



# Retention Guidelines

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**The purpose** of this document is to give guidance to Church of Ireland dioceses and parishes in how long different types of data should be retained. The need to retain certain information can be mandated by, legislation, Church of Ireland regulations, the Data Protection Act 2018, and any regulations or enactments thereunder; Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR).

**Personal data** is any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, address, phone number, religious status, date of birth, PPS / NIN number etc.

The general principles when dealing with personal data are as follows:

- Processed lawfully, fairly and in a transparent manner
- Collected for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Only stored for as long as is necessary
- Processed in a manner that ensures the personal data is kept safe and secure

**Reasons for keeping data:** The Church of Ireland does not wish to simply adopt a "save everything" approach. That is not practical or cost-effective and would place an excessive burden on the Diocese and Parishes to manage the constantly-growing amount of data. Some data, however, must be retained in order to protect the Church's interests, preserve evidence, and generally conform to good business practices.

Some reasons for data retention include:

- Parish Record Collections for historical and/or archival purposes
- Litigation
- Accident investigation
- Security incident investigation
- Safeguarding / children / vulnerable adults investigation
- Regulatory requirements
- Intellectual property preservation
- Legal requirements

**Good practice** suggests that any personal data held should only be kept for as long as it is necessary and useful. You should not hold personal information indefinitely unless there is a valid reason to do so and you should stop processing data if an individual withdraws consent (where the individual's consent is the lawful basis relied upon to process the data). Once the retention timeframes agreed have expired, you must actively destroy the personal data. Failure to do this, and to manage your data, could result in a data breach.

**However** if you decide, at a local level, that certain data should not be destroyed, speak with the Data Controller<sup>1</sup> or the RCB's Data Protection Officer so that an exception can be considered.

Please note that you should NOT destroy data in violation of the guidance notes below and other legislative requirements. Destroying data that a user may feel is harmful to him/her is forbidden as is destroying data in an attempt to cover up a violation of law or policy. This is also considered a data breach. You should

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<sup>1</sup> The Church of Ireland has four joint data controllers: Representative Church Body (General Synod); Diocesan Councils; Parishes; Bishops  
The Representative Church Body, Dublin. Updated May 2019.

always keep a record of when you archive and/or destroy information. The log should include date and title of the content. Where you make a decision to destroy/keep outside retention guidelines, document the decision making process.

### Parish Record Collection

Guidelines concerning the Safe Custody of and Permissions for Copying from Parish Records & Memorials in Burial Grounds have previously been issued and are available through the Church of Ireland website [here](#).

The RCB Library is the official place of deposit for Church of Ireland for parish records that are no longer required in local custody. Here each parish collection is assigned a unique record number, and each item within each collection given its own unique identity. All the collections are listed, and these lists may be accessed through [this](#) colour-coded list. Parish record collections, as with all other archive materials, are stored in fireproof and environmentally-controlled conditions. Public access to records is also fully controlled at the Library. Registers of baptism, marriage and burial are available for public research, but other categories of records such as vestry minutes are subject to 40-year closure, and in some instances records may be subject to 100-year closure to the general public.

When considering transferring records to the Library, the table below which shows the typical content of a parish record collection for archiving at the RCB Library should be considered.

#### Typical content of a parish record collection for archiving in the RCB Library includes:

Registers	Archive as part of Parish Record Collection at the RCB Library	
Combined Register of Baptisms Marriages and Burials	Register of Banns	Register of Burials
Confirmation Register	Register of Baptisms	Register of Marriages

Vestry Records	Archive as part of Parish Record Collection at the RCB Library	
Register of Vestrymen	Vestry Minute Books	

Other Records	Archive as part of Parish Record Collection at the RCB Library	
Account Book	Graveyard Plan	Miscellaneous Loose Papers
Account Reports	Graveyard Register	Orders of Service
Cess Book	Index to Parish Registers	Organizations & Societies
Church Attendance Book	Maps & Plans	
Deeds	Miscellaneous Volumes	

If you have any questions about a Parish Record Collection, or any questions for the RCB Library, please contact the library directly. Contact details and further information is available [here](#).

## Retention Timelines

Below are guidance notes and timelines to follow. If you have any questions please contact the RCB's Data Protection Officer at: [rebekah.fozzard@rcbdub.org](mailto:rebekah.fozzard@rcbdub.org).

### Other Church Specific Records

Type of Record	Retention Period	Comments/Actions
<b>Church Services</b>		
<b>Service Books</b> e.g. parish magazines church guides and parish histories	Retain a small representative sample	Archive with RCB library as part of parish record collection
Baptism certificate counterfoils; marriage certificate counterfoils; copy burial and cremation certificates; applications for baptisms and marriages	Last entry plus 2 years then destroy	Destroy once time period elapsed
<b>Church Buildings and Property</b>		
Church, furnishing and contents including architects reports, tenders, contracts, plans, photographs, drawings and other papers relating to major works to the Church	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Contracts, tenders and specifications for minor works	Last action plus 7 years then destroy	Destroy once stated time period elapsed
Organ specifications, contracts, papers	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Church Property Register & Log Book	Last action plus 1 year	Archive with RCB library as part of parish record collection and remove any personal data
<b>Rectory</b>		
Plans, drawings and photographs	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Minutes, accounts, specifications, tenders, contracts, plans, photographs, drawings and other papers relating to major works to the rectory	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Contracts, tenders and specifications for minor works	Last action plus 7 years then destroy	Destroy once stated time period elapsed

<b>Churchyard</b>		
Minutes, accounts, specifications, tenders, contracts, plans, photographs, drawings and other papers relating to major works to the rectory	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data

### **General Parish Administration**

<b>Type of Record</b>	<b>Retention Period</b>	<b>Comments/Actions</b>
Correspondence concerning appointments	Last action plus 7 years	Review and agree to either keep a sample with personal details scrubbed or destroy. Document decision made
Papers relating to major parish developments or parish audits	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Rector / Bishop (as example) correspondence and other papers on routine administration	Current year plus 3 years	Destroy once stated time period elapsed
Copies of replies to questionnaires or important circulars	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Minutes of Council and committees, church meetings and meetings of parishioners for appointment of church wardens	Last action plus 7 years	Archive with RCB library as part of parish record collection and remove any personal data
Routine correspondence	Current year plus 3 years	Destroy once stated time period elapsed
Visitors Books	Last entry plus 3 years	Destroy once stated time period elapsed or archive with RCB library as part of parish record collection if of historical value

### **Personnel Records - Staff**

<b>Type of Record</b>	<b>Retention Period</b>	<b>Comments/Actions</b>
Terms and conditions of employment	Throughout employment plus 7 years and then destroy	Includes details of employment, references, pay etc.
Policies	Indefinitely	Keep indefinitely and archive
HR Records	Throughout employment plus 7 years and then destroy	Annual Leave / Sick Leave etc.
Disciplinary Records	Throughout employment plus 7 years and then destroy	

Carers Leave / Parental Leave	8 years after the relevant leave is taken and then destroyed	These records should be retained for 8 years following the last date leave was taken
Maternity Leave Records / Paternity Leave	7 years after the relevant leave is taken and then destroyed	These records should be retained for 7 years following the last date leave was taken
Job descriptions and files	18 months	
Job competition files (all called for interview)	18 months after competition is closed then destroy except for those employed.	Keep records of those employed
Selection criteria	18 months	
Candidates short-listed but not successful and/or do not accept role	18 months after competition is closed then destroy	
Interview board marking sheets and interview board notes	18 months and then destroy	
Garda Vetting/Access NI Related Information No negative reports returned	Delete everything else after one year.	
Garda Vetting/Access NI Related Information NEGATIVE REPORT	Hold for 12 months from date vetting application closed.	
Annual appraisal, declaration of acceptance and training records	Retain for duration of the contract plus 7 years	
Contracts for services	Retain for duration of the contract plus 7 years	Keep for stated time period. Then destroy

### Personnel Records - Volunteers

Type of Record	Retention Period	Comments/Actions
Volunteer Agreement	Throughout volunteering plus 7 years. Destroy agreements. See notes	Keep for stated time period then destroy.
Application Form	Throughout volunteering plus 7 years. See notes	Keep for stated time period and then destroy.
Policies	Indefinitely	Keep indefinitely and archive
Disciplinary Records	Throughout volunteering plus 7 years and then destroy	Keep for the stated time period and then destroy
Role descriptions and files	18 months	
Interview records and panel recommendation	Throughout volunteering plus 7 years.	Keep for stated period time and then destroy

Annual Review forms	Throughout volunteering plus 7 years, then destroy.	
Declarations of acceptance and training records	Throughout volunteering and then for 7 years. See notes.	
Garda Vetting/Access NI Related Information No negative reports returned	See notes. Delete everything else after one year.	
Garda Vetting/Access NI Related Information NEGATIVE REPORT	Hold for 12 months from date vetting application closed.	

### Financial Records

Type of Record	Retention Period	Comments/Actions
<b>Payslips</b> - Copies of pay slips and payroll details for each employer including expenses	6 Years plus current year unless Revenue advises otherwise	Keep for stated time period. Then destroy
Pension Records / Superannuation / Retirement Records	<b>Retain until</b> pensioner and dependent spouse are deceased and dependent children are finished full time education plus 7 years – then destroy	Keep for stated time period. Then destroy
Tax Records	6 Years plus current year	Keep for stated time period. Then destroy
Accounts regulations – the file forms part of the accounts records	6 Years plus current year	Keep for stated time period. Then destroy
Accounts regulations – accounts records includes a solicitor keeping the original of each paid cheque drawn on each client account must be retained	6 Years plus current year	Keep for stated time period. Then destroy
Anti-money laundering legislation - documentation evidencing the identity of clients; original documents or admissible copies of transactions	6 Years	Keep for stated time period. Then destroy
Tax and Revenue Compliance – all files	6 Years after the completion of the transaction to which they relate plus current year	Keep for stated time period. Then destroy
VAT regulations – files of persons with a taxable interest in land	Period of taxable interest plus 6 years	Keep for stated time period. Then destroy

Annual CHY Forms	Keep as long as they are valid (assumption one year) plus 6 years	Keep for stated time period. Then destroy
Gift Aid Declarations	Keep as long as they are valid (assumption one year) plus 6 years	Keep for stated time period. Then destroy
PRTB Forms (ROI only)	Forms should be destroyed once time period for registration expires. 4 years for tenancies pre Dec 2016 / 6 years for tenancies registered post Dec 2016	Keep for stated time period. Then destroy.  Post Dec 2016 PRTB hold onto a copy on their system
Cash books, bank statements, other subsidiary financial records	6 Years plus current year then destroy	Keep for stated time period. Then destroy

### Health & Safety

Type of Record	Retention Period	Comments/Actions
Health & Safety Records	10 Years from date of an accident	Keep for stated time period. Then destroy unless justifiable reason for archiving
Pre-Employment Medical Reports	Duration of employment plus 7 years	At end of retention period destroy by confidential shredding
Personal Injuries	3 years from cause of action	Keep for stated time period. Then destroy unless justifiable reason for archiving
Accident reporting sheets or books if relating to adults	Date of incident plus 10 years	Keep for stated time period. Then destroy unless justifiable reason for archiving
Accident reporting sheet of books if children	Date of incident plus 10 years or 3 years from when the child reaches the age of majority whichever is the latest.	Keep for stated time period. Then destroy unless justifiable reason for archiving

### Safeguarding: Children/Young People/Garda Vetting/Access NI

Official guidance was issued via the Safeguarding Office in November 2018. Information is available [here](#).

### Legal and Property Proceedings

A file belongs to the client once the solicitors' costs and outlays have been paid, although there are limitations to what a client has access too. There is a need to retain original executed agreements, deeds and other engrossments on an ongoing basis. Take advice from your solicitor before destroying files arising from legal and property proceedings.

### Further Information

Please contact Rebekah Fozzard, Data Protection Officer (RCB), at: [rebekah.fozzard@rcbdub.org](mailto:rebekah.fozzard@rcbdub.org)