

Employee & Organisational Record Retention Policy

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Version 1.0 | Approved: March 2026 | Next Review: March 2027

1. Purpose

This policy sets out how Generocity Church stores, manages, and disposes of employee and organisational records in compliance with Australian law, including the Fair Work Act 2009, the Privacy Act 1988, ATO requirements, NSW employment legislation, and child safety obligations.

Proper record retention protects the church, its employees, and the people we serve — particularly children. It also ensures we can meet our legal obligations and respond to any audit, dispute, or investigation with confidence.

2. Scope

This policy applies to:

- All paid employees and pastoral staff
- Contractors and volunteers in roles with ongoing obligations (e.g. child-facing roles)
- All campuses and ministry arms of Generocity Church, including Generocity Kids and The Horizon Project

It applies to records held in any format — paper, digital, or cloud-based (including Xero, Google Workspace, Basecamp, and any church management systems).

3. Retention Schedule

The table below sets out minimum retention periods for key record categories. Where multiple obligations apply, retain records for the longest applicable period.

Record Type	Retention Period	Notes
EMPLOYMENT RECORDS		
Employee name, DOB, address	7 years	From date record was made
Pay records (rates, gross/net, deductions)	7 years	From date of each record
Hours worked including overtime	7 years	Rosters and timesheets
Leave records (annual, personal, LSL)	7 years	NSW LSL: calculated from end of employment
Superannuation contributions	7 years	Fund details and amounts paid
Employment contracts	Life + 7 years	Retain for duration of employment plus 7 years
Termination records	7 years	Notice given, reason, final pay
FINANCIAL & TAX RECORDS		
Tax records (ATO)	5 years	From date of lodgement
Super Guarantee records	5 years	ATO may audit further if fraud alleged
FBT records and receipts	5 years	From lodgement date
General financial records	7 years	Best practice to align with Fair Work Act
CHILD SAFETY & SAFEGUARDING		
Working With Children Checks	Duration + 7 years	Best practice; retain after engagement ends
Police Checks	Duration + 7 years	Document date, result, and reviewer
Child safety incidents / reports	Indefinitely	Retain permanently per child safety best practice
Child safe training records	Duration + 7 years	Per ACNC and child safety obligations
WORKPLACE HEALTH & SAFETY		

Workplace injury / incident reports	30 years	Long-tail workers' comp claims can arise years later
Workers' compensation records	30 years	Retain even after employee departs
WHS training records	5 years	From date of training
DISPUTES & LEGAL		
Records related to any dispute	Resolved + limitation	Do not destroy if dispute anticipated
Contractor agreements	Life + 7 years	Include sham contracting risk documentation

4. Responsibilities

CHURCH LEADERSHIP / SENIOR PASTOR

- Approves this policy and any significant changes
- Ensures the organisation has adequate systems to meet these obligations

CHURCH ADMINISTRATOR / OPERATIONS

- Maintains the master record register in GC Admin File > Employee File on drive
- Oversees secure storage and disposal of records
- Coordinates annual review of this policy

CAMPUS PASTORS

- Ensure campus-level records are captured and stored appropriately
- Report to church administration when records are due for review or destruction

ALL STAFF

- Handle records in accordance with this policy
- Do not destroy records without authorisation
- Notify church administration if a dispute arises that may affect records

5. Storage & Security

All employee records must be stored securely and only accessed by authorised personnel. This includes:

- Digital records: password-protected, stored in approved systems (e.g. Google Workspace with appropriate sharing restrictions)
- Physical records: stored in locked cabinets, accessible only by the church administrator and senior leadership
- Cloud-based payroll/accounting (e.g. Xero): ensure accounts remain active and records are exportable before downgrading or cancelling subscriptions

Records must not be stored on personal devices unless secured and backed up to the organisation's systems.

6. Record Destruction

When records have met their minimum retention period and are no longer required, they must be disposed of securely:

- Paper records: shred or use a certified document destruction service
- Digital records: permanently deleted (including from cloud backups where practicable) but listed on the Record Destruction Section of the policy
- USB / physical media: physically destroy or use certified e-waste disposal

Records must NOT be destroyed if:

- A dispute, complaint, or legal claim is pending or reasonably anticipated
- An audit or investigation has been notified
- The record relates to a child safety matter (retain indefinitely)

RECORD OF DESTRUCTION

All record destruction will be kept in a separate register as looks like this for example:

Record Description	Date of Record	Date Destroyed	Method ie Digital/Paper	Carried Out By	Approved By

7. Privacy

All records containing personal information must be handled in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This includes:

- Collecting only the information necessary for employment and ministry purposes
- Ensuring employees can access records about themselves on request
- Not disclosing personal information to third parties without consent, except where required by law

8. Policy Review

This policy will be reviewed annually, or earlier if there are changes to relevant legislation. The church administrator is responsible for initiating the review.

Version	Date	Changes	Approved By
1.0	March 2026	Initial version	Ps Tash Eagle

Authorised by

Name: Ps Tash Eagle

Role: HR Executive Pastor

Date: 25th March 2026

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