

CUNNINGHAME HOUSING ASSOCIATION LTD

EQUALITY IMPACT ASSESSMENT FORM

1. Information	
Document/Policy/ Strategy being created or updated	Data Retention Policy
Purpose of creation or update / Executive Summary:	This policy sets out how Cunninghame Housing Association (CHA) manages the retention, storage, review and deletion of personal data in compliance with UK GDPR and the organisation's wider governance and regulatory duties. It ensures personal data is retained only for as long as necessary, stored securely, and disposed of appropriately across all systems, formats and storage locations. The policy applies to all CHA personnel including employees, volunteers, contractors and subsidiaries.
2. Protected Characteristics	
	Commentary on impact. Positive/neutral/negative as well as mitigations
Age	Neutral The policy outlines procedural requirements for data retention and does not treat individuals differently based on age. Retention schedules apply consistently across all customer and employee data. Mitigation: Ensure staff are trained to recognise and securely retain age-related data only where legally required (e.g., safeguarding, employment).
Disability	Neutral / Positive The secure management of personal data supports compliance with disability-related adjustments or support needs. Mitigation: Ensure reasonable adjustments information is categorised correctly and retained only as long as needed. Provide accessible formats for policy communication if required.
Gender identity/ reassignment	Neutral / Positive Accurate, minimal, and time-bound retention of sensitive personal data protects trans and non-binary individuals' privacy and prevents unnecessary data exposure. Mitigation: Staff handling sensitive personal data must receive GDPR and confidentiality training; access controls should be strictly enforced.
Marriage/civil partnership	Neutral No differential treatment. Any data relating to marital status (e.g., HR records, next of kin) follows universal retention periods. Mitigation: Ensure only necessary marital-status data is kept and deleted in line with policy.
Pregnancy/ maternity	Neutral / Positive Retention of HR and health-related information supports statutory rights and protections. Mitigation: Ensure sensitive health information is retained for statutory periods only and processed with high-level confidentiality.
Religion or Belief	Neutral The policy is administrative and does not involve collection or use of religious-belief data unless necessary for specific operational requirements (e.g., equalities monitoring). Mitigation: Avoid unnecessary collection of belief-related data.

Race	Neutral Retention rules apply equally across all groups. Mitigation: Ensure equalities monitoring data is anonymised wherever possible and deleted when no longer required.		
Sex/Gender	Neutral No gender-specific outcomes. Policy supports secure and fair processing of all personal data. Mitigation: Staff training to reinforce non-discriminatory handling of personal information.		
Sexual Orientation	Neutral / Positive Sensitive personal data such as sexual orientation must be handled with enhanced security. Clear retention rules reduce risk of undue exposure. Mitigation: Limit access to this data and ensure timely deletion.		
Other	Neutral Retention practice applies equally. Mitigation: Follow data-minimisation principles rigorously		
3. Sign Off			
Lead Assessor:	Joanna Thomson, Governance Officer		
Co- Assessor:	John McIntyre, Executive Director of Finance & Corporate Support		
Date initiated:	April 2025		
Consultation:	Internal consultation with Governance, HR, ICT and Data Protection teams; reference to the latest approved CHA group policy documents including Data Retention Policy & Schedule.		
Research:	Review of UK GDPR requirements, CHA internal policies (Data Retention Policy & Schedule, Data Protection Policy), regulatory standards and retention schedules.		
Signature:		Date:	