

 <b>ACCESS 2 PLACE HOUSING</b>	<h2>RECORD RETENTION POLICY</h2>	Policy Number	IT02
		Version	2
		Date	February 2023
		Review Date	February 2025

### 1 Purpose

The purpose of this Policy is to ensure that necessary records and documents of Access 2 Place Housing (A2P) are adequately protected and maintained and to ensure that records which are no longer needed by A2P or are of no value are discarded at the proper time and in the proper way.

This Policy is also for the purpose of aiding employees of A2P in understanding their obligations in retaining electronic documents - including e-mail, internet files, text files, PDF documents, and all Microsoft Office or other formatted files.

### 2 Context

A2P is committed to effective records retention to preserve its history, ensure that critical records are available to meet business needs, comply with legal requirements, optimise the use of space, minimise the cost of record retention, and ensure that outdated and useless records are destroyed. A written record retention policy provides guidelines on the appropriate process for A2P's employees to follow.

### 3 Scope

This policy applies to all employees of A2P and in relation to all physical and soft copy (electronic) records generated in the course of A2P's business activity.

### 4 Risk

By not adhering to consistent and effective retention and destruction of records A2P risks being in breach of legislative statutes and encumbering costs associated with the retention of records that could otherwise be destroyed.

### 5 Policy Detail

#### 5.1 General

A2P will ensure record retention and disposal procedures are followed to appropriately manage all records generated in the course of A2P business activity. In accordance with this policy and A2P's [Privacy, Confidentiality and Information Management Policy](#) and [Information Sharing Guidelines](#), A2P will conduct regular culling, archiving, disposal and secure destruction of files.

Specific responsibilities include:

- electronic financial records will be overseen by A2P's Financial Controller
- paper records will be overseen by A2P's Office Administrator, including annual off-site archiving
- all staff will be responsible for day-to-day file management in their areas of work.

A2P will ensure archived records are easily retrievable in the event they need to be accessed by appropriate staff.

#### 5.2 Do all documents need to be kept as records?

Not all documents need to be kept as records. Under normal administrative practice, many documents are not required longer-term as records and can be legally destroyed as soon as they cease to be useful.



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For example:

- Many documents are duplicates for reference and only the originals need to be kept.
- Some documents are subject to multiple revisions, but once they are finalised it is often only the final version that needs to be kept as a record and the earlier versions can be discarded.
- Some documents are unimportant in the long-term (e.g. meeting confirmations) and there is no need to keep these after the event.

### 5.3 Suspension of Record Disposal in Event of Litigation or Claims

Under any of the following circumstances, the CEO shall promptly inform all staff of any suspension in the further disposal of documents:

- A2P is served with any subpoena or formal request for documents
- the commencement of any litigation against or concerning A2P

If any employee becomes aware of a possible governmental investigation or audit concerning A2P the employee shall inform the CEO. Any further disposal of documents shall be suspended until such time as CEO determines otherwise.

## 6 Procedure

The Record Retention Schedule is organized as follows:

### Section Topic

- |  |                              |
|--|------------------------------|
| A. Accounting and Finance                | J. Miscellaneous             |
| B. Contracts                             | K. Payroll Documents         |
| C. Contribution Records                  | L. Personnel Records         |
| D. Corporate Records                     | M. Property Records          |
| E. Correspondence and Internal Memoranda | N. Quality Assurance Records |
| F. Electronic Documents                  | O. Tax Records               |
| G. Grant Records                         | P. Tenant Records            |
| H. Insurance Records                     | Q. Work Health and Safety    |
| I. Legal Files and Papers                |                              |

### A. Accounting and Finance

Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	2 years



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Bank Statements and Cancelled Cheques	7 years
Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Invoices	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment
Credit card records (documents showing customer credit card number)	7 years
Employee Expense Reports	7 years

**B. Contracts**

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

**C. Contribution Records**

Record Type	Retention Period
Records of Contributions	Permanent
A2P's or other documents evidencing terms of gifts	Permanent

**D. Corporate Records**

Record Type	Retention Period
Corporate Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of incorporation, bylaws, annual corporate reports)	Permanent
Licenses and Permits	Permanent

**E. Correspondence and Internal Memoranda**

**General Principle:** Most correspondence and internal communication should be retained for the same period as the document or matter they pertain to or support. E.g., a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records supporting a particular project be kept with the project and take on the retention time of that particular project file.

Records not pertaining to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:



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1. Records pertaining to routine matters and having no significant, lasting consequences should be discarded within two years. Some examples include:
  - Routine letters and notes that require no acknowledgment or follow up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
  - Form letters that require no follow up.
  - Letters of general enquiry and replies that complete a cycle of correspondence.
  - Letters requesting specific action that have no further value after changes are made or action taken (such as name or address change).
  - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
  - Chronological correspondence files.

Please note that copies of inter-office correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.

2. Records pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

**F. Electronic Documents**

A2P does not automatically delete electronic files beyond the timeframes specified in this Policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy.

Each day A2P will run a backup copy of all electronic files (including email) on A2P’s servers. This backup is a safeguard to retrieve lost information within a one-year retrieval period should documents on the network experience problems. The backup copy is considered a safeguard for the record retention system of A2P, but is not considered an official repository of A2P records. All monthly and yearly backups are stored offsite.

In certain cases a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

1. **Electronic Mail:** Not all email needs to be retained, depending on the subject matter.
  - All email from internal or external sources is to be deleted after 12 months.
  - A2P will archive email for six months after the staff has deleted it, after which time the email will be permanently deleted.
  - All A2P business-related emails should be saved to the relevant file; e.g. a tenant’s file.
  - Staff will not store or transfer A2P related email on non-work-related computers except as necessary or appropriate for A2P purposes.
  - Staff will take care not to send confidential/proprietary A2P information to outside sources.



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- Staff with more than 500MB in their email account will be unable to send or receive messages until the size of their account is reduced. Staff will be notified by A2P’s ITC Provider as their account size approaches 500MB.
  - Any email an employee deems vital to the performance of their job should be saved to a folder appropriate to the subject matter.
2. **Electronic Documents:** Regardless of the format, retention depends on the subject matter (see tables below).
  3. **Web Page Files; Internet Cookies:** All workstations: web browsers should be scheduled to delete internet cookies once per month.

### G. Grant Records

Record Type	Retention Period
Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
All requested ATO correspondence including determination letters and “no change” in exempt status letters	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period
All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Report assessment forms	7 years after completion of grant period
Documentation relating to grantee evidence of invoices and matching or challenge grants that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	7 years after completion of grant period
Grantee work product produced with the grant funds	7 years after completion of grant period

### H. Insurance Records

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	7 years after final adjustment
Certificates Issued to A2P	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance Policies (including expired policies)	Permanent



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Journal Entry Support Data	7 years
Loss Runs	10 years
Releases and Settlements	25 years
Annual Loss Summaries	10 years

### I. Legal Files and Papers

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years

### J. Miscellaneous

Record Type	Retention Period
Consultant's Reports	2 years
Material of Historical Value (including pictures, publications)	Permanent
Policy and Procedures Register – Original	Current version with revision history
Policies and Procedures	Archive superseded version and retain current version only

### K. Payroll Documents

Record Type	Retention Period
Employee Deduction Authorisations	Termination + 7 years
Payroll Deductions	Termination + 7 years
Tax File Number Declaration Forms	Termination + 7 years
Superannuation (super) Standard Choice Form	Termination + 7 years
PAYG Certificates	Termination + 7 years
Garnishments, Assignments, Attachments	Termination + 7 years
Labour Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets (or equivalent)	2 years



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Unclaimed Wage Records	7 years
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### L. Personnel Records

Record Type	Retention Period
Commissions/Bonuses/Incentives/Awards	7 years
Employee Earnings Records	Termination + 7 years
Employee Medical Records	Termination + 7 years
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	Termination + 7 years
Employment Contracts – Individual	Termination + 7 years
Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Employment Records - All Non-Hired Applicants who received a written offer of employment which did not eventuate (all documentation, including: applications; results of post-offer, pre-employment physicals or other tests/examinations; results of any background investigations and related correspondence)	1 year from declining an offer, rescinding an acceptance, or otherwise demonstrating (by either party) that an offer of employment will not go ahead.
Job Descriptions	3 years after superseded

### M. Property Records

Record Type	Retention Period
Asset /Maintenance Records	Permanent
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreement	Permanent
Property Insurance Policies/Certificates of Currency	Permanent

### N. Quality Assurance Records

Record Type	Retention Period
Quality Assurance Audit Reports	3 years
Audit Results (internal)	3 years
Corrective Action Requests	3 years



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Management Review Minutes	3 years
Suppliers Assessment Records	3 years

### O. Tax Records

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
ATO Rulings	Permanent
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Franchise, Property	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns - Commonwealth and State	Permanent
ATO or other Government Audit Records	Permanent

### P. Tenant Records

Record Type	Retention Period
Tenant Records – any and all records related to a tenancy, including (but not limited to) Residential Tenancy Agreements, complaints, rent changes, etc.	7 years after ceasing all tenancy with A2P

### Q. Work Health and Safety

Record Type	Retention Period
Record of a 'notifiable incident'	5 years
Health monitoring records	30 years

## 7 Definitions

- 7.1** 'Record' means any form of recorded information, received or created, that is of historical significance to A2P, or which provides evidence of the decisions and actions of A2P while undertaking its business activities. A2P records may be in any form including, paper, electronic, audio, video, data within business systems, photographs, etc.
- 7.2** 'Destroy' or 'discard' for paper documents means to place into A2P's secure document destruction bin; for electronic documents means to delete.

## 8 Reference Documents and Links

### 8.1 Directive Documents

- [Australian Charities and Not for Profit Act 2012 \(Commonwealth\)](#)



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- [Corporations Act 2001 \(Commonwealth\)](#)
- [Fair Work Act 2009 \(Commonwealth\)](#)
- [Income Tax Assessment Act 1936 \(Commonwealth\)](#)
- [Privacy Act 1988 \(Commonwealth\)](#)
- [Work Health and Safety Act 2012 \(South Australia\)](#)

### 8.2 Supporting Documents

- [National Disability Insurance Scheme \(Quality Indicators\) Guidelines 2018](#)
- AS/NZS ISO 15489 Records Management

### 8.3 Related Documents and Resources

- [Privacy, Confidentiality and Information Management Policy](#)
- [A2P Information Sharing Guidelines Appendix](#)

## 9 Policy Approval

Content Author:	Delegated Authority:	Executive: (if required)
Date: 18/07/2018	Date: 27/09/2018	Date: 27/09/2018
Name: Russell George Position: Quality Assurance Officer	Name: Jonathan Lardner Position: CEO	Name: Jonathan Lardner Position: CEO

## 10 Revision History

Date	Version	Author / Amended By	Comments / Review History
18/07/2018	1	Russell George	Original Draft
12/1/2023	2	Stephanie Singleton with Rachel Colls, Alex Phillips; Jos Hutchinson	(5.1) Expanded procedure. (6 F) Rearrangement for better document flow. (6 L) Updated Non-hired applicants (6 P) Expanded Tenancy Records. (7) Add definition(s) of 'destroy'; 'discard'.  Retention rates left at 7 years due to <a href="#">ACNC</a> requirements (part 3-2, division 55, (4).