

<b>Title:</b>	<b>Document Retention Policy</b>
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<b>Classification:</b>	<b>Public</b>

## 1. Introduction

The purpose of this policy is to ensure that the Dunhill Medical Trust preserves, stores and destroys documents and records, including those held electronically, in an appropriate manner and in accordance with legal requirements.

## 2. Retention of records

Records should be kept only for as long as they are needed to meet the operational need of the Trust and to meet current legal requirements. There are three key principles that determine what information needs to be retained.

- i) *Information that needs to be kept by law*  
Certain pieces of legislation set out types of information that should be kept and how long they should be kept for, for example, the Health & Safety at Work Act.
- ii) *Information that has ongoing business value*  
This is information that is of value to the Trust and is needed either for day to day activities or longer term strategic planning.
- iii) *Information that is of archival value*  
Information of historical and statistical value may be kept permanently, either electronically or in original paper format. For example, whilst legislation has changed relating to the length of time that signed Trustee meeting minutes need to be held, it may be felt appropriate to permanently hold these.

The Document/Records Retention Schedule at Appendix 1 provides more detail on the retention of documents and records within DMT.

## 3. Data protection legislation

The EU General Data Protection Regulation (GDPR), effective May 2018, requires that organisations must:

- Only keep information for as long as there is a business need
- Keep records secure, whether electronic or paper

## 4. Secure storage of documents and records

Paper documents are held within the Trust's offices in lockable cabinets.

Electronic documents and records are stored in accordance with the Trust's Information Security Policy and sub-policies.

## **5. Disposal of records**

Disposal of original records/documents that contain personal or confidential information will be carried out via a confidential waste destruction service and in accordance with the schedule at Appendix 1 below.

Electronic records will be deleted from the Trust's systems in accordance with the schedule at Appendix 1 below, and DMT's Information Security Policy and sub-policies. Data on any obsolete computer equipment will be fully cleaned by DMT's IT consultant prior to disposal.

## **6. Review**

This policy should be reviewed annually.

## Appendix 1 – Document/Records Retention Schedule

Record type	Format	Retention Period	Additional Information
<i>Governance Records</i>			
Board and Committee Minutes	Original signed copy; paper or electronically	Indefinitely	Charities Act 2006 states that minutes held on or after 1 Oct 2007 only need to be held for 10 years; minutes prior to that need to be held permanently. For historical value, it may be sensible to hold all signed minutes. These can be held electronically. (ICSA)
Board Meeting Agenda and Supporting Papers	Electronically	Indefinitely	Papers may be necessary to understand the minutes. (ICSA)
Committee Papers (Investment, Research Grants, Community Grants)	Electronically	Indefinitely	As above. (ICSA)
Strategic Plans	Electronically	6 years from completion	
Certificate of Incorporation	Original required	Life of company	With VWV; paper copies held at DMT
Memorandum of Association	Original	Life of organisation	With VWV; electronic copies held at DMT
Articles of Association	Original	Life of organisation	With VWV; electronic copies held at DMT
<i>Financial Records</i>			
Report and Accounts	Signed copy	Indefinitely	At least one signed copy should be kept for as long as the minutes of Board meetings (per ICSA guidance)
Invoices/Credit Card payments; income received	Electronically	6 complete financial years	PDF and Cashflow (pre 2017/18); Xero (from 2017/18);
Instructions to bank and bank statements	Electronically	6 complete financial years	
Budgets and internal financial reports	Electronically	6 complete financial years	Copies that form part of board papers should be retained for as long as the minutes (ICSA)
Audit Reports	Electronically	6 complete financial years	

Corporation Tax records	Electronically	6 complete financial years	
Electronic banking/financial systems	Electronically	6 complete financial years	Xero automatically removes records; removal of banking records will need to be arranged with C Hoare & Co
Grant payments made	Electronically	6 complete financial years	
Cheque book/paying in counterfoils	Originals	6 years	ICSA advice
<i>Insurance</i>			
Employers' Liability Insurance Certificates	Electronically	Indefinitely	HSE advice is that, whilst since 1 October 2008 there has been no legal requirement for employers to keep copies of out-of-date certificates, employers are strongly advised to keep, as far as is possible, a complete record of their employers' liability insurance.
Insurance Policies	Electronically	6 years	ICSA advice – to retain documents in accordance with accounting and tax requirements, or longer until any claims under a policy are settled.
Claims correspondence	Electronically	At least 3 years after settlement of a claim	ICSA advice
<i>HR</i>			
Applications and interview records for unsuccessful candidates	Electronically	At least 3 months after notifying unsuccessful candidates, but no longer than 12 months unless records are required to defend an action	ICSA advice
Personnel records, including recruitment, references, annual	Electronically	6 years after employment ceases	ICSA advice

appraisals, resignation/ retirement letters, disciplinary matters			
Contracts/Changes to terms and conditions	Electronically	6 years after employment ceases	ICSA advice
Staff/Trustee/Committee member bank details	Electronically	No longer than necessary	Employees – 3 years post employment; Trustees/Committee members once final expenses claim has been paid
Pension records	Electronically	75 years after employment ceases	
<i>Grant Records</i>			
Research and RTF Grants awarded – project information, organisation/grant holder, amount awarded, length of grant, date awarded, date completed, summary of grant, outcomes from the grant	Electronically	For Research Grants: 20 years from end of grant (aligned with the REF 20- year impact period)	Anonymised grant information will be held indefinitely for statistical purposes only
Community Grants awarded – project information, organisation/grant holder, amount awarded, length of grant, date awarded, date completed, summary of grant, outcomes from the grant	Electronically	For Community Grants: 5 years from end of grant;	Anonymised grant information will be held indefinitely for statistical purposes only
Signed grant acceptance	Original signed copy	For the duration of the grant	
General grant correspondence	Paper copies  Electronically	For the duration of the grant  For Community Grants: 5 years from end of grant;	

		For Research Grants: 20 years from end of grant	
Unsuccessful grant applications - outline	Electronically	5 years from date of rejection	
Unsuccessful grant applications - full	Electronically	5 years from date of rejection	
Grant holder bank details	Electronically	No longer than necessary	For duration of grant
Peer reviewers	Electronically	Indefinitely	Contact details held for potential peer reviewers in future grant rounds
<i>Miscellaneous</i>			
General Correspondence/ Emails	Electronically	No longer than necessary – generally no more than 2 years	
Complaints	Electronically	3 years	
<i>IT</i>			
Back-ups	Externally held	90 days	Our IT consultant runs back-ups every day and these are retained on a 90 day rolling basis.
<i>Health &amp; Safety</i>			
Health & Safety Policy	Electronically	? 10 years	ICSA advice that previous versions should probably be kept permanently or until the risk of any claim or prosecution has expired. However, being a small office we probably only need to hold for, say, 10 years
Fire Risk Assessment	Electronically	Until a further assessment has taken place	ICSA guidance
Record of any reportable incidents	Electronically	Three years from date of entry for each incident	ICSA suggests although legal requirement is three years, records should be held permanently

Accident Book	Paper Accident Book (though can be held electronically)	Three years from date of entry for each incident	ICSA suggests although legal requirement is three years, records should be held permanently
<i>General</i>			
Information regarding DMT events, impact reports, etc	Electronically	DMT spreadsheet to be deleted after each mailing	Mailings are sent out via Mailerlite; to ensure DMT uses up-to-date mailing following individuals' opt-in or opt-out preferences spreadsheets are to be deleted following each mailing.
DMT registration lists and surveys	Electronically	To be deleted after each event/survey completion date	Information held on SmartSurvey to be deleted following the survey/registration closing date
Equality Diversity and Inclusion Data	Electronically	Indefinitely for statistical purposes	Information held on a password protected spreadsheet in an anonymous format.