



Data Retention Policy – Public

Dated: 24th May 2018

Version: 1.1

1. Overview

Under General Data Protection Regulations 2018 (“GDPR”) it is a requirement to minimise the retention of data and create retention policies for all data types.

2. Purpose

The retention policy is a tool used to ensure the retention of business information for as long as it is needed. It is to consider the context within which the company operates, including the legal and regulatory environment and for compliance with the fifth data protection principle and the expectations of stakeholders.

3. 5th Data Principle

‘Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.’

4. Scope

The data protection officer (“DPO”) will assign relevant retention periods across the company enabling disposal activity to be carried out in a consistent and controlled manner.

5. Retention Periods

The following table details the retention periods for different information types, but these must be appropriate for each office and should be verified before adoption.

Type	Retention Period before destruction
Client supplied personal identifiable information (“PII”) for cleansing and processing	14 days after last processed, or otherwise agreed with the client
Client supplied PII for analysis	4 weeks after last processed, or otherwise agreed with the client
Client supplied PII for any other purposes	14 days after last processed, or otherwise agreed with the client
Accident books, accident records/reports	3 Years
Accounting records	7 Years
Income tax and NI returns	3 Years



Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	6 years from the end of the scheme
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	3 years after the end of the tax year in which the maternity period ends
Wage/salary records (also overtime, bonuses, expenses)	6 Years
National minimum wage records	3 Years
Records relating to working time	2 Years
Application forms and interview notes (for unsuccessful candidates)	6 months to a year with consent
Assessments under health and safety regulations and records of consultations with safety representatives and committees	Permanently
Inland Revenue/HMRC approvals	Permanently
Parental leave	5 years from birth/adoption of the child or 18 years if the child receives a disability allowance
Pension scheme investment policies	12 years from the ending of any benefit payable under the policy
Personnel files and training records (including disciplinary records and working time records)	6 years after employment ceases
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	6 years from the date of redundancy
Senior executives' records (that is, those on a senior management team or their equivalents)	Permanently for historical purposes
Statutory Sick Pay records, calculations, certificates, self-certificates	6 years after the employment ceases
Marketing – PII	2 years after last interaction
Customer – PII	6 years after last transaction
Contracts with Processor	6 years after last transaction
Contracts with Controller	6 years after last transaction



6. Approval

The DPO is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to the public and members of staff.

Issue No	Description of change	Approval	Date of Issue	Date to review

