

Data Retention Policy

Clanmil Housing Association Ireland clg (Clanmil Ireland) will not retain data for longer than is necessary for the purpose concerned. The following table sets out the association's policy on retention periods for specific data. Some of these retention periods are as required under specific legislation and other data is retained as per best practice in the Social Housing Sector.

Type of Data	Retention duration
Planning (Records of compliance and grants of planning permission)	7+ years (Planning & Development Acts 2000-2012)
Health & Safety (Records of Major Accidents and dangerous occurrences)	10 years (Safety, Health & Welfare at work Act, 2005)
Recruitment (Records & interview notes of unsuccessful applicants)	12 months (Data Protection Commissioner Recommendations – more time may be needed if legal action is threatened)
Employees (Employee contracts after termination)	7 years (Statute of limitations of 6 years on breach of contract claims under Unfair Dismissal Act 1977 – 2007)
Employees (Records of employee tax payments)	6 years (Revenue Commissioners PAYE Guide for Employees)
Health & Safety (Facility floorplans and directions)	7+ years (Safety, Health and Welfare at work (General Application) Regulations 2007-2012)
Tax & Accounts (Accounting records of transactions, company accounts and VAT records)	6 Years (Value Added Tax Consolidated Act 2010, Companies Act 1990)
CCTV Recordings	Up to 30 Days
Data Disposal Schedules	Indefinitely
Tenancy Applications (for successful individuals)	7 years after tenancy ceases
Tenancy applications (for unsuccessful individuals)	12 months
Tenant files	7 years after tenancy ceases
Tenant income details, rent payments and payment histories	7 years after tenancy ceases
Tender documentation from successful suppliers	13 years if the principal contract is awarded under seal of the Company, otherwise 7 years
Tender documentation from unsuccessful suppliers	12 months
Volunteer files	7 years after volunteering ceases
Subject Access Request register	indefinitely

Where there is uncertainty on the retention period for any specific piece of data, it is considered good practice to keep records for **6 years plus 1 year** to cover the general statute of limitation for civil legal action.

Data will be confidentially destroyed once the above time periods elapse and a record of its destruction will be kept in a designated disposal log, indefinitely.