permanently	Companies Act 2006, s 15 (CA 2006)	Not applicable
	New certificate of incorporation to reflect change of company name	Permanently	CA 2006, s 80	Not applicable
	Memorandum & articles of association (signed original)	Permanently	CA 2006, ss 8 and 18	Not applicable
	Trading certificate (if applicable)	Permanently	CA 2006, s 761	Not applicable
	Accounting records	6 years from the date on which the record was made (private companies)	CA 2006, ss 386 and 388	Destroy
	Records of all proceedings at Directors' meetings, including: —Board minutes —written resolutions of the Board —register of sealed documents	10 years from the date of the meeting then archive	CA 2006, s 248 and historical interest	Secure storage at Harrier Park/send to Angus Library
	Minutes of all proceedings of general meetings	10 years from the date of the meeting then archive	CA 2006, s 355	Secure storage/send to Angus Library
	Copies of all members' resolutions passed outside general meetings	10 years from the date of the resolution	CA 2006, s 355	Secure storage/send to Angus Library
	All decisions made by a sole member (if applicable)	10 years from the date of the decision	CA 2006, ss 355 and 357	Secure storage/send to Angus Library
	Reports and accounts required by HMRC (if applicable)	6 years	Value Added Tax Act 1994 (VATA 1994), Sch 11 s 6(3)	Destroy
Register of Directors and their residential addresses	Indefinitely for the register itself	CA 2006, s 162	Not applicable	

Section	Type of Data/Documents	Retention period	Reason	Action after Retention Period
	Register of Secretaries	Indefinitely for the register itself	CA 2006, s 275	Not applicable
	Register of disclosed interests	Indefinitely for the register itself	CA 2006, ss 793, 808, 816 and 817	Not applicable
	Register of members	An old entry may be removed from the register if more than six years have elapsed since the entry was made	CA 2006, ss 113 and 121	Usually not applicable