



# Freedom of Information Policy

Policy Valid From	29 October 2019
Last Review date	29 October 2019
Next Review Date	28 October 2022

## 1. Introduction

- 1.1 Following an Order made by Scottish Parliament, registered social landlords (and their subsidiaries) are now subject to FOI law and, for the purpose of freedom of information, are deemed to be a Scottish public authority. This came into effect on 11 November 2019.
- 1.2 The Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 provide a right of access to recorded information, and to environmental information respectively, held by public authorities. Any person who makes a request to a public authority for information is entitled to receive that information, subject to exemptions.
- 1.3 Berwickshire Housing Association (BHA) is committed to the principles of openness and transparency and the accountability that underpin this information rights legislation.

## 2. Aims and objectives

- 2.1 This policy aims to set out the responsibilities of BHA and its staff in publishing and providing information that falls within the freedom of information legislation and guidance.
- 2.2 The document retention schedule is attached at Appendix 1 and is based on the National Housing Federation's document retention guideline and schedule. This document should be read in conjunction with the freedom of information policy to ensure the information held by BHA is relevant, up-to-date and accurate.

## 3. Legislation overview

- 3.1 The Freedom of Information (Scotland) Act 2002 places three main duties on authorities which must be met in order to comply with our FOI responsibilities.
  1. **Duty to Publish** – authorities must publish information about the work they do, the decisions they take and the services they provide
  2. **Duty to respond to requests** – authorities must respond to the requests for information they receive
  3. **Duty to advise and assist** – authorities must help people who want to access their information

## 4. Responsibilities

- 4.1 All staff are responsible for freedom of information and should follow the guidance set out in this policy and the accompanying procedures when dealing with requests for information. Any failure to apply the policy and procedures that results in BHA's failure to comply with its legal obligations, may lead to disciplinary proceedings.

- 4.2 BHA's FOI Co-ordinator is the Corporate Services Manager. The FOI Co-ordinator has responsibility for co-ordinating the Freedom of Information Policy within BHA. The FOI Lead is the Corporate Support Administrator and will assist the co-ordinator with these duties. Any freedom of information enquiry to BHA should initially be referred to the FOI Lead as the identified contact person and then channelled to the appropriate member of staff. In the absence of the FOI Lead the enquiry should be referred to the FOI Co-ordinator.
- 4.3 The FOI Lead will be responsible for the day-to-day administration of all requests for information and may task Directors and Managers with arranging for requested information to be made available. The FOI Co-ordinator will be responsible for reviewing and releasing the response. The FOI Lead will also be responsible for ensuring that all actioned FOI requests are published on BHA's website.
- 4.4 The FOI Lead will be responsible for maintaining BHA's Model Publication Scheme (MPS) and Guide to Information, ensuring that all valid information is published on the website. They will be responsible for archiving old information once it has been removed from the MPS.
- 4.5 The FOI Lead will be responsible for maintaining the FOI tracker spreadsheet and will retain a record of all information requests, including the recording of search evidence.
- 4.6 The FOI Co-ordinator will be responsible for all dealings with the Scottish Information Commissioner, including regular reporting on the requests for information received and consulting with them in the event of a complaint or investigation.
- 4.7 Each Manager has overall responsibility for their department/s and needs to ensure that staff members are aware of the FOI policy and procedures. On receipt of a request for information they will be responsible for the provision of the information held by their department/s in order for the information to be assessed for release.
- 4.8 The Resource Director will be responsible for any internal reviews that may be requested by the applicant and in the absence of the Resource Director this will fall to the Finance Director.

## **5. Model Publication Scheme**

- 5.1 BHA is committed to openness and transparency and in line with the duty to publish requirements, has formally signed up to the Model Publication Scheme 2018 created and approved by the Scottish Information Commissioner. The MPS outlines the information BHA should be proactively publishing, and what information and guidance BHA must offer to the public to facilitate their access to information.

- 5.2 BHA will publish all relevant classes of information, as defined by the MPS, on our website, alongside our Guide to Information which provides the public with an index to the information available, how to access it if it is not routinely published, what fees may be charged for accessing information and how to contact us should they wish to make a request or seek advice.
- 5.3 BHA will continue to update the Guide to Information when new information is published and will retain information for the current plus two financial years. Older information will be removed but retained for a period of **seven** financial years, to enable us to facilitate requests for information no longer on the guide.

## 6. Freedom of Information Requests

- 6.1 BHA will treat all requests for information fairly and without prejudice. There will be no consideration given to previous interaction with the requester save for cases of vexatious or repeated requests for information. Similarly, no consideration will be given towards the perceived motivations for the request for information.
- 6.2 BHA has 20 working days in which to respond to a valid request for information. There is a provision that will allow BHA to ‘stop the clock’ where it is necessary to seek clarification from the requester. This provision should not be used to stall the response or a means to avoid the 20 working day timescale.

If it is determined that a charge should be made for the provision of the information, it is permitted to ‘stop the clock’ until payment has been received.

## 7. Exemptions

- 7.1 There are some exemptions within FOI legislation, where access to information can be denied. Those exemptions can be categorised as absolute and non-absolute.

<b>Absolute Exemptions</b>	
Section 25	Information otherwise accessible and available (e.g. published online)
Section 26	Prohibitions on disclosure (e.g. would constitute a contempt of court to disclose)
Section 36 (2)	Confidentiality (e.g. constitutes a breach of confidence actionable by a third party)
Section 37	Court Records
Section 38	Personal information (e.g. where the applicant is the subject of the information requested, personal census information)

<b>Non-absolute Exemptions</b>	
Section 27	Information intended for future publication within 12 weeks
Section 28	Relations within the UK – prejudice relations between the UK, including the Scottish Administration, and any other such

	administration.
Section 29	Formulation of Scottish Administrative Policy – e.g. government policy
Section 30	Prejudice to the effective conduct of public affairs e.g. prejudicial to the collective responsibility of Scottish Ministers
Section 31	National security and defence
Section 32	International Relations
Section 33	Commercial interests and the economy e.g. trade secret, is likely to prejudice substantially the commercial interests of any person (including Scottish Public Authority)
Section 34	Investigations by Scottish public authorities and proceedings arising out of such investigations e.g. report to the Procurator Fiscal concerning possible prosecution.
Section 35	Law enforcement
Section 36(2)	Confidentiality
Section 38 (1)(b)	Personal Information
Section 39	Health, safety and the environment e.g. likely to endanger the physical or mental health or the safety of an individual.
Section 40	Audit functions e.g. prejudice the examination of the economy, efficiency and effectiveness with which such local authorities use their resources in discharging their functions.
Section 41	Communications with Her Majesty etc and Honours e.g. communications with Her Majesty with other members of the Royal Family or with the Royal household.

7.2 Non-absolute exemptions are subject to the public interest test, which means the information can only be withheld if the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

## 8. Vexatious or repeated requests

8.1 There is no compulsion to comply with an FOI request if it is deemed to be vexatious in nature. There is no set test in place to determine what is and what is not vexatious but some factors to consider are:

- Would the request cause a significant burden?
- Is there no genuine purpose to making the request?
- Is the request designed to cause disruption?
- Is the request intended to harass staff?
- Is the request inherently unreasonable?

8.2 Questions of whether a request is vexatious in nature should always be applicant blind, a request should not be denied purely on the grounds of previous unrelated behaviours. Generally, it would be wise to err on the side of not considering a request to be vexatious.

Repeated requests can be denied if the information previously provided, or circumstances justifying the denial of the previous request, have not changed.

## **9. Protecting commercial interests**

- 9.1 Under section 33 of FOISA we have the ability to deny the disclosure of information if it would prejudice the commercial interests of any person. For example, we have engaged in a tendering process and have appointed a contractor to carry out the work tendered for. If an unsuccessful contractor (or any other contractor working in the same line of work) were to submit an FOI request for information relating to the tender we would need to consider the commercial interests of the contractor. To provide this information may allow the requester to structure future tenders in a favourable way in order to make their bid more attractive and give a competitive advantage.
- 9.2 In such an instance we are advised to contact the successful contractor and seek their view as to what aspects of their tender they would consider to be commercially sensitive and would be against their commercial interest to provide to a competitor. It would then need to be determined whether the public interest in releasing the information outweighed the commercial interests of the successful contractor.

## **10. Fees**

- 10.1 FOI legislation allows for the charging of a fee for access to information in specific circumstances. There are strict controls on how much can be charged and these are outlined in our Guide to Information.

## **11. Accessing published information**

- 11.1 The Model Publication Scheme 2018 requires BHA to make certain categories of information available on our website. If a request for information that is routinely published under the MPS but the requester is unable to or does not want to access via the website and is unable or unwilling to travel to our offices to view the information in person we are able to charge a fee to provide the information in hard copy format.
- 11.2 In such circumstances BHA is entitled to recoup the cost of providing the hard copy of information. This will include the charging for the cost of printing/photocopying and the cost of postage. It is not permissible to charge any more than the costs to BHA to provide the information in this format.

## **12. Accessing unpublished information**

- 12.1 When a request for information is made and the information is not available via the Model Publication Scheme, BHA is entitled to charge a fee for the work required to gather and provide the information.
- 12.2 The fee should be based on the costs incurred in the gathering of data. Costs include; photocopying/printing, postage and staff's time. Charges for staff time should be calculated per member of staff per hour they have spent based on their hourly salaried rate. It should be noted that this is capped at £15 per hour.

- 12.3 If the total costs come to less than £100 then we are unable to charge a fee. If the total costs are between £100 and £600 then 10% of the cost can be charged. If the total costs are greater than £600 then there is cause to deny disclosure of information based on excessive cost. However, under our duty to advise and assist we should notify the requester of the cost involved and see if it is possible to amend the request to reduce the costs incurred.

### **13. Reporting to the Scottish Information Commissioner (SIC)**

- 13.1 The SIC requires BHA to report on a quarterly basis with details of the requests we have received. This is done via the SIC's online portal.

### **14. Appeals and Complaints**

- 14.1 A requester has the right to appeal if they are unhappy with the response received. In such an instance the requester has the right to ask for an internal review. This review must be carried out by someone other than the FOI Lead/Co-ordinator who collated and responded to the original request.
- 14.2 If the requester is still not satisfied with the response to their appeal, they should be advised of their right to take their appeal to the Scottish Information Commissioner, who on review will issue a 'decision notice' which may result in BHA to act within a given timeframe. Failure to comply with this 'decision notice' could result in the matter being escalated to the Court of Session.
- 14.3 If the requester has a complaint regarding any element of the Freedom of Information Policy or procedure this should be dealt with under the appropriate section of the complaints process.

### **15. Training**

- 15.1 BHA will provide all staff with appropriate training and guidance on the Freedom of Information (Scotland) Act 2002, its importance and their responsibilities in complying with the legislation.
- 15.2 New members of staff will be provided with an FOI briefing within their induction pack.

### **16. Data Protection**

- 16.1 BHA will comply with both the Data Protection Act 2018 and the General Data Protection Regulations. Our full privacy policy can be found on the BHA website – [www.berwickshirehousing.org.uk](http://www.berwickshirehousing.org.uk)

### **17. Anti-Bribery**

- 17.1 BHA is committed to the highest standards of ethical conduct and integrity in all its activities and, to ensure compliance with the Bribery Act 2010, we have a Code of Conduct for all staff, Board Members and associated persons or

organisations acting for or on behalf of BHA when undertaking any actions referred to in this policy.

## **18. Equality, Diversity & Inclusion**

18.1 BHA aims to promote equality and diversity and operate equal opportunities policies which inform all aspects of its business. It will ensure that it adheres to the Equality Act 2010 by being committed to equal and fair treatment for all and opposed to any form of unlawful discrimination.

18.2 As such, in considering this policy, no one will be treated differently or less favourably than others because of any of the protected characteristics as listed in the Equality Act 2010:

- Disability
- Gender
- Gender reassignment
- Pregnancy and maternity
- Race, colour or nationality
- Sexual orientation
- Religion or belief

18.3 Or because of any other condition or characteristic which could place someone at a disadvantage were it to be taken into account, unless this can be objectively justified in terms of the legislation.

18.4 BHA will make reasonable adjustments for disabled people where necessary and possible to do so.

18.5 Upon request, BHA will make information available in alternative formats, such as large print, tape and braille to overcome communication barriers.

## **19. Policy Review**

19.1 This policy will be reviewed every three years. The purpose of the review is to assess the policy's effectiveness and adhering to current legislation and good practice, as well as identify any changes which may be required.

## **20. Documentary References**

20.1 In all BHA's official documents, where references are made to specific job titles, roles, groups or committees, such references shall be deemed to include any changes or amendments to these job titles, roles, groups or committees resulting from any restructuring or organisational changes made within the Association (or, where this policy also applies to another member of the BHA group, made within that group member) between document reviews.

Appendix 1

Document overview			Retention Schedule				
Reference	Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period	Action at end of retention period	Retention source
<b>1. Governance</b>							
1.1	Governance	Organisation wide Corporate Plans, Policies, Business Continuity, Risk Management and Strategies	Superseded document	N/A	1 year after superseded (longer if required for historical reasons)	Securely Destroy	
1.2	Governance	Governance documentation		N/A	Life of company	Securely Destroy	
1.3	Governance	Constitution, Aims and Objectives		Life of company	Life of company	Securely Destroy	
1.4	Governance	Record of HMRC confirmation of charitable status	End of financial year	Minimum 1 year to end of financial year - required for Annual Return as a minimum	Life of company	Securely Destroy	ICSA
1.5	Governance	Record of charitable registration		Life of company	Life of company	Securely Destroy	ICSA
1.6	Governance	Certificate of Incorporation		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 15
1.7	Governance	Memorandum of Association		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 32
1.8	Governance	Articles of Association/ Model Rules		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 32
1.9	Governance	Certificate of registration with		Life of company	Life of company	Securely Destroy	ICSA

		housing regulator					
<b>1.10</b>	Governance	Record of registration and certificate of incorporation for change of name		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 80
<b>1.11</b>	Governance	Registration documentation (Co-operative and Community Benefit Societies)		Life of company	Life of company	Securely Destroy	Co-operative and Community Benefit Societies Act 2014 section 3
<b>1.12</b>	Governance	Internal Audit correspondence, terms of reference, meeting minutes, related papers and reports	After audit	N/A	5 years	Securely Destroy	
<b>1.13</b>	Governance	Board member documents – apt letters, SLAs, bank details etc.	Membership ceases	6 years after board membership ceases though some details should be destroyed when membership ceases e.g. bank details etc.	6 years	Securely Destroy	GDPR Article 5(1) (e) requires that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary CA 2006 recommendation for docs post termination of directorship
<b>2. Data Governance</b>							
<b>2.1</b>	Data Governance	Emails	No longer active	receipt of email	Archived after 6 months Destroyed after 2 years	Securely Destroy	Ofcom National archive guidance ranges from 90 days to four years.
<b>2.2</b>	Data Governance	CCTV	Date of recording	Minimum time necessary	30 days	Securely Destroy	DPA
<b>2.3</b>	Data Governance	Call Recordings	Date of recording	Minimum time necessary	6 months	Securely Destroy	FCA Handbook, conduct of business 11.8
<b>2.4</b>	Data	Data Subject Access	Data sent	6 months	1 year	Securely	ICo

	Governance	Requests				Destroy	
<b>2.5</b>	Data Governance	Films / Videos	Date of recording	Minimum time necessary	3 years	Securely Destroy	
<b>2.6</b>	Data Governance	Data Breach Records	Date of recording	N/A	6 years	Securely Destroy	
<b>2.7</b>	Data Governance	Fraud Records	Date of recording	6 years	6 years	Securely Destroy	FCA Handbook
<b>2.8</b>	Data Governance	Data Subject Access Requests	Data sent	6 months	1 year	Securely Destroy	ICO
<b>3. Meetings</b>							
<b>3.1</b>	Meetings	Notice of meetings		N/A	6 years	Securely Destroy	
<b>3.2</b>	Meetings	Executive meeting agendas, papers, minutes and resolutions		N/A	10 years	Securely Destroy	
<b>3.3</b>	Meetings	Board and Committee meeting minutes and resolutions	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company	Securely Destroy	Companies Act 2006 section 248 and 249
<b>3.4</b>	Meetings	Board and Committee meeting agendas and papers	Date of meeting	10 years from the date of the meeting of extant company or life of company	10 years from the date of the meeting of extant company or life of company	Securely Destroy	Companies Act 2006 section 248 and 250
<b>3.5</b>	Meetings	Shareholder meeting minutes and resolutions	Date of meeting	Life of company	Life of company	Securely Destroy	Companies Act 2006 section 356
<b>3.6</b>	Meetings	Shareholder meeting agendas and papers	Date of meeting	N/A	Life of company	Securely Destroy	
<b>3.7</b>	Meetings	Minutes and resolutions of trustees (charities)	Date of meeting	Life of company	Life of company	Securely Destroy	Charity Commission requirement CC48

4. Regulations and Statutory Returns							
4.1	Regulations and Statutory Returns	Audited financial statements	Submission	Minimum of 3 years	6 years	Securely Destroy	Companies Act 2006 section 388 and Professional Standards Authority and National Archives recommendations for best practice
4.2	Regulations and Statutory Returns	Sealing register		Life of company	Life of company	Securely Destroy	Companies Act 1985
4.3	Regulations and Statutory Returns	Annual Statutory Returns to the Regulator	Submission	Minimum of 1 year from submission	Life of company	Securely Destroy	Co-operative and Community Benefit Societies Act 2014 section 90
4.4	Regulations and Statutory Returns	Register of directors and secretaries		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 162
4.5	Regulations and Statutory Returns	Register of shareholding members		Life of company	Life of company	Securely Destroy	Companies Act 2006 section 113
4.6	Regulations and Statutory Returns	Register of share certificates		Life of company	Life of company	Securely Destroy	Companies Act 1984 s.325
4.7	Regulations and Statutory Returns	Declarations of interest		Life of company	Life of company	Securely Destroy	Company Act 2006 section 177 (implied)
4.8	Regulations and Statutory Returns	List of members (Communities & Benefit Society')		Life of company	Life of company	Securely Destroy	Registrar of Friendly Societies
4.9	Regulations and Statutory Returns	Nursing home and residential care homes registration certificates	End of management	N/A	7 years following end of management	Securely Destroy	Care Quality Commission Guidelines
4.10	Regulations and Statutory Returns	Nursing home and residential care homes inspection reports	End of management	7 years following end of management	7 years following end of management	Securely Destroy	Care Quality Commission Guidelines and Limitation Act 1980
5. Strategic Management							

5.1	Strategic	Business Plans and supporting documentation	End of Business Plan Period	N/A	5 years	Securely Destroy	
<b>6. Insurance</b>							
6.1	Insurance	<p>Current/former policies:</p> <ul style="list-style-type: none"> <li>- crime cover</li> <li>- engineering inspection</li> <li>- motor insurance</li> <li>- property damage</li> <li>- loss of commercial rent</li> <li>- housing contents</li> <li>- office contents</li> <li>- works in progress cover</li> <li>- business interruption cover</li> <li>- all risks cover</li> <li>- engineering insurance</li> <li>- personal accident for staff</li> <li>- professional indemnity</li> <li>- crime/fidelity cover</li> </ul>	End of policy term	Life of company	Life of company	Review	<p>Limitation can commence from knowledge of potential claim and not necessarily the cause of the claim. N.B. Housing Association Boards must annually reaffirm formally their continuation of the Voluntary Board Members Liability Policy (automatically provided via NHF membership). NCVO (National Council for Voluntary Organisations) recommends 3 years after lapse.</p>
6.2	Insurance	Certificate of Employers' Liability Insurance	End of policy term	N/A	40 years	Offer to Archives	2008 regulations removed requirement to retain for 40 years but need to be mindful of 'long tail' industrial disease claims, etc.

6.3	Insurance	Annual Insurance schedule	End of year	N/A	Life of company	Securely Destroy	As current and former policies are kept permanently (above), schedules should be too. Best practice
6.4	Insurance	Claims and related correspondence	End of settlement	N/A	2 years	Securely Destroy	Zurich Municipal recommendation. NCVO recommends 3 years after settlement
6.5	Insurance	Indemnities and guarantees	End of policy term	N/A	6 years after expiry	Securely Destroy	Limitations Act 1980, Limitation for legal proceedings. 12 years if related to land.
6.6	Insurance	Group health policies	End of benefits	N/A	12 years after cessation of benefit	Securely Destroy	
<b>7. Finance</b>							
7.1	Finance	Accounting records for Limited Company		6 years	6 years	Securely Destroy	Companies Act Section 388 recommends 3 years. Taxes Management Act 1970 (TMA) Sec20 (Taxes Management Act 1970) may require any documents relating to tax over 6 (plus) years
7.2	Finance	Accounting records for Communities & Benefit Society' Society or Charity		N/A	6 years	Securely Destroy	
7.3	Finance - Cheques and associated records	Cash books/sheets	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
7.4	Finance - Cheques and associated records	Petty cash records/books/sheets Postage/courier account/cash records Register of postage expenditure	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice

		Postage paid record Postage books sheets					
<b>7.5</b>	Finance - Cheques and associated records	Creditors' history records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.6</b>	Finance - Cheques and associated records	Statements of accounts outstanding orders	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.7</b>	Finance - Cheques and associated records	Vouchers – claims for payment, purchase orders, requisition for goods and services, accounts payable, invoices and so on	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.8</b>	Finance - Cheques and associated records	Wages/salaries vouchers	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.9</b>	Finance - Cheques and associated records	General and subsidiary ledgers produced for the purposes of preparing certified financial statements or published information	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.10</b>	Finance - Expenditure records	Cash books/sheets	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice

<b>7.11</b>	Finance - Expenditure records	Other ledgers (such as contracts, costs, purchases)	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.12</b>	Finance - Expenditure records	Journals – prime records for the raising of charges	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.13</b>	Finance - Expenditure records	Journals – routine adjustments	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.14</b>	Finance - Expenditure records	Trial balances - Year-end balances, reconciliations and variations to support ledger balances and published accounts	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.15</b>	Finance - Receipts and revenue records	Receipt books/butts Office copies of receipts – cashiers', cash register, fines and costs, sale of publications, general receipt books/butts/ records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.16</b>	Finance - Receipts and revenue records	Postal remittance books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.17</b>	Finance - Receipts and revenue records	Receipt books/records for imposts (such as stamp duty, VAT receipt books)	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.18</b>	Finance - Receipts and	Cash registers - Copies of forms,	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice

	revenue records	Reconciliation sheets					
<b>7.19</b>	Finance - Receipts and revenue records	Audit rolls, Summaries/analysis records	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.20</b>	Finance - Receipts and revenue records	Debtors' records and invoices - debit notes rendered on debtors (such as invoices paid/unpaid, registers of invoices, debtors ledgers)	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.21</b>	Finance - Receipts and revenue records	Debits and refunds - Records relating to unrecoverable revenue, debts and overpayments (such as register of debts written off, register of refunds)	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.22</b>	Finance- Salaries and related records	Employee pay histories Note that the last three years' records must be kept for leavers, in either the personnel or finance records system, for the calculation of pension entitlement	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.23</b>	Finance- Salaries and	Salary ledger card/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice

	related records						
<b>7.24</b>	Finance-Salaries and related records	Copies of salaries/wages payroll sheets	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.25</b>	Finance-Purchase order records	Purchase order books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.26</b>	Finance-Purchase order records	Railway/courier consignment books/records/Travel warrants	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.27</b>	Finance-Purchase order records	Goods inwards books/records	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.28</b>	Finance-Purchase order records	Delivery dockets, Stock/stores control cards/sheets/records	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.29</b>	Finance - Financial Statements	Statements/summaries prepared for inclusion in quarterly/annual reports	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>7.30</b>	Finance - Financial Statements	Periodic financial statements prepared for management on a regular basis	End of Financial Year	1 year	1 year	Destroy when cumulated into quarterly/annual reports	HM treasury guidelines, National Audit Office advice
<b>7.31</b>	Finance - Asset register financial records	Assets/equipment registers/records	End of Financial Year	6 years after asset or last one in the register is disposed of	6 years after asset or last one in the register is disposed of	Review	HM treasury guidelines, National Audit Office advice

7.32	Finance - Asset register financial records	Depreciation registers - Records relating to the calculation of annual depreciation	End of Financial Year	6 years after asset or last one in the register is disposed of	6 years after asset or last one in the register is disposed of	Review	HM treasury guidelines, National Audit Office advice
<b>8. Other Banking Records</b>							
8.1	Other Banking Records	Cancelled / Dishonoured Cheque	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.2	Other Banking Records	Paid/presented cheques	End of Financial Year	6 years	7 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.3	Other Banking Records	Record of cheques drawn for payment	End of Financial Year	6 years	7 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.4	Other Banking Records	Bank deposit books/slips/butts	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.5	Other Banking Records	Bank deposit summary sheets - Summaries of daily banking	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.6	Other Banking Records	Bank reconciliations files/sheets	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.7	Other Banking Records	Bank statements, periodic reconciliations	End of Financial Year	2 years	2 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
8.8	Other Banking Records	Electronic banking and electronic funds transfer	End of Financial Year	6 years	6 years	Securely Destroy	HM treasury guidelines, National Audit Office advice
<b>9. Contracts and Agreements</b>							
9.1	Contracts and Agreements	Contracts under seal and/or executed as deeds	Completion	12 years after completion (including any defects liability period)	12 years after completion (including any defects liability period)	Review	Limitation Act 1980.

<b>9.2</b>	Contracts and Agreements	Contracts for the supply of goods or services, including professional services	Completion	6 years after completion (including any defects liability period)	6 years after completion (including any defects liability period)	Securely Destroy	Limitation Act 1980 (12 years if related to land).
<b>9.3</b>	Contracts and Agreements	Documentation relating to small one-off purchases of goods and services, where there is no continuing maintenance or similar requirement	After purchase	N/A	3 years. Suggested limit: goods or services up to £10,000	Securely Destroy	
<b>9.4</b>	Contracts and Agreements	Loan agreements	Last payment	N/A	12 years after last payment	Securely Destroy	
<b>9.5</b>	Contracts and Agreements	Licensing agreements	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.
<b>9.6</b>	Contracts and Agreements	Rental and hire purchase agreements	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.
<b>9.7</b>	Contracts and Agreements	Indemnities and guarantees	Expiry of agreement	6 years after expiry	6 years	Securely Destroy	Limitation Act 1980.
<b>9.8</b>	Contracts and Agreements	Documents relating to successful tender	End of contract	N/A	6 years	Securely Destroy	
<b>9.9</b>	Contracts and Agreements	Documents relating to unsuccessful tenders	After notification	N/A	2 years after notification	Securely Destroy	
<b>9.10</b>	Contracts and Agreements	Forms of tender		N/A	6 years	Securely Destroy	
<b>9.11</b>	Contracts and Agreements	Documentation relating to purchases of medical devices and medical		N/A	11 years	Securely Destroy	

		equipment					
<b>10. Charitable Donations</b>							
<b>10.1</b>	Charitable Donations	Deeds of covenant		N/A	12 years after last payment	Securely Destroy	TMA recommends 12 years after last payment. Limitation for legal proceedings if related to land.
<b>10.2</b>	Charitable Donations	Index of donations granted		N/A	6 years	Securely Destroy	N/A
<b>10.3</b>	Charitable Donations	Account documentation		3 Years	6 years	Securely Destroy	Companies Act recommends 3 years. Best practice
<b>11. Applications and Tenancy Records</b>							
<b>11.1</b>	Application and Tenancy Records	Applications for accommodation	Offer accepted	N/A	6 years after offer accepted	Securely Destroy	Limitation Act 1980, section 2
<b>11.2</b>	Application and Tenancy Records	Continuous Recording of lettings and sales (CORE) data record form		N/A	As long as it is deemed necessary to support social housing policy.	Securely Destroy	CORE Data Sharing Agreement 12.1
<b>11.3</b>	Application and Tenancy Records	Housing Benefit notifications		N/A	2 Years	Securely Destroy	Recommendation from Chartered Institute of Housing. Good practice as per DWP guidance
<b>11.4</b>	Application and Tenancy Records	Rent statements		N/A	2 years	Securely Destroy	
<b>11.5</b>	Application and Tenancy Records	Tenants' tenancy Files, including rent payment records, and details of any complaints and harassment cases		6 years	2 years' records plus current year	Securely Destroy	Limitations Act 1980
<b>11.6</b>	Application and Tenancy	Former tenants' Tenancy	End of tenancy	6 years	6 years	Securely Destroy	Limitations Act 1980

	Records	Agreements, and details of their leaving					
<b>11.7</b>	Application and Tenancy Records	Care plans for children and related documents		Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Until 75th year of child's birth or 15 years after death if child dies before 18. (Case records including care plans)	Securely Destroy	Arrangements for Placements of Children (General) Regulations 1999 and Children's Act 1989. Some documents may be transferred to subsequent caring agency.
<b>11.8</b>	Application and Tenancy Records	Care plans/ case files for adults and related documents	End of support	8 years from end of care. (Adult Social Care)	8 years from end of care. (Adult Social Care)	Securely Destroy	Records Management Code of Practice for Health and Social Care 2016 Some documents may be transferred to subsequent caring agency.
<b>11.9</b>	Application and Tenancy Records	Documentation, correspondence and information provided by other agencies relating to special needs of current tenants		While tenancy continues	While tenancy continues	Securely Destroy	
<b>11.10</b>	Application and Tenancy Records	Records relating to offenders, ex-offenders and persons subject to cautions		While tenancy continues	While tenancy continues	Securely Destroy	NACRO
<b>11.11</b>	Application and Tenancy Records	Safeguarding Referral		10 years	10 years	Securely Destroy	Statutory requirement under the Safeguarding Vulnerable Groups Act 2006 and Care Act 2014
<b>11.12</b>	Application and Tenancy Records	Safeguarding Records - Serious Case Review		Minimum of 364 days or when notified Home Office has closed DHR	Minimum of 364 days or when notified Home Office has closed DHR	Securely Destroy	Records relating to child protection should be kept for 7 years after your organisation's last contact with the child and their family – NSPCC guidance

## 12. Tenancy Records

<b>12.1</b>	Property Records	Rent registrations (superseded)	Superseded document	N/A	6 years	Securely Destroy	Rent Officer Handbook recommendation
<b>12.2</b>	Property Records	Rent Registration (not superseded)		N/A	Life of company	Securely Destroy	Rent Officer Handbook recommendation
<b>12.3</b>	Property Records	Fair rent documentation		N/A	6 years	Securely Destroy	Rent Officer Handbook recommendation
<b>12.4</b>	Property Records	Leases and deeds of ownership		N/A	15 years after expiry.	Securely Destroy	NCVO
<b>12.5</b>	Property Records	Copy of former leases	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.6</b>	Property Records	Wayleaves, licences and easements	Rights given or received cease	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.7</b>	Property Records	Abstracts of title	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.8</b>	Property Records	Planning and building control permissions	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.9</b>	Property Records	Searches	Interest ceases	12 years after interest ceases	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.10</b>	Property Records	Property maintenance records		6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980

<b>12.11</b>	Property Records	Reports and professional opinions		6 years	6 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.12</b>	Property Records	Development documentation	Settlement of all issues	12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>12.13</b>	Property Records	Invoices		12 years	12 years	Securely Destroy	Limitation for legal action relating to land or contracts under seal. Limitations Act 1980
<b>13. Vehicles</b>							
<b>13.1</b>	Transport & Vehicles	Mileage records & defect sheets	Vehicle disposal	N/A	2 years	Securely Destroy	
<b>13.2</b>	Transport & Vehicles	Maintenance records & MOT tests	Vehicle disposal	N/A	2 years	Securely Destroy	
<b>13.3</b>	Transport & Vehicles	Copy Registrations	Vehicle disposal	N/A	2 years	Securely Destroy	
<b>13.4</b>	Transport & Vehicles	Vehicle disposal log	Vehicle disposal	N/A	1 year	Securely Destroy	
<b>13.5</b>	Transport & Vehicles - Operators Licence Only	Operators Licence certificates and documents of title	N/A	Permanently	Permanently	Securely Destroy	Driver & Vehicle Standards Agency (DVSA) Operators Licence requirement
<b>13.6</b>	Transport & Vehicles - Operators Licence Only	Mileage records & defect sheets	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence
<b>13.7</b>	Transport & Vehicles - Operators Licence Only	Maintenance records & MOT tests (up to 3.5T)	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence

13.8	Transport & Vehicles - Operators Licence Only	Maintenance records & MOT tests (HGV over 3.5T)	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence
13.9	Transport & Vehicles - Operators Licence Only	Copy Registrations (up to 3.5T)	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence
13.10	Transport & Vehicles - Operators Licence Only	Copy Registrations (HGV over 3.5T)	Vehicle disposal	15 months	2 years	Securely Destroy	2 years is best practice. DVSA requirement to keep for 15 months under Operators Licence
<b>14. Capital Assets</b>							
14.1	Capital Assets	Capital Assets including all land, property, housing stock, corporate buildings, play areas, vehicles, equipment, fixtures & fittings >£400	Asset sold, transferred or disposed of	N/A	6 years	Securely Destroy	
14.2	Capital Assets	Fixed Asset Register	NA	Permanently	Permanently	Securely Destroy	Charities Act
<b>15. Employees - Tax and Security</b>							
15.1	Tax and Social Security	Record of taxable payments; record of tax deducted or refunded; record of earnings on which standard NI Contributions payable; record of employer's and employee NI contributions	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	HM Revenue and Customs requires retention of each payment for 3 years. Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996

<b>15.2</b>	Tax and Social Security	NIC contracted out arrangements; Inland Revenue notice of code changes, pay and tax details.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996. Taxes Management Act 1970
<b>15.3</b>	Tax and Social Security	Copies of notices to employees (e.g. P45, P60);	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years plus current year	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97). The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996. Taxes Management Act 1970
<b>15.4</b>	Tax and Social Security	HMRC notice of code changes, pay & tax details		6 years	6 years	Securely Destroy	Taxes Management Act 1970
<b>15.5</b>	Tax and Social Security	Expense Claims	After audit	3 years from the end of the tax year they relate to	6 years	Securely Destroy	HMRC
<b>15.6</b>	Tax and Social Security	Record of sickness payments	On payment	6 years	6 years	Securely Destroy	Taxes Management Act 1970 Inland Revenue require retention of each payment for 3 years. SSPR recommends 3 years following year to which they relate
<b>15.7</b>	Tax and Social Security	Record of maternity payments, statutory paternity pay, statutory shared parental pay and statutory adoption pay	On payment	6 years	6 years	Securely Destroy	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended. The Statutory Paternity Pay and Statutory Adoption Pay (admin) Regulations 2002 (SI 2002/2820) and Statutory Shared Parental Pay (Admin) regulations 2014 (SI 2014/2929)

<b>15.8</b>	Tax and Social Security	Income Tax and NI returns	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	6 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97).  The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996
<b>15.9</b>	Tax and Social Security	Redundancy details and record of payments & refunds	Date of redundancy	N/A	6 years	Securely Destroy	IPD recommended
<b>15.10</b>	Tax and Social Security	Revenue and Customs approvals		N/A	Permanently	Securely Destroy	CIPD recommended
<b>15.11</b>	Tax and Social Security	Annual earnings summary	End of Financial Year	N/A	12 years	Securely Destroy	
<b>15.12</b>	Tax and Social Security	Payroll/ salary records, overtime, bonuses expenses etc.	End of Financial Year	Not less than 3 years after the end of the financial year to which they relate	3 years	Securely Destroy	Income Tax (PAYE) Regulations 2003 (SI 2003/2682 Reg 97).  The Income Tax (employments) Regulations 1993 (SI 1993/744) and amended 1996
<b>15.13</b>	Tax and Social Security	Actuarial valuation reports		N/A	Permanently	Securely Destroy	CIPD recommended
<b>15.14</b>	Tax and Social Security	Detailed returns of pension fund contributions; annual reconciliations of fund contributions		N/A	Permanently	Securely Destroy	
<b>15.15</b>	Tax and Social Security	Money purchase details	After transfer or value taken	N/A	6 years	Securely Destroy	CIPD recommended
<b>15.16</b>	Tax and Social Security	Qualifying service details	After transfer or value taken	N/A	6 years	Securely Destroy	CIPD recommended

15.17	Tax and Social Security	Investment policies	From end of benefits payable under policy	N/A	12 years	Securely Destroy	CIPD recommended
15.18	Tax and Social Security	Trade Union agreements	Date of cessation	N/A	10 years after ceasing to be effective	Securely Destroy	CIPD recommended
15.19	Tax and Social Security	Inland Revenue approvals		N/A	Life of company	Securely Destroy	CIPD recommended
15.20	Tax and Social Security	Annual earnings summary	End of tax year	N/A	3 years from the end of the tax year they relate to	Securely Destroy	HMRC
<b>16. Human Resources - Pension Schemes</b>							
16.1	Pension Schemes	Actuarial valuation reports		N/A	Permanently	Securely Destroy	CIPD recommended
16.2	Pension Schemes	Detailed returns of pension fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator
16.3	Pension Schemes	Annual reconciliations of fund contributions		N/A	6 years	Securely Destroy	Pensions Regulator
16.4	Pension Schemes	Money purchase details	After transfer	N/A	6 years after transfer or value taken	Securely Destroy	CIPD recommended
16.5	Pension Schemes	Qualifying service details	After transfer	N/A	6 years after transfer or value taken	Securely Destroy	CIPD recommended
16.6	Pension Schemes	Investment policies	End of benefits payable under policy	N/A	12 years	Securely Destroy	CIPD recommended
16.7	Pension Schemes	Pensioner records	After benefits cease	N/A	12 years after benefits cease	Securely Destroy	CIPD recommended
16.8	Pension Schemes	Records relating to retirement benefits	After transfer or value taken	N/A	6 years	Securely Destroy	RBS(IP)R recommended
<b>17. Human Resources - Personnel Records</b>							
17.1	Personnel Records	Records relating to retirement benefits	After a year of retirement	N/A	6 years	Securely Destroy	RBS(IP)R recommended

<b>17.2</b>	Personnel Records	Terms and conditions of service, both general terms and conditions applicable to all staff, and specific terms and conditions applying to individuals	Leaving date	N/A	6 years	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings
<b>17.3</b>	Personnel Records	Benefits and Deductions (Service contracts for directors (companies))	Date of cessation of directorship	3 years	6 years	Review	ICSA
<b>17.4</b>	Personnel Records	Remuneration package	Leaving date	N/A	6 years	Review	Limitations Act 1980 Limitation for legal proceedings
<b>17.5</b>	Personnel Records	Former employees' Human Resources files	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended
<b>17.6</b>	Personnel Records	References to be provided for former employees	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended
<b>17.7</b>	Personnel Records	Training Programmes	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended
<b>17.8</b>	Personnel Records	Individual training records	Leaving date	N/A	6 years	Securely Destroy	CIPD recommended
<b>17.9</b>	Personnel Records	Short lists, interview notes and related application forms	Last Action	N/A	1 year	Securely Destroy	CIPD recommended
<b>17.10</b>	Personnel Records	Application forms of non-short listed candidates	After notification	1 year	1 year	Securely Destroy	Limitations Act 1980 SDA & RRA recommend 3 months Commission for Racial Equality and Equal Opportunities recommends 6 months.

<b>17.11</b>	Personnel Records	DBS certificate number	Date of clearance	Date of clearance + up to a maximum of 6 months	3 years	Review	DBS check code of practice (Home office)
<b>17.12</b>	Personnel Records	Time cards/ sheets	After audit	N/A	2 years	Securely Destroy	CIPD recommended
<b>17.13</b>	Personnel Records	Trust deeds, rules and minutes (for joint employee/employer sports/social clubs, etc. set up under trust)		N/A	Permanently	Securely Destroy	CIPD recommended
<b>17.14</b>	Personnel Records	Employer/Employee committee minutes (Staff Forum)		N/A	Permanently	Securely Destroy	CIPD recommended
<b>17.15</b>	Personnel Records	Parental leave records	Birth of child	N/A	18 years from birth of child	Securely Destroy	CIPD recommended
<b>18. Human Resources - Health &amp; Safety</b>							
<b>18.1</b>	Health & Safety	Medical records relating to control of asbestos		40 years	40 years	Securely Destroy	The Control of Asbestos at Work Regulations 2002 (SI 2002/ 2675). Also see the Control of Asbestos Regulations 2006 (SI 2006/2739) and the Control of Asbestos Regulations 2012 (SI 2012/632)
<b>18.2</b>	Health & Safety	Health and safety assessments; records of consultations with safety reps		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979
<b>18.3</b>	Health & Safety	Health and safety policy statements		Permanently	Permanently	Securely Destroy	Health and Safety at Work Act 1979

18.4	Health & Safety	Accident records, reports, accident books	Date of occurrence	3 years	6 years after date of occurrence/entry	Securely Destroy	RIDDOR Limitation for legal proceedings RIDDOR 1995 and Limitation Act 1980 Special rules apply concerning incidents involving hazardous substances.
18.5	Health & Safety	Sickness records	Date of occurrence	3 years	6 years from date of sickness	Securely Destroy	The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended Professional Standards Agency
18.6	Health & Safety	Health and safety statutory notices	Once compliant	6 years after compliance	6 years after compliance	Securely Destroy	Limitations Act 1980 Limitation for legal proceedings
<b>19. Technical and Research Records</b>							
19.1	Technical and Research	Technical and research records	After requirements have ended	N/A	12-15 years after requirements have ended for both records and reports and drawings and other data.	Securely Destroy	NCVO
<b>20. ASB case files and associated documents</b>							
20.1	ASB case files and associated documents	ASB (Anti-social behaviour) case files and associated documents		N/A	5 years or until end of legal action	Securely Destroy	
<b>21. Supporting people – subsidy claims / support plans / single assessments including supporting information</b>							
21.1	Supporting People	Supporting people – subsidy claims / support plans / single assessments including supporting information		N/A	Duration of tenancy	Securely Destroy	
<b>22. Resident Meetings</b>							

<b>22.1</b>	Resident Meetings	Resident Meeting Minutes	From date of meeting	N/A	1 year	Securely Destroy	ICSA recommended
-------------	-------------------	--------------------------	----------------------	-----	--------	------------------	------------------

### 23. Property Sales

<b>23.1</b>	Home Ownership	New Sales applications	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2
<b>23.2</b>	Property Sales	Registrations of interest	Sale of property	N/A	2 years	Securely Destroy	
<b>23.3</b>	Property Sales	Offer Details	Offer accepted	current year plus 6 years	6 years	Securely Destroy	Estate Agency Act 1979
<b>23.4</b>	Property Sales	Completion documentation	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985
<b>23.6</b>	Property Sales	Post purchase questionnaire/ customer feedback	Date of creation	N/A	3 years	Review	National Archives guidance
<b>23.6</b>	Property Sales	Help to Buy applications	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2

<b>23.7</b>	Property Sales	Resales (Shared Ownership)	Offer accepted	6 years after offer accepted	6 years	Securely Destroy	Limitation Act 1980, section 2
<b>23.8</b>	Property Sales	Staircasing process documents	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985
<b>23.9</b>	Property Sales	Right to Buy/ Acquire files	Completion of Sale	12 years	12 years	Securely Destroy	Housing Act 1985