

Southward Housing Co-operative Data Retention Schedule/SARs Request

1. Data Retention Schedule

Southward Housing Co-operative

This schedule outlines how long we keep different categories of personal data before securely destroying them.

Data Category	Retention Period	Reason / Notes
Tenancy application forms	12 months (unsuccessful applicants)	Legitimate interest; audit trail
Tenancy files (successful applicants)	6 years after tenancy ends	Legal claims limitation period
Rent payment records	6 years	HMRC and financial regulations
Arrears and debt recovery records	6 years after resolution	Legal claims limitation period
Repairs and maintenance records	6 years	Health & safety, audit
Health & safety records	6–40 years depending on type	Legal requirements
Governance records (AGM, minutes)	Permanently	Historical and legal value
Complaints	6 years after closure	Legal claims limitation period
Equality and diversity data	Duration of membership (if voluntarily provided)	Statistical monitoring only
CCTV footage (if applicable)	30 days unless required for investigation	Security purposes
Correspondence	3 years	Operational need

All data is securely destroyed when no longer required.

2. Subject Access Request (SAR) Procedure

Southward Housing Co-operative

This procedure explains how we handle requests from individuals who want to access their personal data.

2.1 Receiving a Request

A SAR must be made **in writing** and sent to:

The Data Controller

Southward Housing Co-operative,

3 Lydden Grove Wandsworth London, SW18 4LJ

Requests may also be received by email –

Email: admin@southwardhousing.co.uk

Telephone: 07907 631 333

3. Verifying Identity

Before releasing any data, we must verify the requester's identity.

Acceptable proof includes:

- Passport or driving licence
- Utility bill or bank statement (last 3 months)

If the request is made by a representative, written authority must be provided.

4. Logging the Request

The Data Protection Lead will:

- Record the request in the SAR log
- Note the date received
- Set a response deadline (one month)

5. Assessing the Request

We will:

- Identify all systems and files containing the requester's data
- Determine whether any exemptions apply (e.g., third-party data, legal privilege)
- Contact third-party processors if necessary

6. Gathering the Data

We will collect:

- Electronic records
- Paper files
- Emails and correspondence
- Notes, logs, and tenancy documents

We will exclude:

- Data relating to other individuals (unless consent is given or redaction is possible)
- Legally privileged information
- Internal management forecasts or negotiations

7. Responding to the Request

We will provide:

- A copy of the personal data
- The purposes of processing
- Categories of data
- Recipients of the data
- Retention periods
- Source of the data (if not collected from the individual)
- Information about rights and complaints

The response will be provided:

- Within **one month**
- In a secure format (encrypted email or sealed envelope)

8. Extensions

We may extend the deadline by **up to two months** if the request is:

- Complex
- Involves large volumes of data

The requester will be informed within the first month.

9. Refusing a Request

We may refuse a SAR if it is:

- Manifestly unfounded
- Excessive
- Repetitive

We will provide reasons and inform the requester of their right to complain to the ICO.

10. Record Keeping

All SARs, including refusals, must be logged and retained for **three years**.

Approved 07 July 2026