

BETH SHMUEL SYNAGOGUE LIMITED

Data Retention Policy with Schedule

Registered Charity number: 251044
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Introduction

As part of the day-to-day running of our synagogue, we collect and process personal data from a variety of sources. This personal data is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is stored both as a hard copy and in electronic form.

Aims of the policy

We will ensure that the personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and to provide our services – as required by data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Retention

This retention policy (along with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed.

Decisions around retention and disposal are to be taken in accordance with this policy.

As and when the retention period for a specific document has expired, a review is always to be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration is to be given to the method of disposal.

Responsibility

The Beth Shmuel Synagogue Committee (the Committee) are responsible for keeping this retention schedule up to date in order to reflect changing operational needs, new legislation, changing perceptions of risk management and new priorities for our organisation.

The Committee are also responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

All volunteers, staff and Trustees must comply with this policy and should inform the Committee if there is any doubt about the minimum retention periods or if the retention of a document is necessary for a potential claim.

Disposal

We must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- Transmission of records to an external body
- Cloud storage

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Exceptional circumstances should be reported to the board of Trustees without delay.

Appendix 1: Document retention schedule

Tax, Accounting and HR Records:

Type of record	Retention period	Where is it stored?	Reason
Tax returns	10 years from end of fiscal year	Accountants – Cohen Arnold	Governance and audit
Accounting records	3 years from end of fiscal year	Accountants – Cohen Arnold	Tax law and audit requirements
Staff recruitment records	6 months after notifying candidates of outcome	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Limitation period
Immigration and DBS checks	3 years after termination of employment	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Governance and operational need
Contracts	While employment continues and for 7 years after termination	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Operational need and limitation period
Staff personnel records	While employment continues and for 7 years after termination	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Operational need and limitation period
Volunteer records	While volunteering continues and 3 years after volunteering ends	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Governance and operational need
PAYE records	3 years after the end of fiscal year	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Tax and audit requirements
Accident records	4 years from the date the report was made	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Operational need and limitation period

Operational and governance records:

Type of record	Retention period	Where is it stored?	Reason
Memorandum of association	Life of Charity	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Good governance and operational need
Register of members	Life of Charity	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	S.121 of the Companies Act 2006
Register of directors (including date of ceasing to be a director)	Life of registered company	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	S.162 of the Companies Act 2006

Minutes of board meetings	10 years from the date of the meeting	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	S.248 of the Companies Act 2006
Health and safety inspections, property management and asset records	6 years	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Health and Safety at Work Act 1974 and limitation period
CCTV recordings	90 days for routine recordings As long as necessary for any investigations or claims that arise	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Best practice
Legal advice and opinions	6 years after life of the service or matter the advice relates to	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Operational need
Data subject rights requests	6 years from closure of request	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Limitation period
Insurance claims	3 years after settlement	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Limitation period
Complaints	6 years from settlement or closure	Beth Shmuel Synagogue, 171 Golders Green Road, London NW11 9BY	Limitation period