East Sussex Community Voice

Record Keeping and Retention Policy

Version	Date of next review by ESCV Board	Date of adoption by ESCV Board
1	n/a	30th March 2021
2	March 2023	March 2024
3	March 2026	28th May 2026
4	May 2028	
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1 Purpose

1.1 This policy identifies the information held by East Sussex Community Voice CIC (ESCV) and clarifies the legal and best practice requirements for information retention and deletion.

1.1 Accurate and proportionate data records are kept by East Sussex Community Voice CIC to:

- comply with all employment, charity and company legal requirements
- comply with quality assurance systems
- provide a high-quality service to clients and the public

1.2 East Sussex Community Voice CIC has a responsibility to ensure our activities are compliant with the General Data Protection Regulation (2018).

1.3 By listing which information to keep and how long documents must be retained, we are ensuring the appropriate storage, security and disposal of important records and personal information. Employees of ESCV must uphold this policy and follow the guidelines detailed below.

2 Scope

2.1 This policy and procedures apply across all entities or subsidiaries owned or controlled by East Sussex Community Voice CIC and to all employees, including part-time, temporary, or contract employees, who handle corporate and personal information.

2.2 This policy covers all electronic and physical records that contain personal information, including:

- Recruitment documents and personnel files

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- Finances, accounts and financial records
- Email conversations
- Meeting minutes
- Spreadsheets
- Corporate documents and records
- Presentations
- Any scanned documents submitted by employees or external sources

2.3 Records are retained for the period specified in the retention schedule below, which except for items that must be stored permanently, are then appropriately destroyed.

2.4 Employees who access, contribute to, or manage any documents or information sources related to the records mentioned above must follow these guidelines, and all ESCV staff and Board members should be aware of their obligations around storage and disposal.

3 Procedure

3.1 All paper-based records are held securely in locked storage. These may include but are not limited to: contracts, HR records, banking information and financial statements, signed consent forms and documents including personal information project documentation. Wherever possible such records are scanned and saved electronically in a suitable location, with the paper version then securely destroyed.

3.2 Electronic files are kept securely stored on the ESCV SharePoint system, server or on other web—based platforms. These platforms are user restricted and/or password protected, with two-factor authentication applied.

Platforms may include the website content management systems (CMS), Microsoft Teams, and web-based platforms (e.g. SmartSurvey, MailChimp etc) and banking/accounting websites.

3.3 Members of the public or services users who choose to engage with ESCV are made aware where and when their personal information is collected and stored and informed that personal information will be kept confidential and will not be shared unless express consent has been given or there is a legal basis to do so.

When asking for consent to pass on personal details, ESCV staff, Board members, volunteers and representatives will confirm how information will be used and passed on and clarify the rights to amendment and deletion set out under GDPR.

3.4 ESCV will review the outcome of DBS checks undertaken and keep a record of the ID of the check for future reference. Copies of applicants DBS check forms

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are not retained or stored by ESCV.

3.5 ESCV complies with the requirements of company law, and records are maintained and retained in accordance with the retention summary below.

3.6 Insurance policies and employer's liability insurance certificates and records relating to the ownership or leasehold of premises are securely stored and retained in line with the retention summary below.

3.7 Confidential hard copy records that are waiting to be destroyed are stored securely in a secure disposal bin located in the ESCV office, which are then regularly shredded or disposed of by a reputable company.

3.8 Any organisational assets (electronic devices or storage media) should be appropriately cleared of personal information in advance of or at the point of disposal (by a reputable company), and an appropriate record of disposal obtained and retained.

3.9 Any personal assets (electronic devices or storage media) used to access organisational systems should be appropriately cleared of all personal information and records in advance of a role with ESCV coming to an end.

4 Monitoring and review

4.1 The Board of East Sussex Community Voice has the ultimate responsibility for implementing and reviewing this policy. The Board will scrutinise our work on data protection and record retention to ensure that we meet our legal, ethical and operational commitments.

4.2 The East Sussex Community Voice Chief Executive holds the day-to-day responsibility for ensuring that this policy is implemented.

4.3 All staff, board members, volunteers or commissioned providers that deal with personal data are responsible for processing this data in full compliance with the relevant East Sussex Community Voice CIC policies and procedures.

4.4 This policy will be reviewed and updated on a two-year rolling basis by the East Sussex Community Voice Board.

4.5 All records relevant to administering this policy and procedure will be maintained for a period of five years, unless there are exceptional circumstances, and these will be authorised by the Chief Executive.

4.6 This policy may be revised sooner if there is a change in working premises, conditions or laws directly affecting data protection, record retention or any other aspect embedded in the document.

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5 Approval and Adoption

Author	Tahlia Lippett, Business Support Officer
Sponsor	Veronica Kirwan, Chief Executive
Date of approval and adoption	21st May 2026
Date of next scheduled review	May 2028

Signature of East Sussex Community Voice CIC Board Chair

Name	**Vanessa Taylor**
Signature	
Date	**22.06.26**

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Retention Schedule for East Sussex Community Voice CIC

Retention of records in East Sussex Community Voice CIC. **Employment: Staff, board and volunteer records should be retained for six years after the end of employment/term but need only to contain sufficient information to provide a reference (e.g. training and disciplinary records).** **Copies of any reference should be retained for six years after the reference request.** **Director's files should be kept for six years.**

Employment (Staff, Board, Volunteers and contractors)

Application form and selection material (unsuccessful candidates) *(Staff/Board/Volunteers)*	One year after interview date
Application form and selection material *(Staff/Board/Volunteers)*	Duration of employment/participation
References given/information to enable a reference to be provided *(Staff)*	Six years from the end of employment
References received *(Staff/Board/Volunteers)*	Duration of employment/paticipation
Annual appraisal, supervision and assessment records	Six years from the end of employment
Sickness and maternity records *(Staff)*	Six years from the end of employment
Annual leave records *(Staff)*	Six years from the end of employment
Unpaid leave/special leave records *(Staff)*	Six years from the end of employment
Records relating to an injury or accident at work *(Staff)*	12 years
Disciplinary records *(Staff)*	Six years after employment has ended
Statutory maternity pay records, calculations and certificates *(Staff)*	Three years after the end of the tax year in which the maternity period ends
Redundancy details, calculation of payments and refunds *(Staff)*	Seven years from the date of redundancy

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Photo/Media consent forms *(Staff/Board/Volunteers)*	Six years from the end of employment/participation
Note: if an allegation has been made about the member of staff, volunteer or trustee, the staff record should be retained until they reach the normal retirement age or for ten years, if that is longer. E.g. around Safeguarding.	
Public experience, e.g. observations, interviews, enter and view notes, surveys, research/engagement project data.	
Comments recorded on internal databases and project records	Five years from date of entry
Any paper-based comments recorded on ESCV systems (SmartSurvey/Feedback Centre).	One year from date of entry (This is in case there is a query regarding an entry on ESCV systems)
Comments and or other evidence that have not been recorded on the ESCV systems.	Five years from date of entry
Signed consent forms	Five years from date of collection
Contact details	
Mailing lists **(MailChimp)**	Retain until unsubscribed, request for deletion, notified of change or cleaned due to non-receipt of emails/responses.
Outlook contacts (Day-to-day contacts)	Retain until we receive a request to delete or are notified of a change of contact details.
Emails	Seven years from date of receipt
DBS checks	
Record disclosure reference number and date of the check (via scan of form stored in the individuals personnel folder) and return to the staff member, board member or volunteer.	

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Safeguarding concern recording forms	
All safeguarding concern forms and related information should be kept for ten years. If the record relates to children and young people, it must be kept until they are 21 years old before destruction.	
Financial records	
Income tax and National Insurance returns, income tax records and correspondence with HMRC	Six years (public-funded companies)
Payroll records (also overtime, bonuses, expenses)	Not less than six years after the end of the financial year to which they relate
Pension contribution records	Seven years
Pension Scheme Investment Policies	12 years from any benefit payable under the policy
Corporate	
Employers liability certificate	40 years
Insurance policies	Permanently
Certificate of incorporation	Permanently
Minutes of Board of Directors	Permanently
Memorandum of Association	Original to be kept permanently
Articles of Association	Original to be kept permanently
Variations to the governing documents	Variations to be kept permanently
Statutory registers	Permanently
Rental or hire purchase agreements	Six years after expiry
Others	

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Deeds of title	Permanently
Leases	12 years after the lease has expired
Accident Books	Three years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).
Health and Safety policy documents	Retain until superseded
Assessment of Risks under Health and Safety Legislation	Retain until superseded

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Appendix 1 - Terms and Definitions

General Data Protection Regulation (GDPR): The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Data Controller: the entity that determines the purposes, conditions and means of the processing of personal data

Data Processor: the entity that processes data on behalf of the Data Controller

Data Protection Authority: national authorities tasked with the protection of data and privacy as well as monitoring and enforcement of the data protection regulations within the Union

Data Protection Officer (DPO): an expert on data privacy who works independently to ensure that an entity is adhering to the policies and procedures set forth in the GDPR

Data Subject: a natural person whose personal data is processed by a controller or processor

Personal Data: any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person

Privacy Impact Assessment: a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data

Processing: any operation performed on personal data, whether or not by automated means, including collection, use, recording, etc.

Profiling: any automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour

Regulation: a binding legislative act that must be applied in its entirety across the United Kingdom

Subject Access Right: also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them.

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