



Zambia Orphans Aid UK

Charity records retention policy

Date of last review: April 2018

Date of next review: April 2020

Owner: Executive Director

1. INTRODUCTION

- 1.1. The main aim of this policy is to enable Zambia Orphans Aid UK to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Zambia Orphans Aid UK is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period. Data Protection Officer shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.5. If a document or information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to Data Protection Officer who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.



2 DOCUMENT RETENTION PERIOD

DOCUMENT CATEGORY	RETENTION PERIOD	REASON
Corporate/Constitutional		
Company Articles of Association, Rules/bylaws	Permanent	To comply with Companies Act 2006 and Charities Act 2011
Charity Registration certificate	Permanent	To comply with Charities Act 2011
Change of Objects certificates	Permanent	To comply with Charities Act 2011
Trustee minutes of meetings and written resolution	At least 10 years	To comply with Companies Act 2006 and Charities Act 2011
Documents of clear historical/archival significance	Permanent	Historical interest and to tell the story of ZOA
Contracts/MoUs with funders, grantees	Length of contract plus 6 years	To comply with Limitation Act 1980
Contracts executed as deeds	Length of contract plus 12 years	To comply with Limitation Act 1980
IP records and legal files re provision of services	Life of service	To comply with Limitation Act 1980



	provision or IP plus 6 years	
Insurance		
Public & Employers Liability Insurance – being introduced at present due to ZOA-UK recruiting its first employee in Jan 2018	Permanent – when in place	To comply with Employer’s Liability (Compulsory Insurance Regulation) 1998
Policies – when in place	3 years after lapse	To confirm cover and terms
Pension Records		
ZOA-UK is putting in place an employee pension scheme at present, as we recruited our first salaried employee in Jan 2018.		To comply with Pension Regulations www.thepensionsregulator.gov.uk
Tax and Finance		
Annual Accounts and Review	Permanent	To comply with Companies Act 2006 and Charities Act 2011
Tax and accounting records	6 years from end of relevant tax year	To comply with Finance Act 1998 and Taxes Management Act 1970



Information relevant for VAT purposes	Minimum 6 years from end of relevant period	To comply with Finance Act 2006 and HMRC Notice 700/21
Banking records/receipts book/sales ledger	6 years from transaction	To comply with Companies Act 2006 and Charities Act 2011
Deed of covenant / Gift Aid declarations and correspondence re donations	6 years after last payment or 12 years if payments are outstanding or dispute over deed	As part of tax records
Legacy correspondence and financial records	6 years after completion of estate administration	As part of financial records
Employees/Administration		
Payroll/employee income tax and NI records: P45; P6; PIID; P60 etc	6 years from end of current year	To comply with Taxes Management Act 1970/ IT (PAYE) Regulations
HR files	Maximum 6 years from end of employment	To comply with Limitation Act 1970 and Data Protection regulation
Records re working time	2 years	To comply with working time regulations 1998 as amended



Job applications (CVs and related materials re unsuccessful applicants)	6-12 months from notification of outcome of application	To comply with ICO Employment Practices Code (recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976
Pre-employment/ volunteer vetting	6 months	To comply with ICO Employment Practice Code
Volunteer records	12 months after volunteering completed	To provide reference, if appropriate



3. DELETION OF DOCUMENTS

3.1 When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

3.2 This should be shredded.

3.3 Anything that contains personal information should be treated as confidential.

3.4 Where deleting electronically, please refer to Data Protection Officer to ensure that this is carried out effectively.

Other documentation

3.5 Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

3.6 Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact Data Protection Officer.

Individual responsibility

3.7 Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

3.7.1 Has the information come to the end of its useful life?

3.7.2 Is there a legal requirement to keep this information or document for a set period?

3.7.3 Would the information be likely to be needed in the case of any legal proceedings? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

3.7.4 Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

3.7.5 Is the document of historic or statistical significance?

3.8 If the decision is made to keep the document, this should be referred to Data Protection Officer and reasons given.