



Data Retention Policy

V1.0 08/05/18

Policy Statement

This Company Policy and Procedure has been designed to help and encourage all employees to achieve and maintain expected standards of conduct. It applies to all employees and anyone else working for the Company, and its aim is to ensure consistent and fair practice and treatment.

This document does not form part of your Contractual Terms and Conditions of employment and the Company may at any time amend it without consultation or prior notice.

Purpose and Scope

The Company is committed to managing and handling personal data in line with best practice and data protection principles. As such this Policy details the procedures to use to ensure timely and secure disposal of documents and records that are no longer required for business purposes.

The Company holds a wide variety of personal data, from employees, workers, contractors, customers and suppliers, as well as financial data, HR data, marketing data, client data and so on, many of which include personal data. This data is held in various formats including; letters, emails, contracts, forms, software systems in both hard copy and electronic form.

It is essential that this policy is adhered to, as premature destruction of documents could result in an inability to defend claims, business difficulties and failure to comply with data protection legislation, whilst appropriate destruction and disposal will ensure that the storage space is maximised and we are not keeping documents for an unnecessarily long period of time which would breach data protection legislation.

This policy applies to all the information held by the Company and also any personal data that may be held by data processors (service providers) where they are processing information on the Company's behalf.

Everyone is responsible for ensuring that the records that they create/maintain are accurate, maintained and disposed of in accordance with this policy. It is recognised that the documentation created and maintained by the Company will change over time and therefore this policy should be viewed as a living document and it will be reviewed on an annual basis, or as necessary, if sooner.

This policy should be read in conjunction with the Data Protection Policy and the Data Protection Breach Reporting Policy.

Retention

Appendix 1 details the retention periods for specific types of documents and records.

Destruction/Disposal

Hard copies of confidential documents or personal data should be disposed of using confidential waste bins & shredders. Under no circumstances should any personal or confidential data be disposed of in any other manner, as this would potentially breach data protection legislation.

Disposal of documents which do not contain personal data or confidential information can be disposed of in any bin, or by recycling or by electronic deletion in the case of electronic documents.

Records of disposal should be maintained, recording the document disposed of, date and the individual responsible for authorising the disposal.

Appendix 1 – Data Retention Periods

Business Function	Examples of documents	Retention Period
HR	Employee data, including all information on personnel files e.g. CVs, sickness information, disciplinary information, training certificates etc (excluding probation, appraisal and performance data – see below)	6 years post-employment
	Training records	Current year plus 2 years
	Probation/Appraisal/Performance management	Current year plus 5 years
	Data relating to ex-employee claims/threats/SAR	2 years after claim/SAR concluded, or 6 years post-employment whichever is later
	Candidate application forms/CVs and accompanying documentation (of applicants who aren't successful)	6 months post-date of recruitment decision
	DBS data	6 months post-date of check
Finance	Insurance policy documents/claim history	Current year plus 6 years, or 6 years after case concluded, whichever is the later
	Cheque books	Current year plus 3 years
	Paying in books, ledger, invoices, receipts, bank statements, petty cash books	Current year plus 6 years
	Budget reports/budget documentation	Current year plus 3 years
	Customer Account Information	Current year plus 6 years
	Supplier Account Information	Current year plus 6 years
	Annual Accounts	Current year plus 6 years
Health and Safety	Risk Assessments	Current year plus 3 years
	Accident / Incident Reports & associated papers	Current year plus 40 years
Property	Title deeds	Forever
	Maintenance log book	Current year plus 40 years
Customer	Customer data, including all information on Contracts, Performance Management, Disputes, Accounts etc	6 years post completion of last project / invoice
Supplier	Supplier, including all information on Contracts, Performance Management, Disputes, Accounts etc	6 years post completion of last project / invoice