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# Cambray Document Storage Policy

## Introduction

This policy is designed to provide guidance for the retention and/or storage of documents related to the running of Cambray Baptist Church (CBC). The document relates to both storage of paper and electronic records.

## General

In order to produce this document, a large number of resources have been examined in an effort to produce as concise a document as possible.

Two main factors govern which records are to be retained and for how long:

- Church Constitution
- Legal

Essentially, legal requirements will always override Church Constitution requirements when there is an apparent conflict.

## Church Constitution

See Cambray Baptist Church Constitution to read the whole constitution.

The relevant item in the constitution regarding documentation regarding Church Meeting Minutes can be found in **Church Constitution Clause 27 Sub-clause 6** which reads:

> *"The Minutes made under this clause shall be written or printed and filed in a book or binder set aside for this purpose using materials of sufficient quality to ensure that they survive for many years and shall be kept in a safe place."*

## Legal

There are many laws which govern the retention of records the main ones being:

- HMRC
- Charities Act 2011
- Charitable Incorporated Organisations (General) Regulations 2012.
- Data Protection Act 2018
- Taxes Management Act 1970

- Pensions Act 1995
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995
- Discrimination Acts 1975 and 1986
- Race Relations Act 1976
- The Statutory Maternity Pay (General) Regulations 1986
- Statutory Sick Pay (General) Regulations 1982
- Limitations Act 1980
- Employers' Liability (Compulsory Insurance) Regulations 1998

## General Document Retention Guidelines

The actual period records are kept will depend on a number of factors including:

- Legal and related requirements
- Costs
- The CBC's own need to access the document
- Historical value.

Each type of document needs to be assessed separately. In the case of many types of document, it will be sufficient to keep them only for the period required by statute; others will be essential reference material in future years and CBC might, therefore, decide to keep them longer than the period required by law.

In the tables that follow the suggested retention period for each type of document and a brief explanation of the retention period is given. It is possible that some of the types don't currently apply to CBC but they have been included for the sake of completeness.

### Purchase invoices and supplier documentation

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Payments cash book or record of payments made | Six years from the end of the financial year in which the transaction was made | Charities Act |
| Purchase ledger | | |
| Invoice - revenue | | |
| Petty cash records | | Charities Act and HMRC |
| Invoice - capital item | Ten years | Charities Act and HMRC |
| Successful quotations for capital expenditure | Permanently | Commercial considerations |

### Income/ Monies received

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Bank paying in counterfoils | Six years from the end of the financial year in which the transaction was made. | Charities Act |
| Bank statements | | |
| Remittance advices | | |

| | | |
|---|---|---|
| Correspondence re donations | | |
| Bank reconciliations | | |
| Receipts cash book | Ten years | Charities Act and HMRC |
| Sales ledger | | |
| Deeds of covenant/ Gift Aid declarations | Six years after the last payment made. Twelve years if payments outstanding or dispute regarding the deed | Data Protection Act 1998 |
| Legacies | Six years after the estate has been wound up | |

## Payroll documentation

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Income tax records re employees leaving i.e. P45 | Six years plus current year | Taxes Management Act 1970 |
| Notice to employer of tax code (P6) | | |
| Annual return of employees and directors expenses and benefits (P11D) | | |
| Certificate of pay and tax deducted (P60) | | |
| Notice of tax code change | | |
| Annual return of taxable pay and tax deducted | | |
| Records of pension deductions | | Pensions Act 1995 |
| Clock cards | Two years after audit | Audit |
| Payroll and payroll control account | Six years plus current year | Charities Act and Taxes Management Act 1970 |

## Employee/personnel records

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Accident reports | Three years after last entry or end of investigation if later | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 |
| Details of medical schemes | Permanently | Commercial |
| Organisation charts | | |
| Staff personnel charts | Six years after employment ceases | Limitation Act 1980 |
| Wages and salary records | Six years plus the current year | Taxes Management Act 1970 |
| Expense accounts/records | | |
| Overtime records/authorisation | | |

| Document | Retention Period | Reason for Retention Period |
| --- | --- | --- |
| Redundancy details, calculations of payments, refunds, notifications to the Secretary of State | Six years after employment has ceased | Data Protection Act 1998 |
| Life Assurance expression of wish forms | Six years after employment has ceased or death | |
| Applications for jobs- where the candidate is unsuccessful | Six months after notifying the unsuccessful candidate | Discrimination Acts 1975 and 1986 and Race Relations Act 1976 recommend six months. One year limitation for defamation actions under Limitations Act |
| Statutory Maternity Pay records calculations or other medical evidence | Three years after the end of the tax year in which maternity period ends | The Statutory Maternity Pay (General) Regulations 1986 |
| Sickness records | Three years after the end of each tax year for Statutory Sick Pay purposes | Statutory Sick Pay (General) Regulations 1982 |

## Buildings, plant and engineering

| Document | Retention Period | Reason for Retention Period |
| --- | --- | --- |
| Deeds of title | Permanently or until property is disposed of. **Note:** Copy of title deeds should be kept for six years after disposal. | Data Protection Act 1998 |
| Leases | Fifteen years after expiry | Limitations Act 1980 |
| Final plans, designs and drawings of the building, planning consents, building certifications, collateral warranties, records of historical interest and final health and safety file. | Permanently or until six years after property is disposed of | Data Protection Act 1998 |
| Asbestos Register and Asbestos Disposal Certificate | Permanently. Property holders require to examine the premises for asbestos or possible asbestos materials, record the location of those materials and assess the risk. These assessments are to be recorded and provided to anyone who may disturb the asbestos. | Control of Asbestos at work Regulations |
| Plant and Machinery | Until one year after the plant and machinery is removed from the building | Data Protection Act 1998 |
| Records of major refurbishments, warranties, planning consents, design documents, final health and safety files | Thirteen years for actions against contractors etc. | |

### Pension records

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Details re current pensioners | Ten years after benefit ceases | Commercial |
| Pensions scheme - next of kin/expression of wish forms | Six years after date of death | Data Protection Act 1998 |
| All trust deeds and rules | Permanently | Companies Act, Commercial, Pensions Act 1995 |
| Trustees' minute book | | |
| Annual accounts | | |
| Investment and insurance policy records | | |
| Actuarial reports | | |
| Contribution | | |

### Insurance documents

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Policies | Three years after lapse | Data Protection Act 1998 |
| Claims correspondence | Three years after settlement | |
| Accident reports and relevant correspondence | | |
| Employers' Liability insurance certificate | Forty years | Employers' Liability (Compulsory Insurance) Regulations 1998 |

### Other documents

| Document | Retention Period | Reason for Retention Period |
|---|---|---|
| Trustee/director/governor minutes or meetings and decisions | Permanently | Data Protection Act 1998 |
| Annual accounts and annual review | | |
| Major agreements of historical significance | | |
| Investment certificates | | Companies Act, Charities Act, Commercial |
| Investment ledger | | |
| Fixed assets register | | |
| Health and safety records | Three years for general records. Permanently for records relating to hazardous substances. | Personal injury actions must generally be commenced within three years of injury. However industrial injuries not capable of detection within that period (e.g. Asbestos) the time period may be substantially extended. |
| Contract with customers, suppliers | Six years after expiry or termination | Limitations Act 1980. **Note:** Six years |

| Document | Retention Period | Reason for Retention Period |
| --- | --- | --- |
| or agents, licensing agreements, rental/hire purchase agreements, indemnities and guarantees and other agreements or contracts | of the contract. If the contract is executed as a deed, the limitation period is twelve years | is generally the time limit within which proceedings founded on contract may be brought. Actions for latent damages may be brought up to fifteen years after the damage occurs |

## Paper document retention

Each type of data used by CBC should be identified and classified. Once this has been completed and during periodic reviews, it is necessary to define the retention and disposal policy.

All CBC records should be assessed for the statutory and legal requirements, church and accountability requirements and the risks associated with keeping or disposing of the data records.

A records management system or schedule of data retention criteria can be used to document the data records, the requirements and the security controls needed for their identification, storage, protection, retrieval, retention and disposal.

There are a large number of statutes, case law and regulations defining the period some data must be kept for before it is destroyed, some of which are outlined in the tables above.

The exact minimum retention period varies with the specific data type, and the starting date is often context related e.g. period from an event like an accident, date of employment, retirement etc.

### General Requirements

All archive material needs to be kept in secure accommodation, a cool, fairly dry and stable environment. There should be protection against fire, flood, theft, pests and other hazards including damp and mould. Good practice includes:

- Storage areas must be secure and must be kept locked when not in use.
- Access to the storage must be controlled and monitored.
- If a storage area has to be shared, archives should be clearly separated and only handled by people responsible for their care
- No item should be removed without permission of those people responsible for their care.
- If an item is moved or removed, a note should be left with details of where it is and who has it.
- A register of withdrawals and returns should be kept.

Places for storage of documents should have controlled environmental conditions protected against water penetration and flooding. Stores should be located away from water tanks and radiators, which may cause damage to collections.

The latest British Standards Institution (BSI) publication' PD5454: 2012 '*Guide for the storage and exhibition of archival materials*' recommends for mixed collections including papers, photographs, leather bound volumes and other materials storage temperatures between 13˚and 20℃. It also recommends that relative humidity (moisture in the air) should be kept between 35% and 60%.

Sharp fluctuations during the course of each month should be avoided.

### Packaging of documents

Records need to be protected by archival quality (fibreboard) boxes and packaging in the long term to ensure that they remain in good condition. In the shorter term, the main aim should be to box files of loose papers in clean containers and to label them with brief descriptions of the contents.

- Containers should not be airtight as the lack of air circulation can lead to damp and mould attacks, however these should be stout enough to give some protection against water and smoke damage.
- Plastic bags and containers should not be used.
- Bound volumes need not be boxed unless they have detached boards or badly damaged bindings, but can be shelved upright.
- Do not stick labels directly onto spines.

### Selection of documents to store

The most important step is to gather the historical records which have passed out of current use and to arrange them following their original order, which reflects the activity or functions of the creator. This would involve for example keeping all deacons' meeting minutes together.

Not all records contain evidence of historical value and these records may be considered for destruction. Some material may not be of permanent value, containing little or no evidential worth according to established criteria. This judgment should not be the decision of an individual and would benefit from professional archival advice. There is no need to keep multiple copies of publicity material that is printed. One archival copy of each publication for example should normally be kept as evidence of this type of activity and of the event itself.

The Charity Commission for England and Wales has published *'Retention of Accounting Records'* that can help organisations to appraise their current administrative and financial records and develop their own records retention schedule for these categories of records.

I have saved this document as "Retention of accounting records.pdf". There is also a Government document that can be found at:

https://www.gov.uk/government/publications/the-essential-trustee-what-you-need-to-know-cc3/the-essential-trustee-what-you-need-to-know-what-you-need-to-do

### Digital Records

Electronic analogue and digital records are an ever-increasing part of modern documentation and record keeping. It is vital that records in this form are preserved and made accessible for both for current operational requirements as well as for their long term research value.

So when we are assessing CBC's records we must not overlook records created and stored on CBC computers or stored on detachable physical media (external disk drives, DVDs, CDs, memory sticks, etc.), whether they are word-processed documents such as drafts of letters, e-mails, web pages, photographs, films or databases.

Unlike paper records, those created in digital form will not survive very long without active intervention. They require systematic and periodic attention, because without such care even the short-term future of digital material is uncertain. Firstly, digital records are dependent on software and hardware. This means they are vulnerable to changes in technology and the market. For example, many sizes of floppy disk were in existence a few years back but now, no modern computer can read any of these. Secondly, the media on which electronic records are stored is unstable. Disks, diskettes, and hard drives as well as optical media like CDs and DVD's all have a limited life-span. Though estimates vary depending on storage media a ceiling of twenty-five years seems a reasonable estimate. It is worth noting that for memory sticks, the latest widespread form of electronic data storage, the lifespan is significantly less.

Although comprehensive strategies for achieving the long-term preservation and accessibility of electronic records are still being devised, and the same solutions are not necessarily applicable to all types of digital records, simple measures will improve the likelihood that the digital archive remains intact and accessible.

The key steps are to:

- Identify the digital records
- Decide which are most important
- Organise the content

- Save copies in different places
- Manage the digital

### Identify the digital records

Gather information about the digital records we have. Where are the files located? On a computer? On a camera? Online? Are they scattered around on unmarked disks and CDs?

Do a survey to locate computer hardware in any physical form. This may prove a useful exercise to locate records more generally. They may be held by current or previous officers and not necessarily physically onsite the property. It might then be helpful to assemble them physically in one location, but in so doing be careful not to any lose information that might be provided by the order in which they were stored, or any paper records that might provide context.

- The first task is to identify what it is the media actually contain.
- Use a dedicated computer that has up-to-date antivirus software and that is not being used for online activities that may introduce viruses.
- Create a new directory on the computer for the material identified with an identifiable name.
- Then create folders for each of the media to transfer. If possible, set a write blocker on the computer and write-protect tabs on the media to prevent unauthorised changes to the content. If the electronic data is on removable media (e.g. CDs), copy the data from the physical medium to the relevant folder.
- If digital records are on removable media (e.g. CD's), copy the data from the physical medium to the relevant folder. If the medium is a disk, consider copying the data as a disk image, which is a single file that contains an exact copy of the disk's content and ensures that essential metadata will be retained.

Conduct an initial survey of the material to form an overall impression. This does not necessarily entail opening and reading every record; an initial assessment might involve opening a few files in each folder to assess whether the folder title accurately reflects its contents, and an assessment of the likely significance of the material. File names, dates, author and correspondent names can be useful clues. This survey should help identify low value material, which can be deleted, material that may have short- or medium-term use, and material with potential long-term value.

Generate a copy of the directory information (folder and file names, sizes, extensions, and dates). Store a digital copy in the survey directory and print out a hard copy for reference. It is also advisable to make a back-up copy of the directory. An external hard drive might be used for this purpose.

Consider old digital material. This can be in forms that simply cannot be accessed (for example, floppy disks), or it may be that the software required to read the file is now lost.

There are techniques and equipment for retrieving information held in such cases but it is not easy to know whether it is worth spending money, time and energy on retrieving information that may well prove to be of no value. Look for any identifying information on labels or associated packaging such as the creator, title, description of contents, and dates. Record anything that is known about the hardware and software used to create the files. Remember that many of the media will have been created relatively recently, easily within living memory, so their creators may well be alive and able to remember something about the media. For example, photographs of a social gathering from 3 years ago, or copies of CBC's newsletters.

### Decide which are most important

It may not be practical and almost certainly isn't desirable to preserve and transfer to a trusted digital repository every single file, so the next step is to select exactly what to save.

Material should be prioritised based on factors such as the following:

- The value of the records to CBC or their historical importance;
- The level of use or anticipated future use of the record;
- Whether there is an immediate danger of loss of content because of media degradation;
- Whether there appears to be significant digital content that is not replicated in paper records, and if so, whether the digital version has features that add value to the content.

### Organise the content

Once it has been decided what to keep, create a new directory and title it something like ***Archives***.

Then create folders inside the directory and name them with descriptive titles according to the subject, project or activity on which they are based.

In naming files and folders, be as consistent and concise as possible while choosing meaningful names based on standard naming conventions. Include the date in the file name, using the format yyyymmdd (e.g. 10 June 2005 = 20050610) for recording dates: that way files will be presented chronologically in file using management tools. It is advisable to avoid capital letters or spaces: this can cause problems when moving files between different computing environments. The University of Edinburgh has published some useful guidance on naming conventions:

http://www.recordsmanagement.ed.ac.uk/InfoStaff/RMstaff/RMprojects/PP/FileNameRules/FileNameRules.htm

Next, transfer files from wherever they were held originally into the archive folders just created.

If there are several copies or versions of a file, always save the highest-quality, larger-size master version. Give each file a descriptive name to help find the files again in the future.

When saving documents from the Web for reference purposes, make a note of their source: web addresses can change and it can be important to have a record of where it was obtained.

### E-mail management

E-mails should be regularly managed and organised into subject folders with concise and relevant titles. Separate personal and professional email if possible. It is sensible though potentially time-consuming to save historically important e-mails in an alternative format such as html. But don't forget to include the metadata (sender, recipients/s, date etc.), or any attachments. Consider whether to file e-mail attachments separately rather than leaving them in the email directory. If this is done, identify their source in their file name, and save a copy of the e-mail alongside the attachment to provide contextual information

Then delete any e-mail that has no long-term value.

### Save copies in different places

Always make a backup copy of digital archives.

An external hard drive is the best and most convenient choice. Using CD-Rs or DVD-Rs is more time-consuming, could result in splitting data over several disks, and they are also more easily misplaced. A hard drive can hold a lot of content so it makes a good central repository while being portable. Store that copy in a different geographic location away from the main copies.

However, even hard disks will fail at some point. They will either physically decay or become outdated in time. At least once every ten years transfer the content from the old drive to a newer storage technology. This helps ensure ongoing access to archives.

It is possible to backup digital collections with online services. But always read the terms and conditions carefully and don't use an online service as the only backup. Keep a copy on a drive at another location.

Paper is still this best backup option for the records intended for permanent preservation. Print out copies of important documents and photographs, so that we can have the document in an alternative and durable format.

## Managing electronic records

Without active and ongoing management, digital records are extremely unlikely to survive intact in the long-term. Use the system of record-keeping just adopted to inform future filing and ensure that new records are created and kept in a compatible way.

Before undertaking major upgrades and updates of hardware and software, think and plan ahead. It is common for older files to get lost as a result of updates so files should be backed up prior to such changes.

Anti-virus software and a firewall should be installed and regularly updated.

If valuable digital records are encrypted, it is best to select open-source encryption software. However, it is important that if digital data is encrypted that there is make provision for their access in the event of an organisation ceasing to exist. The same is true for password-protected material, which may include the computer, of course. Relevant details should be stored offsite in a secure location, perhaps lodged with another organisation or kept in a site known only to key colleagues.

Keep up to date. Technological changes are rapid and new technologies are constantly appearing. Interoperability with others and the threat of hardware and software obsolescence mean that the digital environment must constantly evolve, but consider critically the impact of these new developments on the ability to use digital data now and in the future

## Sources of advice on digital archives

There are many online sources of advice on all aspects of digital records management and archiving. Among those most suitable for those with little or no technical knowledge are:

*'A useful introduction to the importance of digital preservation* is a short video guide, published by the Library of Congress:

http://www.digitalpreservation.gov/multimedia/videos/personalarchiving.html

The Online Computer Library Centre has produced useful starting information at:

*You've Got to Walk Before You Can Run: First Steps for Managing Born-Digital Content Received on Physical Media*, by Ricky Erway (OCLC, 2012)

(http://www.oclc.org/content/dam/research/publications/library/2012/2012-06.pdf )

The National Archives offers a number of resources:

*Advice for creators and managers of electronic records when selecting physical storage media for long-term preservation*

http://www.nationalarchives.gov.uk/documents/information-management/selecting-storage-media.pdf

*Guidance on care, handling and storage of removable media*

http://www.nationalarchives.gov.uk/documents/information-management/removable-media-care.pdf

*Assistance in identification of files in unknown formats:*

http://www.nationalarchives.gov.uk/PRONOM/Default.aspx

The Digital Preservation Coalition has produced a *Handbook on Digital Preservation*

http://www.dpconline.org/advice/preservationhandbook

Although principally aimed at specialist staff in organisations, it includes much useful general advice.

If it is believed that the archive (whether in digital form, paper, or mixed format) should make its way to an archive repository for permanent preservation, then it is a good idea to get in touch with the chosen repository at an early stage. Identify archive services within in the area of collecting interest on ARCHON, a directory for archive repositories and institutions in the United Kingdom. This is available online:

http://www.nationalarchives.gov.uk/archon/

Contact the Archives Sector Development department at The National Archives who can offer advice on suitable places of deposit: asd@nationalarchives.gsi.gov.uk.

## Questions to ask

We need to ask ourselves the following questions to help decide whether to retain historical records or deposit them elsewhere:

- Do any of the surviving records have significant value as evidence of CBC, who it serves and its history?
- Can these be brought together and maintained by CBC?
- Will external funding be sought, with the implication of opening up public access, or will CBC fund the archive itself?
- How will appropriate care and access be provided? Is there, at least, a secure storage room and reading area, which can be constantly supervised?
- Where is professional advice going to be obtained if there is no professional archivist?
- Who is going to arrange and list the archives?
- Is deposit with an appropriate local or specialist record office a more viable option?
- Are records from other organisations or individuals going to be collected?
- If so, are the necessary procedures in place to support the gift or loan of archive material, and future preservation?
- How is sensitive material going to be handled in terms of access for research? Who is going to determine whether they are closed or made available?

These questions may be daunting for some, but they will perhaps help CBC to make realistic decisions as to the future of our records.