



Streatham Baptist Church Data Retention Policy

Policy Approved by: Church Leaders / Trustees: 25 February 2020

Communicated to Church Staff: email with read receipt and team briefing

Communicated to: Activity Leaders (if applicable): email with read receipt

Communicated to Church Members (if applicable): Church Members' Meeting

Review date: 25 February 2023, or earlier if church needs dictate

1. Introduction

This policy sets out the guidelines for the retention of data collected by Streatham Baptist Church (SBC). This policy should be read in conjunction with the SBC Data Protection Policy.

2. Data Retention Principles

SBC will comply with Storage Limitation Principle of The Data Protection Act 2018, which states that personal data must not be kept for longer than it is needed.

SBC respects an individual's right to erasure and will not continue to hold personal data when an individual has withdrawn their consent for processing.

SBC will conduct regular reviews of the personal data it holds in line with the retention periods set out in the SBC Data Retention Schedule.

In general:

- Data which has a statutory period of retention will be kept for that period;
- Data connected with Safeguarding will be kept for the period advised by the Baptist Union of Great Britain;
- Data needed for public interest archiving, historical research or statistical purposes will be kept indefinitely;
- All other data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- Data will be erased or anonymised when it is no longer needed;

The attached SBC Data Retention Schedule sets out standard retention periods.

3. Management of Data Retention

The SBC Church Leaders, as Charity Trustees, are responsible as the Data Controller for determining the data retention periods set out in the SBC Data Retention Schedule.

The SBC Data Protection Compliance Officer is responsible for ensuring that this policy is implemented and church records are regularly updated to ensure that the SBC Data Retention Schedule is complied with.

All paid and voluntary members of staff, SBC Leaders and other volunteers processing information on behalf of the church shall ensure that they comply with the SBC Data Retention Schedule in respect of the personal data that they hold for the church or the church group or church activity for which they are responsible.

SBC DATA RETENTION SCHEDULE

A Data Processed for the Pursuit of SBC’s Legitimate Interests

DATA	RETENTION PERIOD
Church Members’ Meeting Minutes	Indefinitely
Leaders’ / Trustees’ Meeting Minutes	Indefinitely
Minutes of Leadership-related groups	7 years from date of meeting for all Leadership Related Groups
Church members’ names and dates of membership	Indefinitely
Church members’ contact details	Duration of membership
Other church contact details	Until consent is removed
Baptismal records	Indefinitely
Pastoral records	Pastoral discretion unless safeguarding implications – see Category C
Dedication records	Indefinitely
Church Constitution and other key Governance documents	Indefinitely
Church Annual Reports and Accounts	Indefinitely
Property Trust Deeds, Land Registry Records, etc.	For the duration of the ownership of the property plus 7 years
Records relating to management of contracts	Last payment under the contract plus 6 years
Records of lettings	7 years from financial year end
Premises maintenance and inspection records	7 years from financial year end
SBC Policy and Procedure Documents	Expiry of Policy / Procedure plus 3 years
Church History Documents	Indefinitely
Paid and Voluntary Staff Disciplinary Records	7 years from the date the post-holder has left employment

B Data Necessary for Compliance with a Legal Obligation

DATA	RETENTION PERIOD
Gift Aid Declarations	7 years after last payment made
Records of Gift Aid Donations	7 years after donor ceases giving
Financial Records for Annual Accounts	7 years from financial year end
Payroll info including HMRC Tax and NI Payment Records and correspondence	7 years from financial year end
Pension Records (in addition to those kept by the Baptist Pension Scheme)	7 years from financial year end
Food Safety Training Records	Whilst person is attending SBC
Health and Safety Records including risk assessments, COSHH, RIDDOR, Fire Safety Records and Inspection Reports	At least 3 years from date of record or close of investigation, but up to 50 years for records of contact with a hazardous substance
Employment records for personnel whose role does not involve contact with children and young people and adults at risk, including recruitment, sickness, working adjustments, redundancy	7 years after employment ends
Application records for unsuccessful candidates	1 year from interview date
Building plans, consents and redevelopment records	Indefinitely
Employers’ Liability Insurance Policy & Certificate	7 years
Wedding Register	Indefinitely
Record of Wedding Registrars	Indefinitely

SBC Data Retention Policy and Schedule

C Safeguarding Records

CATEGORY	TYPE OF RECORD	RETENTION PERIOD
Allegations / concerns / risk assessments / safeguarding contracts	Records of safeguarding incidents, allegations or concerns	75 years after last contact with the individual concerned
	Records that relate to safeguarding concerns/allegations about church workers (paid or voluntary)	75 years after employment / role ceases
	Risk assessments / safeguarding contracts concerning known or alleged offenders	75 years after last contact with the individual concerned
Events / activities specifically for children and young people / adults at risk (where no safeguarding incidents or concerns raised)	Registers / records of events or activities, including SBC Safeguarding registration and recruitment forms)	At least 3 years after the event
	Parent / carer consent forms where there has been a major accident	At least 3 years after the form has been completed
	Parent / carer consent forms where there has been no major accident	Until the end of the academic year
	First Aid / accident forms	At least 3 years after the form has been completed
	Health and safety risk assessment	At least 3 years after the risk assessment has been completed
Employment	Minister personnel records including recruitment papers and professional development records where there are safeguarding allegations / investigations, regardless of the findings	75 years from the date of the minister's death
	Personnel records including recruitment papers and professional development records relating to paid and voluntary church workers whose role involves contact with children and adults at risk	75 years after employment / role ceases
	Personnel records for all other voluntary church staff	Termination plus 3 years
Disclosure and Barring Service (DBS) checks	Record of a Disclosure and Barring Service (DBS) check being undertaken for a church worker (paid or voluntary)	75 years after employment / role ceases
Disciplinary Procedure records	Record of a church worker's (paid or voluntary) disciplinary procedure relating to safeguarding allegations / offences	75 years after employment / role ceases
	Record of a minister's disciplinary procedure relating to safeguarding allegations / offences	75 years from the date of the minister's death

SBC Data Retention Policy and Schedule

D Data Processed on the Basis of Consent

DATA	RETENTION PERIOD
Bank account details for payment of salaries, expenses and invoices	7 years from financial year end
Insurance Policies and correspondence not covered elsewhere	Until claims under policy are barred or 7 years after policy lapses, whichever is longer
Volunteering recruitment records (where no contact with children or adults at risk)	1 year after volunteer left
Group Membership records, e.g. Life Groups	3 months after member left
References for schools, colleges and immigration applications	7 years
Photographs of identifiable people	One year after the photograph was taken unless specific consent has been obtained for the photographs to be retained for longer for a specific purpose
Videos of Baptisms and Dedications	Baptisms and Dedications - 3 months after event if recorded.
First person prayer requests published in the church bulletin	3 years after prayer request first published in Bulletin
Consent forms to receive church "marketing information" by emails, texts and phone calls	Until membership is ceased or formal review carried out
Personal data change / update forms	Until confirmation that person has moved away, resigned church membership or died
Help Us To Help You forms	Until confirmation that person has moved away, resigned church membership or died
New to SBC forms and New Members forms	Until confirmation that person has moved away, resigned church membership or died
Group membership forms, including Life Group registration forms (except for groups using Safeguarding forms)	At least 3 months after member left group
Mobile phone statements for church mobile phones	7 years from financial year end, except where needed for safeguarding investigations, when retention periods in section C must be used
Subject Access Requests	7 years from receipt of the request
Registration records for events, e.g. Come Dine with Me, with no obvious safeguarding concerns	1 week after the event unless there is an accident or incident to investigate
Church Weekend Away Records	At least 3 years after the event
Complaints Records	Date of resolution of complaint plus 6 years and then review for most contentious complaints

NB Employment Records

Employers can keep the following data about their employees without their permission:

- Name, address, date of birth, sex, education and qualifications, work experience,
- National Insurance number, tax code, emergency contact details, employment history with the organisation, employment terms and conditions (e.g. pay, hours of work, holidays, benefits, absence), any accidents connected with work, any training taken

Source: <https://www.gov.uk/personal-data-my-employer-can-keep-about-me> (Accessed 25/03/2019)