

Data Retention Policy

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Scottish Social Housing Charter Relevant Standard Outcomes

STANDARD

Section:- The customer/landlord relationship

2. Communication

Social landlords manage their businesses so that:

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| <ul style="list-style-type: none">• <i>tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.</i> |
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Scottish Housing Regulator – Relevant Standards of Governance and Financial Management and Guidance

STANDARD	
1	The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users. Relevant standard 1.3
2	The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities. Relevant standard 2.1, 2.3.
4	The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose. Relevant standard 4.3

DATA RETENTION POLICY

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DATA RETENTION POLICY

1. INTRODUCTION

- 1.1 The UK General Data Protection Regulation (UK GDPR) provides that organisations which process personal data must not retain that data for any longer than is necessary for the purposes for which the personal data are processed.

2. PURPOSE

- 2.1 This policy details Lochalsh and Skye Housing Association's approach to the retention, deletion and destruction of personal data. All LSHA personnel are obliged to familiarise themselves with this policy and refer to it on an ongoing basis to ensure that its terms are implemented and complied with.
- 2.2 This procedure applies to all directors, associates, members, employees, volunteers, contractors (temporary and permanent) (referred to herein as 'LSHA personnel').

3. STORAGE OF PERSONAL DATA

- 3.1 LSHA stores personal data in a variety of ways. This includes hard copy documents, emails, digital documents stored on desktop computers, laptops, phones and other devices, data stored on our servers and in our cloud-based storage, along with data stored by third parties on our behalf.
- 3.2 When updating, rectifying, erasing and deleting any personal data, due care must be taken to ensure that all personal data held in all locations (including back-up storage) and in all forms is dealt with securely and to ensure that a consistent and accurate record of personal data is maintained.

4. RETENTION OF PERSONAL DATA

- 4.1 Different types of personal data may need to be retained for different periods of time depending on the purposes for which the data is processed and the legal and regulatory retention requirements in relation to certain categories of data.
- 4.2 In determining the appropriate retention period consideration should be given to the following factors:
 - the purposes for which the personal data is processed;
 - the legal basis for processing that personal data;
 - legal requirements for retention (particularly employment and health and safety law); and
 - regulatory requirements.

- 4.3 An appropriate retention period should be identified for each category of personal data. Data subjects must be informed of the retention period which applies to their personal data or, if there is no fixed retention period, the criteria used to determine that period; and where the purposes for which the data is processed have changed, any new retention period.
- 4.4 All personal data processed by LSHA shall be retained in accordance with the periods set out in our retention schedule, consisting of the following parts:
- Part 1: General Governance, incorporating Governance, Data Governance, Formal Meetings, Regulations and Statutory Returns, Strategic and Insurance
 - Part 2: Finance, Other Banking Records and Capital Assets
 - Part 3: Contracts and Agreements
 - Part 4: Human Resources and Health & Safety
 - Part 5: Marketing
 - Part 6: Vehicles
 - Part 7: Housing Associations and Tenancy Records
 - Part 8: Legal Records for Solicitors
- 4.5 Personal data will be retained in accordance with the appropriate retention period and permanently deleted and/or securely destroyed in accordance with this policy. No personal data shall be destroyed or deleted other than in accordance with this policy.

5. REVIEW AND DELETION OF PERSONAL DATA

- 5.1 A review of the personal data processed by LSHA will be carried out every 2 years. During the course of this review we will:
- Review the retention periods for each category of personal data processed and whether any alteration to these periods is required
 - Identify personal data which is due for destruction and deletion
 - Arrange for the secure deletion and destruction of personal data which will no longer be retained

6. MONITORING AND REPORTING

- 6.1 Regular monitoring and audits will be undertaken by the Data Protection Lead and/or DPO to check compliance with the law, this policy and associated procedures. Any concerns will be raised with the Chief Executive.

7. REVIEW

- 7.1 This policy will be reviewed every three years or when required, by the Data Protection Officer, to address any weakness in the procedure or changes in legislation or best practice.

- 7.2 This document will be reviewed by the Board or Sub-Committee set up for that purpose in accordance with the requirements of the Association's Register of Policies and Procedures.
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SCHEDULE OF REVISIONS		
DATE	REVISION No.	DETAILS