Model Retention Policy – The Pavilion Club CIC

1. Purpose

This policy sets out how The Pavilion Club CIC manages the retention and disposal of records to meet legal, regulatory, and operational requirements, while protecting personal data in line with the UK GDPR and Data Protection Act 2018.

2. Scope

Applies to all staff, volunteers, and contractors handling records (paper or digital) created or received by the CIC.

3. Principles

- Keep records only as long as necessary for legal, contractual, or operational purposes.
- Store securely to prevent loss, damage, or unauthorised access.
- Dispose of records safely and confidentially when no longer needed.

4. Retention Schedule

Record Type	Retention Period	Reason
Company formation documents, CIC reports	Permanently	Legal requirement
Employment records (after leaving)	6 years	Employment law
Financial records (invoices, receipts, accounts)	6 years	HMRC requirement
Insurance policies	As long as a claim can be made under it / indefinitely	Management and legal proceedings
Marketing contact lists and service updates	Until consent withdrawn or 2 years	GDPR compliance
Project files and reports	3-5 years	Operational/impact evidence
Provision of services or goods	Only as long as necessary	Storage limitation principle
Quotations and tenders	6 years	Limitation Act 1980
Safeguarding records	6 years after case closure	Legal/best practice
Venue lettings records	6 years	HMRC requirement

5. Disposal

- Paper: Shred or use a secure disposal service.
- Digital: Permanently delete from all systems, including backups where possible.

6. Review

This policy will be reviewed annually or sooner if legislation changes.

Approved by: Juliette Thompson – Director

Date: May 2025