

Ely Diocesan Board of Finance

Data Retention Policy (EDBF)

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Data Retention Policy - Care of Diocesan Records

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Introduction

The Ely Diocesan Board of Finance (“EDBF”, “we”, “our”) is committed to managing its information and records responsibly and in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant Church of England guidance.

This policy ensures that records—whether physical or digital—are kept only for as long as necessary for operational, legal, regulatory, or historical purposes. Maintaining good records management reduces risk, supports transparency, and helps EDBF meet its statutory, pastoral, and administrative obligations.

All EDBF staff, clergy, volunteers, and contractors are required to handle records securely, ensuring they are accurate, up to date, retrievable, and disposed of appropriately when no longer required.

This policy should be read alongside:

- The EDBF Data Protection Policy Found on the Diocesan intranet site or available at request from Privacy@elydiocese.org)
- The EDBF Privacy Notice(s) - <https://www.elydiocese.org/parish-support/privacy-and-data-protection/data-privacy-notices/>
- The Church of England Records Management and Retention Guidance - <https://www.churchofengland.org/about/libraries-and-archives/records-and-information-management>
- The EDBF Data Retention Schedule (Appendix A)

Purpose

The purpose of this policy is to:

- Define what constitutes a “record” and how EDBF information should be managed.
- Ensure EDBF complies with statutory and regulatory record-keeping requirements.
- Provide guidance on storage, access, retention, and secure disposal of records.
- Protect personal and confidential information against accidental loss, unauthorised access, or misuse.
- Support the preservation of information of permanent historical value in partnership with the Cambridge University Library with who the EDBF work. Designated library archivists identify, catalogue and retain items of historical & academic significance. The archive is private but can be viewed by the public with permission.

This Policy applies to all formats of data, including paper, digital files, emails, audio/video recordings, photographs, and databases.

Scope

This policy applies to:

- All departments, offices, and committees operating under the EDBF.
- All individuals handling EDBF records, including employees, clergy, volunteers, consultants, contractors, and temporary staff.
- All records created, received, or maintained by the EDBF in the course of its business.

It applies to personal and non-personal data, including but not limited to:

- Employment and HR records
- Safeguarding and DBS data
- Financial and property documentation
- Correspondence, reports, and meeting records
- Photographs, audio-visual material, and digital media

Responsibility

Core responsibilities are outlined below.

Role	Responsibility
Diocesan Secretary	Policy owner and accountable for overall compliance.
Data Privacy Team	Provides advice, monitors compliance, and maintains the retention schedule.
Departmental Managers (Heads of Department)	Ensure that retention rules are implemented within their teams.
All staff and volunteers	Responsible for managing records they create or handle in line with this policy.
IT/Systems Administrator	Ensures secure electronic storage, backup, and deletion processes are in place.

Where doubt exists about retention periods, departments must consult the Data Privacy Team (privacy@elydiocese.org).

Principles of Record Retention

Records must be managed in accordance with the following principles:

1. **Lawfulness:** Records are retained only where a lawful basis applies.
2. **Purpose limitation:** Data must only be used for the purpose it was collected.
3. **Data minimisation:** Only relevant information should be retained.
4. **Accuracy:** Records must be accurate and kept up to date.
5. **Storage limitation:** Records must not be kept longer than necessary.
6. **Integrity and confidentiality:** Records must be stored and disposed of securely.
7. **Accountability:** EDBF must be able to demonstrate compliance with these principles.

Retention and Disposal

- The Retention Schedule (Appendix A) defines how long different types of data must be kept and the method of final action (e.g., destruction, review, or archival).
- When a retention period expires, records should be securely destroyed unless a valid reason for continued retention exists (such as ongoing litigation or audit requirements).
- Electronic and paper records must be treated with equal care; deletion from systems should be permanent and unrecoverable.
- Records of historic value (as determined by the Diocesan Record Office or the Data Privacy Team) should be transferred for permanent preservation.

Archiving and Historical Records

The EDBF recognises the historical and cultural importance of its records. Permanent records will be transferred to the Cambridge University Library Archives in line with the Church of England's national retention guidance.

Before transfer, the Ely Diocesan Board of Finance and where relevant the Bishop's Office will work with the Library archivist to ensure that:

- All records have been reviewed for data protection risks.
- Personal data is redacted where required.
- A transfer log is maintained.

Failure to Comply

Failure to adhere to this policy may result in:

- Breach of UK data protection law.
 - Disciplinary action for staff or volunteers.
 - Regulatory penalties from the Information Commissioner's Office (ICO).
- All suspected breaches must be reported immediately to the Data Privacy Team.

Monitoring and Review

The Data Privacy Team will:

- Review this policy annually or sooner if required by legal or organisational changes.
- Audit departmental retention practices.
- Report findings to the Diocesan Secretary and recommend updates as needed.

The current version of this policy and retention schedule is maintained on the EDBF intranet.

Related Documents

- Data Protection Policy (EDBF)
- Privacy Notice (EDBF) – [Click here](#)
- Information Security Policy (EDBF)
- Records Retention Schedule (EDBF) – linked in Appendix A of this document
- Safeguarding Records Retention Schedule (EDBF) – included in Appendix B of this document
- Church of England Records Management and Retention Guidance:
<https://www.churchofengland.org/about/libraries-and-archives/records-and-information-management>

Appendix A - Ely Diocesan Board of Finance Data Retention Schedule.

The Diocesan Board of Finance has adopted the National Church of England Retention Schedule covering both general records and those relating to Safeguarding matters.

Those schedules set out the retention period and final action for keeping various types of diocesan record.

If you are in any doubt please seek advice from the Privacy Team at privacy@elydiocese.org.

Please note, electronic forms of communication (such as emails), are treated as any other means of record/written correspondence and will be subject to the same retention periods.

Church of England Data Retention Schedule – [Staff intranet > GDPR and Data Protection \(Click here\)](#)

Appendix B - Ely Diocesan Board of Finance Safeguarding Data Retention Schedule.

The Church of England Safeguarding Records Retention Schedule was approved by the National Safeguarding Team – Senior Leadership on 5 March 2024.

It has been specifically developed to cover all safeguarding records for the NCIs and the wider Church and is also included in the Church of England Records Retention Schedule.

The Ely Diocesan Board of Finance (EDBF), has adopted this schedule, which for ease of access is separated and available below and on the Diocesan Intranet here - [Staff intranet > GDPR and Data Protection \(Click here\)](#)

Records Retention Schedule – Safeguarding function

New Reference Number	Activity	Transaction	Description	Manual Trigger	Retention Period	Date Type (Calendar, financial year, other..)	Disposal Action	Personal Data	Justification for Retention based on Legal (Statute, regulation, code of practice), Business, Administrative or Historical requirement	Formats of data	Notes
SFG1	Advice (safeguarding non-casework related)										
SFG1.1	Advice (safeguarding non-casework related)	Provision and receipt of advice	Records relating to the provision and receipt of non-case related, non-legal advice on safeguarding.	Date of Issue	3 Years	Calendar	Destroy	No	Business - to support safeguarding processes and ensure that decisions were based upon good practice.	Electronic - Usually email	
SFG2	Advocacy										
SFG2.1	Advocacy	Undertaking advocacy case work - notebooks	Notes recorded in notebooks during the process of providing advocacy to the Survivor during the Safeguarding process. They will contain information that the survivor has disclosed to the advocate that are not part of the case.	Until Superseded (notes typed up and added to filing system).	1 Year	Calendar	Destroy	Yes	Legal - based on retention period indicated in the report from the Independent Inquiry into Child Sexual Abuse - Aligned with the Case Management records of evidence that the Survivor was provided with adequate confidential advocacy support.	Physical - Notebooks	To ensure compliance with data protection and good records management practices. Notebooks should be treated as follows. <ol style="list-style-type: none"> 1. Ideally case note books should only hold details relating to cases, any other general work related note taking not directly related to case work should be kept separately. 2. Notes should clearly reference the specific case they relate to. 3. Notes should be written up as soon as practicable and stored in a structured filing system. 4. When notes have been transferred the page should be crossed out with a marker to indicate that they have been written up and appropriately filed. 5. Before destruction all pages should be reviewed to ensure that the notes have been transcribed. 6. Notebooks must be retained until all notes have been typed up and filed, and can then be destroyed.

SFG2.1	Advocacy	Undertaking advocacy case work - electronic notes	Notes taken when in discussion during the process of providing advocacy to the Survivor during the Safeguarding process. They will contain information that the survivor has disclosed to the advocate that are not part of the case. Includes notes typed up from physical notebooks.	Close of Case	75 years	Calendar	Destroy	Yes	Legal - based on retention period indicated in the report from the Independent Inquiry into Child Sexual Abuse - Aligned with the Case Management records of evidence that the Survivor was provided with adequate confidential advocacy support.	Electronic - Word documents, emails	
SFG3	Case Management										
SFG3.1	Case Management	Case allocation and planning	Records relating to the administration of complex casework allocation, including allocation lists	End of current year	6 Years	Calendar	Destroy	Yes	Administration - to support the case allocation process	Electronic	
SFG3.2	Case Management	Concerns - church officers	Records that relate to concerns that are determined not to be safeguarding issues.	Date of concern	1 Year	Calendar	Destroy	Yes	Business - following best practice from NSPCC, Save the Children and Local Government Legal - Article 5 UK GDPR (Storage limitation).	Electronic - Not held on MY Concern	If an issue becomes a safeguarding case then will be transferred to a case file.
SFG3.3	Case Management	Concerns - non church officers	Records relating to any initial information that relates to individuals who are non-church officers.	Last Action	1 Year	Calendar	Destroy	Yes	Legal - Legal advice received from Stephen Scowns LLP (2023).	Electronic - Not on the My Concern system	This relates to any documents relating to incidents that are reported to the safeguarding team that do not involve matters relating to Church Officers. Data controllers are not responsible for retaining records on behalf of statutory agencies, there are no duties beyond the reporting of these matters.
SFG3.4	Case Management	Concerns - Tenants	Any initial information that relates to concerns about individuals that are Tenants or prospective tenants. Includes reports and referrals to the Local Authority Safeguarding Team. Application forms and communications with individuals and probation officers.	End of tenancy	6 Year	Calendar	Destroy	Yes	Legal - Limitations Act 1980 (Simple Contract) Legal - Article 5 UK GDPR (Storage Limitation)	Electronic - QL Housing Management System, Shared Drive, Email. Physical - Tennancy file	PB Housing are not responsible for retaining record on behalf of statutory agencies, we have no duty beyond the reporting of these matters.

SFG3.5	Case Management	Individual cases - no further actions	Records relating to the safeguarding matters that have been deemed to require no further action.	Date NFA decision confirmed	2 Years	Calendar	view/Destr	Yes	Stephen Scowns LLP (2023) Article 5 UK GDPR (Data Minimisation) - It is necessary to minimise the data held.	Electronic - Held on MY Concern	
SFG3.6	Case Management	Individual cases - no further action reduced record	Minimised data from records recording a safeguarding matter that was deemed as requiring no further action.	Date of review	75 Years	Calendar	Destroy	Yes	Legal - Legal advice received from Stephen Scowns LLP (2023).	Electronic - Held on MY Concern	The details of what constitutes minimised data can be found in the My Concern Guidelines. System must be reviewed and functionality updated as soon as practicable to enable effective data minimisation.
SFG3.7	Case Management	Individual cases	Records of safeguarding case investigations. Includes: notes, correspondence with victims, correspondence with alleged perpetrators, safeguarding casework reports, minutes of core group meetings, risk assessments etc.	Close of case	75 Years	Calendar	Destroy	Yes	Legal - based on retention period indicated in the report from the Independent Inquiry into Child Sexual Abuse.	Electronic - Held on MY Concern	
SFG3.8	Case Management	Management of case officer notebooks	Any notebooks that a case officer uses to record details of the cases that they are working on.	Until Superseded (notes typed up and added to filing system).	1 Year	Calendar	Destroy	Yes	Administration - to ensure that all relevant information is written up or scanned and transferred to the My Concern System -which is the official case record. Legal - Article 5 UK GDPR (Storage limitation).	Physical - Notebooks	To ensure compliance with data protection and good records management practices. Notebooks should be treated as follows. 1. Ideally case note books should only hold details relating to cases, any other general work related note taking not directly related to case work should be kept separately. 2. Notes should clearly reference the specific case they relate to. 3. Notes should be written up/scanned into the case management system as soon as practicable. 4. When notes have been transferred the page should be crossed out with a marker to indicate that they have been written up in the CMS. 5. Before destruction all pages should be reviewed to ensure that the notes have been transcribed. 6. Notebooks must be retained until all notes have been typed up and filed, and can then be destroyed.
SFG4	Safeguarding Complaints										
SFG4.1	Safeguarding Complaints	Complaints	Records relating to the management of complaints relating to safeguarding activities.	Close of complaint	6 Years	Calendar	Destroy	No	Legal - Limitation Act 1980 (Tort).	Electronic	Complaints about the safeguarding process should align with the NCI complaints process. Records of queries into general safeguarding matters will fall under Communications Function.
SFG5	Safeguarding Practice Reviews										
SFG5.1	Individual Practice Review	Investigations - investigation process	Records of evidence collected or created relating to the investigations of cases where a review has been undertaken.	Completion	75 Years	Calendar	Destroy	Yes	Legal - based on retention period indicated in the report from the Independent Inquiry into Child Sexual Abuse.	Electronic Paper	

SFG5.2	Individual Practice Review	Investigations - reporting	Reports relating to the outcome of the review.	Publication of the report	Permanent	Calendar	Archive	Possible	Historical - has significant value as to how safeguarding matters are dealt with by the Church. Legal - Article 89 UK GDPR (Archive).	Electronic	
SFG5.3	Individual Practice Review	Practice review process	Records relating to the review process. Including: policies and procedures, the initial establishment of the process, terms of reference of the review, appointments of reviewers in accordance with the requirements of the SPR Policy etc.	Completion	6 Years	Calendar	Destroy	Yes	Business - required post report publication to justify the detail of the outputs/reports.	Electronic	
SFG5.4	Individual Case Review	Post case implementation	Records relating to the post case implementation of reviews. Includes: action plans, implementation documents and reports etc.	Completion	Permanent	Calendar	Archive	Possible	Historical - include evidence of failures that result in practice improvement. Legal - Article 89 UK GDPR (Archive).	Electronic	
SFG6.1	National Past Case Reviews and Audits										
SFG6.1	National Past Case Reviews and Audits	Reviews and audit - procedural documents	Records relating to the procedures implemented in any national audits or reviews.	Completion	6 Years	Calendar	Destroy	Yes	Business - required post report publication to justify the detail of the outputs/reports.	Electronic	
SFG6.2	National Past Case Reviews and Audits	Reviews and audits - review process	Records relating to the checks and investigations.	Completion	Permanent	Calendar	Archive	Yes	Historical - includes evidence of failures that result in practice improvement. Legal - Article 89 UK GDPR (Archive).	Electronic	
SFG6.3	National Past Case Reviews and Audits	Reviews and audit - Reporting	Records relating to review and audit reporting of national past case reviews. Includes: any reports or outcomes of reviews etc.	Date of Publication	Permanent	Calendar	Archive	No	Historical - includes evidence of failures that result in practice improvement. Legal - Article 89 UK GDPR (Archive).	Electronic	
SFG6.4	National Past Case Reviews and Audits	Post case implementation	Records relating to the post case implementation process. Includes: action plans, implementation documents and reports etc.	Completion	Permanent	Calendar	Archive	Possible	Historical - includes evidence of failures that result in practice improvement. Legal - Article 89 UK GDPR (Archive).	Electronic	
SFG7	Statutory or Judicial Inquiries										
SFG7.1	Statutory or Judicial Inquiries	Providing evidence for an inquiry	Records created specifically for the review or judicial inquiry. This does not include pre-existing records or documents gathered as part of the process.	Completion	Permanent	Calendar	Archive	Yes	Historical - includes evidence of failures that result in practice improvement. Legal - Article 89 UK GDPR (Archive).	Electronic Paper	When transferred to the archive the records will be closed for a minimum period of 100 years.
SFG7.2	Statutory or Judicial Inquiries	Inquiry - reporting	Records relating to the post inquiry implementation reporting process. Includes: any reports or outcomes of inquiries etc.	Completion	Permanent	Calendar	Archive	Possible	Historical - includes evidence of failures that result in practice improvement Legal - Article 89 UK GDPR (Archive).	Electronic Paper	

SFG7.3	Statutory or Judicial Inquiries	Post inquiry implementation	Records relating to the post inquiry implementation process. Includes: action plans, implementation documents and reports etc.	Completion	Permanent	Calendar	Archive	Possible	Historical - includes evidence of failures that result in practice improvement Legal - Article 89 UK GDPR (Archive).	Electronic Paper	
SFG8 Supervision Management											
SFG8.1	Supervision Management	Professional supervision	Records relating to the supervision process. This includes the supervision forms and any case work included in supervision.	Termination of Employment	75 Years	Calendar	Destroy	Yes	Legal - based on retention period indicated in the report from the Independent Inquiry into Child Sexual Abuse.	Electronic Paper	
SFG9 Survivor Support											
SFG9.1	Survivor Support	Interim support scheme application process	Records relating to the interim support scheme application process. Includes: applications for support and related correspondence.	Close of case or last payment	12 Years	Calendar	Destroy	Yes	Legal - Limitations Act 1980 (Tort General Rule) - these generally relate to financial transactions. Business - To protect the AC from repeated and fraudulent claims.	Electronic Paper	
SFG10 Victim and Survivor Engagement											
SFG10.1	Victim and Survivor Engagement	Ad-hoc engagement work	Records relating to ad-hoc engagements and consultations.	Completion of outputs	6 Years	Calendar	Destroy	yes	Business - monitoring and oversight of the consultations process.	Electronic	
SFG10.2	Victim and Survivor Engagement	Communications with victim and survivors	Records relating to the communications with victims and survivors. Includes correspondence with victims and survivors, newsletters etc.	End of year	3 Years	Calendar	Destroy	Yes	Business - required to evidence the outcomes of the engagement. Legal - Limitations Act 1980 (defamation and malicious falsehood).	Electronic Paper	
SFG10.3	Victim and Survivor Engagement	Ongoing engagement work	Records relating to the ongoing participation and volunteering.	Completion of work	6 Years	Calendar	Destroy	Possible	Business - required to support output of the reports, will be required post report publication to justify the detail of the outputs/reports.	Electronic	
SFG10.4	Victim and Survivor Engagement	Reporting on the engagement work	Reports and outputs of consultations and engagements.	End of Consultation	Permanent	Calendar	Archive	No	Historical - these report will impact on decision making in relation to Safeguarding as such have an historical value to evidence how safeguarding practices changed over time across the Church.	Electronic	These records must not contain any identifiable personal data.