Data Retention Policy

Scope of Policy

This policy applies to all data and records of Platform Housing Group (the Group) that were created, or are maintained, by any Group personnel while acting within the course and scope of their employment, whether such records are located on the Group's property or elsewhere.

The policy applies to all forms of communication and unstructured data, including email, instant messaging, voice, file shares and all other forms of electronic hardware and software. Data is included regardless of whether or not it is stored, transmitted, maintained, or processed on the Group's assets or on an individual's personal mobile device(s) or other electronic assets.

Applicability

The policy applies to all members of the Group.

1.   Policy Statement

1.1   Group members will ensure that documentation, whether in electronic or paper form, is stored for an appropriate length of time that reflects both statutory requirements and established best practice.

1.2   All data and records will be held and processed in a manner that is compatible with the Data Protection Act 2018 and the related **Data Protection and Information Security Policies**.

2.   Context

2.1   The Data Retention Schedule, originated by the National Housing Federation in November 2018, outlines the principal data record types held by providers. This includes record types related to the following functions:

- Governance
- Data governance
- Meetings (e.g., Boards)
- Regulatory and statutory returns
- Strategic management
- Insurance
- Finance, accounting and tax records
- Other banking records
- Contracts and agreements
- Charitable donations
- Application and tenancy records
- Property records
- Vehicles

- Capital assets
- Employee, tax, pension, health and safety and personnel data
- Technical and research records
- Anti-Social Behaviour files
- Supporting People
- Resident meetings
- Property sales

2.2   In January to March 2023, an exercise has been undertaken with the Group's Data Assurance Team, its Data Owners and Data Stewards to review the NHF's Guidance entries and amend trigger events and retention length in line with business, regulatory and legal requirements.

2.3   The Group's Data Retention Schedule is the reference document by which the Group will apply the rules for how it will manage the retention of data and records.

Where any changes are identified and requested to the schedule, whether addition, amendment or deletion, these will be controlled through the Information Compliance Team and signed off by the respective Data Owner.

2.4   Retention periods and their triggers may change as technology, regulation, legislation and business practice change.

To accommodate this, a change control process will be introduced involving Data Owners, Data Stewards, the Data Assurance team and any relevant stakeholders. This is to ensure consistency of approach across systems and full evaluation of the impact of any future changes. The latest version controlled Retention Schedule will be published and available on the Group's Intranet.

2.5   It is recognised that the application of retention to legacy file servers and information systems may require a project based approach rather than being part of business as usual.

To this end, the Group's approach to the application of these retention rules will be to focus on existing and new project and procurement opportunities first and then to adopt a risk based prioritisation approach to legacy systems. The status of retention within a system will be recorded in the Group's Information Asset Register.

3.   Aims and Objectives

3.1   The aim of this policy is to ensure that all members of the Group are storing data and records in information systems that is consistent in terms of retention timescales, and which meets legal requirements and best practice.

3.2   The ultimate aim is for the automatic deletion of records outside of the retention period triggered by event meta-data dates and rules.

4. Policy Outline

4.1 The policy, in conjunction with the current Data Retention Schedule, provides detailed guidance for all Group colleagues on the record type, retention period, retention trigger, retention source, reason for retention, action at the end of the retention period, team owner, data owner and data steward.

5. Equality and Diversity

5.1 We are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

5.2 No equality impact assessment or data protection impact assessment is required specifically for this policy. However, the schedule should be a key document for any data protection impact assessment for projects involving the storage of personal data in the future.

6. Monitoring and Review

6.1 The next policy review is scheduled for April 2025 and then every two years thereafter.

6.2 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.

7. Associated Documents/Policies

7.1 List of documents/associated policies/publications:

- Information Security Policy
- Data Quality Management Policy
- Data Protection Policy
- Data Retention Schedule Master Copy V2.0

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Customer Experience Panel:	No
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DPIA completed:	No
EIA completed:	No
Employee Handbook amends:	N/A