



Document Control and Retention Policy

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Prepared by	Clare Ruxton, Director of Corporate Services
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OSPREY DOCUMENT CONTROL AND RETENTION POLICY STATEMENT

Policy Statement

Osprey Housing believe that effective and efficient Document Control and Retention is vital to the success of maintaining good quality services for all our tenants and providing value for money.

We embrace robust document management and this is encompassed in our Core Values;

- **Ambition and Achievement** – we are a high performing organisation delivering through innovation and challenge
- **Equality and Respect** – we recognise and celebrate the unique value in everyone
- **Quality and Professionalism** – we strive to deliver high standards
- **Agile and Responsive** – we are flexible and quick to deal with change without diminishing our delivery

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1. Introduction

The aim of this Policy is to establish a consistent and robust method for preparing and handling documentation within the Osprey. It applies to the development and review of all policies, procedures and standard form templates within the Osprey.

2. Policy Principles

The purpose of this policy is to ensure that all policies, procedures and standard documents are:

- Accessible and understood by all staff who use them.
- Produced in the same format using an agreed naming convention and corporate identity.
- Approved by the appropriate member of staff or the Board.
- Kept up to date and archived or deleted as required.

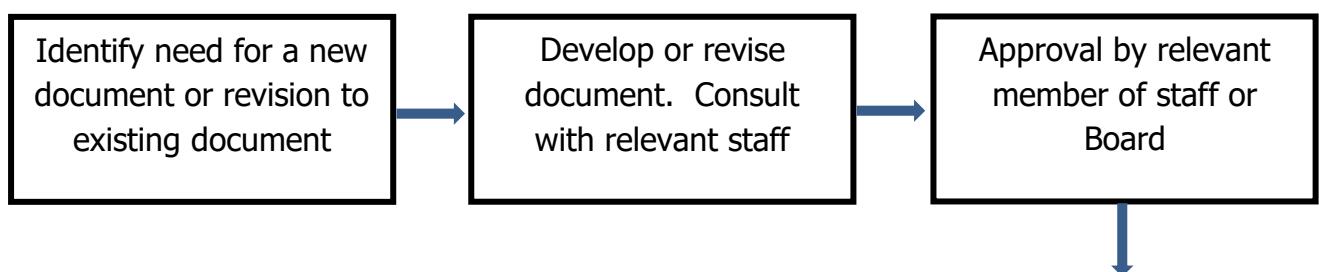
This policy applies to all members of staff who write or approve documents formal documents for Osprey Housing.

All documents are controlled by the Senior Leadership Team in conjunction with Corporate Services who will keep the master log of all documents covered by this Policy. Once a document has been approved the Master Document will be stored within the appropriate folder in SharePoint.

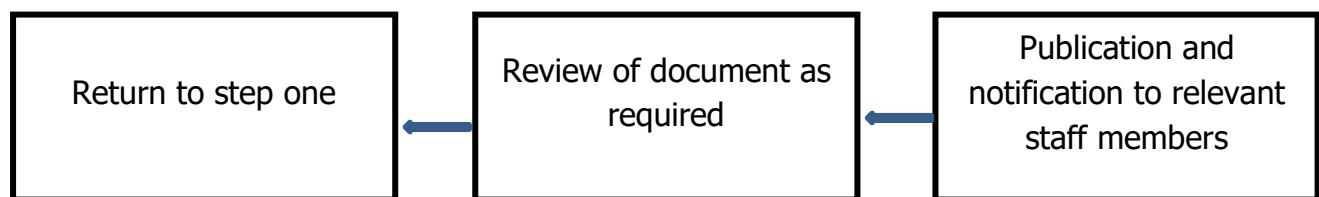
3. Document Control

3.1 Development, Approval and Review of Controlled Documents

The following steps set out a summary of the life cycle of a controlled document and are described in more detail below:



Before developing a document the responsible person should be able to justify the need for the document and ensure that it is not a duplicate of an existing document. All documents should be written in a style which is concise and clear using unambiguous terms and language.



Every controlled document should be typed using Tahoma 12 font and must clearly state:

- Who created the document – name and title
- Who approved the document and when
- The document's status (draft, approved, under review)
- The document's version number excluding tenant documents and forms

The following naming conventions should be used for all controlled documents:

XXXX Policy/Form FIN/GCS/HM/AM/HR Y.Y Version Z.Z

An initial draft should be reviewed by key personnel to ensure details of the document are correct and fit for purpose.

The type of document determines the forum for final approval:

- Policies should be approved by the relevant subcommittee of the Board and/or the Board. The approval must be minuted. (See Schedule of Delegated Authority for further information).
- Standard form templates can be approved by the relevant member of the SMT.

The original final version of a document should be labelled Version 1.0.

Depending on the type of document, staff will be notified of relevant new or revised documents by the Corporate Services Team or their line manager.

Responsible persons are expected to keep their documents up to date to reflect changing practices and legislation. Documents must be reviewed once every 3 years and should be reviewed earlier if there is significant change in practice or legislation.

The Corporate Services Team will keep records of review dates and will notify the responsible person when a review is due. The Corporate Services Team will remove out of date documents from the electronic filing system, archive them and replace them with new versions.

If a policy has been updated and there is no significant change in practice final approval can be granted through delegated authority by the Chair and Vice Chair of the relevant Board Sub-Committee.

Please note that standard letters are not covered by this Policy – it is the responsibility of each senior manager to ensure that the correct version of their standard letters are available to all staff and recorded in the standard letters and documents register.

4. Document Retention

4.1 Guiding Principles

Through our data retention practices, we aim to meet the following commitments:

- We comply with legal and regulatory requirements to retain data.
- We comply with our data protection obligations, in particular, to keep personal data no longer than is necessary for the purposes for which it is processed.
- We handle, store and dispose of data responsibly and securely.
- We create and retain data where we need this to operate our business effectively, but we do not create or retain data without good business reason.
- We allocate appropriate resources, roles and responsibilities to data retention.
- We regularly remind employees of their data retention responsibilities.
- We regularly monitor and audit compliance with this Policy and update this Policy when required.

4.2 Role and Responsibilities

We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised good practices. All employees must comply with this Policy. Failure to do so may subject us to serious civil and/or criminal liability.

The Director of Corporate Services in conjunction with the Senior Leadership team is responsible for identifying the proper period of retention for our data and for providing guidance and training to employees in relation to this Policy. Employees are, however, responsible for handling the destruction of data whose retention period has expired. Senior Leadership team members have the ultimate responsibility to ensure data from their departments is being retained/disposed of appropriately.

4.3 Recommended Retention Periods

Certain data is more important to us and is therefore listed in the recommended retention periods set out in the Schedule to this Policy as being required to be retained permanently. This may be because we have a legal requirement to retain it permanently (so that we can produce it in the future), we may need it as evidence of our transactions or it is important to the running of our business.

Some data may be discarded or deleted once it has served its useful purpose or the period for bringing any claims against us has expired. The recommended retention periods set out in the Schedule to this Policy specify time periods for the retention of such data. Such data should not be retained beyond this period, unless a valid and strong business reason justifies its continued retention. If employees are unsure whether to retain certain data beyond the recommended retention period, they should consult the Corporate Services team.

If data is not listed in the recommended retention periods set out in Appendix 1 of this Policy, employees should consult the Corporate Services team for guidance.

4.4 Disposal and Destruction of Data

Hard copy data must be destroyed by shredding via the external contractor and electronic data must be deleted securely in a manner that it cannot be reconstituted after it has been deleted. Hard disk drives must be securely destroyed. No hard copy data should be destroyed by recycling.

Data must not be destroyed if the Director of Corporate Services confirms that its continued retention is relevant and necessary for the purposes of legal proceedings in which we are involved.

4.5 Failure to Comply

Osprey take compliance with this policy very seriously. Failure to comply with the policy may lead to disciplinary action for an employee under our procedures, and this action may result in dismissal for gross misconduct.

Any questions or concerns about this Policy should be directed to the Corporate Services team.

5. Equal Opportunities

Osprey shall strive to ensure equality of opportunity, and by definition, that all individuals are treated fairly regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We oppose, and shall adopt a zero tolerance stance towards, all forms of unlawful discrimination, harassment and victimisation. In this regard, Osprey acknowledges the protected characteristics and types of unlawful behaviour defined within the Equality Act 2010. As a minimum all practices shall aim to ensure compliance with the legislative provisions therein.

5. Monitoring & Reporting

We shall monitor this policy in conjunction with our other policies and procedures to ensure that it is being adhered to.

6. Review

This policy will be reviewed every 3 years unless an earlier review is required due to:

1. changes to applicable legislation, rules, regulations and guidance, both those which affect Osprey directly and those which affect the resources available to significant numbers of our customers to enable them to sustain tenancies;
2. changes in the organisation;

3. continued best practice.

Appendix 1
RECOMMENDED DATA RETENTION PERIODS

Type of Data	Recommended Retention Period
Governance and Management	
Certificate of registration as a registered social landlord from SHR Confirmation of registration as a Scottish charity from OSCR Confirmation of charitable status from HMRC Certificate of registration as a registered society with the FCA Certificate of registration as a care provider with the Care Inspectorate Rules and Standing Orders	Permanent
Applications for membership	5 years from date of end of membership
Full membership register Abbreviated membership register Register of share certificates Register of tenant organisations	Permanent
Board member declarations of interest Board member documents, including appointment letters and bank details	6 years from end of membership
Board (and AGM and SGM) minutes and resolutions (including special resolutions)	Permanent
Board (and AGM and SGM) papers (including notice of Board meetings, AGMs and SGMS)	6 years from date of issue
Register of Board members	Permanent
Register of payments and benefits Register of gifts and hospitality	10 years from date of register entry
Annual return on the Scottish Social Housing Charter, including supporting information	5 years from date of submission
Annual return to the FCA	Permanent
Business plans and supporting documentation	5 years from date of completion

Type of Data	Recommended Retention Period
Business continuity plans	
Risk registers	Permanent
Housing Management and Financial Inclusion/Income Maximisation	
Housing application form (including equalities and medical information) Tenancy offer letters Tenant visit records Tenancy agreement Emergency contact information/next of kin Correspondence to and from tenants Tenants' contact details Tenants' identity documentation Pet permissions Alterations permissions Changes to tenancy, including assignations, changes to joint tenancy, mutual exchange requests, sublets and succession forms and letters Powers of attorney/mandates of authority Guardianship documentation Tenancy reference requests (received and provided) Housing Benefit related documentation, including applications, claims (including reinstatement claims), consent mandates and correspondence to and from local authority Housing Benefit department Universal Credit related documentation Referrals for money and benefits advice Correspondence to and from DWP Correspondence to and from local authority Social Work department Correspondence to and from support agencies Occupational therapists' reports Anti-social behaviour incidents, including Police reports, complaints, witness statements and noise recordings End of tenancy form Eviction case files Void process documentation Communications with local authority regarding allocations	6 years from date of end of tenancy (including moves)

Type of Data	Recommended Retention Period
Diary notes on document management system Court letters, documents and notices of proceedings, court reports, correspondence with solicitors and correspondence to and from Shelter	
Abandonment files	6 years from the date of end of tenancy
Unsuccessful housing applications	6 years after notification of outcome of application
Tenant general (non-repair) satisfaction surveys and consultations	6 years from date of completion
Advice regarding benefits, debts arrears reduction and income maximisation, including details of referrals to, and contact with, other agencies	6 years from the date of end of tenancy
Maintenance and Works	
Gas records	6 years from date of inspection
Decanting records Inspection / complaint file notes	6 years from date of end of tenancy
Affordable Housing Supply Programme Funding documentation for adaptations Correspondence with tenant re: works and adaptations	6 years from date of completion of works
Works orders	Permanent
Stock condition surveys	2 years from date of survey
Electrical records	6 years from date of inspection
Insurance claims	Depends on the requirements of the insurer (but minimum of 6 years from date of claim)
Tenant repair satisfaction surveys and consultations	6 years from date of completion
Factoring	

Type of Data	Recommended Retention Period
Factoring agreement	6 years from date of termination of factoring agreement
Communal work requests	6 years from the date of termination of factoring agreement
Finance, Pensions and Insurance	
Accounting records (including cheque counterfoils, bank statements and reconciliations and charitable donations made) Auditing records Balance sheets and supporting documents VAT records and correspondence Invoices Credit and debit notes Cash records, including petty cash Creditor and debtor accounts Orders and delivery notes Budgets and internal financial reports	7 years from the end of the relevant financial year
Signed versions of accounts Grant funding (HAG, etc.)	Permanent
Tax returns	10 years from the end of the relevant financial year
Tenant financial information, including bank details	7 years from the date of final payment
Rent payments, rent statements and rent refunds Arrears correspondence Debt recovery, earnings and bank arrests Bankruptcy information	6 years from date of end of tenancy
Employee salary records, records of overtime, bonuses and benefits in kind Pay As You Earn (PAYE) records, including wage sheets, deductions, working sheets, calculations of the PAYE income of employees and relevant	7 years from date of termination of employment

Type of Data	Recommended Retention Period
<p>payments to them, the deduction of tax from, or accounting for tax in respect of, such payments</p> <p>Copies of notices to employees (e.g. P45, P60)</p> <p>HMRC correspondence in relation to tax codes, pay and tax details</p> <p>Travel and subsistence payments (including expense claims and payments), season ticket advances and loans to employees</p> <p>Employee income tax records</p> <p>Records of income on which National Insurance contributions are payable</p> <p>Records of employer's and employee's National Insurance contributions</p> <p>Correspondence with HMRC</p> <p>National minimum wage requirements records, including hours worked</p> <p>Statutory sick, maternity, paternity and shared parental pay records, calculations, certificates or other evidence</p> <p>Leave records</p>	
<p>Pension actuarial valuation reports</p> <p>Returns of pension fund contributions</p> <p>Annual reconciliations of pension fund contributions</p>	Permanent
Documentation relating to retirement benefits	Permanent
Current and former insurance policies and certificates	Permanent
Annual insurance schedules	6 years from the end of period of insurance
Information Requests and Complaints	
<p>GDPR subject access request register</p> <p>Third party disclosure register</p> <p>Environmental information request register</p>	6 years from date of register entry
GDPR subject access request case files, personal data provided, including legal advice and internal communications regarding request	3 years from date of response/last contact

Type of Data	Recommended Retention Period
Environmental information request case file, including record of correspondence with applicant and information provided	
Complaints to the Information Commissioner (GDPR) and the Scottish Information Commissioner (environmental information) Complaints (including stage 2 complaints, correspondence with the SPSO and complaints performance reports) Data security incident and breach investigation documentation	6 years from date of last action/report production/end of investigation
GDPR general compliance records	3 years
Data security incident and breach register	Permanent
Health and Safety	
Health and safety assessments Health and safety policy statements Records of consultations with safety representatives	Permanent
Health and safety statutory notices	6 years after compliance
Records of reportable injuries, diseases or dangerous occurrences, including reportable incidents, reportable diagnoses and injury arising out of accident at work (and associated investigations and the accident book)	5 years from date of the entry
Records of reportable injuries, diseases or dangerous occurrences, including reportable incidents, reportable diagnoses and injury arising out of accidents involving children (and associated investigations and the accident book)	Depends on the requirements of the insurer (but minimum of 25 years)
Record of employees exposed to asbestos dust, including health records of each employee Medical records and details of biological tests under the Control of Lead at Work Regulations Medical records specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record

Type of Data	Recommended Retention Period
Records of monitoring of exposures to hazardous substances (where exposure monitoring is required under Coshh)	<p>Where the record includes the personal exposures of identifiable employees, 40 years from the date of the last entry made in the record</p> <p>Otherwise, 5 years from the date of the last entry made in the record</p>
Records of tests and examinations of control systems and protective equipment under Coshh	5 years from the date on which the record was made
Recruitment and Human Resources	
Rejected job applicant records, including application letters or forms (including equal opportunities monitoring forms), CVs (including copies of qualifications), references and other pre-employment checks, interview notes, assessment and psychometric test results and correspondence concerning application	6 months from date of notification of rejection
Application records of successful candidates, including application letters or forms (including equal opportunities monitoring forms), CVs (including copies of qualifications), references and other pre-employment checks, interview notes, assessment and psychometric test results and correspondence concerning employment	7 years from date of termination of employment
Criminal records requirement assessments for a particular post, consisting of criminal records information forms and the recorded outcomes of Disclosure Scotland checks	<p>12 months after the assessment was last used</p> <p>All other information, as soon as practicable after the check has been completed and the outcome recorded, unless the DPO assesses – in exceptional circumstances – that retention is relevant to the ongoing employment relationship, in which case, maximum retention</p>

Type of Data	Recommended Retention Period
	period of 6 months after the check has been completed
Copies of identification documents	2 years from date of termination of employment
Identification documents of foreign nationals (including right to work)	2.5 years from date of termination of employment
Employment contracts, including personnel and training records, written particulars of employment and changes to terms and conditions of employment Employee performance and conduct records, probationary period reviews, review meeting and assessment interviews, appraisals and evaluations and promotions and demotions Death benefit nomination and revocation forms Resignation, termination and retirement records Grievances Collective workforce agreements Records concerning temporary employees	7 years from date of termination of employment
Disciplinary investigations, including warnings	6 months after conclusion of investigation or expiry of warning
Records relating to and/or showing compliance with Working Time Regulations, including registration of work and rest periods and working time opt-out forms	3 years from the date on which the record was made
Trade union agreements	10 years after ceasing to be effective
Occupational health records	40 years after completion of assessment
Redundancy records	7 years from date of redundancy
Contracts and Procurement	
Transfer Agreement	30 years after the date of stock transfer
Contracts executed under seal	20 years after the end of the contract

Type of Data	Recommended Retention Period
Contracts for the supply of goods or services, including professional services Documentation relating to small one-off purchases of goods and services where there is no continuing maintenance or similar requirement Licensing agreements Rental and hire purchase agreements Indemnities and guarantees	6 years after the end of the contract
Loan agreements Right to buy sale documents	Permanent
Forms of tender	6 years after notification of award decision
Document relating to unsuccessful tenderers	3 years after contract award
Documents relating to successful tenderers	6 years after the end of the contract
Property Records	
Leases and titles to property	20 years after the end of the lease / ownership ceases
Development documentation	Permanent
Wayleaves, licences and servitudes	20 years after the rights that were granted or received cease to exist
Planning and building control permissions Title searches undertaken prior to purchase of property	20 years after ownership ceases
Property maintenance records	Permanent
Vehicles	
Ownership and registration documentation Maintenance records, including MOT tests and servicing Mileage records	2 years after the date of disposal of vehicle

Type of Data	Recommended Retention Period
PR, Communications and Website	
Newsletter distribution lists (post)	Until the recipient opts out of receiving the newsletter
Social media posts	Depends on internal business requirements
Website contact forms / requests / enquiries / complaints	Delete as soon as the form / request / enquiry / complaint has been transferred to the document management system, although the original may be retained for audit trail purposes
Photographs (including consent forms, where available)	Until the subject of the photograph objects to their photograph being used
Office and Administration	
Digital Visitor book entries	6 months from date of visit